

**FINAL  
ENVIRONMENTAL IMPACT REPORT**

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**AIRPORT MASTER PLAN**  
**SAN DIEGO INTERNATIONAL AIRPORT**

**CHAPTER ONE: EXECUTIVE SUMMARY  
with RESPONSES TO COMMENTS**



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# CHAPTER ONE: EXECUTIVE SUMMARY

This Environmental Impact Report was developed in accordance with the California Environmental Quality Act. Public Resources Code §§ 21000 et. seq. and the Guidelines for Implementation of the California Environmental Quality Act (California Code Regulations Title 14., §§ 15000-15387). The California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an objective, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT level analyses. This document evaluates, at a PROGRAM level, the potential short-term and long-term, direct, indirect and cumulative environmental impacts associated with the airport uses designated by the Proposed Airport Land Use Plan in the Airport Master Plan. In addition, this Environmental Impact Report provides a PROJECT level analysis for specific improvements that are proposed for construction and operation in the Airport Master Plan to meet aviation demand through 2015 at San Diego International Airport. The analysis for both the PROJECT and PROGRAM level projects was completed using the same analysis methodologies. However, the projects included in the PROGRAM level analysis represent potential airport uses or improvements that have not been fully vetted and will require PROJECT level analysis in the future. Specific mitigation measures are provided for the PROJECT level analysis and potential mitigation measures are provided for the PROGRAM level analysis with the understanding that during future PROJECT level analysis, specific mitigation measures will be provided.

The Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County Regional Airport Authority.

After review of the comments on the 2007 Draft EIR the San Diego County Regional Airport Authority determined that the public did not identify any significant new environmental impacts from the Proposed Project or from new mitigation measures proposed in response to comments. Further, the comments did not provide any new information therefore the Final Environmental Impact Report will not be re-circulated. As part of the evaluation of the comments received on the Draft Environmental Impact Report, revisions were made to the Draft Environmental Impact Report (specifically Chapters Two through Seven and the Technical Appendices) to clarify and provide additional information in the Final Environmental Impact Report. Text to be deleted is shown in strike out, and text that has been inserted is shown in underline.

## 1.1 Introduction and Background

San Diego International Airport is located in the northwest portion of the downtown area within the City of San Diego. The existing Airport site is severely constrained by its location. San Diego International Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east. Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport's proximity within two miles from Downtown San Diego.

San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has a single, 9,401-foot-long 200-foot-wide east-west runway,

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making it the busiest single-runway commercial airport in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project.

From 1960 to 2000, the San Diego County population grew from approximately one million residents to approximately three million residents. Each of the three existing passenger terminals was constructed during this forty-year period while annual passenger totals at San Diego International Airport tripled between 1980 and 2005. In 2007, San Diego International Airport served 18.3 million annual passengers.

During the development of the previously circulated Draft EIR two other studies were underway to accommodate the increasing demand on San Diego International Airport facilities: the San Diego International Airport Master Plan and the Airport Site Selection Program. The Airport Master Plan has been updated to incorporate the alternatives considered in this Environmental Impact Report. The following sections include descriptions of the San Diego County Regional Airport Authority, these studies, relevant findings, and how the studies were related.

### **1.1.1 San Diego County Regional Airport Authority**

San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of Supervisors. The Port District's purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

### **1.1.2 Airport Master Plan**

An airport master plan is a concept for future development of an airport. The goal of the San Diego International Airport Master Plan is to provide a financially and environmentally responsible guideline for future Airport development that will accommodate forecast aviation demand and remain adaptable to either a short-term or long-term future for the existing Airport site.

In order to meet this goal of the Airport Master Plan, the following overall objectives were set to guide future development at San Diego International Airport:

1. Improve levels of service for Airport customers/users
2. Improve Airport safety and security for Airport customers/users
3. Utilize property and facilities efficiently by
  - a. Maintaining balance of passenger volumes and operations among the Airport's facilities.
  - b. Improving tenant facilities
4. Enhance Airport access as part of the region's transportation system
5. Enhance regional economy by serving demand for air service

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6. Prepare measured, incremental improvements that are cost effective and respond to the region's forecast for air service for passengers and cargo
  7. Involve stakeholder and community input
  8. Consider compatibility with surrounding land uses and Airport Authority policies.

### **1.1.3 Airport Site Selection Program**

From 2003 to November, 2006, the Airport Authority conducted a comprehensive study of relocating the region's primary commercial airport or enhancing San Diego International Airport's capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Site Selection Program process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The voters of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego's long-term transportation needs.

The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process. As such, relocation of San Diego International Airport is not considered as an alternative in this document.

### **1.1.4 Activity Forecast and Planning Horizon Used for Environmental Analysis**

The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Environmental Impact Report considers potential environmental impacts through the year 2030.

The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration's 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first three full years after the forecast was completed. Because the trend at San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in [Table 1-1](#).

Gated flight schedules were prepared from the annual forecasts as a means of generating derivative forecasts, including gate requirements, for use in the environmental analysis. The environmental evaluation process examined a "No Project" Alternative against which the Proposed Project (Preferred Alternative) was compared in addition to the existing conditions. The No Project Alternative represents the way in which San Diego International Airport would accommodate the projected demand absent the construction of any projects that have not yet received the required environmental approvals. Specifically, San Diego International Airport would not be able to add any contact gates or expand any of the associated terminal and roadway facilities.

Considering common use gate requirements, the 2010, 2015, 2020, 2025, 2030 flight schedules were gated using the existing terminal layout. No changes in flight schedules were required; however, airlines would be required to share gates much more than they do currently and passenger hold rooms would not be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack of flexibility, or operational complexity resulting from extensive gate sharing, and extremely poor

Table 1-1  
**Forecast Annual Passengers**

Year	Passengers
2005 (actual, a)	17,372,521
2006 (actual)	17,481,942
2007 (actual)	18,326,761
2010 (b)	19,500,000
2015 (b)	22,800,000
2020 (b)	25,100,000
2025 (b)	26,600,000
2030 (b)	28,200,000

Notes:

(a) Annual passengers for 2005 were extrapolated at the onset of this study (April 2005) and those numbers were used for analysis of 2005. Passenger numbers extrapolated for 2005 were 17,689,972.

(b) Constrained High Scenario Forecast.

Source: SH& E Aviation Activity Forecast, June 2004 and Draft Airport Master Plan, HNTB, 2007.

passenger service levels resulting from the crowded terminal area and congested roadways. All of these factors could possibly induce airlines to reduce service levels even if their projected flight schedules could technically be accommodated.

## **1.2 Summary of Proposed Project (Preferred Alternative)**

The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:

1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.
2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.
3. Provide for future public transit options in airport land use planning.

The Proposed Project to be evaluated in this program Environmental Impact Report consists of two key components of the Airport Master Plan needed to meet the Project Objectives. The first component is the Proposed Airport Land Use Plan and the second is implementation of specific projects contained in the Airport Master Plan called the Proposed Airport Implementation Plan. The Proposed Airport Land Use Plan will assist with meeting the Proposed Project objectives focused on future efficient development (i.e., utilizing the Airport property and facilities efficiently by reserving adequate land for future development). The Proposed Airport Implementation Plan will meet the Proposed Project objectives focused on developing efficient facilities compatible with surrounding land uses. These components are described in more detail in the following sections.

### **1.2.1 Proposed Airport Land Use Plan**

The San Diego County Regional Airport Authority proposes to adopt an Airport Land Use Plan that:

- Depicts the boundaries of San Diego International Airport; and
- Designates the land uses on the Airport.

The Proposed Airport Land Use Plan is a policy document only. The Proposed Airport Land Use Plan is a figure that depicts the properties and boundaries under the planning jurisdiction of San Diego County Regional Airport Authority.

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The Proposed Airport Land Use Plan is a program level planning guide to ensure that Airport facilities are planned with thought and foresight to serve the greatest number of Airport users. With limited physical space available for Airport purposes, the Proposed Airport Land Use Plan guides and groups similar Airport uses to insure compatible, shared, and orderly development of Airport facilities. The adoption of the Proposed Airport Land Use Plan may incorporate mitigation measures that would be requirements and conditions for future projects to reduce environmental impacts. In addition, the Proposed Airport Land Use Plan may be modified or amended in the future to respond to changes in the demand for Airport facilities as identified in future passenger, operations, and cargo forecasts.

It is important to note that the majority of the lands that comprise San Diego International Airport are State tidelands, which are held in trust for the benefit of the citizens of the State of California. The San Diego International Airport property (with the exception of a thin strip of land along Pacific Highway that is not designated as “tidelands”), while under the control and jurisdiction of the San Diego County Regional Airport Authority, remain in the public trust and any proposed land uses must be consistent with California Tidelands Trust requirements. The Proposed Airport Land Use Plan describes four general categories of land use on the Airport: Airfield, Terminal, Ground Transportation, and Airport Support, all of which are consistent with California Tidelands Trust requirements.

The Proposed Airport Land Use Plan designates properties that are contemplated by the San Diego County Regional Airport Authority to be used for future Airport purposes. The former Teledyne Ryan property generally located between the Airport and North Harbor Drive, south of Taxiway B and east of the Commuter Terminal, is depicted for use as airfield, ground transportation, and airport support. Until such time as the area is remediated and determined available for development the land use can not be specifically determined. Once the remediation is complete, the San Diego County Regional Airport Authority will develop specific project improvements consistent with the Proposed Airport Land Use Plan and conduct an environmental analysis at a PROJECT level for any airport facilities proposed to be constructed and operated.

## **1.2.2 Proposed Airport Implementation Plan (with Parking Structure)**

The Airport Implementation Plan (with Parking Structure) would include PROJECT-level approvals for those elements that are to be designed and constructed through 2012 and operate through 2015 and beyond. The San Diego County Regional Airport Authority has identified specific physical improvements at San Diego International Airport to allow the Airport to effectively continue its mission of serving San Diego’s commercial air transportation needs as forecasted through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030, however, implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review at a project level will be undertaken by the San Diego County Regional Airport Authority. Project elements through 2015 include the following:

- Expand existing Terminal Two West with 10 new jet gates;
- Construct new aircraft parking and replacement Remain-Over-Night aircraft parking apron;
- Construct new apron and aircraft taxiway;
- Construct new second level road/curb and vehicle circulation serving Terminal Two;
- Construct a new parking structure and vehicle circulation serving Terminal Two;
- Relocate and reconfigure SAN Park Pacific Highway;
- Construct a new access road from Sassafras Street/Pacific Highway intersection;
- Construct new general aviation facilities including access, terminal/hangars, and apron to improve Airport safety for Airport customers/users;
- Demolish the existing general aviation facilities to improve airport safety and circulation on airfield; and
- Reconstruct Taxiway C, construct new apron hold areas, and new taxiway east of Taxiway D.

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One or more of these elements may require additional review and approvals from other governmental agencies including the Federal Aviation Administration. All would be implemented with due regard for the existing contractual rights of private parties and public agencies, and applicable law and regulations.

## **1.3 Alternatives Considered in Detail**

According to the California Environmental Quality Act, the Environmental Impact Report must describe and evaluate feasible alternatives to the Proposed Project that could attain most of the basic project objectives and would avoid or substantially lessen any significant environmental impacts associated with the Proposed Project. In addition, a No Project Alternative must also be analyzed. Alternatives to the Proposed Project are described in detail in Chapter 4, *Proposed Project and Alternatives*, and are briefly described in the sub-sections that follow. It should be noted that the Proposed Project without Parking Structure and the East Terminal Alternative (with and without Parking Structure) include the Proposed Airport Land Use Plan as the first component of each alternative.

### **1.3.1 Proposed Project (without Parking Structure)**

For this variation of the Proposed Project Alternative, all elements of the Proposed Airport Implementation Plan are the same as described in section 1.2.2, *Proposed Airport Implementation Plan (with Parking Structure)*, except that no parking structure would be constructed. This variation of the Proposed Project assumes that excess parking demand would be served by off-property parking facilities and alternate modes of transportation. A second level roadway at the unit terminal would be constructed independent of the garage to serve curbside demand. All of the project objectives would be met by this variation of the Proposed Project with the exception of providing an adequate Level of Service to meet forecast parking demand with the current Airport property.

### **1.3.2 East Terminal Alternative**

The East Terminal Alternative includes adoption of an Airport Land Use Plan and the Airport Implementation Plan Alternative. As the San Diego County Regional Airport Authority is mandated to plan and operate only Airport uses, the San Diego County Regional Airport Authority has determined that there are no reasonable alternatives to the Proposed Airport Land Use Plan, beyond the No Action Alternative, that would avoid or substantially lessen the potential environmental impacts of the Proposed Project. Thus the East Terminal Alternative includes the same Airport Land Use Plan as the Proposed Project (Preferred Alternative).

#### **1.3.2.1 East Terminal Alternative (with Parking Structure)**

The San Diego County Regional Airport Authority has identified an alternate build scenario that would allow the San Diego International Airport to effectively continue its mission of serving San Diego's commercial air transportation needs as forecasted through 2015.

Project elements for the Airport Implementation Plan Alternative include:

- Construct new unit terminal with five replacement gates and seven new gates;
- Expand existing Terminal Two West with three new jet gates;
- Relocate commuter aircraft to Terminal One and Terminal Two;
- Construct new aircraft parking and replacement Remain-Over-Night aircraft parking apron;
- Construct new apron and aircraft taxiway;
- Construct new surface parking and vehicle circulation west of Terminal Two West;
- Construct new surface and structured parking and vehicle circulation at Terminal One and New Unit Terminal;
- Relocate and reconfigure SAN Park Pacific Highway;
- Construct a new access road from Sassafras Street/Pacific Highway intersection;
- Construct new general aviation facilities including access, terminal/hangars, and apron to improve Airport safety for Airport customers/users;

- Demolish the existing general aviation facilities to improve airport safety and circulation on airfield; and
- Reconstruct Taxiway C, construct new apron hold pads, and new taxiway east of Taxiway D.

### **1.3.2.2 East Terminal Alternative (without Parking Structure)**

For this variation of the East Terminal Alternative, all elements of the Proposed Airport Implementation Plan Alternative are the same as described in section 1.3.2.1, *Proposed Airport Implementation Plan Alternative (with Parking Structure)*, except that no parking structure would be constructed. This variation of the East Terminal Alternative assumes that excess parking demand would be served by off-property parking facilities and alternate modes of transportation. A second level roadway at the unit terminal would be constructed independent of the garage to serve curbside demand. All of the project objectives would be met by this variation of the East Terminal Alternative with the exception of providing an adequate level of service to meet forecast parking demand with the current Airport property.

### **1.3.3 No Project Alternative**

The No Project Alternative assumes that no Airport Land Use Plan would be adopted and assumes no projects beyond those that have already received or will receive environmental approval prior to approval of this Environmental Impact Report. California Environmental Quality Act (CEQA) guidelines require the evaluation of a “No Project” alternative. The purpose of this analysis is “to allow the decisionmakers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The No Project alternative analysis is not the baseline for determining whether the Proposed Project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.”(California Code of Regulations Title 14, §15126.6(e)(1)).

### **1.3.4 Summary of Alternatives Considered in Detail**

**Table 1-2** provides a brief comparison of all the alternatives considered in Detail to meet the project objectives.

Table 1-2  
Comparison of Alternatives

<b>Alternative</b>	<b>Meets Project Objectives</b>	<b>Reasons for Meeting or Not Meeting Project Objectives</b>
Proposed Project with Parking Structure (Preferred Alternative)	Yes	Accommodates forecast growth through 2015 while improving Level of Service and utilizing Airport property efficiently.
Proposed Project without Parking Structure	No	Accommodates forecast growth through 2015 and utilizes airport property efficiently but would not improve Level of Service/convenience for airport users including business travelers, “meeters and greeters,” and other passengers such as families being accompanied to and from the terminal.
East Terminal with Parking Structure Alternative	Yes	Accommodates forecast growth through 2015 with potential improving Level of Services. Does not make most efficient use of Airport property.
East Terminal without Parking Structure Alternative	No	Accommodates forecast growth through 2015 but would not improve Level of Service/convenience for airport users including business travelers, “meeters and greeters,” and other passengers such as families being accompanied to and from the terminal. Does not make most efficient use of Airport property.
No Project Alternative	No	Does not provide for airport land use guidance. Does not provide for adequate Level of Service to accommodate forecast growth through 2015. Would require that ground loading be used to accommodate increased passenger demand. Terminal crowding would increase and queues for security screening would require upwards of an hour.

Source: HNTB Analysis.

## 1.4 Alternatives Considered and Rejected

Alternatives for the Proposed Project were considered. Alternatives were considered and rejected for both the Proposed Airport Land Use Plan and the Proposed Airport Implementation Plan. The San Diego County Regional Airport Authority determined that there were no alternatives to the Proposed Airport Land Use Plan that would meet the project objectives or reduce environmental effects. Specifically there are no alternatives for the Proposed Airport Land Use Plan because:

- Existing airfield/runway configuration cannot be altered.
- Airport uses dependent on connection to airfield/runway have a priority.
- Airport uses such as Terminal and Ground Transportation serve commercial passengers and require more acres.

Section 4.4.1, *Proposed Airport Land Use Plan*, provides details for this decision.

The San Diego County Regional Airport Authority considered the following types of alternatives to meet the project objectives related to providing adequate facilities to accommodate air service demand (forecast growth through 2015) while improving Levels of Service:

- Airport relocation
- Use of other airports
- Use of other modes of transportation
- Use of other terminal locations on the airport

Section 4.4.2, *Proposed Airport Implementation Plan*, provides the analysis of these alternatives and the reasons that they were rejected for further consideration.

### 1.4.1 Summary of Alternatives Considered and Rejected

**Table 1-3** provides a brief comparison of all the alternatives considered but rejected for further analysis.

Table 1-3

**Comparison of Alternatives Considered and Rejected**

<b>Alternative</b>	<b>Meets Project Objectives</b>	<b>Reasons for Meeting or Not Meeting Project Objectives</b>
Airport Relocation	No	Can not be developed within project timeline (available by the year 2015).
Use of Other Airports	No	Other airports within the San Diego region do not currently have adequate certification for passenger service, runway lengths, taxiway/apron areas, or terminals. Additionally, commercial airports closest to San Diego International Airport are in excess of 80 miles from the existing Airport and also have limited capacity for growth. Lastly, aircraft operators chose which airports they use and service therefore use of another airport can not be mandated by the San Diego County Regional Airport Authority.
Use of Other Modes of Transportation	No	Use of other modes of transportation could not be implemented with out assistance from other governmental agencies and any additional bus lanes or rail option could not be implemented within the project timeline. Increasing vehicular travel is clearly not the environmentally preferred alternative.
Use of Other Terminal Locations on Airport	No	Land is not currently available anywhere else on the Airport property that could accommodate the needed terminal area. If adequate land was available in the North Area it would require splitting terminal operations which would require duplication of many infrastructure components leading to inefficient operations and confusion for passengers.

Source: HNTB Analysis.

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## 1.5 Environmental Areas of Concern

The environmental process for this Environmental Impact Report was initiated in September 2005 with the issuance of a Notice of Preparation. In response to initial reaction to comments received, the San Diego County Regional Airport Authority issued a Revised Notice of Preparation in January 2006. During the Notice of Preparation process scoping meetings were held. With consideration of the Notice of Preparation process the San Diego County Regional Airport Authority issued a Draft Environmental Impact Report in May 2006. Comments received on the previous Draft Environmental Impact Report identified the following environmental areas of concern:

- Noise;
- Land Use Planning;
- Traffic and Circulation;
- Air Quality;
- Historic, Architectural, Archaeological, Paleontological, and Cultural Resources;
- Biological Communities/Endangered and Threatened Species;
- Coastal Resources;
- Utilities and Service Systems;
- Aesthetics;
- Hazardous and Hazardous Materials;
- Human Health Risk Assessment; and
- Cumulative Effects

These impact categories as well as population and housing; hydrology and water quality; wetlands; light emissions; geology and soils; public services; and recreation are analyzed in detail in Chapter 5, *Environmental Setting, Consequences, and Mitigation Measures*. The remaining California Environmental Quality Act environmental categories required for potential environmental effect determination are identified and addressed in Section 5.20, *Effects Found Not to be Significant*.

## 1.6 Environmental Effects and Mitigation Measures

**Table 1-4** summarizes the potential environmental effects associated with the Proposed Project (Preferred Alternative), the East Terminal Alternative, and the No Project Alternative for each California Environmental Quality Act environmental category. The San Diego County Regional Airport Authority adopted the California Environmental Quality Act guidelines, *Title 14 California Code of Regulations, Division 6 Chapter 3 Guidelines for Implementing the California Environmental Quality Act*, and the Environmental Checklist questions from *Appendix G* for impact criteria on February 2, 2004. The San Diego County Regional Airport Authority has used these guidelines as their own since adoption. Where other agencies have differing or additional criteria, those criteria are specifically defined within the introduction of each resource category in Chapter Five, *Environmental Setting, Consequences, and Mitigation Measures*.

For all analyses conducted for this program Environmental Impact Report, baseline conditions are for the year 2005. The year 2005 was used as the baseline conditions for the following reasons:

- The original Notice of Preparation was issued in September 2005 and analysis was started considering 2005 as the baseline year. The revised Notice of Preparation identified additional project elements to be considered in the program Environmental Impact Report but did not change the project objectives for the Proposed Project nor necessitate a new baseline year.
- Use of 2005 as the baseline conditions allowed the use of the most recent available traffic data and models agreed to by the San Diego Association of Governments, the California Department of Transportation, and the City of San Diego.

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**Table 1-5** briefly identifies the potential significant environmental effects of the Proposed Project, feasible measures to mitigate the impacts, and the expected status of the effects with mitigation measures in place.

The maximum development scenario is not provided in this summary. The maximum development scenario is provided in Section 5.3.8 to inform the public and agencies responsible for traffic and circulation of the effects of accommodating regional growth at San Diego International Airport. As such, any significant impacts or mitigation measures associated with the maximum development scenario are for information purposes only. At the time a specific project is proposed, additional environmental analysis will provide the significance of development effects on traffic and circulation, and propose mitigation measures that the San Diego County Regional Airport Authority will perform in order to mitigate any significant impact.

The summary includes Proposed Airport Implementation Plan required PROJECT level mitigation measures, construction mitigation measures, and PROGRAM level mitigation measures potentially necessary for implementation of the Proposed Airport Land Use Plan: “MM” indicates PROJECT level mitigation measures proposed for implementation of the Proposed Airport Implementation Plan; “PMM” indicates PROGRAM level mitigation measures considered for the future Proposed Airport Land Use Plan; “Construction” indicates mitigation measures proposed during construction.

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
<b>5.1 Noise</b>						
Single-Event Noise	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Cumulative Noise	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Surface Transportation Noise	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Construction Noise	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.2 Land Use Planning</b>						
Onsite Land Use Plans and Policies	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Surrounding Land Use Plans and Policies	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.3 Traffic and Circulation (2030)</b>						
Street Segment Operations	Significant	Significant	Significant	Significant	Not Applicable	Less than Significant
Intersection Operations	Significant	Significant	Significant	Significant	Not Applicable	Less Than Significant
Freeway Operations	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Not Applicable	Less Than Significant
Freeway Ramp Operations	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Railroad Crossings	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Transit	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Terminal Curbside	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Parking	Less Than Significant	Significant	Less Than Significant	Significant	Not Applicable	Less Than Significant
On-Airport Traffic Circulation	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
<b>5.4 Population and Housing</b>						
Population	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Housing	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.5 Air Quality</b>						
Operational <sup>2</sup> Emissions Inventory (2015)						
CO	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
HC	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
NO <sub>x</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
SO <sub>x</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>10</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>2.5</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Operational Ambient Concentrations (2015)						
CO	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
NO <sub>2</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
SO <sub>2</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>10</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
PM <sub>2.5</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
CO Hot Spots	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
Operational <sup>2</sup> Emissions Inventory (2030)						
CO	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less than Significant
HC	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
NO <sub>x</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
SO <sub>x</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>10</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>2.5</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Operational Ambient Concentrations (2030)						
CO	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
NO <sub>2</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
SO <sub>2</sub>	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
PM <sub>10</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
PM <sub>2.5</sub>	Significant	Significant	Significant	Significant	Not Applicable	Significant
CO Hot Spots	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Construction Related Emissions						
CO	Less Than Significant		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant
HC	Less Than Significant (for With Parking Structure)		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant
NO <sub>x</sub>	Less Than Significant (for With Parking Structure)		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant
SO <sub>x</sub>	Less Than Significant (for With Parking Structure)		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
PM <sub>10</sub>	Less Than Significant (for With Parking Structure)		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant
PM <sub>2.5</sub>	Less Than Significant (for With Parking Structure)		Comparable to the Proposed Project (Preferred Alternative)		Not Applicable	Less Than Significant
<b>5.6 Hydrology and Water Quality</b>						
Hydrology	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Water Quality	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Urban Runoff	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.7 Historic, Architectural, Archaeological, Paleontological, and Cultural Resources</b>						
Architectural Resources	Less Than Significant	Less Than Significant	Significant	Less Than Significant	Not Applicable	Less Than Significant
Archaeological Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Paleontological Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Cultural Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Historic Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.8 Biotic Communities/Endangered and Threatened Species</b>						
Direct Impacts	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Indirect Impacts	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Significant (Airport Land Use Plan Only)	Not Applicable	Less than Significant
Habitat Conservation and Natural Communities Conservation Plans	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.9 Wetlands</b>						
Wetlands	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
<b>5.10 Coastal Resources</b>						
Coastal Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.11 Utilities and Service Systems</b>						
Energy	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Telecommunication Systems	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Water Demand/Supply and Systems	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Sewer	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Solid Waste	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.12 Light Emissions</b>						
Lighting	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.13 Aesthetics</b>						
Visual Impacts	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.14 Geology and Soils</b>						
Seismic Hazards	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Non-seismic Hazards	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
<b>5.15 Hazards and Hazardous Materials</b>						
Hazards and Hazardous Materials	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant

Table 1-4  
Summary of Environmental Effects

Section	Proposed Project (Preferred Alternative) [Includes Airport Master Plan Proposed Airport Land Use Plan and Proposed Airport Implementation Plan]		East Terminal Alternative [Includes Airport Master Plan - Airport Land Use Plan and - Airport Implementation Plan Alternative]		No Project Alternative <sup>1</sup>	Significance After Mitigation
	With Parking Structure	Without Parking Structure	With Parking Structure	Without Parking Structure		
<b>5.16 Human Health Risk Assessment</b>						
Potential Incremental Cancer Risk						
Residence	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
School	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Worker	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Potential Incremental Health Impact: Chronic						
Residence	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
School	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Worker	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Not Applicable	Less Than Significant
Potential Incremental Health Impact: Acute						
Residence	Significant	Significant	Significant	Significant	Not Applicable	Significant
School	Significant	Significant	Significant	Significant	Not Applicable	Significant
Recreation Area	Significant	Significant	Significant	Significant	Not Applicable	Significant
Worker	Significant	Significant	Significant	Significant	Not Applicable	Significant
<b>5.17 Public Services</b>						
Fire Protection Services	Less Than Significant		Less Than Significant		Not Applicable	Less Than Significant
Law Enforcement	Less Than Significant		Less Than Significant		Not Applicable	Less Than Significant
<b>5.18 Recreation</b>						
Existing Parks and Recreational Resources	Less Than Significant		Less Than Significant		Not Applicable	Less Than Significant
Planned Parks and Recreational Resources	Less Than Significant		Less Than Significant		Not Applicable	Less Than Significant

Notes:

1. CEQA regulations require determination of the significant environmental effects of the Proposed Project. Although the EIR analyzes the No Project Alternative, there are no significant environmental effects of the No Project Alternative.
2. Operational emissions analysis includes: aircraft, auxiliary power units, ground support equipment, motor vehicles, and stationary sources.

Table 1-5  
Summary of Impacts and Mitigation Measures <sup>1</sup>

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
<b>Traffic and Circulation<sup>3</sup> (Section 5.3)</b>				
Under the Proposed Airport Implementation Plan the volume to capacity ratio along Sassafras Street between Pacific Highway and Kettner Boulevard would increase to 0.99 from 0.94 under the No Project Alternative.		X	MM5.3-1 Sassafras Street between Pacific Highway and Kettner Boulevard – Construct one additional eastbound travel lane for a total of two westbound and two eastbound travel lanes between Pacific Highway and Kettner Boulevard.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along Sassafras Street between Kettner Boulevard and India Street would increase to 1.36 from 1.32 under the No Project Alternative		X	MM5.3-2 Sassafras Street between Kettner Boulevard and India Street – Construct one additional eastbound travel lane for a total of one westbound and two eastbound travel lanes between Kettner Boulevard and India Street.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along Kettner Boulevard between Sassafras Street and Palm Street would increase to 1.02 from 0.99 under the No Project Alternative		X	MM5.3-3 Kettner Boulevard between Sassafras and Palm Streets – Construct one additional travel lane for a total of four travel lanes one-way between Sassafras and Palm Streets.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between Terminal One Access and Winship Lane would increase to 1.01 from 0.94 under the No Project Alternative		X	MM5.3-4 North Harbor Drive between Terminal One Access and Winship Lane - Construct one additional travel lane for a total of nine lanes. This segment is currently a maximum eight-lane configuration per the City's roadway classification for Primary Arterial. A new roadway classification would be required and corresponding capacity values defined to analyze the impact of the added lane.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between Winship Lane and the Rental Car Road would increase to 1.03 from 0.97 under the No Project Alternative		X	MM5.3-5 North Harbor Drive between Winship Lane and the Rental Car Road - Construct one additional travel lane for a total of nine lanes. This segment is currently a maximum eight-lane configuration per the City's roadway classification for Primary Arterial. A new roadway classification would be required and corresponding capacity values defined to analyze the impact of the added lane.	Less Than Significant

Table 1-5  
Summary of Impacts and Mitigation Measures <sup>1</sup>

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between the Rental Car Road and Laurel Street would increase to 1.79 from 1.73 under the No Project Alternative		X	MM5.3-6 North Harbor Drive between the Rental Car Road and Laurel Street - Construct one additional travel lane for a total of seven lanes between the Rental Car Road and Laurel Street.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between Laurel Street and Hawthorn Street would increase to 1.27 from 1.22 under the No Project Alternative		X	MM5.3-7 North Harbor Drive between Laurel Street and Hawthorn Street - Construct one additional travel lane for a total of seven lanes between Laurel and Hawthorn Streets.	Less Than Significant
As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along Grape Street would increase to 1.17 from 1.13, between North Harbor and Pacific, to 1.5 from 1.46 between Pacific and Kettner, and to 1.69 from 1.66, between Kettner and I-5.		X	MM5.3-8 Grape Street between North Harbor Drive and I-5 - Construct one additional travel lane for a total of four lanes which would require prohibiting parking on one side of Grape Street.	Less Than Significant
As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along Hawthorn Street would increase to 1.20 from 1.16, between North Harbor and Pacific, to 1.06 from 1.03 between Pacific and Kettner, and to 1.69 from 1.66, between Kettner and I-5.		X	MM5.3-9 Hawthorn Street between North Harbor Drive and I-5 - Construct one additional travel lane for a total of four lanes which would require prohibiting parking on one side of Hawthorn Street.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along Kettner Boulevard between Washington and Sassafras Streets would increase to 1.14 from 1.11 under the No Project Alternative		X	MM5.3-10 Kettner Boulevard between Washington and Sassafras Streets- Construct one additional travel lane for a total of four travel lanes one-way between Washington and Sassafras Streets.	Less Than Significant
Under the Proposed Airport Implementation Plan the volume to capacity ratio along Laurel Street between the Pacific Highway and Kettner Boulevard would increase to 1.15 from 1.13 under the No Project Alternative		X	MM5.3-11 Laurel Street between the Pacific Highway and Kettner Boulevard- Reclassify from 4-Lane Collector to 4-Lane Major between the Pacific Highway and Kettner Boulevard.	Less Than Significant

Table 1-5  
Summary of Impacts and Mitigation Measures <sup>1</sup>

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
Under the Proposed Airport Implementation Plan the volume to capacity ratio along India Street between Laurel and Palm Streets would increase to 2.68 from 2.64 under the No Project Alternative		X	MM5.3-12 India Street between Laurel and Palm Streets – Construct one additional travel lane or a total of three one-way lanes and would require prohibiting on-street parking between Laurel and Palm Streets.	Less Than Significant
As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along India Street would increase to 2.11 from 2.09, between Palm and Sassafras, and to 2.42 from 2.41 between Sassafras and Washington.		X	MM5.3-13 India Street between Palm and Washington Streets - Construct one additional travel lane for a total of four one-way lanes which would require prohibiting on-street parking between Palm and Washington Streets.	Less Than Significant
Under the Proposed Airport Implementation Plan the intersections of Hawthorn Street and North Harbor Drive would operate at a Level Of Service F and E, AM and PM respectively without mitigation.		X	MM5.3-14 Hawthorn Street and North Harbor Drive – Restripe the westbound left turn lane to a shared left and right turn lane.	Less Than Significant
Under the Proposed Airport Implementation Plan the intersections of Grape Street and Kettner Boulevard would operate at a Level Of Service E (PM) without mitigation.		X	MM5.3-15 Grape Street and Kettner Boulevard – Add an exclusive southbound left turn lane.	Less Than Significant
Under the Proposed Airport Implementation Plan the intersections of Sassafras Street and Kettner Boulevard would operate at a Level Of Service F (PM) without mitigation.		X	MM5.3-16 Sassafras Street and Kettner Boulevard – Change cycle length from 70 seconds to 90 seconds.	Less Than Significant
Under the Proposed Airport Implementation Plan the intersections of Grape Street and I-5 Southbound On-Ramp would operate at a Level Of Service F (PM) without mitigation.		X	MM5.3-17 Grape Street and I-5 Southbound On-Ramp – Optimize signal timing.	Less Than Significant
<b>Air Quality (Section 5.5)</b>				
Emissions inventory indicates that forecast growth increases air quality impacts when compared to the No Project Alternative.		X		NO <sub>x</sub> levels can not be mitigated as the generators of this pollutant are not controlled by the San Diego County Regional Airport Authority.

Table 1-5  
**Summary of Impacts and Mitigation Measures <sup>1</sup>**

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
<b>Historic, Architectural, Archaeological, Paleontological, and Cultural Resources (Section 5.7)</b>				
No significant impacts are associated with the Proposed Airport Implementation Plan. The airport land use designations included in the Airport Land Use Plan are similar to existing land uses and the designation of airport uses will not result in a physical change to the environment. However once specific improvements are proposed and identified at a project level any potential affects will be reevaluated specific to historic resources. If future development has potential to significantly impact these resources, appropriate mitigation measures will be developed and implemented.			Not Applicable	Not Applicable
<b>Biotic Communities/ Endangered and Threatened Species (Section 5.8)</b>				
No significant impacts are associated with the Proposed Airport Implementation Plan however future implementation of the Airport Land Use Plan may require mitigation as improvements within the Teledyne Ryan lease hold are in proximity to California least tern nesting habitat areas and may cause indirect impacts.	X		Mitigation Measures to address indirect impacts to biological resources will be deferred until specific projects are proposed in the area surrounding the least tern nesting habitat at the far east end of the Teledyne Ryan leasehold. Mitigation measures listed below are program level measures to be verified at such time as development of the Teledyne Ryan leasehold becomes viable.	Less Than Significant
	X		PMM5.8-1 Avoidance of construction adjacent to the least tern nesting habitat in airfield ovals during the least tern breeding season	
	X		PMM5.8-2 Design and construction of new facilities such that potential predator perches are minimized and, where potential perches are unavoidable, the use of anti-perch material on those surfaces  PMM5.8-3 Use of lighting that is directed away from the least tern nesting ovals	

Table 1-5  
**Summary of Impacts and Mitigation Measures <sup>1</sup>**

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
	X		PMM5.8-4 Use of enforceable lease requirements and associated site inspections to ensure that there are no open trash containers or other sources of food available to least tern predators at tenant facilities on the former Teledyne Ryan leasehold.	
<b>Human Health Risk Assessment (Section 5.16)</b>				
The Proposed Project increases the potential acute (short term) incremental health impacts (non-cancer) in residential, school, recreational areas, and off-site workers.		Airport Terminal Design	MM5.16-1 Encourage and facilitate the use of gate-furnished power and air conditioning as a means of reducing emissions from aircraft auxiliary power units. This will be accomplished by the installation of electrical and conditioned air hook-ups at all new gates.	Significant  To help insure these mitigation measures are implemented, San Diego International Airport will prepare an Air Quality Management Plan that will identify the steps, provisions and timetables necessary for their effectiveness to be achieved.
		Airport Tenant Mitigation	MM5.16-2 Encourage and facilitate the replacement of diesel-fueled ground service equipment with low- and no-emitting equipment and vehicles. This will be accomplished by coordinating a ground service equipment replacement program with the airlines and by providing the necessary infrastructure to accommodate the newer, less polluting ground service equipment fleet.	
		Airport Mitigation	Mitigation measures for operation (aircraft and vehicular) related emissions are comprised of the following  MM5.16-3 By improving taxiways, the number of runway crossings by aircraft can be reduced to increase the overall efficiency of the airfield system.	

Table 1-5  
**Summary of Impacts and Mitigation Measures <sup>1</sup>**

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
		Airport Mitigation	MM5.16-4 Reconstructing taxiways and hold aprons to better meet the current and future fleets of aircraft will improve operational performance of the airfield (i.e. large aircraft will be able to taxi unimpeded past other aircraft, ground vehicles and ground obstructions).	
		Airport Mitigation	MM5.16-5 Reconstructing Taxiway C, adding new apron hold pads and a new taxiway east of Taxiway D allows aircraft to bypass those on the existing aprons and provide more efficient access to new GA facilities.	
		Airport Mitigation	MM5.16-6 The new access/egress roadway configurations and expanded curbsides in the main terminal area will help to improve surface traffic circulation, lessen stop-and-go driving and reduce excess motor vehicle idling.	
		Airport Mitigation	MM5.16-7 The new multi-level parking structure will also include dedicated departure curbs and a transit plaza accommodating high-occupancy shuttles, buses and vans. New access roadways from North Harbor Drive directly into the structure also eliminate the need for vehicles to utilize the curbside roadways. Combined with the elevated pedestrian walkways connecting the parking structure with the terminal, all these improvements will also help to enhance surface traffic circulation, lessen stop-and-go driving and reduce excess motor vehicle idling.	
		Construction	Mitigation measures for construction-related emissions are comprised of the following: MM5.16-8 Prevent construction equipment and delivery trucks from excess idling during periods of inactivity. Excess idling is defined as idling more than 5 minutes per CCR, Title 13, and Section 2485.	

Table 1-5  
**Summary of Impacts and Mitigation Measures <sup>1</sup>**

Potential Significant Impact	Project Component Causing Impact		Mitigation Measures	Level of Significance After Mitigation
	Proposed Airport Land Use Plan <sup>2</sup>	Proposed Airport Implementation Plan		
		Construction	MM5.16-9 Substitute low- and zero-emitting construction equipment whenever possible.	
		Construction	MM5.16-10 Implement a construction-employee shuttle service, rideshare program and/or on-site food service to reduce vehicle trips.	
		Construction	MM5.16-11 Encourage the use of clean-burning diesel engines wherever possible.	
		Construction	MM5.16-12 Use Electrical drops in place of temporary electrical generators whenever feasible.	

Notes:

- Includes Proposed Airport Implementation Plan required PROJECT level mitigation measures, construction mitigation measures, and PROGRAM level mitigation measures potentially necessary for implementation of the Proposed Airport Land Use Plan:  
 “MM” indicates PROJECT level mitigation measures proposed for implementation of the Proposed Airport Implementation Plan  
 “PMM” indicates PROGRAM level mitigation measures considered for the future Proposed Airport Land Use Plan  
 “Construction” indicated mitigation measures proposed during construction.
- The maximum development scenario is not provided in this summary. The maximum development scenario is provided in Section 5.3.8 to inform the public and agencies responsible for traffic and circulation of the effects of accommodating regional growth at San Diego International Airport. As such, any significant impacts or mitigation measures associated with the maximum development scenario are for information purposes only. At the time a specific project is proposed, additional environmental analysis will provide the significance of development effects on traffic and circulation, and propose mitigation measures that the San Diego County Regional Airport Authority will perform in order to mitigate any significant impact.
- Even though the impacts would be reduced to less than significant as a result of mitigation, because the mitigation is under the responsibility and jurisdiction of other agencies and the SDCRAA cannot ensure their implementation, the SDCRAA will be adopting a statement of overriding considerations when approving the Proposed Project.

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## 1.7 Significant and Unavoidable Impacts

Chapter Five, *Environmental Setting, Consequences, and Mitigation Measures*, provides the detailed analysis for the Proposed Project (Preferred Alternative). The analysis indicates that the Proposed Project (Preferred Alternative) could potentially result in and/or contribute incrementally to air quality impacts and resulting human health risk impacts.

### **Traffic and Circulation**

As described in Section 5.3.3, *Traffic Impacts and Significance Criteria*, significance criteria used to determine potentially significant impacts for freeway segments and metered on-ramps, street/roadway segments, intersections and parking were derived from the City of San Diego Development Services Department's CEQA Significance Determination Thresholds guidelines dated January 2007; significance criteria for railroad crossings were derived from the California Utilities Commission, and best practice management was used to determine significance criteria for transit, parking, terminal curbsides and on-airport roadways.

Per Section O, *Transportation/Circulation and Parking*, of the City of San Diego's CEQA Significance Determination Thresholds dated January 2007, mitigation measures have been identified to mitigate the project's direct significant and/or cumulatively considerable traffic impacts.

Mitigation measures were identified in this section for each potentially significant impact per the City's guidelines. When possible mitigation and additional improvements were identified to improve the level of service of the transportation facility to within the City's acceptable guidelines, LOS D or better, and in many instances the mitigation identified to mitigate a potentially significant impact to insignificant conditions also improved the LOS of the facility to LOS D or better. In some instances no feasible mitigation could be identified to mitigate to LOS D or better.

Subsequent to implementation of any required mitigation a peak hour roadway analysis would be conducted as part of a mitigation feasibility study to determine specific mitigation measures to be implemented.

### **Air Quality Impacts**

As described in Section 5.5, *Air Quality*, the predicted increases NO<sub>x</sub> in 2030 are due to the forecasted increase in operations at SDIA in the future. Compared to the No Project Alternative, there is some variability in these results among the alternatives analyzed, but these differences are small (i.e., <10 percent). Therefore, these impacts are considered unavoidable.

With respect to the predicted violations of the CAAQS for NO<sub>2</sub> again, these are also predicted exceedances with or without the planned improvements to SDIA beyond 2015. In 2010, 2015, and 2030, the Proposed Airport Implementation Plan, Airport Implementation Plan Alternative and the Airport Land Use Plan are expected to "contribute significantly" to projected violations of the 1 hour CAAQS for NO<sub>2</sub> which were also predicted under the No Project Alternative. Specifically, in 2010, the Airport Implementation Plan is predicted to cause a 70 µg/m<sup>3</sup> increase when compared to the No Project Alternative. This value represents 21% of the 1 hour NO<sub>2</sub> standard and, therefore, is considered a significant impact. In 2015, the Airport Implementation Plan and Airport Land Use Plan are expected to cause a 39 and 41 µg/m<sup>3</sup> increase over when compared to the No Project Alternative. These values represent approximately 12% of the 1 hour NO<sub>2</sub> standard and are also considered to be significant impacts. Finally, in 2030 under the Airport Implementation Plan, Airport Implementation Plan Alternative and the Airport Land Use Plan, 1 hour NO<sub>2</sub> levels are predicted to increase by 49 µg/m<sup>3</sup> when compared to the No Project Alternative. This represents 15% of the 1 hour NO<sub>2</sub> standard and is considered a significant impact. By comparison, in the years 2010, 2015, and 2030 the Airport Implementation Plan, Airport Implementation Plan Alternative and the Airport Land Use Plan will not contribute significantly (i.e., <5%) to any predicted violation as the PM<sub>10</sub> and PM<sub>2.5</sub> concentrations remain practically the same between the No Project and the Project alternatives. (See Section 5.5 pages 36-37). Therefore, these impacts are still considered significant, but unavoidable.

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## **Human Health Risk Assessment**

As described in Section 5.16, *Human Health Risk Assessment*, The level of significance for acrolein as determined by the HHRA is above the CEQA threshold of significance and cannot be mitigated to levels below significant and, thus, are unavoidable. However, the implementation of the mitigation measures listed in Section 5.16.7, *Mitigation Measures* will further reduce the potential impacts on the health of nearby receptors. Further, as discussed previously, studies and data suggest that the results of the HHRA for acrolein are conservative and may actually overstate the pollutant's effects. Notably, air monitoring of HAPs in the vicinities of other large metropolitan airports did not detect this compound. Acrolein also degrades quickly in air and its content in aircraft exhaust is recognized to be substantially overstated in the currently available speciation profiles for aircraft engines. An understanding of these tendencies is critical for a proper assessment of acrolein's potential impacts.

Therefore, the implementation of the mitigation measures listed in Section 5.16.7, *Mitigation Measures* will only further reduce the potential impacts on the health of nearby receptors. Otherwise, the level of significance for this pollutant as determined by the HHRA is above the threshold of significance and is therefore considered unavoidable.

## **Other Categories**

No other significant irreversible changes would occur with implementation of the Proposed Project (with Parking Structure), the Preferred Alternative.

# **1.8 Comments Received on May 2006 Draft EIR**

The Draft Environmental Impact Report for the San Diego International Airport Master Plan was distributed for review by cooperating agencies, organizations, and the public in May 2006. All of the comments were received via mail, e-mail, fax, or delivered by messenger between June 15 and October 23, 2006. This section briefly summarizes the comments received by agencies and organizations. Appendix A contains all of the comments received, along with a summary of comments by category.

A total of 22 federal/state/local agencies, organizations, and community planning groups submitted comments to the SDCRAA for review and consideration during development of the Draft Environmental Impact Report. Public and agency comments were encouraged by the SDCRAA, as it is helpful in the identification of issues that warrant additional consideration.

**Table 1-6** summarizes the number of comments received by Federal, State, and Local Agencies, Organizations, and Community Planning Groups.

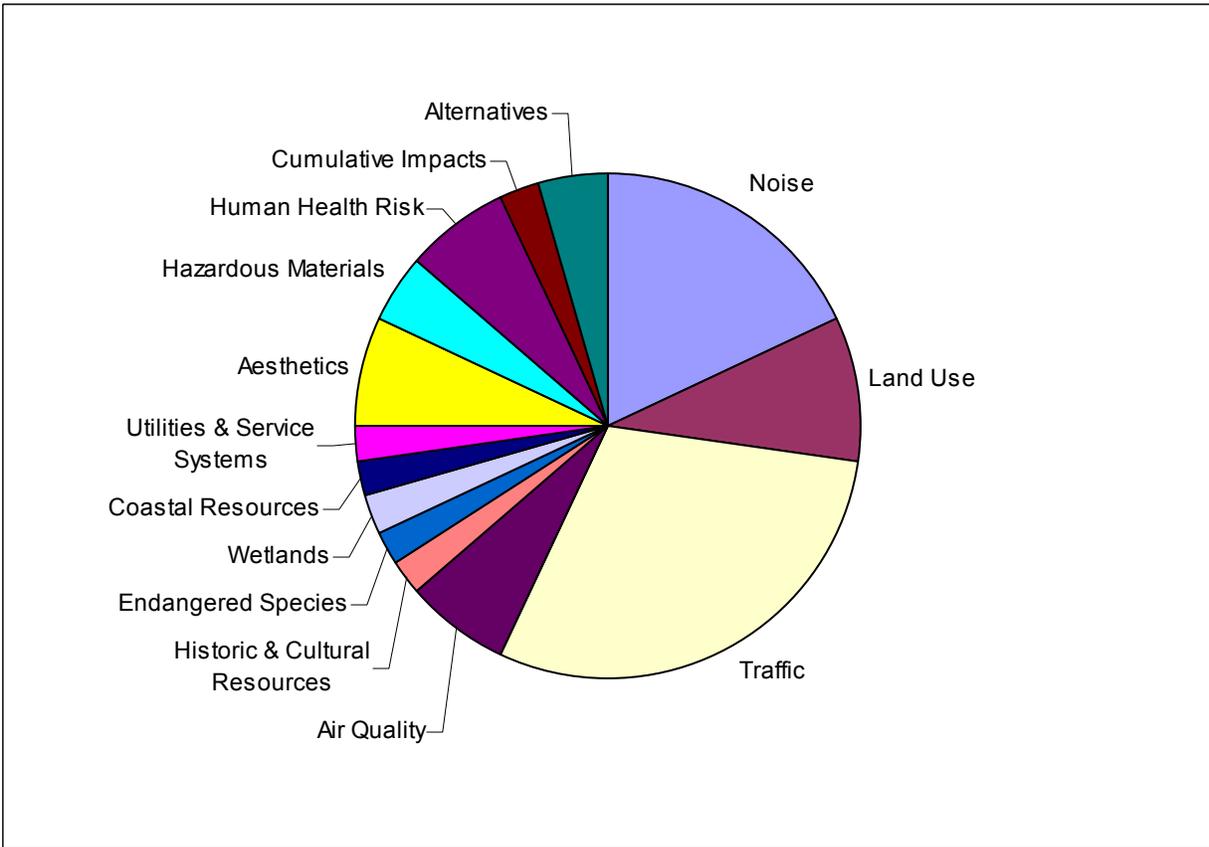
Table 1-6  
**Summary of Comments Received**

<b>Commenter</b>	<b>Written Comments</b>
Federal Agencies	2
State Agencies	4
Local Agencies	8
Organizations	4
Community Planning Groups	4

All of the comments received addressed the Proposed Project. Several agencies included remarks about the No Project Alternative as well, but these comments typically focused on a comparison between the Proposed Project and No Project Alternatives. No comments were received that addressed the East Terminal Alternative.

As shown in **Figure 1-1**, comments were submitted regarding several categories, with the most significant emphasis placed on (1) traffic, (2) noise, and (3) land use issues. Several comments also brought into question operational levels for the No Project and Proposed Project Alternatives, as operational levels were the same for all alternatives considered through the year 2015. Several comments expressed the need to extend the analysis year beyond 2015 to better plan for the airport's growth. The comments that were received have been addressed throughout the text of this Draft EIR.

Figure 1-1  
**Summary of Comments Received**



## 1.9 Comments Received on October 2007 Draft EIR

The Draft Environmental Impact Report for the San Diego International Airport Master Plan was distributed for review by cooperating agencies, organizations, and the public in October 2007. Comments were received through email, fax, and standard U.S. mail. The initial 60 day comment period was through October until November 30, 2007. After two extensions, the 125 days comment period concluded on February 4<sup>th</sup>, 2008.

Public and agency comments were encouraged by the SDCRAA, as it is helpful in the identification of issues that warrant additional consideration. A total of 24 federal/state/local agencies, organizations, and community planning groups submitted comments to the SDCRAA for consideration during the review period of the Draft Environmental Impact Report. In addition, 41 individuals submitted comments that have also been included in the responses to comments of the Final EIR. [Table 1-7](#) contains a complete list of commenters and the date their comments were received.

Table 1-7  
List of Contributing Commenters

Name	Agency	Date received
Darrell Roberson	Public Comment	October 9, 2007
Wayne Smith	Public Comment	October 9, 2007
Chantal Saipe	Public Comment	October 10, 2007
Lance Murphy	Public Comment	October 17, 2007
Lance Murphy	Public Comment	October 17, 2007
Joe Varley	Public Comment	October 19, 2007
Jarvis Ross	Public Comment	October 21, 2007
Joe Varley	Public Comment	October 22, 2007
Geoff Page, Chair Peninsula Community Planning Board	Peninsula Community Planning Board	October 25, 2007; November 19, 2007
John Karpinski	Public Comment	October 30, 2007
Paul Zablodny	Public Comment	November 1, 2007
Karen Voigt	Public Comment	November 5, 2007
David Elmore	Public Comment	November 5, 2007
James Gilhooly	Public Comment	November 6, 2007
Catherine Kurland	Public Comment	November 8, 2007
Greg Holmes, Unit Chief	California, Department of Toxic Substance Control	November 13, 2007; December 3, 2007
Darrell Roberson	Public Comment	November 14, 2007
Sandy Hesnard, Aviation Environmental Specialist	Department of Transportation	November 19, 2007
Mehdi Rastakhiz, Associate Engineer	Metropolitan Wastewater Department	November 21, 2007
Tom Stewart	Public Comment	November 26, 2007
Bill Ingram	Public Comment	November 26, 2007
Cary McGagin, Captain	Department of California Highway Patrol	November 29, 2007
Marylou LoPreste	Public Comment	December 3, 2007

Table 1-7  
**List of Contributing Commenters**

Name	Agency	Date received
James Whalen	Public Comment	December 6, 2007
Larry Simon, Federal Consistency Coordinator	California Coastal Commission	December 17, 2007
Shane Finneran, Secretary, Ocean Beach Planning Board; Representative, Airport Noise Advisory Committee	Ocean Beach Planning Board, Inc.	December 21, 2007
Tom Smisek, Mayor	Office of the Mayor, Coronado	December 26, 2007
Kurt Luhrsen, Principal Planner	North County Transit District	January 4, 2008
John French	Public Comment	January 9, 2008
James Frost	Public Comment	January 9, 2008
James Cash	Public Comment	January 13, 2008
Michael Huff	Public Comment	January 25, 2008
Andrew Berg	National Electrical Contractors Association	January 30, 2008
Suhail Khalil	Public Comment	January 30, 2008
William E. Prinz, REHS, MPA	Solid Waste Local Enforcement Agency, City of San Diego	January 31, 2008
Lynn Wade, Michael BuFalry & Dustin	Public Comment	February 1, 2008
Jason Feldman	Public Comment	February 1, 2008
Gidon Singer	Public Comment	February 1, 2008
Ardetta Steiner	Public Comment	February 1, 2008
Jarvis Ross	Public Comment	January 4, 2008
Bob Leiter, Director of Land Use and Transportation	SANDAG	February 4, 2008
Kelly Broughton, Director	Development Services Department, City of San Diego	February 4, 2008
Darin Neufeld, Resource Management Intern	Resource Management Division, City of San Diego	February 4, 2008
D. W. Zautcke, Colonel USMC	United States Marine Corps	February 4, 2008
Jacob Armstrong, Chief	California Department of Transportation	February 4, 2008
Conan Cheung, Director of Planning & Scheduling	Metropolitan Transit System	February 4, 2008
John W. Helmer, Manager, Planning Services	Unified Port of San Diego	February 4, 2008
Lance G. Murphy, Chair Airport Committee	Peninsula Community Planning Board	February 4, 2008
Cynthia Conger, Committee Board Member	Peninsula Community Planning Board	February 4, 2008
Lance Murphy, SANNoise	SANNoise	February 4, 2008
Stephen L. March	Luce, Forward, Hamilton & Scripps LLP on behalf of Jimsair Aviation Services, Inc.	February 4, 2008
L. Winslet	Public Comment	February 4, 2008

Table 1-7  
List of Contributing Commenters

Name	Agency	Date received
Harris Steiner	Public Comment	February 4, 2008
William Gibson	Public Comment	February 4, 2008
Margaret Valentine	Public Comment	February 4, 2008
Julia Quinn	Public Comment	February 4, 2008
Teresa Brownyard	Public Comment	February 4, 2008
Roger Britt	Public Comment	February 4, 2008
Miguel Romero (and family)	Public Comment	February 4, 2008
Bill Ingram	Public Comment	February 4, 2008
Matthew Naiman	Public Comment	February 4, 2008
Gregory Giselman	Public Comment	February 4, 2008
Kevin Faulconer	City of San Diego, Council	February 5, 2008
Paul Grimes	Public Comment	February 5, 2008

## 1.9.1 Comments

This section contains the comments received during the 125 day comment period for the review of the October 2007 Draft EIR. Most of the comments received were relevant to the review of the Draft EIR and responses to these comments can be found in a table corresponding to the appropriate comment. In situations where multiple comments were received for the same subject, general responses were developed. Each general response has a number which is referenced in the response table. The general responses can be found in Section 1.9.1.1. Comments that were not relevant to the review of the Draft EIR are also included in this comment section.

### 1.9.1.1 General Responses

The following comments represent comments on received on the Draft EIR received from several persons and the responses. The responses are applied where applicable to comments provided by multiple sources.

**General Comment #1:                    *Why was relocation of SDIA not considered as an alternative?***

The Airport Master Plan (AMP) EIR does not consider relocation as an alternative for the reasons stated in Chapter 4, Proposed Project and Alternatives. As described in Section 7.1 of the AMP, the FAA-approved *San Diego International Airport Aviation Activity Forecasts [SH&E 2004]* predict that with approximately 260,000 annual aircraft operations airfield delays will begin to constrain growth of aircraft operations. As described in the AMP within Chapter 7, delay would exceed established thresholds of tolerance at approximately 300,000 annual operations. These delays would cause airlines to slow their increases in number of airline flights through the San Diego International Airport (SDIA) unless SDIA obtained another runway. The SH&E Report indicates that 300,000 annual operations would be reached sometime around 2030 using the Constrained High Scenario Forecast. [Table 2-1 EIR](#). Between today and 2022, the existing Airport facilities will become increasingly congested. The facilities will become inadequate to handle the forecast passenger volume set forth in the FAA-approved forecast effectively or at a level of service that is consistent with industry standards.

One of the objectives of the Proposed Project is to maintain to the extent feasible an acceptable level of passenger and airport service while handling the growth projected to occur with or without implementation of the Proposed Project through 2015. For this reason, the EIR does not consider relocation of the airport

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as an alternative. Relocating the Airport would require steps to accommodate passengers to an acceptable level of service at the Airport that would take much longer than the timeframe for the Proposed Project. To create a new airport, the final selection and implementation of any airport relocation would have been subject to a separate CEQA review process. Such a CEQA process and the other permitting activities plus all the property acquisition, infrastructure development, and other required actions would take well in excess of ten years. The ASSP determined that the cost of moving to MCAS Miramar was approximately \$7.3 billion in 2005 dollars; consideration of a new green field site would potentially require more extensive funding. Furthermore, at the beginning of the EIR process, the San Diego County Regional Airport Authority (SDCRAA) was still conducting the Airport Site Selection Program (ASSP), the ASSP is summarized in the next four paragraphs.

#### History of Site Selection Program:

Separately from this EIR process, from the year 2001 through the year 2006 the SDCRAA conducted the ASSP as part of the state law requirement to conduct a comprehensive study of all potential airport sites and solutions to meet the region's air transportation needs through the year 2030. Cal. Pub. Util. Code § 170048. State law required the SDCRAA, as part of the ASSP, to have a countywide advisory ballot measure with an airport location recommendation. Id. § 170048(h). Through the course of evaluating 30 possible sites and applying screening criteria to winnow the range of potential options, the SDCRAA identified nine sites as candidates for further analysis. The SDCRAA selected five of these sites to undergo a comprehensive detailed alternative analysis for developing a recommendation for a new airport location. The decision document, which summarizes the results of many technical analyses, is available at the SDCRAA's website, [http://www.san.org/airport\\_authority/archives/index.asp](http://www.san.org/airport_authority/archives/index.asp).

After conducting its review, the SDCRAA recommended relocation of the airport to Marine Corps Air Station Miramar based on a full public analysis of environmental, operational, economic, and social factors. *Airport Site Selection Program, Decision Document*, The Ricondo & Associates Team, May 2006. In accordance with the same state law that created the SDCRAA, the SDCRAA presented its MCAS Miramar recommendation to the people of San Diego County as a ballot measure in November 2006. The advisory ballot measure was identified as San Diego County Measure A, in the November 7, 2006 election. The measure did not pass; the result was 61.83% No and 38.17% Yes. County of San Diego, Election Results 2006.

Although the SDCRAA conducted the ASSP process concurrently with the AMP process, the two processes were separate and not interdependent. The ASSP evaluated the potential of relocating San Diego International Airport to a site that could be developed and operated in a manner that meets the County's projected long-term commercial aviation needs through 2030 and beyond. The AMP is intended to identify and set forth a measured, incremental improvement program for the existing Airport facilities. The AMP addresses the immediate needs of the Airport, irrespective of the outcome of the ASSP process.

The completion of the ASSP was not dependent on the assumptions or outcome of the AMP. If the ASSP process had resulted in a formal decision by SDCRAA to relocate the Airport, then the SDCRAA would have had to complete various federal, state, and local permit and approval processes. That process would include the environmental reviews required under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Thus, if the voters had determined to create a new airport and indicated the proposed location, the final selection and implementation of any airport relocation would have been subject to a separate CEQA review process. Such a CEQA process and the other permitting activities plus all the property acquisition, infrastructure development, and other required actions would take well in excess of ten years. Accordingly, relocation of the operations of SDIA to a new airport was determined not to be a reasonable alternative to public or transportation needs that must be met between now and 2015 or 2020. The SDCRAA did not intend either this EIR or Proposed Project to cover or include a new airport. In addition, because of these factors we do not know the status of potentially relocating the Airport at this time. Thus, it is speculative as would be any attempt to analyze the environmental impacts of a theoretical new airport in this document. See CEQA Guidelines § 15145.

#### **General Comment #2: Why not extend the comment period?**

The SDCRAA issued a Draft EIR on October 2, 2007 with the original comment period concluding on November 30, 2007. The SDCRAA extended the comment period to January 4, 2008. The SDCRAA

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then extended the comment period another 30 days to February 4, 2008. In total, the Draft EIR was available for comment for 125 days.

October 2, 2007- November 30, 2007: 59 days

October 2, 2007-January 4, 2008: 90 days (extended on November 13, 2007)

October 2, 2007- February 4, 2008: 125 days (extended on December 12, 2007)

CEQA requires public circulation of an EIR for at least 45 days, subject to state agency review. Cal. Pub. Res. Code § 21091(a). The Guidelines further state that review shall not be longer than 60 days “except in unusual circumstances.” CEQA Guidelines § 15105. The 125-day comment period for the Draft EIR issued on October 2, 2007 was already more than twice the number of days legally recommended for review and, as such, has provided ample opportunity for the public and government agencies to review, consider, and comment on the Draft EIR.

**General Comment #3:                    *Why is the future No Project used as baseline for all environmental impacts instead of the existing conditions?***

The Legislature enacted CEQA to ensure that decision makers and the public would have adequate information to enable them to understand accurately the potential environmental effects that would result from the implementation of a proposed project. To meet this goal, an EIR is required to provide detailed information regarding the environmental effects a proposed project likely would cause. Cal. Pub. Res. Code § 21601.

The essence of CEQA’s mandate is that the lead agency is to determine (through fact gathering and analysis) what potentially adverse effects might result from the construction and operation of a proposed project. CEQA Guidelines § 15121. Often, this may be accomplished by comparing existing environmental conditions in the vicinity of a proposed project to the conditions that may exist in that area at some time after the proposed project is implemented. Id. § 15125. In some cases, however, using existing conditions as the point of comparison may be misleading. As one court explained, the data examined and the comparisons made by the agency are tools to ensure “that the evaluation of impacts normally will do what common senses says it should do and what the EIR’s most important audience, the public, will naturally assume it does: compare what will happen if the project is build with what will happen if the site is left alone.” *Woodward Park Homeowners Ass’n. v. City of Fresno*, 150 Cal. App. 4th 683, 707 (2007).

It would be inaccurate to attribute negative environmental impacts to a project that, as a matter of fact, will not be caused by that project. Such a misleading document could lead decision makers to reject a project under a mistaken belief that their decision not to implement it will avoid future environmental harms. This would defeat the fundamental informational purpose of CEQA.

CEQA does not require an EIR to assume a project causes environmental problems simply because those problems are predicted to occur after project implementation. That would be the classic fallacy: simply because one event occurs after another event has occurred, does not mean that the first event caused the second. To the contrary, where it is demonstrated factually that the proposed project is not the cause of those possible future conditions, an EIR that erroneously claims that the project will cause such conditions would violate CEQA’s mandate. Such an EIR would fail to inform the public and decision makers about the actual effects of a project and would falsely imply that choosing not to carry out a project will avoid or mitigate those environmental concerns.

The analysis in the EIR, therefore, directly identifies the effects that implementation of the AMP may cause and distinguishes those effects from events that will occur for a variety of other reasons, including general economic growth in the San Diego region, new physical development that the City of San Diego may approve or sponsor, and continued operation of existing facilities, including the Airport.

Most importantly, the analysis demonstrates that without any of the AMP improvements the existing Airport would attract and accommodate all of the passengers, aircraft, and ground traffic that would be present if those AMP improvements are constructed through the year 2022 if forecasts hold true. The difference through the year 2022 is that the existing facilities would be less pleasant and convenient, less efficient and thus, in fact, more likely to create traffic and air quality issues.

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The analysis of the airport's existing facilities forecast reveals that, by 2022, the current SDIA terminal facilities will not be adequate to handle the forecasted number of passengers based on well-accepted airport planning principles [AMP Section 7.2 describes Level of Service as defined by the International Air Transport Association (IATA)]. As described in Section 2.2.2 of the EIR, SDIA's single runway defines the ultimate capacity of SDIA. Around 2022, the increase in passenger volume is projected to reach SDIA's operational capacity with existing terminal facilities. *San Diego International Airport Aviation Activity Forecast*, SH&E 2004. The EIR does not consider additional improvements because it focused on near-term (now until 2015) needs. The SDCRAA had a near-term focus because the AMP's consideration of improvements beyond 2030 was only at a programmatic level as the ASSP was underway and the SDCRAA expected future planning efforts would detail the future needs for SDIA beyond 2015. Additional terminal improvements not included in the current AMP will be needed to accommodate the forecasted increase in operations. Without additional improvements, the terminal facilities will reach such a reduced level of service beyond the 2022 timeframe that SDIA will not be able to service additional passengers even with the runway operating below capacity. However, the particular facilities that may be required or constructed are not known at this time.

The proper comparison for CEQA purposes to determine the environmental effects of the project is between what would occur in the absence of the project versus what would occur if the project is built. To provide an accurate assessment of the potential adverse environmental effects, the EIR uses the FAA-approved Aviation Activity Forecast, SH&E 2004, as the basis for determining whether potential environmental impacts are expected with AMP implementation. Because the forecast conditions will exist (with a few specific exceptions discussed in the EIR) even without the AMP improvements, for purposes of CEQA those conditions are not "effects"—that is, they are not the result of—the project.

Unlike adding a new lane on a freeway or building a new shopping center, in this case, the appropriate comparison for assessing environmental effects is not a static "before and after" picture based on the date environmental review commenced. That "normal" approach is not applicable when, as here, the environmental conditions will change, perhaps adversely, over time regardless of whether the project is built.

The CEQA Guidelines specifically dictate that where a proposed project is to be compared with an already adopted plan, "the analysis shall examine the existing physical conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced as well as the potential future conditions discussed in the plan." *Id.* § 15125(e). Thus, where a plan (such as a general plan or the airport layout plan and facilities) is already in place, the Guidelines indicate that the EIR should discuss both existing conditions and future conditions under the presently-in-place plan.

**General Comment #4:**                    ***Why are traffic impacts not being mitigated or declared significant beyond the impacts of the future No Project Alternative?***

As discussed in General Comment #3, providing the analysis for the effects caused by implementation of the Proposed Project (as opposed to those caused by other factors) is an important requirement for meeting CEQA's goals. The comparison for determining whether the Proposed Project could cause potential significant environmental effects on traffic and circulation depends on whether such effect would occur only with implementation of the project or whether it would occur even if the project were never built. In the case of traffic, although the EIR identified potentially significant traffic impacts that would result from implementation of the Proposed Project, the EIR identifies mitigation measures that would reduce all traffic related impacts that otherwise would be caused by the project to a level less than significant.

Per Section O, Transportation/Circulation and Parking, of the City of San Diego's CEQA Significance Determination Thresholds dated January 2007, mitigation measures have been identified to mitigate the project's direct significant and/or cumulatively considerable traffic impacts. Additionally, the EIR indicates potential measures that other agencies could undertake to restore and maintain traffic standards at LOS D or better. Such measures go beyond required mitigation obligations under CEQA, and there is no requirement for implementation of such measures. Nonetheless, where possible, the SDCRAA will work with other agencies and government entities to carry out such measures.

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CEQA requires an EIR to identify ways in which “significant effects can be mitigated or avoided.” Cal. Pub. Res. Code § 21002.1. The EIR indicates the potential effects and attendant mitigation measures for each section. Section 5.3.8 outlines traffic mitigation measures for each alternative. The mitigation measures, if implemented, reduce the potential impacts to less than significant.

As a matter of policy, the EIR analyzes both (a) the Project’s impacts on traffic, and (b) general deterioration of traffic conditions as a result of regional growth. In addition, the EIR identifies measures to alleviate traffic caused by both. However, CEQA only requires that SDCRAA mitigate Project-caused traffic. Neither CEQA nor the City of San Diego’s CEQA Significance Determination Thresholds dated January 2007 require that the SDCRAA implement measures to restore or maintain traffic at or above LOS D when a traffic problem is the result of general growth in the area, rather than a result of the Proposed Project. The EIR identified adequate mitigation measures for all Project-caused traffic. Additionally, the EIR identifies potential improvements that could be implemented to alleviate general non-Project-caused traffic problems. However, in some cases, no practicable traffic improvement measures were identified for traffic problems caused by regional growth. In such instances, because that general regional growth is not due to or caused by the Proposed Project, those general regional growth effects are not considered significant and unavoidable impacts of the Proposed Project.

Although the mitigation measures identified in the EIR would reduce traffic impacts to level of less than significant, the roadway segments, intersection, arterial roadways, and freeway ramps and operations are within the legal authority, responsibility and jurisdiction of the City of San Diego or Caltrans, not SDCRAA. As such, the EIR recognizes that SDCRAA lacks the legal authority to ensure that these other agencies will implement the mitigation measures necessary to render the traffic impacts less than significant. If these agencies do not implement the mitigation measures identified and adopted by SDCRAA, it is possible that the traffic impacts of the Project will remain significant after Project implementation. For this reason, SDCRAA will adopt a Statement of Overriding Considerations identifying Project benefits which outweigh any traffic impacts which may remain unmitigated in the event that the agencies with jurisdiction over such mitigation fail to implement the identified measures.

**General Comment #5:                    *Why is the SDCRAA not mitigating traffic impacts off of Airport property?***

As stated in Section 5.3.8 of the EIR, roadway segments, intersections, and arterial roadways in the project area are within the responsibility and jurisdiction of the City and not the SDCRAA. Freeway ramps and operations in the project area are within the responsibility and jurisdiction of Caltrans and not the SDCRAA.

Although the SDCRAA does not have the authority to impose mitigation measures affecting transportation and circulation facilities within the responsibility and jurisdiction of another public agency, the SDCRAA will coordinate with the City and Caltrans in implementing necessary mitigation measures and recommends that the City and Caltrans consider the mitigation measures identified to mitigate the potential effects of regional growth. In addition, the SDCRAA is restricted under federal law from using “airport reserve” for “non-aeronautical” purposes. See Policy and Procedures Concerning the Use of Airport Revenue, 64 Fed. Reg. 7679 et seq. (Feb. 16, 1999). Certain FAA grant assurances restrict the use of airport funds outside airport boundaries. However, the FAA has indicated that it is willing to consider whether the SDCRAA can use airport revenue to fund certain off-airport transportation improvements that provide solely direct access to the airport. If the City or Caltrans take action to approve and implement the road and freeway improvements identified in Section 5.3.8 of the EIR, the SDCRAA will request the FAA to determine the permissible use of funds.

**General Comment #6:                    *Why are noise impacts not being mitigated or declared significant beyond the impacts of the future No Project Alternative?***

As stated in Section 5.1.1.3 of the EIR, the significance criteria for aviation noise were considered per a federal and state standards, and City of San Diego significance thresholds. *CEQA Significance Determination Thresholds Development Services Department*, January 2007. The transportation element in the General Plan for the City of San Diego has identified sound levels compatible with various land

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uses. The maximum acceptable sound level is 65 CNEL<sup>1</sup> for residential development and 75 CNEL for commercial, industrial, and manufacturing facilities. *City of San Diego General Plan Transportation Element*, Table 2, page Transportation 93. These standards typically apply to usable exterior living areas adjacent to transportation noise sources such as roadways, railways, and areas of aircraft activity.

The Airport Land Use Compatibility Plan (ALUCP) contains policies regarding the attenuation of noise levels within the 60 CNEL for SDIA. According to the ALUCP and section 59.5.0701 of San Diego's Municipal Code, interior noise attenuation is required for new residential construction to reduce the interior noise levels of residential structures to 45 CNEL within the 60 CNEL contour of SDIA.

As stated in the EIR, the Proposed Project would cause a significant impact if there would be:

- A 1.5 dB or more increase resulting in noise sensitive areas being exposed to 65 CNEL or greater, as compared to future conditions as they would exist without the project; or
- A 3 dB or more increase resulting in noise sensitive areas being exposed to 60 CNEL or greater, as compared to future conditions as they would exist without the project.

As discussed in General Comment #3, providing the analysis for the effects caused by implementation of the AMP (as opposed to those caused by other factors) is an important requirement for meeting CEQA's goals. The Proposed Project does not induce growth as described in General Comment Response #7. The comparison for determining whether the Proposed Project could cause potential significant environmental effects on noise depends on whether such effect would occur only with implementation of the project or whether it would occur even if the project were never built. Because the same increase in noise levels will occur even if the project is not implemented through approximately 2022 that increase, as a matter of fact, cannot be a significant adverse environmental effect of the project. The change in noise exposure beyond 2022 when compared to the No Project Alternative is also minimal as aircraft operations increase by only an estimated 42 daily operations. Section 2.2.3.3 of the EIR, Tables 2-15 through 2-20. Specifically the increased operations amount to approximately a 6% increase in operations when compared to the 2020 daily operations level (forecasts were provided specifically for 5 year interval, the year 2022 is not detailed for the EIR). This level of increase can not mathematically impose a significant noise increase. Due to the nature of decibels, a logarithmic unit of measurement typically used to express loudness, a doubling of traffic would be required to increase noise levels by 3 dB. Therefore it can be concluded that that an increase of 6% would not produce significant change in noise levels. Because the implementation of the project will have no significant adverse environmental effects on noise, no mitigation is required under CEQA. Neither of the significance levels described previously is met when comparing the Proposed Project or Project Alternative to No Project Alternative. Therefore, mitigation is not required.

**General Comment #7:                      *Why does the building of gates not induce growth for both ground and air traffic?***

As discussed above, pursuant to CEQA Guidelines Sections 15121(a), 15126.2(d), and 15130, the impacts of a proposed project must be caused by the project and distinguished from those that would result regardless of project approval. Air transportation, like any other type of transportation, is a derived demand.<sup>2</sup> Derived demand means that the demand for air transport is not wanted for its own sake but for the benefits derived from it including traveling in and out of the San Diego region for business, leisure, and military/federal government purposes. Specifically, the demand arises from the need of a given person or a given product to be at a given location at a given time. People travel because they desire or need to be at a certain place, whether for leisure, business, or personal reasons. Likewise, shippers transport commodities because consignees need the product to be at a given location, whether for

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<sup>1</sup> Description of aircraft noise exposure in environmental documents is primarily based on using the Community Noise Equivalent Level (CNEL) metric. CNEL is the average noise level over a 24-hour period with a 5 dB increase attributed to evening operations (i.e., operations between 7 PM to 10 PM) and a 10 dB increase attributed to nighttime operations (i.e., operations between 10 PM and 7 AM). The 5 dB and 10 dB increases during evening and nighttime hours, respectively, are intended to account for the added intrusiveness of aircraft noise during time periods when ambient noise due to vehicle traffic and other sources is typically less than during the daytime.

<sup>2</sup> See for example, "Revisiting the Notion of Induced Traffic through a Matched Pairs Study", by Patricia L. Mokhtarian, Francisco J. Samaniego, Robert H. Shumway, and Neil H. Willits. *Transportation* 29, 2002, 193-220.

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personal or business use, or for resale. In short, the desire or need to travel or to ship a product is generated by factors unrelated to the transportation mode or facility.

The Proposed Project would only induce growth if (1) it would attract new travelers or (2) it would remove a barrier to increased throughput (i.e. take out a bottleneck). As to category one, there is no attraction effect with this Proposed Project. The reason for growth is need in personal demand by passengers. It has nothing to do with the number of gates. We know this from our experience with other airports. As for category two, we know that there are no current barriers or bottlenecks to be removed. The current facilities could accommodate all demand until approximately 2022, BUT not at a service level that allows for a pleasant, comfortable passenger experience through the airport facilities.

The role of an airport or any other part of the transportation infrastructure is to accommodate the need or desire to relocate. An Airport does not, in and of itself, generate that need or desire. Airport planners base airport master planning forecasts upon this understanding. Airport planners based their projections for aircraft operations and enplaned passengers on the size of the market and the cost of travel. These projections are independent of any assumptions about the airport facility. Typically, once planners estimate the demand for air travel at a particular site, an airport sponsor will plan to accommodate the demand.<sup>3</sup> The FAA works from these same assumptions in preparing Terminal Area Forecasts (TAF) for individual facilities. The TAF system is the official forecast of aviation activity at FAA facilities. The FAA prepares the TAF in order to plan, staff and budget accordingly. The TAF is made available to state and local officials as well as the aviation industry for use in planning aviation facilities. The FAA's TAF summary reports include forecasts for active airports in the National Plan of Integrated Airport System (NPIAS) based on enplanements. The FAA bases its forecasts for FAA and FAA contract towered airports are based on operations for each fiscal year. The FAA always includes SDIA within the TAF. Unconstrained, meaning that the physical constraints of a facility (such as a single runway or inadequate terminals) are not considered, forecasts developed for the SDIA Master Plan future years are demand based. The SH&E Aviation Activity Forecast for SDIA (approved by the FAA in June 2005) considers the ultimate constraining factor at SDIA to be the single runway, as described in Section 2.2.2 of the EIR. The constrained forecast considers runway congestion and reduces operations to match a desired service level in the situation where the airfield at SDIA is not improved to meet the market demand. The SH&E forecast did not consider other constraining factors such as terminals in development of the forecast.

Airlines generally will expand activities at an airport until revenue from each additional flight is less than the cost of each additional flight.<sup>4</sup> Therefore, airlines will increase the number of flights as long as passenger demand warrants it and facilities operationally can accept more flights or passengers. Conversely, no matter how many runways or gates an airport may have, if passengers do not want to travel to or from the region served by that airport, airlines will not add flights in or out of such an airport. Providing additional capacity, by itself, will not cause an airline to add new flights. Thus, even adding another runway would not necessarily lead to additional flights because the number of flights an airline decides to fly depends on market demand, not airport capacity unless airport capacity is a limiting factor. Many airports in the United States, such as San Bernardino International Airport, have unused capacity; (this is inherently true otherwise operations in the United States would not continue to grow) however the airlines have not added flights at these airports because additional service is not warranted by demand.

The following tables provide enplanement levels (the total number of passengers boarding an aircraft) at three air carrier airports that added gates or renovated terminal facilities but did not increase gates.

These tables provide evidence that the number of gates does not induce increased operations as seen by limited change in the enplanement levels in the years after the improvements.

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<sup>3</sup> See FAA Advisory Circular 150/5070-6, Airport Master Plans and Forecasting Aviation Activity by Airport, prepared for FAA by GRA Inc., July 2001.

<sup>4</sup> This is standard economic theory. When the marginal cost of a product exceeds the price that can be obtained, the producer will cease producing. See Microeconomic Theory, James E. Henderson and Richard E. Quandt, 1971 by McGraw-Hill, Inc.

Midway Chicago: Improvements in 2004

**Terminal Development Program completed; June 2004, 14 new gates**

Year	Scheduled Enplanements	Passenger Growth Rate Between Years
1998	4,954,796	
1999	5,975,096	20.59%
2000	6,957,336	16.44%
2001	7,244,52	4.13%
2002	7,585,834	4.71%
2003	8,450,042	11.39%
2004	9,252,314	9.49%
2005	8,429,362	-8.89%
2006	8,864,959	5.17%
2007	9,044,483	2.03%
2008*	9,606,044	6.21%
2009*	10,165,342	5.82%
2010*	10,692,738	5.19%

FAA Terminal Area Forecast, December 2007. Values shown beyond 2006 are forecasted by the FAA

**San Diego: Improvements in 1996/1998**

**West Terminal Expansion with 9 gates in 1998 and New Commuter Terminal with 4 gates in 1996.**

Year	Scheduled Enplanements	Passenger Growth Rate Between Years	Operations
1990	5,487,508		211,965
1991	5,649,071	2.94%	206,424
1992	5,967,837	5.64%	214,844
1993	5,883,093	-1.42%	209,267
1994	6,295,539	7.01%	215,215
1995	6,626,050	5.25%	228,740
1996	6,841,900	3.26%	243,595
1997	7,087,240	3.59%	220,979
1998	7,317,952	3.26%	224,140
1999	7,550,495	3.18%	224,095
2000	7,845,829	3.91%	208,894
2001	7,785,057	-0.77%	213,080
2002	7,256,992	-6.78%	201,604
2003	7,514,777	3.55%	206,135
2004	7,995,873	6.40%	212,074
2005	8,494,476	6.24%	225,448
2006	8,649,558	1.79%	231,704
2007	9,083,777	5.02%	232,613

FAA Terminal Area Forecast, December 2007. Values shown beyond 2006 are forecasted by the FAA

**San Francisco: Improvements in early 2000**  
**International Terminal Opened in December of 2000 with 28 gates, with an overall increase**  
**in gates of 8 gates.**

<b>Year</b>	<b>Scheduled Enplanements</b>	<b>Passenger Growth Rate Between Years</b>
1994	16,396,063	
1995	16,887,347	3.00%
1996	18,347,249	8.64%
1997	19,004,714	3.58%
1998	19,205,448	1.06%
1999	19,224,974	0.10%
2000	19,647,516	2.20%
2001	17,875,926	-9.02%
2002	14,645,954	-18.07%
2003	14,002,396	-4.39%
2004	15,389,467	9.91%
2005	15,913,090	3.40%
2006	16,177,563	1.66%
2007	16,748,507	3.53%
2008	17,886,670	6.80%
2009	18,548,400	3.70%
2010	19,246,891	3.77%

FAA Terminal Area Forecast, December 2007. Values shown beyond 2006 are forecasted by the FAA

The Table that follows illustrates that even without additional gates a facility will continue to increase enplanements due to demand for aviation services. Indeed, Washington National/Reagan National Airport set records in 2007 for enplanements.

**Washington National/Reagan National Airport: Improvements in 1997  
Total Rehabilitation of Terminals with No New Gates**

<b>Year</b>	<b>Scheduled Enplanements</b>	<b>Passenger Growth Rate Between Years</b>
1992	7,296,622	
1993	7,512,275	2.96%
1994	7,494,656	-0.23%
1995	7,380,226	-1.53%
1996	7,235,390	-1.96%
1997	7,408,118	2.39%
1998	7,574,624	2.25%
1999	7,277,696	-3.92%
2000	7,195,127	-1.13%
2001	7,393,527	2.76%
2002	5,275,407	-28.65%
2003	6,577,550	24.68%
2004	7,495,648	13.96%
2005	8,434,653	12.53%
2006	8,900,030	5.52%
2007	9,089,177	2.13%
2008	9,297,050	2.29%
2009	9,397,712	1.08%
2010	9,499,466	1.08%

FAA Terminal Area Forecast, December 2007. Values shown beyond 2006 are forecasted by the FAA

Since the late 1990s Detroit Metropolitan Wayne County Airport (DTW) has undergone a dramatic transformation with a new terminal; a sixth runway and improvements continue with the ongoing construction of a new terminal to replace the aging Smith Terminal. The new terminal is scheduled to open in 2008. These improvements are meant to expand DTW's capacity however the number of enplanements continued to climb without the terminal improvements from the 1990s.

**Detroit Wayne County Airport: Improvements in 2002-2008**  
**Total Rehabilitation of Terminals with New Terminals and New Runway**

Year	Scheduled Enplanements	Passenger Growth Rate Between Years
1990	10,552,053	
1991	10,241,703	-2.94%
1992	10,983,586	7.24%
1993	11,496,509	4.67%
1994	12,801,476	11.35%
1995	13,990,302	9.29%
1996	14,866,851	6.27%
1997	15,028,353	1.09%
1998	15,456,583	2.85%
1999	16,962,103	9.74%
2000	17,520,806	3.29%
2001	16,766,532	4.31%
2002	15,118,121	-9.83%
2003	15,629,863	3.38%
2004	16,748,147	7.15%
2005	17,545,384	4.76%
2006	17,323,171	-1.27%
2007	17,885,915	3.25%
2008	18,418,435	2.98%
2009	18,903,450	2.63%
2010	19,402,577	2.64%

As demonstrated in Chapter 7 of the AMP (Facilities Requirements Analysis), multiple aspects of the airport service areas did not meet the demand requirements in 2004 when the facilities analysis was completed however passenger levels continue to grow at SDIA. Specifically, the facilities analysis determined that terminal facilities did not provide an adequate level of service for 2004 passenger requirements. For example, the current layout of the non-secure public area for general circulation is under what would be necessary to provide a “High” level of service for airport users. Specifically the AMP states a level of service B as defined by International Airport Transport Association standards. The total terminal was deficient by approximately 165,500 square feet in 2004, and the number of passengers using the airport has only increased since 2004. The level of deficiency will increase as SDIA’s aircraft operations and passenger levels grow. The number of travelers coming through SDIA is increasing, but there have been no accompanying increases in the size of the Airport. This has created, and will continue to foster, a crowded cramped facility.

The 2004 SH&E *San Diego International Airport Aviation Activity Forecast*, indicates that when demand moves beyond 300,000 annual operations, the airport will essentially reach gridlock. Runway-related delays both in the air and on the ground will be intolerable, and there will insufficient gates to accommodate aircraft on the ground. San Diego Aviation Activity Forecasts, SH&E June 2004 - FINAL Page 109. The EIR gate analysis described in Section 2.2.3.3 determined that beyond 2020 the number of gates will constrain SDIA’s ability to accommodate additional passengers. This will occur despite the constrained airfield conditions. The level of traffic will not change due to the project through the year 2020. Instead, the same level of traffic will flow better and improve the experience of those who use the airport. Thus, the proposed improvements to accommodate traffic through 2015 at SDIA will not generate additional traffic, but provide a higher level of service to Airport users who would otherwise be using

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insufficient facilities. As described in section 3.2.2 of the EIR (Terminal Improvements Needed), when the first phase of Terminal Two West was opened in January 1998 the facility did not experience a spike in airport operations or passenger volumes. Based on industry experience and consistent with well-established principles and practices in airport planning, the terminal improvements proposed to be developed between now and 2015 would have a similar impact on enplanements as those experienced in 1998 when Terminal Two West terminal was opened—that is, no increased travel generated due to those terminal improvements.

The situation is a bit different after 2020. The impact analysis contained in the EIR covers years beyond those for which the proposed improvements are needed in response to comment on the May 2006 Draft EIR to evaluate an extended future to match up to regional transportation analyses. Beyond 2020 the existing gates can not accommodate forecast annual passengers (25.1 Million Annual Passengers). Thereafter, the number of gates will constrain passenger volume. Adding ten new gates will meet forecast demand through 2020 as detailed in Section 2.2.3.2 of the EIR. Thus, the impact analysis through 2020 for the EIR uses the same operational levels for all alternatives. For the years 2025 and 2030, the No Project Alternative includes fewer operations, however. The terminal improvements from both the Proposed Project (Preferred Alternative) and the Airport Plan Alternative (East Terminal) would accommodate the constrained high forecast. As described in section 2.2.2 (Aviation Forecast Update and Planning Horizon Used for Environmental Analysis), SDIA's single runway ultimately constrains the facility. Future planning efforts beyond this EIR process will consider the long-term consequences of the existing one-runway airfield system.

**General Comment #8:                    *Why was the RPZ not included in the analysis for environmental impacts?***

The EIR does not address either of SDIA's two Runway Protection Zones (RPZs) because the Proposed Project and Alternatives do not alter or affect the RPZs or land use within the RPZs.

An RPZ is a trapezoidal area centered upon an extended runway centerline. The dimensions of the RPZ are determined by the type of aircraft that use the runway as well as the approach minima. Approach minima (or minimums) establish minimum visibility requirements for pilots executing a landing or approach to a runway. Minimum visibility requirements are established for the altitude at which the cloud layer begins, called the "ceiling," and the distance pilots can see in front of them, called "range." Approach minima are established for each runway approach depending on the type of navigational aides available and for each type of aircraft, based on its approach speed. According to FAA Advisory Circular 150/5300-13, "the RPZ's function is to enhance the protection of people and property on the ground." RPZs fulfill this function by identifying and advising airports on what buildings, objects, and activities in the vicinity could present hazards to airport's operations or persons on the ground. FAA will not approve projects that allow for people to use or gather in the RPZ. There are two RPZs at SDIA, one at each end of the runway.

The EIR does not address the RPZs at SDIA because the Proposed Project would not affect or alter the existing RPZs or the land uses within the existing RPZs. A description of the Proposed Project and alternatives to the Proposed Project is contained in Chapter 4 of the EIR, Proposed Project and Alternatives. As stated within Chapter 4, airfield improvements are limited to the taxiways, taxilanes, and apron areas near Terminal 2 West. The Proposed Project does not alter the Airport's runway, its safety areas, or approach visibility minima.

**General Comment #9:                    *Why were transit improvements and TDM/TSM not included as mitigation measures?***

The SDCRAA supports improvements to Airport transit service and is developing policies and programs to encourage and increase transit ridership by airport users comprised of passengers and employees. The SDCRAA is committed to increasing transit ridership to SDIA and has led a multi-agency Airport Transit/Roadway Committee, which developed a Draft Airport Transit Plan for SDIA identifying opportunities to improve transit access. Committee members represent the following agencies: San Diego County Regional Airport Authority (SDCRAA), San Diego Association of Governments (SANDAG), Metropolitan Transit System (MTS), North Coast Transit District (NCTD), Caltrans, City of San Diego / Centre City Development Corporation (CCDC), Port of San Diego, Federal Aviation Administration, and

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California Coastal Commission. Because the document is in draft form and the feasibility of each measure is being evaluated, it is uncertain at this point which transit recommendations will ultimately be made and implemented. The main goal of the Airport Transit Plan and the SDCRAA is to increase the airport passenger transit ridership from the existing 1.2 percent to the national average of 4 to 6 percent over the next 3 to 5 years.

The Airport Transit Plan recommends improvements described in [Table 2-21 of the EIR](#), which have been presented to the respective transit agencies. The SDCRAA will conduct feasibility analysis on these recommendations where the SDCRAA has control over the area in question and thus the ability to implement feasible alternatives and is working with other committee members to conduct feasibility analysis on recommendations under their respective jurisdiction. In 2008, additional feasibility analysis and passenger ridership estimates will be prepared. Based upon this analysis, specific airport transit programs will be recommended by the Transit Roadway Committee for implementation by the SDCRAA and the transit agencies.

However, for purposes of the EIR and understanding the effectiveness of transit measures on reducing traffic, the SDCRAA conducted analysis on the segment of North Harbor Drive between Rental Car Road and Laurel Street to assess the benefit from increasing transit ridership from 1.2% to 5% (representing the goal of the Airport Transit Plan). The increase in transit ridership did not reduce impacts to North Harbor Drive to less than significant levels. The SDCRAA estimated the increase in transit ridership to reduce traffic along North Harbor Drive east of the terminals by approximately 2,500 vehicles by 2030.

This increase in transit ridership and resulting decrease in roadway traffic would result in a volume to capacity (v/c) ratio reduction of .04, which is less than the .06 v/c reduction required to reduce traffic to no project conditions. The v/c ratio is the measure of traffic volume on a given segment relative to the traffic capacity of the same segment and is the criteria used to identify the significance threshold (see Section 5.3.3). However, the reduction in traffic and associated decrease in the v/c ratio resulting from an increase in transit ridership is not sufficient to remove potentially significant impacts to North Harbor Drive resulting from implementation of the Proposed Project in 2030. As the increase in transit ridership would not remove potentially significant project impacts specific transit improvements were not included in the EIR as mitigation. Section 5.3.8 of the EIR identifies specific mitigation measures that will reduce all potentially significant traffic impacts to a level of less than significance.

In addition, the SDCRAA is committed to identifying and implementing all feasible transportation systems management (TSM) and transportation demand management (TDM) measures and will do so in cooperation Caltrans, the City of San Diego, and other agencies responsible for the transportation infrastructure surrounding the Airport. Typical TDM and TSM measures primarily benefit employees who are regular users of a facility and this measure is identified under the Airport Transit Plan Recommendation as the Employee Transit Incentive Program.

The SDCRAA conducted analysis on the segment of North Harbor Drive between Rental Car Road and Laurel Street to assess the benefit of employee TDM/TSM measures. According to the Parsons 2004, Update of Traffic Data for San Diego International Airport traffic, used for the EIR traffic analysis (see Section 5.3.1.2), employee trips represent approximately 8% of daily traffic at SDIA. If employee trips were reduced 10%, there would be a reduction of approximately 680 vehicles on North Harbor Drive in 2030.

This equates to a .01 v/c ratio reduction along North Harbor Drive between Rental Car Road and Laurel, less than the .06 v/c ratio reduction required to eliminate any potentially significant impact resulting from implementation of the Proposed Project in 2030. As TSM/TDM measures would not remove potentially significant project impacts, Section 5.3.8 of the EIR identifies other mitigation measures that will reduce all potentially significant traffic impacts to a level of less than significant.

In addition, the identified transit measures will be implemented only through the cooperation and under the jurisdiction of other agencies, including Metropolitan Transit System (MTS) and North Coast Transit District (NCTD). Because SDCRAA cannot guarantee that the transit improvement measures will be implemented and because it is currently working with a multi-agency Airport Transit/Roadway Committee, which developed the Draft Airport Transit Plan for SDIA, SDCRAA did not identify transit measures as mitigation and instead focused on other traffic related mitigation measures.

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### **1.9.1.2 Federal and State Agencies, Planning Groups, and Local Agency Comments and Responses**

This section contains copies of the comments and responses received from State and Federal agencies, planning groups, and local agencies. Within each letter, the individual comments have been marked with a number corresponding to the response in the table immediately following the letter.

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**From:** Cotoia Maj Heather J  
**Sent:** Monday, February 04, 2008 11:57 AM  
**To:** Airport Planning  
**Cc:** Myers GS15 Clifford O  
**Subject:** DRAFT EIR SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN  
**Signed By:** Verifying the signature. Click the icon for details.  
**Attachments:** Draft EIR MCRDSD 080201.PDF

To Whom it May Concern,

On behalf of Mr. Myers, Community and Plans Liaison Officer, Marine Corps Recruit Depot San Diego, attached is the comments on the Draft Environmental Impact Report for the San Diego International Airport Master Plan.

vrs *Heather J. Cotoia*  
Major, U.S. Marine Corps  
Deputy, AC/S G-1  
Marine Corps Recruit Depot San Diego &  
Western Recruiting Region

<<...>>

RECEIVED  
FEB 04 2008  
PLANNING DEPT. #44



**UNITED STATES MARINE CORPS**  
 MARINE CORPS RECRUIT DEPOT/WESTERN RECRUITING REGION  
 1600 HENDERSON AVENUE SUITE 238  
 SAN DIEGO, CALIFORNIA 92140-50017

5090  
 G4FAC  
**FEB 01 2008**

Mr. Ted Anasis  
 San Diego County Regional Airport Authority  
 P.O. Box 82776  
 San Diego, California 92138-2776

Dear Mr. Anasis,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the San Diego International Airport Master Plan. Our comments are provided below:

1. Lease for runway extension and Instrument Landing System (ILS) - 1.2.1. The runway extension and Instrument Landing System are located on parcels of Marine Corps Recruit Depot, San Diego (MCRDSD) property that are leased to the Airport Authority. Although the expiration date of the lease is beyond the 2015 projections, it should be included to be a more accurate reflection of Airport holdings.

2. California Environmental Quality Act (CEQA) document - 1.5 and 2.1.1. MCRDSD requests to be included as an interested party for review of the document when available.

3. Aviation forecast - 2.2.2 (Table 2-5). A chart that reflects past projections of annual passenger loading versus actual would be beneficial. A 1997 Master Plan working group document projected 2005 annual passenger loading to be 10,000,000 versus the actual amount of 17,372,521. The chart would allow the reviewer a more accurate picture of projections and potential impacts.

4. Development of the north side of the runway - 2.4.2 & 4.5.4. MCRDSD is concerned with any development proposed near Washington Street. The Washington Street gate is the main gate for visitor entry and tractor/trailer deliveries.

5. Capacity - 3.2.2. A key premise of the report is the assumption that the proposed actions will not increase capacity. That assumption is based upon the airlines current financial situation. Adding additional gates does make it possible for the airport to increase capacity if the fiscal situation changes.

6. Noise discussed as an average - 5.1.1. Disruption and irritation from aircraft typically come from spikes in noise. With more take-offs and landings, the frequency of the spikes increases. Averaging tends to camouflage the impact. Please address the frequency, duration and decibel level of the spikes in the final document.

6

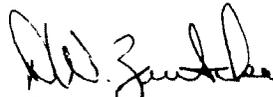
7. California Advisory Handbook for Community and Military Compatibility Planning (Handbook). Several sections of the report highlight planning guidelines and community plans. Please include the Handbook in the report. It can be found on <http://www.cpr.ca.gov/military.html>.

7

8. View corridor - Fig 5.95. The discussions and photographs of view corridors did not include Henderson Avenue. The proposed 10-gate extension will make the terminal visible on this primary street. This may constitute an adverse impact to the MCRDSD Historic District.

8

9. The point of contact for this matter is Major Frank McClinton at (619)524-4381 or [frank.mcclintick@usmc.mil](mailto:frank.mcclintick@usmc.mil).

  
D. W. ZAUTCHE  
Colonel USMC  
By direction

<b>United States Marine Corps</b>		Signed by: D.W. Zautcke, Colonel USMC
Subject:	Draft Environmental Impact Report (EIR) for San Diego International Airport Master Plan Project	
Comment: 1	Subject: Lease for runway extension and Instrument Landing System (ILS) – 1.2.1	Response
The runway extension and Instrument Landing System are located on parcels of Marine Corps Recruit Depot, San Diego (MCRDSD) property that are leased to the Airport Authority. Although the expiration date of the lease is beyond the 2015 projections, it should be included to be a more accurate reflection of Airport holdings.		As described in Chapter 2, Project Description, of the Draft EIR, the proposed project does not alter the Airport's runway or navigational aid facilities. The commenter is correct that portions of land currently utilized for airfield and navigational aid facilities are utilized under the terms of a lease agreement between the SDCRAA and MCRDSD.
Comment 2	Subject: California Environmental Quality Act (CEQA) document – 1.5 and 2.1.1	Response
MCRDSD requests to be included as an interested party for review of the document when available.		The DEIR was released in October 2007 and the MCRDSD was provided a copy of the document for review.
Comment 3	Subject: Aviation forecast – 2.2.2 (Table 2-5)	Response
A chart that reflects past projections of annual passenger loading versus actual would be beneficial. A 1997 Master Plan working group document projected 2005 annual passenger loading to be 10,000,000 versus the actual amount of 17,372,521. The chart would allow the reviewer a more accurate picture of projects and potential impacts.		Historical data might provide perspective. However, the EIR analysis is based on future operational levels that are related to recent projects. The forecast operational levels were obtained using the best available modeling techniques and the forecast was approved by the FAA in June 2005. We do not believe that showing previous projects would provide meaningful information for analyzing future passenger levels provided in Table 2-2.
Comment 4	Subject: Development of the north side of the runway – 2.4.2 & 4.5.4	Response
MCRDSD is concerned with any development proposed near Washington Street. The Washington Street gate is the main gate for visitor entry and tractor/trailer deliveries.		There is no Section 4.5.4 in the EIR. The Airport Authority maintains an easement to Washington Street that will continue to be used for ground access to the airport. The Airport Authority has evaluated the traffic volumes at this intersection in the Draft EIR and will review the environmental analysis conducted by the USMC for any project modifications to Washington Street.
Comment 5	Subject: Capacity – 3.2.2	Response
A key premise of the report is the assumption that the proposed actions will not increase capacity. That assumption is based upon the airlines current financial situation. Adding additional gates does make it possible for the airport to increase capacity if the fiscal situation changes.		Comment noted; all environmental analysis is based on forecasting which considers the financial strengths of the area of influence. See also Response to General Comment #7.
Comment 6	Subject: Noise discussed as an average – 5.1.1	Response
Disruption and irritation from aircraft typically come from spikes in noise. With more take-offs and landings, the frequency of the spikes		The EIR uses both a cumulative noise metric and a Time Above 65 dB noise metric. Use of a cumulative noise metric is standard practice for

	<p>increases. Averaging tends to camouflage the impact. Please address the frequency, duration and decibel level of the spikes in the final document.</p>	<p>determining impact. However, the EIR did consider the time above metric at 5 dB intervals from 65 dB to 95 dB and nighttime flights above 80 SEL and 90 SEL. These metrics address frequency, duration, and various decibel levels. See Section 5.1.1.1 for the discussion of the use of the Time Above 65 dB metric and 5.1.2 for discussion of the supplemental metrics used in the EIR.</p>
<p>Comment 7</p>	<p>Subject: California Advisory Handbook for Community and Military Compatibility Planning (Handbook)</p>	<p>Response</p>
	<p>Several sections of the report highlight planning guidelines and community plans. Please include the Handbook in the report. It can be found on <a href="http://www.opr.ca.gov/military.html">http://www.opr.ca.gov/military.html</a></p>	<p>Comment noted. The Military Handbook is not applicable to the Airport Master Plan EIR as the Proposed Project does not conflict with any military uses (i.e. low-level flight paths, military impact zones, or special use airspace). The EIR, however, has been updated to incorporate by reference the Military Handbook, see Section 2.5. The Handbook is available at <a href="http://www.opr.ca.gov/military/handbook/Complete_Advisory_Handbook_2006.pdf">http://www.opr.ca.gov/military/handbook/Complete_Advisory_Handbook_2006.pdf</a></p>
<p>Comment 8</p>	<p>Subject: View corridor – Fig 5.95</p>	<p>Response</p>
	<p>The discussions and photographs of view corridors did not include Henderson Avenue. The proposed 10-gate extension will make the terminal visible on this primary street. This may constitute an adverse impact to the MCRDSD Historic District.</p>	<p>Additional photographs were taken and have been included in response to this comment directly following this comment page. Photographs include views on MCRDSD from Henderson Avenue and nearby streets looking south/southwest toward the Airport where the proposed 10-gate extension to Terminal 2W would be located. The existing terminal 2 is visible from several of the views, while other views toward the airport are visually screened by buildings and trees on the MCRDSD base. The proposed expansion to the terminal would be at the same relative height and scale as the existing terminal, and would be at the same distance as existing airport facilities. The existing Terminal 2 will screen views of the proposed parking structure and second-level road/curbside that are proposed to serve Terminal 2 in the Airport Implementation Plan.</p> <p>No scenic resources are visible from any of the views in the photographs that look toward the Airport and Henderson Avenue. The proposed expansion is consistent with existing airport facilities, and therefore would not create an adverse visual impact to the MCRDSD Historic District. This information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR.</p>



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

November 6, 2007

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NOV 13 2007

PLANNING DEPT #44

Mr. Ted Anasis, AICP  
Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, California 92138

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE AIRPORT MASTER PLAN, SAN DIEGO INTERNATIONAL AIRPORT (NORTH HARBOR DRIVE), SDCRAA # EIR-06-01 PROJECT, CITY OF SAN DIEGO, SAN DIEGO COUNTY (SCH#2005091105)

Dear Mr. Anasis:

The Department of Toxic Substances Control (DTSC) has received your submitted Public Notice of Availability of a draft Environmental Impact Report (EIR) with an Executive Summary, EIR, Appendices and supporting documents for the above-mentioned project. The following project description is stated in your document: "The San Diego International Airport Master plan includes the development and operation of the following major project components: existing Terminal 2 West with 10 new jet gates; construct new aircraft parking apron; construct new apron and aircraft taxilanes; construct new second-level roadway and departure curb serving Terminal 2; and construct a new parking structure. A project description and site plans describing project components are included in the Draft EIR." DTSC sent comments to SDCRAA on your above-mentioned project on October 24, 2004 and June 12, 2006. DTSC repeats those comments; please address if applicable.

- 1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances. 1
- 2) The EIR should identify the known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies: 2
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information. 3
- 4) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. 4

- 5) Your document states in Section 5.15 Hazards and Hazardous Materials the following information: "Table 5.15.2 Sites and Facilities Reported or with the Potential to Contain Hazardous Wastes or Environmental Contamination in the Vicinity of SDIA. Former Naval Training Center Inactive Landfill. Former Rental Car Facility Fuel Farm. Former Lindbergh Field Fuel Farm. Former US Air Hangar and Maintenance Facility. Former Teledyne-Ryan Facility. Airport Fuel Farm. Former Lindbergh Field Live-Fire Training Facility. Former General Dynamics (Lindbergh Field Plant) Facility. General Approach and Methodology. Regulatory Framework. Environmental Setting. Level of Significance after Mitigation Measures. "Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports should be included in the EIR. 5
- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property. 6
- 7) If buildings, other structures, or associated uses; asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies. 7
- 8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. 8
- 9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment (i.e. Section 5.16 Human Health Risk Assessment) overseen and approved by the appropriate government agency 9

and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

- |     |   |    |
|-----|---|----|
| 10) | If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).   | 10 |
| 11) | If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility. | 11 |
| 12) | If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.   | 12 |
| 13) | Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.  | 13 |
| 14) | If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).   | 14 |
| 15) | If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.   | 15 |
| 16) | If the site was used for agricultural, cattle ranching or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.                | 16 |
| 17) | Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an  |    |

Mr. Ted Anasis, AICP  
November 6, 2007  
Page 5

Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

17

- 18) In future CEQA documents please provide complete contact information, including contact person information, contact fax and e-mail address, and agency web address which contains the project information. Also, if the project title changes, please provide historical project title(s).

18

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, preferably at email: [thom@dtsc.ca.gov](mailto:thom@dtsc.ca.gov) or (714) 484-5477.

Sincerely,



Greg Holmes  
Unit Chief  
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
1001 I Street, 22nd Floor, M.S. 22-2  
Sacramento, California 95814

CEQA#1891

<b>State of California Department of Toxic Substance Control</b>		Signed by: Greg Holmes, Unit Chief, Southern California Cleanup Operations Branch- Cypress Office
Subject:	Notice of availability of a draft environmental impact report for the Airport Master Plan, San Diego International Airport (North Harbor Drive), SDCRAA # EIR-06-01 Project, City of San Diego, San Diego County (SCH#2005091105)	
Comment: 1	Subject:	Response:
The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.		Section 5.15.4 of the EIR contains information pertaining to the current and historic uses of the project site that have (or have the potential to have) resulted in the release of hazardous wastes/substances.
Comment: 2	Subject:	Response:
<p>The EIR should identify the known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:</p> <ul style="list-style-type: none"> <li>-National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S. EPA)</li> <li>-Envirostor (formerly CalSites): A database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below)</li> <li>-Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by the U.S. EPA</li> <li>-Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S. EPA</li> <li>-Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.</li> <li>-Leaking Underground Storage Tanks (LUST)/Spills, Leaks Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.</li> <li>-Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.</li> <li>-The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS)</li> </ul>		The EIR contains a listing and summary information of sites within the Project area that are known (or have the potential to have) environmental contamination and whether these conditions may pose a threat to human health or the environment. See Section 5.15.4. These sites were identified using the information available from the database listed.
Comment: 3	Subject:	
The EIR should identify the mechanism to initiate any required		Comment noted: First, the EIR contains a summary listing of all the

<p>investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No. 17 below for more information.</p>	<p>sites in the vicinity of SDIA that are known (or have the potential) to have environmental contamination and/or require further investigation or remediation. Second, all further and necessary investigations will be conducted prior to site remediation and development. (In some cases, it may be more cost-effective and environmentally sound to conduct the remediation during the site development.) Third, all activities involving sites with environmental contamination will be coordinated with the appropriate governmental agencies. In accordance with Health &amp; Safety Code Section 101480-101490 and the policies of the County of San Diego Department of Environmental Health (DEH), the Authority will apply for regulatory oversight by DEH in those instances where no investigation, remediation, or regulatory oversight is currently underway.</p>
<p>Comment:4      Subject:</p>	
<p>All environmental investigations sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table.</p>	<p>All environmental investigations (including sampling and/or remediation) will be conducted under a Work Plan that has been properly approved.</p> <p>The EIR contains a summary listing of all the sites in the vicinity of SDIA that are known to have environmental contamination. This information was obtained through environmental investigations (including Phase I/II Environmental Site Assessment Investigations) among other resources, which are referenced in the EIR. Because the sampling results from these investigations are so voluminous, the findings from these investigations are summarized in the EIR, Section 5.15.4.</p>
<p>Comment: 5      Subject:</p>	
<p>Your document states in Section 5.15 Hazards and Hazardous Materials the following information: "Table 5.15.2 Sites and Facilities Reported or with the Potential to Contain Hazardous Wastes or Environmental Contamination in the Vicinity of SDIA. Former Naval Training Center Inactive Landfill. Former Rental Car Facility Fuel Farm. Former Lindbergh Field Fuel Farm. Former US Air Hangar and Maintenance Facility. Former Teledyne-Ryan Facility. Airport Fuel Farm. Former Lindbergh Field Live-Fire Training Facility. Former General Dynamics (Lindbergh Field Plant) Facility. General Approach and Methodology. Regulatory Framework. Environmental Setting. Level of Significance after Mitigation Measures." Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new</p>	<p>All necessary environmental investigations, sampling and remedial actions will be approved and overseen by the proper regulatory agencies and will be conducted prior to the development of any construction. Resource Conservation &amp; Recovery Act 42 U.S.C. §§6901-6992k. California Integrated Waste Management Board Title 27 California Code of Regulations.</p> <p>The EIR contains summary listings and descriptions of all closure, certifications, and remediation approval reports for the study area. See Table 5-15.2.</p>

development or any construction. All closure, certification or remediation approval reports should be included in the EIR.		
Comment: 6	Subject:	
If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.		Comment noted. The EIR contains a summary listing of all the sites in the vicinity of SDIA that are known to have environmental contamination.
Comment 7	Subject:	
If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.		Comment noted. The EIR contains a summary listing of all the sites in the vicinity of SDIA that are known to have environmental contamination.
Comment: 8	Subject:	
The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.		Comment noted and these soil sampling precautions will be adopted and incorporated into all site sampling and remediation Work Plans. Resource Conservation & Recovery Act 42 U.S.C. §§6901-6992k. California Integrated Waste Management Board Title 27 California Code of Regulations.
Comment: 9	Subject:	
Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment (i.e. Section 5.16 Human Health Risk Assessment) overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.		The Health Risk Assessment (Section 5.16) of sensitive receptors (these included residences, schools, workers, and recreational locations) has thus far found no significant or adverse health impact on sensitive receptors within the area surrounding the Airport.
Comment: 10	Subject:	
If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste		Comment noted and the site/building tenants of the proposed projects will be obligated to adhere to all federal, state and local regulations pertaining to the generation, storage and disposal of hazardous wastes.

Control Regulations (California Code of Regulations, Title 22, Division 4.5)		
Comment: 11	Subject:	
If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.		Comment noted (see response to your Comment #10.)
Comment: 12	Subject:	
If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.		Comment noted (see response to your Comment #10.)
Comment: 13	Subject:	
Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.		Comment noted (see response to your Comment #10.)
Comment: 14	Subject:	
If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit for the overseeing Regional Water Quality Control Board (RWQCB).		Comment noted and SDIA operates under SWRCB Water Quality, NPDES General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities, generally referred to as the General Industrial Storm Water Permit. Under the General Industrial Storm Water Permit, SDIA is required to control and eliminate sources of pollution in storm water through development and implementation of a SWPPP. Any modifications to the NPDES permit necessary to implement the Proposed Project will be obtained from the RWQCB prior to any permitted wastewater discharge.
Comment: 15	Subject:	
If during construction/demolition of the project, the soil and/or ground water contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.		Comment noted.
Comment: 16	Subject:	
If the site was used for agricultural, cattle ranching or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, of necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.		The areas of the planned improvements to SDIA have never been used for agriculture, cattle ranching or related activities. See Appendix F for history of the SDIA site.

Comment: 17	Subject:	
<p>Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see <a href="http://www.dtsc.ca.gov/SiteCleanup/Brownfiles">www.dtsc.ca.gov/SiteCleanup/Brownfiles</a>, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VAC.</p>		<p>Comment noted. (See also response to your Comment #5)</p>
Comment: 18	Subject:	
<p>In future CEQA documents please provide complete contact information, including contact person information, contact fax and email address, and agency web address which contains the project information. Also, if the project title changes, please provide historical project title(s).</p>		<p>Comment noted; future CEQA documents produced by the SDCRAA will include the information requested.</p>



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

November 29, 2007

RECEIVED

DEC 03 2007

PLANNING DEPT. #44

Mr. Ted Anasis, AICP  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, California 92138-2776

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR SAN DIEGO  
INTERNATIONAL AIRPORT MASTER PLAN PROJECT (SCH# 2005091105)

Dear Mr. Anasis:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a Supplemental EIR for the above-mentioned project. The following project description is stated in your document: "The San Diego International Airport Master Plan includes the development and operation of the following major project components: expand existing Terminal 2 West with 10 new jet gates; construct new aircraft parking apron; construct new apron and aircraft taxi-lanes; construct new second-level roadway and departure curb serving Terminal 2; and construct a new parking structure."

Based on the review of the submitted document DTSC has the following comments:

- 1) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table. 1
- 2) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the 2

- contaminants should be remediated in compliance with California environmental regulations and policies.
- 3) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. 3
  - 4) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented. 4
  - 5) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA. 5
  - 6) In future CEQA documents please provide the contact person's e-mail address. 6

If you have any questions regarding this letter, please contact Ms. Eileen Khachatourians, Project Manager, at (714) 484-5349 or email at [EKhachat@dtsc.ca.gov](mailto:EKhachat@dtsc.ca.gov).

Sincerely,



Greg Holmes  
Unit Chief  
Southern California Cleanup Operations Branch - Cypress Office

cc: See next page

Mr. Ted Anasis  
November 29, 2007  
Page 3

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
1001 I Street, 22<sup>nd</sup> Floor, M.S. 22-2  
Sacramento, California 95814

CEQA# 1923

<b>State of California Department of Toxic Substances Control</b>		Signed by: Greg Holmes, Unit Chief, Southern California Cleanup Operations Branch- Cypress Office
Subject:	Draft Environmental Impact Report (EIR) for San Diego International Airport Master Plan Project (SCH# 2005091105)	
Comment: 1	Subject: Sample Procedures	Response
All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.		See response to State of California Department of Toxic Substance Control (DTSC) Comment # 4.
Comment 2	Subject: Demolition Procedures	Response
If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.		See response to State of California Department of Toxic Substance Control (DTSC) Comment # 7.
Comment 3	Subject: Soil excavation/importing	Response
The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.		See response to State of California Department of Toxic Substance Control (DTSC) Comment # 8.
Comment 4	Subject: Contamination	Response
If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.		See response to State of California Department of Toxic Substance Control (DTSC) Comment # 15.
Comment5	Subject: EOAs and VCAs	Response
Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for		See response to State of California Department of Toxic Substance Control (DTSC) Comment # 17.

private parties. For additional information on the EOA please see <a href="http://www.dtsc.ca.gov/SiteCleanup/Brownfiles">www.dtsc.ca.gov/SiteCleanup/Brownfiles</a> , or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VAC.		
Comment 6	Subject: Future contact Information	Response
In future CEQA documents please provide the contact person's e-mail address.		Comment noted.

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 904-5200  
FAX (415) 904-5400



December 11, 2007

RECEIVED

DEC 17 2007

PLANNING DEPT. #44

Ted Anasis, AICP  
Manager, Airport Planning  
San Diego County Regional Airport Authority  
ATTN: Paul Webb  
P.O. Box 82776  
San Diego, CA 92138-2776

Subject: October 2007 Draft Environmental Impact Report for the Airport Master Plan for San Diego International Airport

Dear Mr. Anasis:

The Coastal Commission federal consistency staff received the above-referenced document and submits the following comments. In September 2006 the Commission staff submitted comments on the May 2006 version of the Draft EIR for the Airport Master Plan. It is our understanding that the only substantive difference between the 2006 and 2007 documents is the change in the planning horizon from 2015 to 2030. As such, the Commission is re-submitting our September 14, 2006, letter to serve as our comments on the 2007 Draft EIR.

1

Sincerely,

Larry Simon  
Federal Consistency Coordinator

Enclosure

cc: CCC – San Diego Coast District

## CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 904-5200  
FAX (415) 904-5400



September 14, 2006

Ted Anasis, AICP  
Manager, Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Subject: Draft Environmental Impact Report (DEIR) for the Airport Master Plan for San Diego International Airport

Dear Mr. Anasis:

The Coastal Commission federal consistency staff conducted a brief review of the above-referenced document for San Diego International Airport and submits the following comments. The DEIR evaluates the proposed Airport Master Plan, which consists of two elements: the Airport Land Use Plan and airport facility improvement projects designed to meet forecast air traffic demand through 2015. The Land Use Plan is a policy document that describes the boundaries of and the land uses on the airport. The proposed improvement projects include (but are not limited to) expansion of Terminal 2 West with ten new jet gates, construction of new aircraft parking aprons and aircraft taxilanes, reconstruction of Taxiway C and construction of a new taxiway east of Taxiway D, construction of a new parking structure and a surface parking lot, and construction of new general aviation facilities.

The DEIR states that one or more of these projects may require additional environmental review and approvals from government agencies. The DEIR states on page 5.10-1 that:

*In accordance with the Coastal Act and Airport Authority Act, SDCRAA will seek Coastal Development Permits (if necessary) for the proposed developments at SDIA that would follow adoption of the plan (e.g., Implementation Plan projects).*

...

*Where Coastal Development Permits are necessary, SDCRAA will apply for these directly to the Coastal Commission.*

The Commission staff agrees that that the SDCRAA will need to obtain coastal development permits from the Commission for proposed development at SDIA contemplated under the proposed Airport Master Plan.

Section 3.3 of the DEIR examines proposed federal, state, and local actions and required permits for the Airport Master Plan and states in part that:

*The proposed Federal actions include Federal Aviation Administration approval of the Airport Layout Plan showing the proposed development, and the completion of the National Environmental Policy Act documentation.*

Pursuant to the federal Coastal Zone Management Act (CZMA Section 307 (16 U.S.C. §1456), and 15 CFR Part 930 of the CZMA Federal Consistency Regulations) the Commission reviews federal activities, development projects, permits and licenses, and financial support to state and local governments for consistency with the California Coastal Management Program (CCMP) and in particular, the Chapter 3 policies of the California Coastal Act. Should the Federal Aviation Administration (FAA) propose development at SDIA in conjunction with or independent of the SDCRAA's proposed improvement projects, the FAA will need to prepare and submit to the Commission a consistency determination for such development. The FAA may also need to determine that Commission review of a consistency determination is needed in order for the FAA to complete its responsibilities under the National Environmental Policy Act for proposed development at SDIA. In addition, the SDCRAA may need to prepare and submit to the Commission a consistency certification for the FAA's approval of the aforementioned Airport Layout Plan.

3

The Commission notes that the FAA's requirement for Commission review of a consistency determination (under any of the above scenarios) may precede the SDCRAA's anticipated schedule for submitting coastal development permit applications for airport improvement projects. In a case where the FAA is proposing development (e.g., navigation aids for airport operations proposed under the Airport Master Plan), the Commission can review a consistency determination from the FAA and either concur with or object to the project, based on conformance with the CCMP. Alternatively, where the SDCRAA is seeking Commission concurrence with the FAA's approval of an Airport Layout Plan that reflects the SDCRAA's proposed Airport Master Plan, the Commission could review that consistency certification and concur in concept (if it conforms with the CCMP), acknowledging that it will subsequently review more detailed coastal development permit applications from the SDCRAA for specific improvement projects described in the Airport Master Plan.

4

The primary issues that the Coastal Commission will focus on in its review of coastal development permits, consistency determinations, and consistency certifications are biological resources, water quality, and public access. The standard of review for consistency determinations and certifications is the CCMP and in particular, the Chapter 3 policies of the Coastal Act.

Thank you for the opportunity to comment on the DEIR. Additional procedural and substantive information on the federal consistency process can be obtained at the Commission's web site, [www.coastal.ca.gov/fedcd/fedcndx.html](http://www.coastal.ca.gov/fedcd/fedcndx.html). Please contact me at (415) 904-5288 should you have

any questions regarding the federal consistency process. Please contact Diana Lilly in the Commission's San Diego Coast District Office at (619) 767-2370 for questions regarding the coastal development permit process.

Sincerely,

A handwritten signature in black ink that reads "LARRY SIMON". The letters are cursive and somewhat stylized, with the first name being more prominent.

Larry Simon  
Federal Consistency Coordinator

cc: CCC – San Diego Coast District  
FAA – San Diego

<b>State of California California Coastal Commission</b>		Signed by: Larry Simon, Federal Consistency Coordinator
Subject:	October 2007 Draft Environmental Impact Report for the Airport Master Plan for San Diego International Airport	
Comment 1	Subject: Resubmitted Comments	Response
<p>The Coastal Commission federal consistency staff received the above-referenced document and submits the follow comments. In September 2006 the Commission staff submitted comments on the May 2006 version of the Draft EIR for the Airport Master Plan. It is our understanding that the only substantive different between the 2006 and the 2007 documents is the change in the planning horizon from 2015 to 2030. As such, the Commission is re-submitting our September 14, 2006 letter to serve as our comments on the 2007 Draft EIR.</p>		<p>Comment noted; the only substantive difference between the two drafts is the Environmental Analysis extended to 2030.</p>
Comment 2	Subject: Additional Review/Approval	Response
<p>The DEIR states that one or more of these projects may require additional environmental review and approvals from government agencies. The DEIR states on page 5.10-1 that: <i>In accordance with the Coastal Act and Airport Authority Act, SDCRAA will seek Coastal Development Permits (if necessary) for the proposed developments at SDIA that would follow adoption of the plan (e.g., Implementation Plan projects)... Where Coastal Development Permits are necessary, SDCRAA will apply for these directly to the Coastal Commission.</i></p> <p>The Commission staff agrees that the SDCRAA will need to obtain coastal development permits from the Commission for proposed development at SDIA contemplated under the proposed Airport Master Plan.</p>		<p>The Commission staff's concurrence with this section of the Draft EIR is noted.</p>
Comment 3	Subject: Section 3.3	Response
<p>Section 3.3 of the DEIR examines proposed federal, state, and local actions and required permits for the Airport Master Plan and states in part that: <i>The proposed Federal actions include Federal Aviation Administration approval of the Airport Layout Plan showing the proposed development, and the completion of the National Environmental Policy Act documentation.</i> Pursuant to the federal Coastal Zone Management Act (CZMA Section 307 (16 U.S.C § 1456), and 15 CFR Part 930 of the CZMA Federal Consistency Regulations) the Commission reviews federal activities, development projects, permits and licenses, and financial support to state and local governments for consistency with the California Coastal Management Program (CCMP) and in particular, the Chapter 3 policies of the California Coastal Act. Should the Federal Aviation Administration</p>		<p>The federal Coastal Zone Management Act compliance requirements as they pertain to SDCRAA and the FAA are noted. SDCRAA will comply with applicable elements of the federal Coastal Zone Management Act and anticipates that the FAA will do the same.</p>

<p>(FAA) propose development at SDIA in conjunction with or independent of the SDCRAA's proposed improvement projects, the FAA will need to prepare an submit to the Commission a consistency determination for such development. The FAA may also need to determine that Commission review of a consistency determination is needed in order for the FAA to complete its responsibilities under the National Environmental Policy Act for proposed development at SDIA. In addition, the SDCRAA may need to prepare and submit to the Commission a consistency certification for the FAA's approval of the aforementioned Airport Layout Plan.</p>		
<p>Comment 4</p>	<p>Subject: Commission consistency determination</p>	<p>Response</p>
<p>The Commission notes that the FAA's requirements for Commission review of a consistency determination (under any of the above scenarios) may precede the SDCRAA's anticipated schedule for submitting coastal development permit applications for airport improvement projects. In a case where the FAA is proposing development (e.g., navigation aids for airport operations proposed under the Airport Master Plan), the Commission can review a consistency determination from the FAA and either concur with or object to the project, based on conformance with the CCMP. Alternatively, where the SDCRAA is seeking Commission concurrence with the FAA's approval of an Airport Layout Plan that reflects the SDCRAA's proposed Airport Master Plan, the Commission could review that consistency certification and concur in concept (if it conforms with the CCMP), acknowledging that it will subsequently review more detailed coastal development permit applications from the SDCRAA for specific improvement projects described in the Airport Master Plan.</p> <p>The primary issues that the Coastal Commission will focus on in its review of coastal development permits, consistency determinations, and consistency certifications are biological resources, water quality, and public access. The standard of review for consistency determinations and certifications is the CCMP and in particular the Chapter 3 policies of the Coastal Act.</p>	<p>The Coastal Commission's role in the development process and its anticipated focus on biological resources, water quality, and public access are noted.</p>	

**DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**

4902 Pacific Highway  
San Diego, CA 92110-4097  
(619) 220-5492  
(800) 735-2929 (TT/TDD)  
(800) 735-2922 (Voice)



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NOV 19 2007

PLANNING DEPT. #44

November 16, 2007

File No.: 645.06.12678.V5239

Mr. Ted Anasis  
Manager, Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Dear Mr. Anasis:

Re: Project SCH# 2005091105, Draft Environmental Impact Report, Airport Master Plan, San Diego International Airport.

The San Diego Area Office of the California Highway Patrol has received a Draft Environmental Impact Report (EIR) for the above entitled project. Because of our geographical proximity to the site, we have been asked by Department's Special Projects Section to assess traffic related matters that may affect our area operations.

According to your draft report, the Proposed Airport Land Use Plan may be modified or amended in the future to respond to changes in the demand for Airport facilities as identified in future passenger, operations and cargo forecasts.

Your traffic analyses were based upon anticipated conditions in the years 2010, 2015, 2020, 2025 and 2030 for the proposed project and its alternatives. Your estimated trip generation increases under three assumptions for the period from 2005 to 2010 ranged from 9400 to 9500 and if the period is extended to 2015 the range is from 24,250 to 24,400. Your report recognizes the significant impact upon I-5, I-8, SR 163 and SR 94.

In your report you propose to "Establish a Construction Coordination Office within the Ground Transportation Department." The duties of this entity are described in Attachment A, attached hereto and by this reference incorporated herein as though fully set forth. We are requesting that you specifically incorporate notification to the California Highway Patrol as a requirement of the duties of that entity. In light of the foregoing, we request that you keep our office informed of those activities which will affect the roadways under our jurisdiction.

1

We appreciate being given the opportunity of responding to your EIR. If you have any questions regarding this letter and our comments, please contact Lt. Clayton M. Carter at (619) 220-5492.

Sincerely,

CARY MCGAGIN, Captain  
Commander  
San Diego Area

cc: Special Projects Section

*Safety, Service, and Security*

## Attachment A

Establish a Construction Coordination Office within the Ground Transportation Department. This office would operate during the life of the Proposed Airport Implementation Plan construction period to coordinate deliveries, monitor traffic conditions, advise motorists about detours, congested areas, and alternative parking areas, and monitor and enforce delivery times and routes. SDIA will periodically analyze traffic conditions on designated routes during construction to evaluate and optimize the transportation system during the construction period.

This office will undertake a variety of duties, including, but not limited to:

- Inform motorists about detours, alternative parking, and congestion by use of static or changeable message signs, media announcements, airport website, airport information, roadway, radio station, etc;
- Work with police to enforce delivery times and routes, including specified truck routes;
- Establish staging areas;
- Coordinate with emergency response agencies to maintain emergency access and response times;
- Coordinate Caltrans, and city roadway projects with SDIA projects so as to minimize impacts to travel;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with neighbors to address their concerns regarding construction activity traffic;
- Analyze traffic conditions to determine the need for additional traffic controls, communication, signal modifications, lane re-striping, rerouting, etc.

Require Orientation for Construction Personnel. All construction personnel will be required through contractual means to participate in an SDIA project specific orientation that includes where to park, where staging areas are located, construction policies, delivery routes, detours, airport construction area driving protocol, etc., in addition to airport safety and security issues training.

There would be a temporary and unavoidable increase in traffic volumes on project area roadways during construction of the Proposed Airport Implementation Plan due to traffic generated by trucks hauling materials and equipment, and construction workers commuting to and from SDIA. Construction worker and truck trips were estimated by the San Diego International Airport Program Study Construction Schedule Estimation. Equipment, crews and activity durations were provided in a conceptual schedule to show how the SDCRAA would most likely complete project elements and the program in the required sequence to maintain an operating airport. This construction schedule was produced for this EIR primarily to analyze impacts to air quality from construction activities, but is also used also to analyze impacts to traffic and circulation.

The critical issue relating to project construction involves maintenance of traffic in the immediate construction zone, and handling the additional traffic related to transportation materials and crews. No construction traffic would be expected to use residential street to access SDIA. Construction workers would be expected to generate few peak hour trips because their work shifts typically start before the morning peak and end before the evening peak. All workers would

be expected to park on-site at SDIA. Construction-related truck trips that would occur while the peak numbers of employees are present would be minimal, with construction materials and equipment being hauled during off-peak hours. There would be some circumstances, for instance when concrete pours are being made to construct the parking structure, there would be up to one truck every seven minutes from 7:00 AM to 4:00 PM, or eight to nine truck trip per hour during the AM peak hour. Because these impacts are temporary, no potential significant impacts are anticipated and no mitigation measures are required. It should be noted, however, that the contractor will prepare a traffic control plan as part of construction contract in order to ensure that construction worker and truck trip are minimized during AM peak hours and will not use residential streets to access SDIA.

Because construction is a short-term activity and would be expected to follow plans and rules that minimize affects, no potential significant impacts to traffic and circulation are expected.

<b>State of California Department of California Highway Patrol</b>		Signed by: Cary McGagin, Captain Commander, San Diego Area
Subject:	Project SCH# 20050911105, Draft Environmental Impact Report, Airport Master Plan, San Diego International Airport	
Comment: 1	Subject: Duties of Ground Transportation Connection	Response
<p>In your report you propose to "Establish a Construction Coordination Office within the Ground Transportation Department." The duties of this entity are described in Attachment A, attached hereto and by this reference incorporated herein as though fully set forth. We are requesting that you specifically incorporate notification to the California Highway Patrol as a requirement of the duties of that entity. In light of the foregoing, we request that you keep our office informed of those activities which will affect the roadways under our jurisdiction.</p>		<p>Comment noted. The SDCRAA will incorporate in the files in the Construction Coordination Office, notify the California Highway Patrol as needed and keep the Department of California Highway Patrol informed about activities that will potentially affect roadways under the Department's jurisdiction.</p>

**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

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NOV 19 2007

November 9, 2007

Mr. Ted Anasis  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

**PLANNING DEPT. #44**

Dear Mr. Anasis:

San Diego International Airport Master Plan Draft Environmental Impact Report; SCH# 2005091105

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operational safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. We offer the following comments for your consideration.

The San Diego County Regional Airport Authority (SDCRAA) is updating the San Diego International Airport Master Plan to accommodate existing and future demand for air travel in the San Diego Region through 2030. The project to be evaluated consists of "two key components." The first component is the Airport Land Use Plan, a policy document which will describe four general categories of land use on the airport: airfield, terminal, ground transportation and airport support. The second component is implementation of specific projects contained in the Airport Master Plan, called the Proposed Airport Implementation Plan.

San Diego International Airport operates with a State Airport Permit issued by the Division. Detailed information regarding the Division and the State airport permit process is available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/>. For questions concerning the State airport permit process, please contact the Division's Aviation Safety Officer for San Diego County, Jeff Brown, at (916) 654-4565.

Prior to amending the State airport permit or releasing State funds for airport projects, the Division, as a responsible agency under CEQA, must be assured that the proposal is in full compliance with CEQA. The issues of primary concern to us include airport-related noise and safety impacts on the surrounding community as well as the community's potential effect on airport operations. Consideration given to the issue of compatible land uses in the vicinity of the airport should help to relieve future conflicts between the airport and its neighbors. If the master plan environmental document adequately addresses the issues associated with the master plan projects, additional environmental documentation may not be required. CEQA, Public Resources Code 21096, also requires the Caltrans Airport Land Use Planning Handbook be utilized as a resource in the preparation of environmental documents for projects within the boundaries of an airport land use compatibility plan, or if such a plan has not been adopted, within two nautical miles of an airport.

The SDCRAA has directed the formation of the Airport Land Use Compatibility Plan Technical Advisory Group to assist in the preparation of the Final Airport Land Use Compatibility Plans for the airports within San Diego County. According to the Draft Environmental Impact Report (DEIR), the SDCRAA anticipates adopting the San Diego International Airport Land Use Compatibility Plan by the year 2009.

California Public Utilities Code Section 21659 prohibits structural hazards on or near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces in accordance with the Federal Aviation Administration's Federal Aviation Regulations Part 77 "Objects Affecting Navigable Airspace."

San Diego International Airport is classified as a "noise problem airport" and operates with a "variance" from the State Noise Standards (California Code of Regulations, Title 21, Section 5000 et seq.). From the information provided in Table 5-1.5 of the DEIR, the "Preferred Alternative" will result in an increase in the number of new housing units in the 65 decibel (dB) and greater future Community Noise Equivalent Level (CNEL) contours for the airport. Table 1-5, "Summary of Impacts and Mitigation Measures" does not appear, however, to address mitigation for this increase in homes within the airport's "noise impact area" (NIA), which is the area within the airport's 65 dB CNEL contour that is composed of incompatible land uses as defined in Section 5014 of the Noise Standards. We also noted that the "Federal and State Standards" text on page 5.1-2 of the DEIR neglects to address the State Noise Standards. For questions concerning the State Noise Standards requirements, please contact the Division's Airport Noise Specialist, Betsy Eskridge, at (916) 654-5203.

3

The protection of airports from incompatible land use encroachment is vital to California's economic future. Although the need for compatible and safe land uses near airports in California is both a local and a state issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

We are interested in the airport master planning process and request copies of all future airport master plan documents. Please contact Philip Crimmins, the Division's airport master plan coordinator for San Diego County, at (916) 654-6223, if you have questions regarding the Division's participation in the master plan process.

These comments reflect the areas of concern to the Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our District 11 San Diego office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,



SANDY HESNARD  
Aviation Environmental Specialist

c: State Clearinghouse, San Diego County Regional Airport Authority

*"Caltrans improves mobility across California"*

<b>State of California Department of Transportation</b>		Signed by: Sandy Hesnard, Aviation Environmental Specialist
Subject:	San Diego International Airport Master Plan Draft Environmental Impact Report; SCH# 2005091105	
Comment: 1	Subject: Airport Land Use	Response
<p>The San Diego County Regional Airport Authority (SDCRAA) is updating the San Diego International Airport Master Plan to accommodate existing and future demand for air travel in the San Diego Region through 2030. The project to be evaluated consists of “two key components.” The first component is the Airport Land Use Plan, a policy document which will describe four general categories of land use on the airport: airfield, terminal, ground transportation and airport support. The second component is implementation of specific projects contained in the Airport Master Plan, called the Proposed Airport Implementation Plan.</p> <p>The San Diego International Airport operates with a State Airport Permit issued by the Division. Detailed information regarding the Division and the State airport process is available on-line at: <a href="http://www.dot.ca.gov/hg/planning/aeronaut/">http://www.dot.ca.gov/hg/planning/aeronaut/</a>. For questions concerning the State airport permit process, please contact the Division's Aviation Safety Officer for San Diego County.</p> <p>Prior to amending the State airport permit or releasing State funds for airport projects, the Division, as a responsible agency under CEQA, must be assured that the proposal is in full compliance with CEQA. The issues of primary concern to us include airport-related noise and safety impacts on the surrounding community as well as the community's potential effect on airport operations. Consideration given to the issue of compatible land uses in the vicinity of the airport should help to relieve future conflicts between the airport and its neighbors. If the master plan environmental document adequately addresses this issues associated with the master plan projects, additional environmental documentation may not be required. CEQA, Public Resources Code 21096, also requires the Caltrans Airport Land Use Planning Handbook be utilized as a resource in the preparation of environmental documents for projects within the boundaries of an airport land use compatibility plan, or if such a plan has not been adopted, within two nautical miles of an airport.</p>		<p>Comment noted. The SDCRAA used the Caltrans Airport Land Use Plan Handbook as a resource in preparation of the EIR.</p> <p>The SDCRAA is in the process of preparing the EIR for the amended SDIA ALUCP. The NOP was released in early 2005 and the FEIR is expected in 2009. The amended SDIA ALUCP will include the 2030 CNEL contours generated in the AMP Draft EIR. The SDIA ALUCP will speak to compatibility issues associated with operational growth that are not induced by projects considered in this EIR. This information has been added to the ALUCP discussion of the ALUCP in Section 5.2.2.2 of the FEIR. This information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR.</p> <p>Individual community plans are considered in Section 5.2 of the EIR. The forthcoming amendment to the SDIA ALUCP will also consider community plans.</p> <p>The SDCRAA is also concerned with noise and safety and has addressed the potential noise and land use impacts of the Proposed Project in Sections 5.1 and 5.2 of the EIR. The Proposed Project accommodates forecast demand and does not promote unsafe actions. As mentioned previously, the SDIA ALUCP will address compatibility issues associated with operational growth that are not induced by projects considered in this EIR. The SDIA Airport Master Plan EIR addresses CEQA Public Resources Code 21096 however the SDIA ALUCP addresses the mitigation requirements set for noise compatibility planning for land uses surrounding the airport. The SDIA ALUCP sets standards for land use compatibility related to aviation noise inclusive of sound attenuation requirements.</p>
Comment 2	Subject: Structural Hazards	Response
The SDCRAA has directed the formation of the Airport Land Use		Comment noted. The SDCRAA considered structural hazards in

<p>Compatibility Plan Technical Advisory Group to assist in the preparation of the Final Airport Land Use Compatibility Plans for the airports within San Diego County. According to the Draft Environmental Impact Report (DEIR), the SDCRAA anticipates adopting the San Diego International Airport Land Use Compatibility Plan by the year 2009. California Public Utilities Code Section 21659 prohibits structural hazards on or near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces in accordance with the Federal Aviation Administration's Federal Aviation Regulations Part 77 "Objects Affecting Navigable Airspace"</p>	<p>accordance with FAA's Part 77 Regulation in contemplation of airport improvements.</p>
<p>Comment 3      Subject: Noise</p>	<p>Response</p>
<p>San Diego International Airport is classified as a "noise problem airport" and operates with a "variance" from the State Noise Standards (California Code of Regulations, Title 21, Section 5000 et seq.). From the information provided in Table 5-15 of the DEIR, the "Preferred Alternative" will result in an increase in the number of new housing units in the 65 decibel (dB) and greater future Community Noise Equivalent Level (CNEL) contours for the airport. Table 1-5, "Summary of Impacts and Mitigation Measures" does not appear, however, to address mitigation for this increase in homes within the airport's "noise impact area" (NIA), which is the area within the airport's 65 dB CNEL contour that is composed of incompatible land uses as defined in Section 5014 of the Noise Standards. We also noted that the "Federal and State Standards" text on page 5.1-2 of the DEIR neglects to address the State Noise Standards. For questions concerning the State Noise Standards requirements, please contact the Division's Airport Noise Specialist.</p>	<p>The DEIR delineated all housing units and estimated population based on SANDAG GIS land use and 2000 census data at 5 dB CNEL intervals from 60 dB CNEL to 75 dB CNEL regardless of building sound attenuation. This meets the State Noise Standards Section 5014 (a) requirements.</p> <p>The SDCRAA is the process of amending the ALUCP for SDIA, as well as updating the Part 150. These processes will address the Airport's noise impact areas in total. The Proposed Project for the AMP does not induce operations and, therefore, the growth in noise levels can not be attributed to the Proposed Project. The ALUCP and Part 150 are the mechanisms that address overall growth in operations at an airport facility.</p>

Al Cox  
4050 Taylor Street  
San Diego, CA 92110  
Phone: 619-688-6003  
FAX: 619-688-4299  
E-mail: Al.Cox@dot.ca.gov



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PLANNING DEPT. #44

# Fax

**To:** Ted Anasis  
SDCRAA

**From:** Jacob Armstrong  
Development Review Branch  
Caltrans District 11

**Fax** (619) 400-2459

**Pages:** 4 Total

**Phone:** (619) 400-2478

**Date:** February 4, 2008

**Re:** SCH 2005091105

**CC:**

---

See attached correspondence regarding the Airport Master Plan for the San Diego International Airport

**DEPARTMENT OF TRANSPORTATION**

District 11 · 4050 Taylor Street · M.S. 240  
San Diego, CA 92110  
PHONE (619) 688-6960  
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TTY (619) 688-3214



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February 4, 2008

11-SD-005  
PM 17.53  
SCH 2005091105

Mr. Ted Anasis  
San Diego County Regional Airport Authority  
P. O. Box 82776  
San Diego, CA 92138-2776

Dear Mr. Anasis:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the Airport Master Plan (AMP) for the San Diego International Airport (SDIA). The State highways serving the airport (Interstate 5 [I-5], Interstate 8 [I-8], State Route 163 [SR-163], and others) should be regarded as both local and regional assets facilitating access and mobility needs for the entire San Diego region and SDIA. Caltrans has the following comments regarding the AMP's DEIR and the potential impacts on the State Highway system.

**Traffic Impact Analysis**

The DEIR needs to provide a map of existing streets and their access to existing freeway ramps.

1

The DEIR, Table 5-3.15-2005, Existing Freeway Ramp Operations-Existing Conditions: volumes shown on this table are lower than Caltrans' Peak Hour Demand volumes. Please explain.

2

The DEIR states that by 2015 an estimated 5.5 million travelers will use the SDIA, therefore, contributing to the traffic volumes on both the freeway ramps and main lanes. However, the DEIR is unclear how the additional traffic volumes will impact these freeway facilities. Therefore, the DEIR should include a site map for all the turning movement volumes (SDIA traffic volumes included) for all freeway ramps along I-5 and all intersecting local streets for years 2005, 2010, and 2015.

3

The DEIR should include a Ramp Intersection Capacity Analysis in terms of intersecting lane vehicles per hour (ILV/Hr.) in accordance with the Caltrans Highway Design manual Section 406. It should be understood that the proposed mitigation measure of changing the timing of the existing traffic signals on the freeway ramps will not mitigate the impact caused by the 5.5 million travelers that go to the SDIA. Caltrans endeavors to maintain a target Level of

4

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Ted Anasis  
February 4, 2008  
Page 2

Service (LOS) at the transition between LOS "C" and LOS "D" on Caltrans owned facilities, including intersections.

**DEIR Analysis**

The DEIR identifies a Significant Impact on Freeway Operations for the proposed Airport Land Use Plan (2030). The discussion of widening I-5 as a potential mitigation measure does not provide a full analysis of potential I-5 related improvements and comes to the sole conclusion that "...widening the freeway by one lane in one direction could reduce densities by as much as 20%, as shown in Table 5-3.120. Freeway widening is therefore more than necessary to mitigate the freeway impacts associated with the Proposed Airport Land Use Plan" (Page 5.3-171).

5

The widening of I-5 as the sole mitigation in the DEIR is not a sufficient or acceptable analysis. The EIR should describe feasible measures which could minimize significant adverse impacts. Caltrans recommends the San Diego County Regional Airport Authority (SDCRAA) incorporate into the DEIR recommendations from the Airport Transit/Roadway Committee and the Central I-5 Corridor Study. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time (CEQA Guidelines 15126.4).

6

There are also no transit mitigation measures identified. Caltrans encourages the SDCRAA to examine a reasonable range of alternatives such as other modes to and from the airport. This includes a full array of ground transportation alternatives linking the SDIA with the surrounding transportation network to help mitigate the impacts the proposed AMP will have on the regional transportation system. The DEIR should include a comprehensive set of effective mitigation measures that includes, but not limited to; Transportation Systems Management strategies (TSM) and SDIA access improvements for buses, taxis, and vanpools.

7

The mitigation measures in the EIR should take the form of a reasonable attempt to implement the freeway and transit improvements identified in the Regional Transportation Plan (RTP). The RTP calls for direct ramps from I-5 to Pacific Highway, and exclusive bus/HOV lanes between Old Town Transit Center and the airport. These improvements in the RTP are based upon previous studies, including the 2003 Airport Transit Access Study, the Central I-5 Corridor Study, and recommendations from the Airport Transit/Roadway Committee. The EIR should include the improvements and alternatives in these studies as part of its analysis in the EIR.

8

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Ted Anasis  
February 4, 2008  
Page 3

**Mitigation Measures**

Caltrans does not agree with the DEIR's findings that affected agency's facilities impacted by the AMP are the sole responsibility and jurisdiction of said agency and not the responsibility of the SDCRAA. The SDCRAA should work with Caltrans, City of San Diego, the San Diego Association of Governments (SANDAG) and others, in examining alternatives and funding solutions to mitigate for transportation impacts created by the growth of the SDIA.

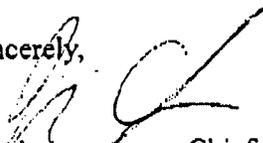
The *City of Marina* case clearly states that "each public agency shall mitigate or avoid the significant effects on the environment of projects that is carries out or approves whenever it is feasible to do so" (*Marina* p. 360). While the Supreme Court did indicate that public agencies sometimes cannot spend money if it has not been appropriated, as well as the certain limitations on the expenditure of public funds, there is still a duty to ask for the funds to perform the required mitigation as part of the project funding package and/or identify which funds may be eligible.

9

While it is understood the Airport Authority operates under provisions required by certain Federal Aviation Administration (FAA) grant assurances that restrict the use of airport funds outside of the airport boundaries, the FAA has indicated that they are willing to consider whether or not the use of airport revenue may be permitted for certain off-airport transportation mitigation measures that provide direct access to the airport. However, the FAA's determination will not be known until a final, approved mitigation package is available for discussion with the FAA (Mitigation Measure 5.3.8 AMP DEIR). While we appreciate this language in the DEIR, it is imperative that the appropriate mitigation proposals be identified through the analysis and included in the Final EIR in order to facilitate such future discussions with the FAA. In addition, the SDCRAA should identify funding received from non-FAA sources that may be eligible for off-airport mitigation.

The Airport Authority has been very cooperative and active in meeting with Caltrans representatives. We appreciate the opportunity to be involved in the Master Plan process and look forward to continuing cooperation with the SDCRAA in coordinating land use and transportation issues associated with the AMP. If you have questions regarding Caltrans comments, please contact me at (619) 688-6960.

Sincerely,



Jacob Armstrong, Chief  
Development Review Branch

- c: Miriam Kirshner, San Diego Association of Governments
- Labib Qasem, City of San Diego, Development Services Dept.
- Scott Morgan, State Clearinghouse

*"Caltrans improves mobility across California"*

<b>State of California California Department of Transportation</b>		Signed by: Jacob Armstrong, Chief Development Review Branch
Subject:	San Diego International Airport Master Plan Draft Environmental Impact Report	
Comment: 1	Subject: Provide Map	Response
The DEIR needs to provide a map of existing streets and their access to existing freeway ramps.		Figure 5.3-1 provides a diagram of the existing streets and freeway ramps.
Comment 2	Subject: Table 5-3.14-2005	Response
The DEIR, Table 5-3.15-2005, Existing Freeway Ramp Operations- Existing Conditions: volumes shown on this table are lower than Caltrans' Peak Hour Demand Volumes. Please Explain.		Freeway ramp volumes for 2005, <i>Existing Conditions</i> , are based on SANDAG Series 10 model data. The SANDAG model data was post processed as described in Section 5.3.1.1, to remove SANDAG model estimates of airport traffic that were based on the 2000 SDIA air passenger forecasts. Then the revised airport traffic volumes were calculated based on the FAA approved 2004 SDIA air passenger forecasts and added to the background volumes. As a result, the volumes may vary slightly from Caltrans' volumes. During preparation of the DEIR, Caltrans provided average daily traffic (ADT) volumes for each ramp in the study area; however, the ramp meter analysis shown in Table 5-3.15 is based on peak hour volumes.
Comment 3	Subject: Contributing Traffic Volumes	Response
The DEIR states that by 2015 an estimated 5.5 million travelers will use the SDIA, therefore, contributing to the traffic volumes on both the freeway ramps and main lanes. However, the DEIR is unclear how the additional traffic volumes will impact these freeway facilities. Therefore, the DEIR should include a site map for all the turning movement volumes (SDIA traffic volumes included) for all freeway ramps along I-5 and all intersecting local streets for years 2005, 2010, and 2015.		In 2015 under both the Proposed Airport Implementation Plan and No Project Alternatives, 22.8 million annual passengers are forecast to use SDIA (see Tables 5-3.18 and 5-3.81). Future freeway ramp and mainline volumes under the Proposed Airport Implementation Plan are presented in Tables 5-3.27 and 5.3-28 and compared to volumes under the No Project Alternative. Intersection lane configurations are depicted in Figure 5.3-4, turning movement volumes and operations under the Proposed Implementation Plan are presented in Tables 5-3.22 through 5-3.25, and a breakout of airport traffic and background traffic at each intersection are provided in Tables D-42 through D-52 in Appendix D. In addition, Figure 5.3-5 has been updated, in cooperation with Caltrans staff, to identify each intersection by number corresponding to the above referenced tables and depicts the direction of turning movements for each intersection.
Comment 4	Subject:	Response
The DEIR should include a Ramp Intersection Capacity Analysis in terms of intersecting lane vehicles per hour (ILV/Hr.) in accordance with the Caltrans Highway Design manual Section 406. It should be understood that the proposed mitigation measure of changing the timing of the existing traffic signals on the freeway ramps will not mitigate the impact caused by the 5.5 million travelers that go to the SDIA. Caltrans		At Caltrans request, SDCRAA has conducted the attached ILV/Hr analysis for each signalized ramp intersection located within the Study Area. Note that the FEIR uses the more precise Highway Capacity Manual (HCM) methodology to assess traffic impacts and the ILV/Hr analysis is provided for informational purposes only.

<p>endeavors to maintain a target Level of Service (LOS) at the transition between LOS “C” and LOS “D” on Caltrans owned facilities, including intersections.</p>	<p>In 2015 under both the Proposed Airport Implementation Plan and No Project Alternatives, 22.8 million annual passengers are forecast to use SDIA (see Tables 5-3.18 and 5-3.81). The EIR Section 5.3.5.2 presents the traffic impact analysis for the proposed project and EIR Section 5.3.8.4 discusses potential impacts and proposed mitigation for freeway ramps. No significant impacts to metered freeway ramps would result from development of the proposed project (either the Proposed Airport Implementation Plan or Airport Land Use Plan).</p> <p>The SDCRAA understands that Caltrans endeavors to maintain a target Level of Service at the transition between LOS “C” and LOS “D” on Caltrans-owned facilities. All potential impacts to freeway ramp intersections along with mitigation measures are identified in Section 5.8.</p>	
<p>Comment 5</p>	<p>Subject: Table 5-3.120</p>	<p>Response</p>
<p>The DEIR identifies a Significant Impact on Freeway Operations for the proposed Airport Land Use Plan (2030). The discussion of widening I-5 as a potential mitigation measure does not provide a full analysis of potential I-5 related improvements and comes to the sole conclusion that “...widening the freeway by one lane in one direction could reduce densities by as much as 20%, as shown in Table 5-3.120. Freeway widening is therefore more than necessary to mitigate the freeway impacts associated with the Proposed Airport Land Use Plan” (Page 5.3-171)</p>	<p>See response to your Comment #6.</p>	
<p>Comment 6</p>	<p>Subject: Widening I-5 as Mitigation</p>	<p>Response</p>
<p>The widening of I-5 as the sole mitigation in the DEIR is not as sufficient or acceptable analysis. The EIR should describe feasible measures which could minimize significant adverse impacts. Caltrans recommends the San Diego County Regional Airport Authority (SDCRAA) incorporate into the DEIR recommendations from the Airport Transit/Roadway Committee and the Central I-5 Corridor Study. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time (CEQA Guidelines 15126.4)</p>	<p>The widening of I-5 is identified in the EIR because it is the primary mitigation measure that can be quantified to fully mitigate all impacts to the freeway segments under the Airport Land Use Plan and was identified as a recommendation in the <i>2003 Central Interstate 5 Corridor Study</i> led by SANDAG and Caltrans. However, the SDCRAA acknowledges that freeway widening is complex and additional alternatives that may reduce but not fully mitigate all impacts to the freeway network should be explored.</p> <p>During discussions with Caltrans staff, recommendations from the Central I-5 Freeway study were reviewed. Recommended Alternative E, I-5 freeway ramps from Old Town Avenue to Pacific Highway, was determined to have the potential to provide benefits to freeway segments impacted by the Proposed Land Use Plan. As shown in Section 5.3.8, this improvement would improve conditions on the NB and SB section of I-5 from Old Town Avenue to Washington Street and</p>	

		<p>mitigate the potentially significant impact on the NB section during the PM period to No Project conditions. Additional segments of I-5 will still experience potentially significant impacts with the implementation of I-5 freeway ramps. Those impacts could be mitigated with freeway widening discussed in Section 5.3.8.</p> <p>Also note that because the Airport Land Use Plan is considered on a program level in this EIR, the SDCRAA will undertake additional environmental review on specific projects generalized in the Airport Land Use Plan as those projects are moved forward for planning and design.</p>
Comment 7	Subject: No Transit Mitigations	Response
<p>There are also no transit mitigation measures identified. Caltrans encourages the SDCRAA to examine a reasonable range of alternatives such as other modes to and from the airport. This includes a full array of ground transportation alternatives linking the SDIA with the surrounding transportation network to help mitigate the impacts the proposed AMP will have on the regional transportation system. The DEIR should include a comprehensive set of effective mitigation measures that includes, but not limited to; Transportation Systems Management strategies (TSM) and SDIA access improvements for buses, taxis, and vanpools.</p>		<p>See response to General Comment #9.</p>
Comment 8	Incorporating RTP mitigation measures	Response
<p>The mitigation measures in the EIR should take the form of a reasonable attempt to implement the freeway and transit improvements identified in the Regional Transportation Plan (RTP). THE RTP calls for direct ramps from I-5 to Pacific Highway, and exclusive but/HOV lanes between Old Town Transit Center and the airport. These improvements in the RTP are based upon previous studies, including the 2003 Airport Transit Access Study, the Central I-5 Corridor Study, and recommendations from the Airport Transit/Roadway Committee. The EIR should include the improvements and alternatives in these studies as part of its analysis in the EIR.</p>		<p>In response to Caltrans' request, the SDCRAA has evaluated specific recommendations from the 2003 Central I-5 Corridor Study. SDCRAA evaluated the potential benefit of providing direct ramps from I-5 at Old Town Avenue to Pacific Highway as a freeway segment improvement (the Central I-5 Corridor Study Recommended Improvement Alternative E). This has been added to Section 5.3.8 as potential mitigation for impacts resulting from the Airport Land Use Plan. See response to your Comment #6.</p> <p>The Airport Land Use Plan provides a dedicated transit corridor along Pacific Highway from Washington Street to the South terminals and the traffic analysis assumes public transit vehicles and parking/rental car shuttles from the CONRAC would use this corridor. <i>Central I-5 Corridor Study</i> recommended Alternative B, Pacific Highway Viaduct, which was not included in the mitigation analysis, as it would allow traffic to I-5 South and from I-5 North, south of the Airport, to use the Pacific Highway Viaduct, potentially extending freeway impacts north of Hawthorn.</p>

Comment 9	Responsibility of mitigation	Response
	<p>Caltrans does not agree with the DEIR’s findings that affected agency’s facilities impacted by the AMP are the sole responsibility and jurisdiction of said agency and not the responsibility of the SDCRAA. The SDCRAA should work with Caltrans, City of San Diego, the San Diego Association of Governments (SANDAG) and others, in examining alternative and funding solutions to mitigate for transportation impacts created by the growth of the SDIA.</p> <p>The <i>City of Marina</i> case clearly states that “each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so” (<i>Marina p 360</i>). While the Supreme Court did indicate that public agencies sometimes cannot spend money if it has not been appropriated, as well as the certain limitations on the expenditure of public funds, there is still a duty to ask for the funds to perform the required mitigation as part of the project funding package and/or identify which funds may be eligible.</p> <p>While it is understood the Airport Authority operates under provisions required by certain Federal Aviation Administration (FAA) grant assurances that restrict the use of airport funds outside of the airport boundaries, the FAA has indicated that they are willing to consider whether or not the use of airport revenue may be permitted for certain off-airport transportation mitigation measures that provide direct access to the airport. However, the FAA’s determination will not be known until a final, approved mitigation package is available for discussion with the FAA (Mitigation Measure 5.3.8 AMP DEIR). While we appreciate this language in the DEIR, it is imperative that the appropriate mitigation proposals be identified through the analysis and included in the Final EIR in order to facilitate such future discussions with the FAA. In addition, the SDCRAA should identify funding received from non-FAA sources that may be eligible for off-airport mitigation.</p>	<p>As described in Section 5.3.8 of the Draft EIR, roadway segments, intersections and arterial roadways in the project area are within the responsibility and jurisdiction of the City and not the SDCRAA. Freeway ramps and operations in the project area are within the responsibility and jurisdiction of Caltrans and not the SDCRAA. Although the SDCRAA does not have the authority to impose mitigation measures affecting transportation and circulation facilities within the responsibility and jurisdiction of another public agency, SDCRAA would coordinate with the City and Caltrans in implementing necessary mitigation measures and recommends that the following mitigation measures be considered as results of future regional growth. While the Airport Authority operates under strict provisions required by certain FAA grant assurances that restrict the use of airport funds outside of the airport boundaries. See Policy and Procedures Concerning the Use of Airport Revenue, 64 Fed. Reg. 7679 et seq. (Feb 16, 1999). However, the FAA has indicated that they are willing to consider whether or not the use of airport revenue may be permitted for funding certain off-airport transportation mitigation measures that provide direct access to the airport. If the City or Caltrans take action to approve and implement the road and freeway improvements identified, the SDCRAA will coordinate with the FAA to identify off-airport improvements that are eligible to utilize airport revenues. See Response to General Comment #5.</p>

**SAN AMP EIR TIS  
ILV ANALYSIS SUMMARY**

Intersection	Peak Hr	2010 No Project				2015 No Project				2030 No Project			
		Caltrans ILV		HCM		Caltrans ILV		HCM		Caltrans ILV		HCM	
		ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS
1. Grape & I-5 SB On-Ramp	AM	689	Stable Flow	11.1	B	757	Stable Flow	8.9	A	1,128	Stable Flow	15.1	B
	PM	1,409	Unstable Flow	28.6	C	1,528	Stop & Go	35.2	D	2,337	Stop & Go	87.1	F
2. Hawthorne & I-5 NB Off-Ramp	AM	892	Stable Flow	11.1	B	917	Stable Flow	10.6	B	1,121	Stable Flow	15.3	B
	PM	564	Stable Flow	11.8	B	586	Stable Flow	12.0	B	717	Stable Flow	11.0	B
3. Washington St & SanDiego Ave	AM	502	Stable Flow	12.5	B	534	Stable Flow	13.1	B	656	Stable Flow	15.0	B
	PM	697	Stable Flow	13.6	B	752	Stable Flow	14.1	B	757	Stable Flow	16.8	B
4. Washington St & Hancock St	AM	482	Stable Flow	27.8	C	503	Stable Flow	28.1	C	388	Stable Flow	25.9	C
	PM	829	Stable Flow	30.2	C	797	Stable Flow	30.8	C	622	Stable Flow	28.0	C
5. Washington St & Pacific Hwy SB-Ramps	AM	307	Stable Flow	12.6	B	340	Stable Flow	12.7	B	556	Stable Flow	12.4	B
	PM	604	Stable Flow	14.9	B	657	Stable Flow	15.1	B	1,137	Stable Flow	17.4	B
6. Washington St & Pacific Hwy NB-Ramps	AM	428	Stable Flow	33.5	C	512	Stable Flow	46.7	D	349	Stable Flow	31.1	C
	PM	678	Stable Flow	67.7	E	817	Stable Flow	107.8	F	511	Stable Flow	79.3	E

Intersection	Peak Hr	2010 Project (With Garage)				2015 Project (With Garage)				2030 Project (With Garage)			
		Caltrans ILV		HCM		Caltrans ILV		HCM		Caltrans ILV		HCM	
		ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS
1. Grape & I-5 SB On-Ramp	AM	687	Stable Flow	11.1	B	755	Stable Flow	10.8	B	1,139	Stable Flow	15.3	B
	PM	1,406	Unstable Flow	28.3	C	1,524	Stop & Go	34.7	C	2,350	Stop & Go	90.1	F
2. Hawthorne & I-5 NB Off-Ramp	AM	891	Stable Flow	11.0	B	915	Stable Flow	10.6	B	1,131	Stable Flow	16.0	B
	PM	563	Stable Flow	11.8	B	584	Stable Flow	12.0	B	723	Stable Flow	11.1	B
3. Washington St & SanDiego Ave	AM	503	Stable Flow	12.5	B	534	Stable Flow	13.1	B	657	Stable Flow	14.9	B
	PM	697	Stable Flow	13.6	B	765	Stable Flow	14.1	B	759	Stable Flow	16.8	B
4. Washington St & Hancock St	AM	461	Stable Flow	27.8	C	504	Stable Flow	28.1	C	390	Stable Flow	25.9	C
	PM	793	Stable Flow	30.2	C	858	Stable Flow	30.8	C	625	Stable Flow	28.0	C
5. Washington St & Pacific Hwy SB-Ramps	AM	308	Stable Flow	12.6	B	341	Stable Flow	12.7	B	561	Stable Flow	12.5	B
	PM	605	Stable Flow	14.9	B	657	Stable Flow	15.1	B	1,105	Stable Flow	17.6	B
6. Washington St & Pacific Hwy NB-Ramps	AM	428	Stable Flow	33.5	C	512	Stable Flow	46.9	D	144	Stable Flow	21.2	C
	PM	679	Stable Flow	68.5	E	818	Stable Flow	100.5	F	518	Stable Flow	79.8	E

Intersection	Peak Hr	2005 Existing Condition				2015 Land Use Plan				2030 Land Use Plan			
		Caltrans ILV		HCM		Caltrans ILV		HCM		Caltrans ILV		HCM	
		ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS	ILV/Hr	Operating Level	Delay (sec)	LOS
1. Grape & I-5 SB On-Ramp	AM	589	Stable Flow	13.7	B	804	Stable Flow	10.4	B	1,191	Stable Flow	15.4	B
	PM	1,193	Stable Flow	31.3	C	1,615	Stop & Go	48.9	D	2,445	Stop & Go	113.0	F
2. Hawthorne & I-5 NB Off-Ramp	AM	793	Stable Flow	52.3	D	967	Stable Flow	21.4	C	1,184	Stable Flow	22.5	C
	PM	508	Stable Flow	20.9	C	647	Stable Flow	18.3	B	788	Stable Flow	10.8	B
3. Washington St & SanDiego Ave	AM	475	Stable Flow	12.3	B	709	Stable Flow	13.3	B	674	Stable Flow	15.2	B
	PM	662	Stable Flow	13.3	B	775	Stable Flow	14.0	B	771	Stable Flow	16.6	B
4. Washington St & Hancock St	AM	471	Stable Flow	22.9	C	509	Stable Flow	27.8	C	428	Stable Flow	26.0	C
	PM	821	Stable Flow	26.0	C	865	Stable Flow	30.6	C	630	Stable Flow	27.7	C
5. Washington St & Pacific Hwy SB-Ramps	AM	277	Stable Flow	20.1	C	360	Stable Flow	12.2	B	622	Stable Flow	12.8	B
	PM	552	Stable Flow	24.1	C	675	Stable Flow	15.3	B	1,155	Stable Flow	18.1	B
6. Washington St & Pacific Hwy NB-Ramps	AM	644	Stable Flow	34.7	C	503	Stable Flow	69.3	E	424	Stable Flow	54.6	D
	PM	1,263	Unstable Flow	37.0	D	853	Stable Flow	106.8	F	556	Stable Flow	81.9	F

Source: HNTB, 2008.  
San Diego International Airport

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**From:** Mehdi Rastakhiz [MRastakhiz@sandiego.gov]  
**Sent:** Wednesday, November 21, 2007 10:40 AM  
**To:** Marc Cass  
**Cc:** Airport Planning; Bobbi Salvini  
**Subject:** San Diego Airport Master Plan Draft EIR

**Attachments:** Memo to Marc Cass for San Diego Airport Draft EIR Master Plan 11 07.doc



Memo to Marc Cass  
for San Dieg...

Marc,

Attached, please find our comments for the San Diego Airport Master Plan Draft EIR.  
Please call me if you have any questions.

Thanks,  
Mehdi

RECEIVED

NOV 21 2007

PLANNING DEPT. #44

CITY OF SAN DIEGO  
MAYOR JERRY SANDERS  
**MEMORANDUM**

**DATE:** November 21, 2007  
**TO:** Marc Cass, Environmental Planner, DSD  
**FROM:** Mehdi Rastakhiz, Associate Engineer, MWWD, EPM Development Section  
**SUBJECT:** San Diego Airport Master Plan Draft EIR

---

The Development Section of the Metropolitan Wastewater Department (MWWD) reviewed the draft environmental document referenced above and has the following comments:

This project will be constructed after the trash within the NTC site is removed and site is remediated. Two major City of San Diego interceptors, North Metro Interceptor Sewer gravity lines (114-inches and 96-inches) are located at the proposed project site. There is also an 18-inch VC trunk sewer within the proposed site which runs parallel to Sprunce Road. The Scope of Work (SOW) for the proposed landfill remediation project must be very clear as it affects the major interceptors, including the depth of excavation and depth of cover remaining on the pipe during the excavation for remediation.

1

The analysis should include the condition assessment and structural integrity evaluation of the existing interceptors; weight of the heavy equipment during construction, dynamic load calculations, shoring and construction phasing plans that demonstrates how the work will be performed to protect the interceptors and the trunk sewer and coordination for potential shut down of any upstream pump station(s). If any structural support is being proposed it has to be reviewed and approved by the MWWD Development Section and Devolvement Services Department (DSD) structural engineers. **The proposed improvement to the pipe must be compatible and meet the intent of use of the proposed airport facility.**

2

If inserting a liner is being proposed it has to be evaluated for structural support and reduction of capacity due to reduction of cross sectional area of a very large diameter pipe. Both dewatering and especially by passing the flow during the operation will be a great concern. By passing the flow has to meet the Regional Water Quality Control Board (RWQCB) requirements for complete redundancy. The report should address any other sewer pipe that is being affected.

3

If you have any questions regarding this matter, please call me at (619) 533-5155.

cc: Bobbi Salvini

<b>City of San Diego Metropolitan Wastewater Department</b>		Signed by: Mehdi Rastakhiz, Associate Engineer
Date of Letter:		Date receive:
Subject	San Diego Airport Master Plan Draft EIR	
Comment 1	Subject: Scope of Work	Response:
<p>This project will be constructed after the trash within the NTC site is removed and site is remediated. Two major City of San Diego interceptors, North Metro Interceptor Sewer gravity lines (114-inches and 96-inches) are located at the proposed project site. There is also an 18-inch VC trunk sewer within the proposed site which runs parallel to Sprunce Road. The Scope of Work (SOW) for the proposed landfill remediation project must be very clear as it affects the major interceptors, including the depth of excavation and depth of cover remaining on the pope during the excavation for remediation.</p>		<p>Comment noted; The Scope of Work for NTC Landfill Remediation Phase 2 Plans and Specifications indicates that 10 feet of cover will be maintained over the sewer lines at all times. In the event there is less than 10 feet of cover for some reason during construction, the contractor shall submit a plan for approval by the Airport Authority to protect the pipe while construction is ongoing. The Landfill Remediation work is a significant distance from the 18-inch VC trunk sewer parallel to Sprunce and no interface is anticipated.</p>
Comment 2	Subject: Proposed Improvements	Response
<p>The analysis should include the condition assessment and structural integrity evaluation of the existing interceptors; weight of the heavy equipment during construction, dynamic load calculations, shoring and construction phasing plans that demonstrates how the work will be performed to protect the interceptors and the trunk sewer and coordination for potential shut down of any upstream pump station(s). If any structural support is being proposed it has to be reviewed and approved by the MWD Development Section and Devolvement Services Department (DSD) structural engineers. <b>The proposed improvement to the pipe must be compatible and meet the intent of use of the proposed airport facility.</b></p>		<p>Comment noted: The Airport Authority will coordinate with MWWD. Any work plans submitted to the Airport Authority regarding protection of the sewer lines will be forwarded to the MWWD for review and comment.</p> <p>Design for the sewer lines is being coordinated with MWWD. No work will proceed without a City of San Diego plan check process. The Airport Authority's understanding is that MWD and DSD will review and approve the plans prior to beginning the work.</p>
Comment 3	Subject: Structural Support and RWQCB requirements.	Response
<p>If inserting a liner is being proposed it has to be evaluated for structural support and reduction of capacity due to reduction of cross sectional area of a very large diameter pipe. Both dewatering and especially by passing the flow during the operation will be a great concern. By passing the flow has to meet the Regional Water Quality Control Board (RWQCB) requirements for complete redundancy. The report should address any other sewer pipe that is being affected.</p>		<p>Comment noted: Designers for the Airport Authority are specifically addressing structural support and reduction of capacity for a very large diameter pipe. Any sewer pipe potentially affected so as to cause a reduction in capacity will meet the RWQCB requirements for redundancy.</p>



**CITY OF CORONADO**

RECEIVED

DEC 16 2007

PLANNING DEPT. #44

**OFFICE OF THE MAYOR**  
1825 STRAND WAY  
CORONADO, CA 92118

December 19, 2007

**TOM SMISEK**  
MAYOR  
(619) 522-7322

San Diego County Regional Airport Authority  
PO Box 82776  
San Diego CA 92138-2776

Re: Comments from the City of Coronado on the Draft Environmental Impact Report (EIR) for the San Diego International Airport Master Plan

The Draft EIR was formally reviewed by the City of Coronado City Council on November 20, 2007, at a public meeting. Although the City has no specific comments on potential adverse environmental impacts that may occur from the implementation of the Master Plan, there are significant land use and transportation issues with the proposed Master Plan itself that need to be evaluated for the benefit of the region.

The Master Plan for the viability of San Diego International Airport (SDIA) as the primary airport for the San Diego region has incorporated and/or recommended several projects that will not improve or enhance its capability for meeting future demands. Due to its location, the airport needs to be sensitive to future development and the maximum utilization of its limited land mass. While the single runway operation is a sizable constraint, it is workable and should be optimized. Transportation to and from the airport must be improved by situating their destination points on the airport in the proper places.

- 1. Because of the increasing traffic on North Harbor Drive due to the future development of the bay front, an effort must be made to reduce airport traffic along this route. Therefore, increasing the south side terminal capacity will not improve this situation. A north terminal must be constructed on the other side of the runway that is accessed from I-5. Using today's mix of airlines serving SDIA, the obvious choice would be Southwest Airlines and possibly Jet Blue. This would separate the ground traffic and protect one of the most favorable draws to SDIA – its easy accessibility. 1
- 2. Negotiations with the U.S. Marine Corps must be resumed to purchase/trade real estate for the construction of a north taxiway along the length of the runway. This would avoid delays by landing aircraft from having to cross the runway while taxiing back to the north terminal. 2
- 3. A new parking structure on the south side would no longer be necessary. 3

4. Because of the limited size of the facility, rental cars would need to be kept off the airport land. 4
5. Commuter aircraft can continue in their current location until landing/takeoff requirements surpass the capability of the single runway. They can then be moved to outlying airports. This will decrease ground traffic as well as runway operations. 5
6. A transportation hub on the north side may be something to consider in the future. Right now, possibly a train station could be incorporated. Until there is a change in public transportation use, this may not be the best use of limited funds for improving the airport. 6

Thank you for providing the opportunity to comment. If you have any questions, please contact Tony Peña, Director of Community Development at (619) 522-7330, or via email at [tpeña@coronado.ca.us](mailto:tpeña@coronado.ca.us).

Sincerely,



Tom Smisek  
Mayor

cc: City Council  
City Manager  
Assistant City Manager  
Community Development Director

<b>City of Coronado Office of the Mayor</b>		Signed by: Tom Smisek, Mayor
Subject	Comments from the City of Coronado on the Draft Environmental Impact Report (EIR) for the San Diego International Airport Master Plan	
Comment 1	Subject: Traffic	Response
<p>Because of the increasing traffic on North Harbor Drive due to the future development of the bay front, an effort must be made to reduce airport traffic along this route. Therefore, increasing the south side terminal capacity will not improve this situation. A north terminal must be constructed on the other side of the runway that is accessed from I-5. Using today's mix of airlines serving SDIA, the obvious choice would be Southwest Airlines and possibly Jet Blue. This would separate the ground traffic and protect one of the most favorable draws to SDIA – its easy accessibility.</p>		<p>This EIR considers the near-term requirements for maintaining an adequate level of service at SDIA through 2015. See Section 2.3 Objectives of the Proposed Project and Proposed Project Description of the EIR.</p> <p>As stated in Section 1.4.1 of the Draft Environmental Impact Report, use of other terminal locations on airport (including the area north of Runway 9-27) were rejected because “land is not currently available anywhere else on the airport property that could accommodate the needed terminal area. If adequate land was available in the North Area it would require splitting terminal operations which would require duplication of many infrastructure components leading to inefficient operations and confusion for passengers.” Additional land would also be required to utilize for an extension of Taxiway C to serve a north terminal.</p> <p>As the commenter states, moving specific airlines to the north area would separate ground traffic. The separation of ground traffic is inconsistent with the goals and objectives set forth in the Airport Master Plan – specifically, the enhancement of airport access as part of the region's transportation system and the objective to configure the roadway system to avoid congestion points that lead to traffic delays and confusion.</p>
Comment 2	Subject: USMC negotiations	Response
<p>Negotiations with the U.S. Marine Corps must be resumed to purchase/trade real estate for the construction of a north taxiway along the length of the runway. This would avoid delays by landing aircraft from having to cross the runway while taxiing back to the north terminal.</p>		<p>As stated in Chapter 7.1, <i>Facility Requirements – Airfield</i>, of the Draft Airport Master Plan, it is recommended that the SDCRAA resume negotiations with the US Marine Corps on a potential land transfer sufficient to accommodate the proposed extension of Taxiway C. However, this recommendation was made with three stipulations outlined in the Master Plan report: (1) All or portions of the MCRD property become readily available at some point in the future, (2) Significant ancillary development occurs on the north portion of the airfield increasing operations originating or terminating in that portion of the airfield concurrent with overall operations growth, which will lead to problematic levels of delay for aircraft attempting to cross the runway to reach the north complex, (3) Airport operations levels reach the</p>

		constraint threshold of 260,000 annually, further congesting Taxiway B. At the current time, none of these conditions have been met.
Comment 3	Subject: Parking	Response
A new parking structure on the south side would no longer be necessary.		<p>The EIR analyzes an alternative that does not include a parking structure adjacent to Terminal 2 West. However, as summarized in Section 1.3.4, Summary of Alternatives Considered in Detail, the Proposed Project without Parking Structure alternative does not meet the project objectives for the following reason: “Accommodates forecast growth through 2015 and utilizes airport property efficiently but would not improve Level of Service/convenience for airport users including business travelers, ‘meeters and greeters,’ and other passengers such as families being accompanied to and from the terminal.”</p> <p>The commenter appears to be suggesting that a new parking structure adjacent to Terminal 2 West would “no longer be necessary” if, and only if, the proposed project were to be replaced with a terminal facility north of Runway 9-27. As stated in Section 3.2.3.3, Increase Public Parking Areas, “the Airport Master Plan facility requirements provided in [Draft EIR] Table 3-3 show that a total of 4,085 parking spaces are available at the terminal area today while demand for terminal area parking exceeds 6,000 spaces.” Thus, the existing surface parking facilities are deficient for the existing demand level and will be increasingly deficient as demand increases. A parking structure would help provide sufficient facilities to meet both the existing and projected demand.</p>
Comment 4	Subject: Rental Cars	Response
Because of the limited size of the facility, rental cars would need to be kept off the airport land.		As stated in Section 3.2.3.5 of the Draft EIR, Further Ground Transportation Improvements, “the Airport Master Plan identifies additional ground transportation facilities that may be contemplated including transit access and rental car facility requirement, both requiring extensive coordination with transportation/transit agencies and off-Airport tenants.” At the current time there are no rental car facilities located on airport property. The Proposed Airport Land Use Plan, described in Section 4.1.1 of the Draft EIR, identifies ground transportation land uses including rental car facilities. The Proposed Airport Land Use Plan identifies a 30 acre land area that would be designated for future uses including, but not limited to, the development of rental car facilities.
Comment 5	Subject: Commuter Aircraft	Response
Commuter aircraft can continue in their current location until landing/takeoff requirements surpass the capability of the single runway. They can then be moved to outlying airports. This will		Existing federal laws prevent the San Diego County Regional Airport Authority from restricting access to San Diego International Airport by aircraft type or airline. Airlines may choose to relocate their scheduled

decrease ground traffic as well as runway operations.	air service to and from the San Diego region to other airports that are certified for use by commercial airlines. However, these decisions are made at the discretion of the airlines. At the current time, there is only one other airport (McClellan-Palomar Airport in Carlsbad) in San Diego County currently served by scheduled commercial airlines. In addition, the airline operations and passenger forecast used to estimate vehicular traffic take into account the operational capacity of the single runway at SDIA.	
Comment 6	Subject: Transportation Hub	Response
A transportation hub on the north side may be something to consider in the future. Right now, possibly a train station could be incorporated. Until there is a change in public transportation use, this may not be the best use of limited funds for improving the airport.	Comment noted. The Vision Plan for SDIA will consider integrated multi-model transportation facilities as the extended future of the Airport is analyzed.	



**COUNCILMEMBER KEVIN FAULCONER**

SECOND DISTRICT  
CITY OF SAN DIEGO

February 4, 2008

RECEIVED

FEB 05 2008

PLANNING DEPT. #44

Mr. Ted Anasis  
San Diego Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Re: Airport Master Plan Draft Environmental Impact Report

Dear Mr. Anasis:

I appreciate the opportunity to comment on the Airport Master Plan Draft Environmental Impact Report (DEIR). After reviewing the DEIR, focusing particularly on the Airport Master Plan's effects on the surrounding neighborhoods, it appears that the data presented in the DEIR reinforces the need for an alternate airport site. Additionally, the issues regarding air traffic noise, single runway limitations, vehicular traffic, and the proposed parking structure need further evaluation.

**New Airport Location Search**

Any conversation regarding the expansion of, or significant capital improvements to, Lindbergh Field must include a discussion of the search for a new airport location. It has been stated by many planning organizations that Lindbergh Field will reach capacity in the near future. Notably, this point was argued by the Airport Authority in the 2006 Proposition A campaign and is highlighted in this DEIR.

The search for a new airport location should and must resume for two reasons:

1. There is no voter mandate to discontinue the search.
2. The Master Plan's proposed projects will only offset the rising capacity demand for a limited time.

One of the reasons for deferring the search for a new airport is the misconception that through the failure of Proposition A, which asked if the Airport Authority should pursue MCAS Miramar as a location for a commercial airport, San Diego County voters decided that Lindbergh Field is to remain the region's international airport. In fact, the DEIR states that:

“(t)he result of the Airport Site Selection Program, as determined by the voters of San Diego, is that the region’s primary airport is Lindbergh Field for the foreseeable future.”



I do not agree with that summation and request that any statements of this nature in the DEIR be clarified to note that the voters rejected the latest proposal for MCAS Miramar as the new location for San Diego International Airport (SDIA); they did not endorse Lindbergh Field as the optimal location for SDIA.

### **Inherent Capacity Limitations**

Lindbergh Field's capacity, as noted in the DEIR, is limited by its "constraining component," the single runway. No amount of capital improvements, including the addition of new gates at Terminal 2, will overcome this limitation. The improvements outlined in the DEIR will only postpone the inevitable – the need for a new, dual runway airport.

2

On top of the constraints imposed by a single runway, it is acknowledged that the projects outlined in the DEIR's Implementation Plan are, at best, only short-term proposals. It is recognized that "no implementation improvements are proposed beyond those required to meet 2015 aviation demand." At best, this plan will only seek to meet the growth projections in the next seven years. The Airport Authority should continue to seek a new, viable location for SDIA.

### **Air Traffic Noise**

In determining the impacts on nighttime sleep disturbance, the DEIR compares the preferred project alternative to 2005 baseline levels and to the No Project Alternative.

The DEIR concludes that "...there is not a substantial change in noise affecting sleep and there is less than a significant impact." However, several figures show that some areas of Uptown, Loma Portal, Midway and Ocean Beach could expect more flights. The basis for the conclusion that there would be no significant impact to nighttime sleep disturbance is unclear. Both the data and history suggest that increased flights result in increased frequency of air traffic noise. The DEIR's conclusion of no significant impact to nighttime sleep disturbance must be clearly substantiated.

3

### **Vehicular Traffic Impacts**

North Harbor Drive is one of the critical gateways in to and out of the Point Loma, Midway and Ocean Beach communities. The traffic increase identified in the DEIR could lead to gridlock on this critical artery. The data in the DEIR indicates that airport generated traffic will increase through 2030. In fact, the data show that several street segments under the proposed plan (with the parking structure) on North Harbor Drive decrease to an "F" rated level of service when compared to the No Project Alternative. This jump in traffic will surely spill into the surrounding communities as non-airport traffic migrates to less congested roads.

4

A significant element of the DEIR that remains ambiguous is the source of funding for the suggested traffic mitigation measures. Without definite funding, either from the FAA or another source, to pay for the proposed traffic projects, any plan that would increase the traffic impacts to the surrounding neighborhoods is not viable. The City of San Diego should not be responsible for funding any of the traffic projects. The Airport Authority should immediately seek the

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Page 3  
Mr. Ted Anasis  
February 4, 2008

FAA's determination as to whether airport funds can be used outside airport boundaries for transportation mitigation measures.

**Parking Structure Alternative**

Because of the extreme sensitivity of North Harbor Drive as well as the need to preserve or improve the levels of service at its intersections, I urge the Airport Authority not approve the parking structure. Centralizing parking in the form of a 5,000 space multilevel parking structure will be one of the critical factors that will impede traffic flow on North Harbor Drive. The Airport Authority should further compare the different traffic and circulation impacts between the parking structure and no parking structure alternatives.

6

**Conclusion**

The DEIR needs to clearly address capacity limitations at Lindbergh Field, including a way to accommodate future air traffic demand through the use of a single runway.

The information within the DEIR states that a single runway cannot accommodate the projected increased air traffic. In addition, as described above, the data presented regarding the increased impacts from traffic noise, vehicular traffic, and the proposed parking structure need further evaluation.

I appreciate your attention to the issues I have raised in this letter. Please contact me should you have questions.

Sincerely,



Kevin Faulconer  
Councilmember, Second District

KF:mta



<b>City of San Diego Councilmember Kevin Faulconer</b>		Signed By: Kevin Faulconer, Councilmember, Second District
Subject	Airport Master Plan Draft Environmental Impact Report	
Comment 1	Subject: New Airport Location Search	Response
<p>Any conversation regarding the expansion of, or significant capital improvement to, Lindbergh Field must include a discussion of the search for a new airport location. It has been stated by many planning organizations that Lindbergh Field will reach capacity in the near future. Notably, this point was argued by the Airport Authority in the 2006 Proposition A campaign and is highlighted in this DEIR.</p> <p>The search for a new airport location should and must resume for two reasons:</p> <ol style="list-style-type: none"> <li>1. There is no voter mandate to discontinue the search</li> <li>2. The Master Plan's proposed projects will only offset the rising capacity demand for a limited time.</li> </ol> <p>One of the reasons for deferring the search for a new airport is the misconception that through the failure of Proposition A, which asked if the Airport Authority should pursue MCAS Miramar as a location for a commercial airport, San Diego County voters decided that Lindbergh Field is to remain the region's international airport. In fact, the DEIR states that:</p> <p>"(t)he result of the Airport Site Selection Program, as determined by the voters of San Diego, is that the region's primary airport is Lindbergh Field for the foreseeable future."</p> <p>I do not agree with that summation and request that any statements of this nature in the DEIR be clarified to note that the voters rejected the latest proposal for MCAS Miramar as the new location for San Diego International Airport (SDIA); they did not endorse Lindbergh Field as the optimal location for SDIA.</p>		<p>See response to General Comment #1.</p> <p>The SDCRAA has initiated, in collaboration with the City of San Diego, the San Diego Association of Governments (SANDAG), and the California Department of Transportation (Caltrans), a long term Vision Plan for San Diego International Airport to provide for the region's air transportation needs. While the Vision Plan will not identify a new airport location, it is intended to suggest solutions for additional air transportation capacity to meet the needs of the region beyond the improvements proposed in the Airport Master Plan as analyzed in the Draft EIR.</p> <p>Section 2.2.4 of the EIR represented the facts of the vote taken in November of 2006 and noted the steps that would be required to select a new site for the airport. The Airport Site Selection process is separate and independent from the Airport Master Plan process which is the subject of the EIR. The intention of the EIR is not to describe the vote as reflecting a choice of the people that Lindbergh Field is the optimal location for SDIA. Section 1.1.3 of the EIR correctly describes the election as a rejection of the use of MCAS Miramar for a commercial airport facility and nothing more. The EIR does not indicate that the voters endorsed Lindbergh Field as the preferred location, however, until a new Airport Site Selection Program is undertaken, Lindbergh Field is the region's primary airport for the foreseeable future.</p>

Comment.2	Subject: Inherent Capacity Limitations	Response
	<p>Lindbergh Field's capacity, as noted in the DEIR, is limited by its "constraining component," the single runway. No amount of capital improvements, including the addition of new gates at Terminal 2, will overcome this limitation. This improvements outlined in the DEIR will only postpone the inevitable – the need for a new, dual runway airport.</p> <p>On top of the constraints imposed by a single runway, it is acknowledged that the projects outlined in the DEIR's Implementation Plan are, at best, only short-term proposals. It is recognized that "no implementation improvements are proposed beyond those required to meet 2015 aviation demand." At best, this plan will only seek to meet the growth projections in the next seven years. The Airport Authority should continue to seek a new, viable location for SDIA.</p>	<p>See response to General Comment #1. The SDCRAA has embarked on the next phase of the Master Plan process and is examining options for the extended future at SDIA and/or other options that might meet the future regional demand for air transportation.</p>
Comment 3	Subject: Air Traffic Noise	Response
	<p>In determining the impacts on nighttime sleep disturbance, the DEIR compares the preferred project alternative to 2005 baseline levels and the No Project Alternative.</p> <p>The DEIR concludes that "...there is not a substantial change in noise affecting sleep and there is less than a significant impact." However, several figures show that some areas of Uptown, Loma Portal, Midway and Ocean Beach could expect more flights. The basis for the conclusion that there would be no significant impact to nighttime sleep disturbance is unclear. Both the data and history suggest that increased flights result in increased frequency of air traffic noise. The DEIR's conclusion of no significant impact to nighttime sleep disturbance must be clearly substantiated.</p>	<p>There will be additional flights at SDIA in 2015 compared to 2005 operational levels. The EIR concludes that there will be no significant impacts associated with the increase in operations when compared to the 2015 No Build alternative. The No Build alternative for 2015 represents the growth operations projected for SDIA that will occur if the Proposed Project is not approved and constructed. This analysis is based on California Code of Regulations Title 14, § 15126.6 (e)(3)(B). See also Response to General Comment #6.</p>
Comment 4	Subject: Vehicular Traffic Impacts	Response
	<p>North Harbor Drive is one of the critical gateways in to and out of the Point Loma, Midway and Ocean Beach communities. The traffic increase identified in the DEIR could lead to gridlock on this critical artery. The data in the DEIR indicates that airport generated traffic will increase through 2030. In fact, the data show that several street segments under the proposed plan (with the parking structure) on North Harbor Drive decrease to an "F" rated level of service when compared to the No Project Alternative. This jump in traffic will surely spill into the surrounding communities as non-airport traffic migrates to less congested roads.</p>	<p>The EIR identifies all impacts and proposed mitigation for these impacts (see Section 5.3.8) that would result from development of the Proposed Airport Implementation Plan. The shift of airport traffic using the west to access the airport is assumed to grow from the existing 15% to 30% in 2030. This increase in traffic using the westbound path leaving the airport to access the freeways is partially contributable to the increased traffic congestion east of the airport roadways leading to the freeway and is an appropriate assumption as traffic east of the airport increases. Traffic impacts identified in Section 5.3 take into account this shift.</p> <p>Portions of North Harbor Drive operate at LOS F under the Proposed Implementation Plan (with and without parking structure) along with the</p>

		No Project alternative. No potentially significant impacts result from the Proposed Project until 2025 and mitigation measures are identified to mitigate potentially significant impacts that are identified under all alternatives in 2025 and 2030.
Comment 5	Subject:	Response
A significant element of the DEIR that remains ambiguous is the source of funding for the suggested traffic mitigation measures. Without definite funding, either from the FAA or another source, to pay for the proposed traffic projects, any plan that would increase the traffic impacts to the surrounding neighborhoods is not viable. The City of San Diego should not be responsible for funding any of the traffic projects. The Airport Authority should immediately seek the FAA's determination as to whether airport funds can be used outside airport boundaries for transportation mitigation measures.		Comment noted; the SDCRAA will consult with the FAA to determine those projects eligible to use airport revenues. The commenter should note that increased traffic is not induced by the Proposed Project. Specifically, increased operations are projected for SDIA regardless of improvements to the terminal and the Airport provides a needed public service. Improvements to off-airport roadways and city-dedicated streets are not the lone responsibility of the SDCRAA.
Comment 6	Parking Structure Alternative	Response
Because of the extreme sensitivity of North Harbor Drive as well as the need to preserve or improve the levels of service at its intersections, I urge the Airport Authority not approve the parking structure. Centralizing parking in the form of a 5,000 space multilevel parking structure will be one of the critical factors that will impede traffic flow on North Harbor Drive. The Airport Authority should further compare the different traffic and circulation impacts between the parking structure and no parking structure alternatives.		The parking structure will serve to accommodate projected parking demand requirements that would not necessarily go off-site if parking is not provided. Extensive traffic analysis was completed and provided in Section 5.3.5.2; this analysis compares the Proposed Project with a parking structure and without a parking structure. The difference in impact for North Harbor Drive is not significant when considering the Proposed Project with and without a parking structure.

**From:** Kirshner, Miriam [mailto:mki@sandag.org]  
**Sent:** Monday, February 04, 2008 4:27 PM  
**To:** Anasis Theodore  
**Cc:** Wilschetz Keith; Schumacher, Dave; Leiter, Bob; Wiley, Julie  
**Subject:** Revised Comment Letter on Airport Master Plan DEIR

Hi Ted – Attached is a replacement comment letter on the Draft EIR for the Airport Master Plan. I apologize for the confusion. We overlooked a few revisions in our earlier version.

Please toss the earlier letter and use this one instead. I am sending a hard copy also.

Miriam Kirshner  
Senior Transit Planner  
SANDAG  
401 B Street, Suite 800  
San Diego, CA 92101  
mki@sandag.org  
619-699-6995

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FEB 04 2008

PLANNING DEPT. #44

2/5/2008



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 San Diego, CA 92101-4231  
 (619) 699-1900  
 Fax (619) 699-1905  
 www.sandag.org

February 4, 2008

File Number: 3000600

Mr. Ted Anasis, Manager of Airport Planning  
 San Diego County Regional Airport Authority  
 P.O. Box 82776  
 San Diego, CA 92138-2776

Dear Mr. Anasis:

SUBJECT: Draft Environmental Impact Report for the Airport Master Plan

Thank you for the opportunity to review the revised Draft Environmental Impact Report (DEIR) for the San Diego International Airport Master Plan, dated October 2007.

We appreciate the modifications and additions to the DEIR resulting from discussions between our two agencies about the original draft EIR and our agencies' interdependent planning efforts. We also appreciate having had the opportunity to meet with you and other members of the Airport Authority to review SANDAG's remaining concerns about the DEIR and to discuss how the Airport Authority might participate in making improvements to surface transportation to mitigate the project's traffic impacts and improve access to the airport.

This letter summarizes our comments on the original DEIR released in May 2006 and points out where we believe the revised DEIR either addresses these comments or is in need of further modification. These concerns were discussed with the SANDAG Transportation Committee on January 18, 2008, which concurred with the comments raised in this letter.

SANDAG staff supports the following new elements of the revised DEIR:

- The time horizon for the travel forecast has been extended to 2030, as requested by SANDAG and others. This timeline conforms to the time horizon for the Regional Transportation Plan (RTP) and its traffic models.
- The DEIR contains alternative development plans for the airport, including the option to include or exclude the 2,000 to 4,000-space parking structure, and the option of pursuing development of an intermodal transit center and consolidated rental car facility on the north side of the airfield. The intermodal facility also could include passenger drop-off and an internal shuttle to the terminals. These new alternatives would move the airport closer to the long-range possibility of providing for passenger access on the north side, where freeway and transit access improvements could be provided.

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- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

- Potential transit improvements that have been identified by the Airport Transit Committee are referenced in the revised DEIR.

3

SANDAG staff has concerns about the following elements of the revised DEIR:

- The alternative that eliminates the Terminal 2 parking structure does not evaluate possible parking pricing, management, and transit improvements that could help alleviate the reduction in parking. Thus, it is not described on an equal footing with the parking structure alternative. The conclusion in the revised DEIR that this alternative does not meet the project objectives is not supportable without consideration of these measures.

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- The traffic analysis assumes that the proposed airport improvements do not generate additional trips on the road network. Projected growth in air passengers is not attributed to airport improvements identified in the Airport Master Plan (AMP), and is assumed to occur whether or not the proposed airport improvements are made. In other words, the revised DEIR does not include a “plan-to-ground” impact comparison. This method of traffic analysis understates traffic impacts. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15125, “where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical condition at the time the Notice of Preparation is published.” This “plan-to-ground” analysis has been clarified in many court decisions, including Environmental Information and Planning Council v. County of El Dorado (1982) 131 Cal. App. 3d 350, “where two plans could not be compared to each other without showing how they would relate to the existing level of development.” The Airport Authority’s analysis is also in conflict with Woodward Park Homeowners Association Inc. v. City of Fresno (2007) 150 Cal.App. 4<sup>th</sup> 683, which discusses the requirement that the lead agency use the existing physical condition at the time the notice of preparation is prepared as the baseline and proper use of a two-baseline approach in the event the lead agency wishes to use an alternate baseline.

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Airport Authority staff has contended that it is within its discretion to utilize a baseline of “existing conditions” that is years in the future for purposes of analyzing impacts pursuant to CEQA Guideline 15126.2. The Airport Authority has not established substantial evidence supporting its use of a baseline other than 2005 existing conditions. Furthermore, the Airport Authority’s contention that it can use a synthetic ceiling (airport’s passenger capacity due to a single runway) for purposes of setting a baseline for determining impacts under CEQA has been disapproved on several occasions, most recently in Communities for a Better Environment v. South Coast Air Quality Management District 2007 WL 4395256 (Cal.App. 2 Dist.) (Cal.App. 2 Dist., 2007).

- The revised DEIR does not commit the Airport Authority to implement improvements to the freeway and public transit network to mitigate traffic impacts. While potential freeway and transit improvements are described, they are not included as project features or mitigation measures. Mitigation measures should relate to the impacts identified in the traffic analysis, and should include freeway and transit improvements that are identified in the RTP and/or Airport Transit Plan, and that are consistent with Federal Aviation Administration regulations regarding the use of airport revenues. The Airport Authority can use FAA and passenger facility charges in a creative and cooperative fashion with other agencies to mitigate its impacts.

6

- It is our understanding that the Airport Authority has recently embarked on a Vision Plan for SDIA to plan for the airport's long-term development. Although site planning has not begun, the concept of providing for passenger access on the north side of the airport, including new freeway ramps, rail extensions, and/or an intermodal center, has emerged as an important future element. Completion of the north taxiway by extending it to the west also appears to be an important improvement. The land use section of the EIR should address whether and how this short-term Airport Master Plan is compatible with the long-term development of San Diego International Airport. In other words, the EIR should analyze whether construction of the AMP improvements would conflict with possible future north side improvements, such as the taxiway extension, freeway and rail connections, and the intermodal center. Please keep in mind that the "lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect." (CEQA Guidelines Section 15003[h].)

We appreciate that the Airport Authority is leading an effort to identify needed transit improvements to serve airport users and to identify funding responsibilities. We look forward to working with you on developing these concepts and their inclusion in the Airport Master Plan and DEIR. We also support your efforts to prepare a Vision Plan for SDIA and appreciate your outreach to SANDAG and other stakeholders in this effort. Finally, we appreciate your assistance in our effort to develop an air-rail network study for the San Diego region. We look forward to continued collaboration on these major programs.

Thank you for considering these comments.

Sincerely,



BOB LEITER  
Director of Land Use and Transportation Planning

BL/MK/cd

<b>SANDAG</b>		Signed By: Bob Leiter, Director of Land Use and Transportation Planning
Subject	Draft Environmental Impact Report for the Airport Master Plan	
Comment 1	Subject: Traffic Timeline	Response
The time horizon for the travel forecast has been extended to 2030, as requested by SANDAG and others. This timeline conforms to the time horizon for the Regional Transportation Plan (RTP) and its traffic models.		Comment noted.
Comment 2	Subject: Alternate Development plans	Response
The DEIR contains alternative development plans for the airport, including the option to include or exclude the 2,000 to 4,000-space parking structure, and the option of pursuing development of an intermodal transit center and consolidated rental car facility on the north side of the airfield. The intermodal facility also could include passenger drop-off and in internal shuttle to the terminals. These new alternatives would move the airport closer to the long-range possibility of providing for passenger access on the north side, where freeway and transit access improvements could be provided.		Comment noted. The Airport Land Use Plan includes a transit corridor on the Airport, described in Section 4.1.1 that would provide shuttles and high-occupancy vehicles with direct access between the transit center and consolidated rental car facility on the north and terminals in the south.
Comment 3	Subject:	Response
Potential transit improvements that have been identified by the Airport Transit Committee are references in the revised DEIR.		Comment noted.
Comment 4	Subject: Terminal 2 parking alternative	Response
The alternative that eliminates the Terminal 2 parking structure does not evaluate possible parking pricing, management, and transit improvement that could help alleviate the reduction in parking. Thus, it is not described on an equal footing with the parking structure alternative. The conclusion in the revised DEIR that this alternative does not meet the project objectives is not supportable without consideration of these measures.		The EIR analyzes the impact of a parking structure specific to environmental categories without expectation of pricing or other management techniques for managing demand. While these techniques may serve to reduce demand for on-airport facilities the impact assessed for the Proposed Project with and without the structure is a conservative estimate of the potential impact.
Comment 5	Subject: Baseline conditions	Response
The traffic analysis assumes that the proposed airport improvements do not generate additional trips on the road network. Projected growth in air passengers is not attributed to airport improvements identified in the Airport Master Plan (AMP), and is assumed to occur whether or not the proposed airport improvements are made. In other words, the revised DEIR does not include a 'plan-to-ground' impact comparison. This method of traffic analysis understates traffic impacts. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 1515, "where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical condition at the time the		See response to General Comment #6.  Commenter cites <i>Environmental Planning and Information Council ("EPIC") v. County of El Dorado</i> , 131 Cal.App.3d 350 (1982), for the proposition that the DEIR must include a "plan-to-ground" analysis that includes an examination of the existing physical conditions at the time the Notice of Preparation is published. Commenter is correct regarding CEQA's requirement that the DEIR include a description of existing environmental conditions. However, the description of existing environmental conditions is not always the appropriate point of

Notice of Preparation is published.” This “plan-to-ground” analysis has been clarified in many court decisions, including Environmental Information and Planning Council v. County of El Dorado ([http://ceres.ca.gov/ceqa/cases/1982/el\\_dorado\\_043082.html](http://ceres.ca.gov/ceqa/cases/1982/el_dorado_043082.html)) (1982) 131 Cal. App. 3d 350, “where two plans could not be compared to each other without showing how they would related to the existing level of development.” The Airport Authority’s analysis is also in conflict with Woodward Park Homeowners Association Inc. v City of Fresno (2007) 150 Cal. App. 4<sup>th</sup> 683, which discusses the requirement that the lead agency use the existing physical condition at the time the notice of preparation is prepared as the baseline and proper use of a two-baseline approach in the event the lead agency wishes to use an alternate baseline.

Airport Authority staff has contended that it is within its discretion to utilized a baseline of “existing conditions” that is years in the future for purposes of analyzing impacts pursuant to CEQA Guideline 15126.2. The Airport Authority has not established substantial evidence supporting its use of a baseline other than 2005 existing conditions. Furthermore, the Airport Authority’s contention that it can use a synthetic ceiling (airport’s passenger capacity due to a single runway) for purposes of setting a baseline for determining impacts under CEQA has been disapproved on several occasions, most recently in Communities for a Better Environment v. South Coast Air Quality Management District 2007 WL 4395256 (Cal.App. 2 Dist.) (Cal. App. 2 Dist., 2007).

comparison for assessing the environmental effects of a proposed project. The Guidelines and case law acknowledge that although existing conditions “normally” serve as the best starting point for assessing environmental impacts, but is not always the appropriate basis for determining the actual environmental impacts of a proposed project. In this case, basing a calculation of environmental effects upon a comparison between existing conditions and projected future conditions would present a false picture of the environmental effects of the Proposed Project.

The cases cited in the comment support the approach of the DEIR. For example, *EPIC* held that in assessing the impacts of a proposed project for an *undeveloped* piece of property, agencies should compare impacts that would arise from the actual development of that parcel against the existing environment, rather than some hypothetical, potential allowable development. In *EPIC*, the agency compared an out-of-date general plan with a new general plan that would allow less growth than the old plan. The court held that because the old plan was both out-of-date and quite different from the existing plan, the EIR had to address the existing level of actual physical development in the county as the basis for comparison. Thus, *EPIC* stands for the proposition that an agency cannot use hypothetical situations when determining significant effects, but must deal with the actual circumstances in which a project is proposed to be carried out. In this case, the actual circumstance is that SDIA is, and will continue to be, a fully functional operating airport.

Furthermore, the facts in the case of *Woodward Park Homeowners Ass’n v. City of Fresno*, 150 Cal. App. 4th 683 (2007), are not comparable to the proposed AMP, and the case therefore is not relevant. The proposed project in that case was development of office and retail project that might be built with City of Fresno approval of a rezoning, compared to what would have been permitted to be built under existing zoning. That case did not deal with the continued utilization of an existing facility. The comparison made in the AMP EIR is between what is projected to occur if the existing facility (SDIA) continues to be used, based on FAA-approved forecasts, and what would occur if the AMP facilities are constructed.

The court’s analysis in the *Woodward Park* case supports the DEIR’s approach to assessing the possible adverse environmental effects by affirming that the goal of CEQA is to provide information regarding the likely environmental impacts of a project. The court explained that the data examined and the comparisons made by the agency are tools to

		<p>ensure “that the evaluation of impacts normally will do what common sense says it should do and what the EIR’s most important audience, the public, will naturally assume it does: compare what will happen if the project is build with what will happen if the site is left alone.” <i>Woodward Park</i>, 150 Cal. App.4th at 707.</p> <p>The FAA-approved forecast indicates future airport operational levels that will occur, regardless of changes in the facilities at SDIA that the AMP would provide for efficiency and the comfort of the traveling public. These flight and passenger activity levels do not depend on implementation of the Proposed Project. Thus, in comparing present conditions to future conditions, it would be misleading to treat future environmental concerns in the Airport area as resulting from or caused by the Proposed Project. As the Proposed Project has no causal relationship with potential significant adverse environmental impacts, conducting such an assessment would set a false base for comparison and directly conflict with the CEQA’s goals of providing an accurate assessment of potential environmental harms resulting from a proposed project.</p>
Comment 6	Subject: Mitigation Traffic Impacts	Response
	<p>The revised DEIR does not commit the Airport Authority to implement improvements to the freeway and public transit network to mitigate traffic impacts. While potential freeway and transit improvements are described, they are not included as project features or mitigation measures. Mitigation measures should relate to the impacts identified in the traffic analysis, and should include freeway and transit improvements that are identified in the RTP and/or Airport Transit Plan, and that are consistent with Federal Aviation Administration regulations regarding the use of airport revenues. The Airport Authority can use FAA and passenger facility charges in a creative and cooperative fashion with other agencies to mitigate its impacts.</p>	<p>As described in Section 5.3.8, mitigation measures were identified in this section for each potentially significant impact per CEQA guidelines. Only the Land Use Plan resulted in potentially significant impacts to freeway segments. Mitigation, including the freeway ramps recommended in the Central I-5 Corridor Study has been identified in Section 5.3.8.3. The EIR identifies a range of traffic related mitigation measures which together reduce traffic related impacts to a level of less than significant, and thus further mitigation is unnecessary.</p> <p>See response to General Comment #9 for discussion on transit improvements.</p> <p>As the commenter notes, FAA statutes and regulations restrict the ability of the SDCRAA to fund county wide initiatives to reduce regional traffic impacts.</p> <p>The Mitigation Monitoring and Reporting Program provides the SDCRAA’s commitment to mitigation.</p>
Comment 7	Subject: Vision Plan for SDIA	Response
	<p>It is our understanding that the Airport Authority has recently embarked on a Vision Plan for SDIA to plan for the airport’s long-term development. Although site planning has not begun, the concept of</p>	<p>The Proposed Airport Land Use Plan speaks to the future of the Airport at the onset of the EIR. The SDCRAA initiated the next phase of planning for SDIA in February 2008 (Vision Plan). The findings of the</p>

<p>providing for passenger access on the north side of the airport, including new freeway ramps, rail extensions, and/or an intermodal center, has emerged as an important future element. Completion of the north taxiway by extending it to the west also appears to be an important improvement. The land use section of the EIR should address whether and how this short-term Airport Master Plan is compatible with the long-term development of San Diego International Airport. In other words, the EIR should analyze whether construction of the AMP improvements would conflict with possible future north side improvements, such as the taxiway extension, freeway and rail connections, and the intermodal center. Please keep in mind that the “lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect.” (CEQA Guidelines Section 15003[h].)</p>	<p>Vision Plan will be reviewed environmentally in the future. Because the Vision Plan is at its initiation stage, analysis of improvements that will be formed by the Vision Plan are yet unknown and more detailed analysis would be speculative. At this time, the inclusion of the ALUP is the best estimate of future airport uses to meet the forecast demand for air service.</p> <p>With the inclusion of the Airport Land Use Plan on a program level the SDCRAA has met its obligation to consider at a programmatic level the potential effects of for additional development at SDIA, even though the exact details of such additional development cannot be known at the time of the EIR.</p> <p>In addition, none of the proposed improvements described in the Draft EIR would conflict with the types of improvements that may be considered for the area north of Runway 9/27 in the Vision Plan.</p>
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THE CITY OF SAN DIEGO

February 4, 2008

RECEIVED

FEB 04 2008

Ted Anasis, Airport Planning Manager
San Diego Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

PLANNING DEPT. #44

Subject: City of San Diego Comments on the Draft Environmental Impact Report for the Airport Master Plan for the San Diego International Airport (SCH No. 2005091105).

Dear Mr. Ted Anasis:

The City of San Diego ("City") has received and reviewed the Draft Environmental Impact Report ("DEIR") for the Airport Master Plan ("AMP") for the San Diego International Airport ("SDIA") and appreciates this opportunity to provide comments to the San Diego County Regional Airport Authority ("Airport Authority").

Staff from the Development Services Department ("DSD"), City Planning & Community Investment Department ("CPCP"), and Metropolitan Wastewater Department ("MWWD") have reviewed the DEIR and have the following comments regarding the content of the DEIR:

Development Services Department, Entitlements Division, Transportation Development Section: Labib Qasem (619) 446-5358

- 1. The DEIR covers the airport trip generation as 85,000 daily trips in 2005, 110,000 daily trips in 2015 and 135,000 daily trips in 2030. The Airport Authority is required to provide all the required transportation mitigation measures for the 2030 future demand of 50,000 additional daily trips at the SDIA site.
2. The current traffic demand for SDIA should be compared to the future 2030

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traffic demand in the traffic study. The proposed supply side alternatives for the SDIA expansion should not be the basis for the traffic comparison in the traffic study. The supply side alternatives for the SDIA expansion show very small change in the future traffic demand.

3. The City's classification on Rosecrans Street between Nimitz Boulevard and Barnett Avenue is a five lane Major Street with a capacity of 45,000 Average Daily Trips ("ADT"). This will affect some of the tables regarding the level of service on this segment of this street.
4. Table 5-3.18 shows zero trip generation for 2015 for both in Daily and In trips. This typo should be corrected.
5. Table 5-3.21, 5-3.26 and 5-3.28 should compare the proposed project traffic impacts to Existing Condition.
6. Any street or intersection with unacceptable level of service of E or F within the study area shall require project traffic mitigation due to the trip generation increase of 50,000 daily trips in 2030 at SDIA.
7. The proposed project shall provide as a minimum the following transportation mitigation measures to the satisfaction of the City Engineer:
  - a. Sassafras Street between Pacific Highway and India Street – construct additional lanes for a total of two lanes in each direction.
  - b. Kettner Boulevard between Sassafras Street and Palm Street – construct additional lanes for a total of four lanes.
  - c. North Harbor Drive between Terminal One Access and Hawthorne Street – construct additional lanes for a total of ten lanes.
  - d. Grape Street between North Harbor Drive and Kettner Boulevard - construct additional lanes for a total of five lanes.
  - e. Grape Street between Kettner Boulevard and I-5 - construct additional lanes for a total of six lanes.
  - f. Hawthorne Street between North Harbor Drive and Kettner Boulevard - construct additional lanes for a total of four lanes.
  - g. Hawthorne Street between Kettner Boulevard and I-5 - construct additional lanes for a total of four lanes.

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- h. Kettner Boulevard between Washington Street and Palm Street - construct additional lanes for a total of four lanes.
  - i. Laurel Street between Pacific Highway and Kettner Boulevard – construct a raised median and reclassify as a four lane Major Street.
  - j. India Street between Olive Street and Washington Street - construct additional lane for a total of four lanes.
  - k. At the intersection of Grape Street / Pacific Highway – construct an exclusive northbound right turn lane.
  - l. At the intersection of Grape Street / Kettner Boulevard – construct two southbound left turn lanes.
  - m. At the intersection of Sassafras Street / Kettner Boulevard – construct an exclusive southbound right turn lane.
  - n. At the intersection of Grape Street / I-5 southbound on-ramp – construct an exclusive eastbound right turn lane and a 3-lane on ramp.
  - o. Provide a traffic signal at the intersection of North Harbor Drive and McCain Road.
- 
- 8. Provide additional freeway improvements to I-5 and I-8 to mitigate the proposed project traffic impacts based on the future 2030 traffic demand. 8
  - 9. Provide additional transit improvements and free transit passes to increase the transit ridership to and from the airport site and reduce the future traffic impacts. 9
  - 10. Provide a Transportation Demand Management (“TDM”) Plan for all the employees working at SDIA that includes private shuttles and free transit passes. 10
  - 11. Provide a Transportation Phasing Plan for the required transportation mitigation measures based on the traffic need and the existing right-of-way constrains to the satisfaction of the City Engineer. 11

**Development Services Department, Entitlements Division, Environmental Analysis  
 Section: Marc Cass (619) 446-5330**

- 1. As a baseline, the City of San Diego has established a threshold of 45 years of age to initiate an evaluation of historical significance under the California Environmental Quality Act (CEQA). CEQA Public Resources Code section

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 cause a significant effect on the environment.” A historical resource is a resource that is listed in, or determined to be eligible for, the California Register of Historical Resources. Historical resources that are listed in a local historical register are presumed to be historically significant, unless a preponderance of the evidence indicates the resource is not historically significant.

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Section 5.7.1.1 of the DEIR discusses properties which are 50 years old or older, as well as those that will become 50 years old by 2015. The analysis should include all properties that are 45 years old or older.

2. Under CEQA, the DEIR must include feasible mitigation measures for impacts resulting from project approval. The DEIR indicates airport trip generation for 2005 as being 85,000 daily trips with a forecasted 110,000 daily trips for 2015 and 135,000 daily trips for 2030. The traffic mitigation outlined in the DEIR should be reconfigured for all traffic impacts that result from 2030 trip forecast. The EIR should identify and make clear the party responsible for implementing the mitigation measures. As the responsible agency for the operation and long-term planning and development of SDIA, the Airport Authority is responsible for mitigating all traffic impacts expected to occur through the year 2030.

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3. In the Noise section, 5.1-1, Community Noise Equivalent Level (“CNEL”) is defined as the “average noise level over a 24-hour period with a 3 decibel increase attributed to evening operations (i.e., operations between 7 PM to 10 PM) and a 10 decibel increase attributed to nighttime operations (i.e., operations between 10 PM and 7 AM).” The City of San Diego’s Significance Determination Thresholds (January 2007) defines the CNEL as the “average noise level over a 24-hour period with a 3 decibel increase attributed to evening operations (i.e., operations between 7 PM to 10 PM) and a 10 decibel increase attributed to nighttime operations (i.e., operations between 10PM and 7AM).” Provide justification in the use of a 3 decibel increase used in the DEIR vs. the City’s 5 decibel increase in evening operations.

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4. The Noise section, 5.1-14, discusses nighttime disturbances as a result of the preferred project when compared to the baseline conditions (2005). The DEIR determined that there is not a substantial change in noise affecting sleep and there is a less than significant impact. However, Figures 5.1-20 through 5.1-43 suggest an increase in nighttime changes when compared to baseline conditions. Specifically, Figure 5.1-24 shows a significant increase in increased flights as delineated by the increase in orange and yellow. It seems that this increase would be substantial and would be considered a significant impact under CEQA. Please expand/clarify on the discussion.

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5. The proposed project would result in the construction of a five story parking structure adjacent to Harbor Drive. The City is unable to determine if the proposed parking structure would have visual impacts. While the level of architectural detail provided for the proposed five story parking structure is not necessary at this time, the EIR should provide renderings/simulations of the bulk and scale of the proposed structure. Specifically, the renderings should identify any key observations point or designated view corridor that the parking structure may impact.

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**Metropolitan Wastewater Department, Development Section: Mehdi Rastakhiz  
(619) 533-5155**

1. This project will be constructed after the waste within the NTC landfill site is removed and site is remediated. Two major City interceptors, North Metro Interceptor Sewer gravity lines (114-inches and 96-inches) are located at the proposed project site. There is also an 18-inch VC trunk sewer within the proposed site which runs parallel to Sprunce Road. The Scope of Work for the proposed landfill remediation project must be very clear as it affects the major interceptors, including the depth of excavation and depth of cover remaining on the pipe during the excavation for remediation.
2. The analysis should include the condition assessment and structural integrity evaluation of the existing interceptors; weight of the heavy equipment during construction, dynamic load calculations, shoring and construction phasing plans that demonstrates how the work will be performed to protect the interceptors and the trunk sewer and coordination for potential shut down of any upstream pump station(s). If any structural support is being proposed, it has to be reviewed and approved by the MWWD Development Section and DSD structural engineers. The proposed improvement to the pipe must be compatible and meet the intent of use of the proposed airport facility.
3. If inserting a liner is being proposed it has to be evaluated for structural support and reduction of capacity due to reduction of cross sectional area of a very large diameter pipe. Both dewatering and especially by passing the flow during the operation will be a great concern. By passing the flow has to meet the Regional Water Quality Control Board (“RWQCB”) requirements for complete redundancy. The report should address any other sewer pipe that is being affected.

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**City Planning & Community Investment, Community Planning Division: Tait Galloway (619) 533-4550**

**1. Overall EIR Analysis**

The City understands that the DEIR includes both program and project level analyses. As such, the following issues should be address in the Final EIR:

- a. In general, the EIR should indicate where the analysis specifically addresses the project or the program since subsequent project level environmental analyses may use this program level EIR.
- b. The EIR should provide additional program level analysis addressing the different development scenarios for the year 2030 that would develop 20 additional gates as outlined in Chapter 8 of the AMP.
- c. The EIR should provide additional program level analysis addressing any potential increase in gate capacity that would increase air operation capacity beyond the maximum build out of the no project alternative for the years 2020 to 2030.
- d. The EIR should further address the NTC Landfill Remediation Project in more detail to explain the linkage to the proposed implementation project.

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**2. Proposed Project**

The DEIR indicates that the “No Project” alternative could theoretically accommodate the projected 2020 activity, but it could result in poor passenger services levels resulting from crowded terminal areas. The EIR should address if the No Project alternative would result in the number of occupants exceeding the allowable occupancy load as specified by the state building code for the terminal areas or impact the ability for occupants to exit the terminal areas in the event of an emergency for the projected 2020 and 2030 activity.

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**3. Background**

In section 2.4.3, the DEIR states that the 2004 Airport Land Use Compatibility Plan (ALUCP) for SDIA designates as conditionally compatible new residences and other noise sensitive uses located within 60-65 decibel CNEL noise contours. The EIR should note that the 2004 ALUCP designates the above-mentioned uses has conditionally compatible located within the 60-85 decibel CNEL contour.

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**4. Noise**

It appears to the City that the noise contours as shown in DEIR Figure 5.1-4 for the 2015 CNEL noise contours for the Proposed Project alternative have very small differences from the No Project alternative. DEIR Figure 5.1-17 for the 2030 CNEL noise contours proposed project show a slight increase from the no

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- project noise contours. The EIR should indicate if Figure 5.1-17 represents a program level analysis of the level of operation associated with the full implementation of the AMP at 2030.
5. The City is unable to determine the impact to future population and housing impacted by the proposed project's CNEL noise contours. It is unclear in DEIR Table 5-1.5 if the population and housing data represents the San Diego Association of Government's ("SANDAG") forecasted housing and population or 2000 Census data. The EIR analysis for this table should incorporate the most recent SANDAG 2030 forecast for population and housing, which can be reported in 5-year increments. 24
  6. The City understands that the integrated noise model used in the noise analysis did not account for terrain features including the rising terrain to the northeast of runway 27. The EIR noise analysis should be adjusted or redone to account for terrain features, since it is reasonable to assume that such features will still exist in 2030. 25
  7. The City understands that the Airport Authority has recently modified the qualification criteria for the Quiet Home Program to remove the six housing unit per multifamily building limitation as well as enhancing the program's ability to provide noise attenuation to more homes per year. The EIR should address the Quiet Home Program and its role in attenuating existing structures in areas above the 65 decibel noise level. 26
  8. The City understands that the Airport Authority is in the process of preparing a new Federal Aviation Administration ("FAA") Part 150 noise land use compatibility study for SDIA. The EIR noise analysis should address the role of the Part 150 study and the potential for the study's recommendations to affect future aircraft operations or impact land use - noise compatibility. 27
  9. **Land Use**  
The DEIR circulation and traffic analysis proposes traffic improvements that include additional travel lanes and turn lanes to existing surface streets as potential mitigation measures for the proposed project (AMP and Implementation Plan). The EIR should address the acquisition of right-of-way and any associated impacts to land use and on street parking, that supports adjacent commercial land use. 28
  10. The City understands that the 2004 Airport Land Use Compatibility Plan ("ALUCP") contains policies and criteria that have the potential to affect land use at or above the 60 decibel CNEL noise contour. The EIR does not address potential land use impacts to all of the City's community plans that would be impacted within the 2030 projected 60 decibel CNEL noise contour for the 29

proposed project. The EIR land use analysis should include all of the impacted community plans within the 2030 projected 60 decibel CNEL noise contour for the proposed project.

11. The DEIR indicates that the noise contours associated with the proposed project at the 2030 projected noise level would be equal or less than the noise contours adopted in the 2004 ALUCP and therefore, the impact to land use would be less than significant. The City is unable to determine if the 2030 projected noise contours are equal or less than the 2004 ALUCP noise contours. The EIR should provide a map showing both the 2030 projected noise contours and the 2004 ALUCP noise contours.

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12. *Runway Protection Zone*

The City is unable to determine if the EIR addresses impacts to land use or safety hazards from the Runway Protection Zone (“RPZ”) for each runway end. The City understands that FAA requires that the RPZs be shown in either or both an AMP or Airport Layout Plan (“ALP”). The City understands that the RPZs for SDIA are shown in the amended 2006 ALP. The specific RPZ dimensions are based on FAA standards based on the operational characteristics of a runway as specified in FAA Advisory Circular 150/5300-14. The FAA provides guidance to the airport operator concerning the development of uses in the RPZ as specified in FAA Advisory Circular 150/5300-13. If the RPZ impacts property not owned by the airport, the FAA provides strict land use recommendations for future development, but it recommends that the airport obtain ownership of the property in the RPZ. The City understands that the purchasing of property in a RPZ may be eligible for potential FAA funding.

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13. The Airport Authority Board, as the Airport Land Use Commission for San Diego County, has adopted the FAA land use recommendations for the RPZ in the Airport Land Use Compatibility Plan (ALUCP) for SDIA. When discussing the ALUCP, the EIR does not address the existence of the RPZ limitations or any potential existing or future impacts to land use associated with the RPZ for each runway end. The City understands that the ALUCPs incorporate the RPZ areas with land use compatibility policies for the City to implement, but neither the ALUCPs nor the City defines the geographic extent of the RPZ areas. The RPZ areas are directly related to the existing and long-term operation of SDIA and their extent is defined by FAA criteria.

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14. The AMP addresses the operation and development of the airport up to 2030. The AMP states the following objective: “Consider compatibility with surrounding land uses and Airport Authority policies.” The City is unable to determine if the Airport Authority has a policy addressing non-airport property in the RPZ. The City understands that the Airport Authority Board, at its January 2008 meeting, gave direction to its staff to provide a financial analysis addressing the acquisition

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of property in the RPZ areas. Given the stated objective of the AMP and recent Airport Authority Board direction, the EIR should do the following:

- a. Disclose the existence of the runway 9-27 RPZ areas;
- b. Provide a map of the existing and any potential future RPZ areas; and
- c. Provide any Airport Authority policies or FAA guidelines associated with land use compatibility in the RPZ that may impact land use including the potential of the Airport Authority to obtain ownership of property in the RPZ areas.

15. **Traffic and Circulation**

The City understands that the DEIR includes both program and project level analyses. The EIR should address if the program level traffic analysis includes the proposed future 20 additional gates along Harbor Drive and the consolidated rental car facility, transit center, and surface parking along Pacific Highway as addressed in the different development scenarios for the year 2030 outlined in Chapter 8 of the AMP.

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16. The Proposed ALUP shows a proposed transit corridor from the existing terminal area along Harbor Drive to the North side of the Airport along Pacific Highway. The Plan indicates that a portion of the corridor along Laurel Street and Pacific Highway would require the acquisition of right-of-way. The EIR should address the acquisition of right-of-way and any associated impacts to land use or circulation.

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17. The City is unable to determine if proposed implementation project with the parking structure would affect the future implementation of a future light rail transit extension or other type of fixed guideway system that may provide access between the terminal areas and future multimodal transit center using the proposed transit corridor shown in the proposed Airport Land Use Plan (“ALUP”). The EIR circulation and traffic analysis at both the program and project levels should analysis any potential impacts the preferred project would have on the potential implementation of a fixed guideway system serving the Terminal 2 area.

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18. The DEIR proposes that the City, SANDAG, and California Department of Transportation (“Caltran”) consider providing future circulation improves including additional travel lanes to existing surface streets as potential mitigation measures for the proposed project (AMP and Implementation Plan).

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- a. The EIR circulation and traffic analysis at both the program and project levels should consider the potential use of High Occupancy Vehicle

- (“HOV”) lanes from the freeway ramps to the terminal areas as a potential mitigation measure to allow and support the use of vans, shuttles, and buses for airport related passenger and work trips rather than adding new travel lanes to existing roadways.
- b. The EIR circulation and traffic analysis at both the program and project levels should provide a phasing schedule for the potential mitigation measures.
  - c. The EIR circulation and traffic analysis should identify a potential process for the Airport Authority to work with the City, SANDAG, Caltran, Metropolitan Transit System (“MTS”), and North County Transit District (“NCTD”) to identify regional, state, and federal funding sources to plan and implement potential feasible mitigation measures.
  - d. The EIR circulation and traffic analysis should disclose that the potential mitigation measures may cause the need for the City to amend its affected community plans to reflect any changes to planned street classifications, roadway widening and major intersection improvement projects.
19. The DEIR addresses the development of an Airport Transit Plan (“ATP”) and shows a matrix with recommended transit improvements. The City understands that the ATP is not apart of the AMP. The City supports the implementation of new and improved existing transit access as potential mitigation measures aimed at reducing vehicle parking and circulation impacts.
- a. The EIR circulation and traffic analysis at both the program and project levels should include the implementation of improvements to existing routes and new routes as addressed in the ATP, including, but not limited to remote parking/terminals with express bus flyway service and light rail transit or bus rapid transit connections to the airport terminal areas.
  - b. The EIR circulation and traffic analysis at both the program and project levels should include the implementation of a comprehensive TDM plan or program for Airport Authority employees and non Airport Authority employees working at the Airport, including but not limited to providing incentives or subsidies for carpooling or vanpooling and transit pass subsidies (full or partial).
  - c. The EIR should document any specific limitations, conditions, or restrictions placed on the Airport Authority by the FAA limiting the funding for capital transit improvements and ongoing operation of transit serving the airport.
20. The City understands that the United States Marine Corps is planning to develop the existing access gate to Marine Corp Recruit Depot at Washington Street and

Pacific Highway into the main entrance for the Depot, which may impact access to the North side of the airport. The EIR should address this potential impact to the circulation on and access to the North Side of the Airport.

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21. In section 5.3.1.3, the DEIR states that the Series 10 SANDAG forecast uses 1995 while the Series 11 uses year 2000 as the base year for population / employment inputs. The EIR should note that the Series 9 SANDAG forecast uses 1995, Series 10 uses 2000, and the Series 11 uses year 2004 as the base year for population / employment inputs. In addition, subsequent references to the Series 10 and 11 forecasts should be corrected. Forecast background information can be obtained from the SANDAG website.

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Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. The City respectfully requests that you please address the above comments in the EIR.

Sincerely,



Kelly Broughton  
Director  
Development Services Department

KB/tg/mc

cc: William Anderson, FAICP, Deputy Chief Operating Officer: Executive Director  
City Planning & Development  
Phil Rath, Policy Advisor, Mayor's Office  
Janice Weinrick, Assistant Director, City Planning & Community Investment  
Mary Wright, Deputy Director, City Planning & Community Investment  
Cecilia Gallardo, Assistant Deputy Director, Development Services  
Labib Qasem, Senior Traffic Engineer, Development Services  
Tait Galloway, Senior Planner, City Planning & Community Investment  
Mehdi Rastakhiz, Associate Civil Engineer, Metro Wastewater  
Marc Cass, Associate Planner, Development Services

<b>The City of San Diego Development Services Department</b>		Signed by: Kelly Broughton, Director Development Services Department
Subject	City of San Diego Comments on the Draft Environmental Impact Report for the Airport Master Plan for the San Diego International Airport (SCH No. 2005091105).	
Comment 1	Subject: Development Services Department, Entitlements Division, Transportation Development Section	Response
The DEIR covers the airport trip generation as 85,000 daily trips in 2005, 110, 000 daily trips in 2015 and 135,000 daily trips in 2030. The Airport Authority is required to provide all the required transportation mitigation measures for the 2030 future demand of 50,000 additional daily trips at the SDIA site.		See response to Response to General Comments #3 and #4. The difference between no project and implementation of the plan in 2030 is approximately 6,250 daily trips, not 50,000, and mitigation measures are identified in Section 5.3.8 to address significant impacts resulting from this increase in traffic. CEQA only requires the SDCRAA to mitigate significant environmental effects caused by the Proposed Project, not increased trips that would happen with or without the Project.
Comment 2		Response
The current traffic demand for SDIA should be compared to the Future 2030 traffic demand in the traffic study. The proposed supply side alternatives for the SDIA expansion should not be the basis for the traffic comparison in the traffic study. The supply side alternatives for the SDIA expansion show very small change in the future traffic demand.		See Response to General Comment #3. The forecast demand for SDIA was developed considering most predominately real personal income for San Diego County and were based on population and personal income forecasts developed by SANDAG, the designated metropolitan planning organization for the San Diego Region. Supply side economics were not part of the forecast development.
Comment 3		Response
The City's classification on Rosecrans Street between Nimitz Boulevard and Barnett Avenue is a five lane Major Street with a capacity of 45,000 Average Daily Trips ("ADT"). This will affect some of the tables regarding the level of service on this segment of this street.		The commenter is correct. The classification of Rosecrans Street between Quimby Street and Barnett Avenue has been revised to a five-lane Major Street and the capacity has been changed to 45,000 ADT in the Final EIR. All street segment tables: 5-3.11, 5-3.20, 5-3.21, 5-3.34, 5-3.35, 5-3.46, 5-3.47, 5-3.59, 5-3.60, 5-3.72, 5-3.73, 5-3.100 and 5-3.101 have been updated and proposed 2015 mitigation to add a 5 <sup>th</sup> lane under the Airport Land Use Plan has been removed as this lane already exists.
Comment 4		Response
Table 5-3.18 shows zero trip generation for 2015 for both in Daily and In trips. This typo should be corrected.		The Final EIR includes this correction.
Comment 5		Response
Table 5-3.21, 5-3.26 and 5-3.28 should compare the proposed project traffic impacts to Existing Conditions.		See response to General Comment #3.
Comment 6		Response
Any street or intersection with unacceptable level of service of E or F within the study area shall require project traffic mitigation due to the trip generation increase of 50,000 daily trips in 2030 at SDIA.		See response to your Comment #1. Mitigation is identified in Section 5.3.8 for all streets and intersections with potential significant impacts resulting from the increase in traffic under the Proposed Implementation

		Plan compared to the No Project Alternative.
Comment 7		Response
<p>The proposed project shall provide as a minimum the following transportation mitigation measures to the satisfaction of the City Engineer:</p> <ul style="list-style-type: none"> <li>a. Sassafras Street between Pacific Highway and India Street – construct additional lanes for a total of two lanes in each direction.</li> <li>b. Kettner Boulevard between Sassafras Street and Palm Street – construct additional lanes for a total of four lanes.</li> <li>c. North Harbor Drive between Terminal one Access and Hawthorne Street – construct additional lanes for a total of ten lanes.</li> <li>d. Grape Street between North Harbor Drive and Kettner Boulevard – construct additional lanes for a total of five lanes.</li> <li>e. Grape Street between Kettner Boulevard and I-5 – construct additional lanes for a total of six lanes.</li> <li>f. Hawthorne Street between North Harbor Drive and Kettner Boulevard – construct additional lanes for a total of four lanes.</li> <li>g. Hawthorne Street between Kettner Boulevard and I-5 – construct additional lanes for a total of four lanes.</li> <li>h. Kettner Boulevard between Washington Street and Palm Street – construct additional lanes for a total of four lanes.</li> <li>i. Laurel Street between Pacific Highway and Kettner Boulevard – construct a raised median and reclassify as a four lane Major Street.</li> <li>j. India Street between Olive Street and Washington Street – construct additional lane for a total of four lanes.</li> <li>k. At the intersection of Grape Street/Pacific Highway – construct an exclusive northbound right turn lane.</li> <li>l. At the intersection of Grape Street/Kettner Boulevard - construct two southbound left turn lanes.</li> <li>m. At the intersection of Sassafras Street/Kettner Boulevard – construct an exclusive southbound right turn lane.</li> <li>n. At the intersection of Grape Street/I-5 southbound on-ramp – construct an exclusive eastbound right turn lane and a 3-lane on ramp.</li> <li>o. Provide a traffic signal at the intersection of North Harbor Drive and McCain Road.</li> </ul>		<p>All mitigation identified in this comment, with the exception of (o), is included in the EIR Section 5.3.8. The EIR identifies measures that mitigate the project's direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies, consistent with the City of San Diego's January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better. In many cases, the mitigation and the improvements are the same. Per the City guidelines, measures required to mitigate the project's direct significant and/or cumulatively considerable traffic impacts are identified in a Mitigation Monitoring and Reporting Program to be adopted by the Airport Authority.</p> <p>Item (o) identifies the addition of a traffic signal at the intersection of North Harbor Drive and McCain Road. This mitigation measure is proposed as part of the Liberty Station Development and assumed that the signal would be in operation by 2010 (see 5.3.5.2, Page 5.3-37). The SDCRAA has approved the funding for the installation of this signal and has submitted the engineering designs to the City of San Diego Traffic Engineer for review and approval. The traffic signal is anticipated to be installed and operational in 2008.</p> <p>The Mitigation Monitoring and Reporting Program identifies the parties responsible for implementing the mitigation measures.</p>
Comment 8		Response
<p>Provide additional freeway improvements to I-5 and I-8 to mitigate the proposed project traffic impacts based on the future 2030 traffic demand.</p>		<p>Mitigation is identified in Section 5.3.8 for all freeway segments and freeway ramps with potentially significant impacts resulting from the increase in traffic under the Proposed Airport Implementation Plan</p>

		compared to the No Project Alternative (see EIR Sections 5.3.8.3 and 5.3.8.4). No significant impacts to freeway ramps would result from the development of the Proposed Project. See response to California Department of Transportation Development Review Branch Comment #6.
Comment 9		Response
Provide additional transit improvements and free transit passes to increase the transit ridership to and from the airport site and reduce the future traffic impacts.		See response to General Comment #9.
Comment 10		Response
Provide a Transportation Demand Management (“TDM”) Plan for all the employees working at SDIA that includes private shuttles and free transit passes.		See response to General Comment #9. This will require extensive coordination with the estimated 6,000 employees by airport tenants that work over three shifts during the airport’s 24-hour operation.
Comment 11		Response
Provide a Transportation Phasing Plan for the required transportation mitigation measures based on the traffic need and the existing right-of-way constrains to the satisfaction of the City Engineer.		<p>All mitigation identified in this comment, with the exception of (o) is included in the EIR section 5.3.8. The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies, consistent with the City of San Diego’s January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service-defined by the City of San Diego to be LOS D or better. In many cases, the mitigation and the improvements are the same. Per the City guidelines, measures required to mitigate the project’s direct significant and/or cumulatively considerable traffic impacts are identified in a Mitigation Monitoring and Reporting Program to be adopted by the Airport Authority.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the FAA to identify those off-airport road improvements that are eligible to utilize airport revenues.</p>
Comment 12	Development Services Department, Entitlements Division, Environmental Analysis Section	Response
As a baseline, the City of San Diego has established a threshold of 45 years of age to initiate an evaluation of historical significance under the California Environmental Quality Act (CEQA). CEQA Public Resources Code section 21084.1 states that “a project that may cause a substantial adverse change in the significance of a historical resource is		The Draft EIR addressed all buildings older than 45 years old or that would be 50 years old by 2015. The text on page 5.7-1 of the Final EIR has been corrected to reflect this inconsistency in the DEIR. This information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR.

<p>a project that may cause a significant effect on the environment.” A historical resource is a resource that is listed in, or determined to be eligible for, the California Register of Historical Resources. Historical resources that are listed in a local historical register are presumed to be historically significant, unless a preponderance of the evidence indicates the resource is not historically significant.</p> <p>Section 5.7.1.1 of the DEIR discusses properties which are 50 years old or older, as well as those that will become 50 years old by 2015. The analysis should include all properties that are 45 years old or older.</p>	
<p>Comment 13</p>	<p>Response</p>
<p>Under CEQA, the DEIR must include feasible mitigation measures for impacts resulting from project approval. The DEIR indicates airport trip generation for 2005 as being 85,000 daily trips with a forecasted 110,000 daily trips for 2015 and 135,000 daily trips for 2030. The traffic mitigation outlined in the DEIR should be reconfigured for all traffic impacts that result from the 2030 trip forecast. The EIR should identify and make clear the party responsible for implementing the mitigation measures. As the responsible agency for the operation and long-term planning and development of SDIA, the Airport Authority is responsible fro mitigating all traffic impacts expected to occur through the year 2030.</p>	<p>The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies, consistent with the City of San Diego’s January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better. In many cases, the mitigation and the improvements are the same. Per the City guidelines, measures required to mitigate the project’s direct significant and/or cumulatively considerable traffic impacts are identified in a Mitigation Monitoring and Reporting Program to be adopted by the Airport Authority.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the FAA to identify those off-airport road improvements that are eligible to utilize airport revenues.</p>
<p>Comment 14</p>	<p>Response</p>
<p>In the Noise section, 5.1-1, Community Noise Equivalent Level (“CNEL”) is defined as the “average noise level over a 24-hour period with a 3 decibel increase attributed to evening operations (i.e., operations between 7 PM to 10 PM) and a 10 decibel increase attributed to nighttime operations (i.e., operations between 10 PM and 7 AM).” The City of San Diego’s Significance Determination Thresholds (January 2007) defines the CNEL as the “average noise level over a 24-hour period with a 3 decibel increase attributed to evening operations (i.e., operations between 7 PM and 10 PM) and a 10 decibel increase attributed to nighttime operations (i.e., operations between 10 PM and 7 AM).” Provide justification in the use of a 3 decibel increase used in the DEIR vs. the City’s 5 decibel increase in evening operations.</p>	<p>The commenter is correct. The analysis has been updated to reflect a 5 dB penalty for evening operations. Although the additional 2 dB penalty increases the size of the CNEL contours, the difference in contours between the Proposed Project, No Project, and Alternatives remains proportional to the DEIR analysis. Because the differences between alternatives remain proportional, this information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR. The FEIR includes corrected population analysis and graphics in Section 5.1.1 of the document.</p>

Comment 15		Response
	<p>The Noise section, 5.1-14, discusses nighttime disturbances as a result of the preferred project when compared to the baseline conditions (2005). The DEIR determined that there is not a substantial change in noise affecting sleep and there is a less than significant impact. However, Figures 5.1-20 through 5.1-43 suggest an increase in nighttime changes when compared to baseline conditions. Specifically, Figure 5.1-24 shows a significant increase in increased flights as delineated by the increase in orange and yellow. It seems that this increase would be substantial and would be considered a significant impact under CEQA. Please expand/clarify on the discussion.</p>	<p>The night time operational analysis must be considered in total, rather than discretely. The EIR considers the difference between the No Project and Proposed Project and Project Alternative for significance. See Response to General Comment #6 describing why this comparison is appropriate for determining significance. To determine significance, the EIR examined the increased noise (if any) resulting from the Proposed Project. The threshold of significance for noise was whether the Proposed Project results in either: (1) a 1.5 dB or more increase resulting in noise sensitive areas being exposed to a 65 CNEL or greater, as compared to the No Project Alternative; or (2) a 3 dB or more increase resulting in noise sensitive areas being exposed to 60 CNEL or greater, as compared to the No Project Alternative. The Proposed Project will not cause either threshold to be exceeded. See EIR 5.1-6.</p> <p>When Table 5-1.6 is considered with Figures 5.1-25 and 5.1-31 it can be surmised that some residents will experience 10 or less additional single events of 80 SEL while others will have a reduction in those noise levels, the same is true of the 90 SEL by the year 2030 if the forecast for 2030 is met and aircraft noise is not reduced by quieter aircraft.</p> <p>The 2015 analysis provides the most reasonable estimate of the future as aircraft technology and fleet mix will not have changed significantly within the timeframe analyzed. Reviewing figures 5.1-23 and 5.1-29 indicates that differences in the Proposed Project and the No Project Alternatives are minor and although some residents may experience up to 10 additional operations above 80 or 90 SEL other residents will receive reduced flights.</p>
Comment 16		Response
	<p>The proposed project would result in the construction of a five story parking structure adjacent to Harbor Drive. The City is unable to determine if the proposed parking structure would have visual impacts. While the level of architectural detail provided for the proposed five story parking structure is not necessary at this time, the EIR should provide renderings/simulations of the bulk and scale of the proposed structure. Specifically, the renderings should identify any key observations point or designated view corridor that the parking structure may impact.</p>	<p>Existing views from North Harbor Drive to the north are presently of the airport terminals, airport roads and parking. The proposed project will not alter the views toward the airport from North Harbor Drive and will be similar airport terminal, road and parking facilities. Vehicle operators and passengers traversing on North Harbor Drive have no expectation of viewing a visual landmark or scenic vista on the airport. No views from North Harbor Drive to the south towards Harbor Island, San Diego Bay or downtown San Diego will be altered by the proposed project. There are no significant visual impacts due to the parking structure element of the proposed project.</p>

Comment 17	Subject: Metropolitan Wastewater Department, Development Section	Response
<p>This project will be constructed after the waste within the NTC landfill site is removed and site is remediated. Two major City interceptors, North Metro Interceptor Sewer gravity lines (114-inches and 96-inches) are located at the proposed project site. There is also an 18-inch VC trunk sewer within the proposed site which runs parallel to Sprunce Road. The Scope of Work for the proposed landfill remediation project must be very clear as it affects the major interceptors, including the depth of excavation and depth of cover remaining on the pipe during the excavation for remediation.</p>		Comment noted.
Comment 18		Response
<p>The analysis should include the condition assessment and structural integrity evaluation of the existing interceptors; weight of the heavy equipment during construction, dynamic load calculations, shoring and construction phasing plans that demonstrates how the work will be performed to protect the interceptors and the trunk sewer and coordination for potential shut down of any upstream pump station(s). If any structural support is being proposed, it has to be reviewed and approved by the MWWDD Development Section and DSD structural engineers. The proposed improvement to the pipe must be compatible and meet the intent of use of the proposed airport facility.</p>		Comment noted. Engineering designs for the proposed project above the interceptors and trunk sewer will be submitted to the MWWDD Development Section for review and approval.
Comment 19		Response
<p>If inserting a liner is being proposed it has to be evaluated for structural support and reduction of capacity due to reduction of cross sectional area of a very large diameter pipe. Both dewatering and especially by passing the flow during the operations will be a great concern. By passing the flow has to meet the Regional Water Quality Control Board ("RWQCB") requirements for complete redundancy. The report should address any other sewer pipe that is being affected.</p>		Comment noted. Engineering designs for the proposed project above the interceptors and trunk sewer will be submitted to the MWWDD Development Section for review and approval.
Comment 20	Subject: City Planning & Community Investment, Community Planning Division	Response
<p>The City understands that the DEIR includes both program and project level analyses. As such, the following issues should be address in the Final EIR:</p> <ul style="list-style-type: none"> <li>a. In general, the EIR should indicate where the analysis specifically addresses the project or the program since subsequent project level environmental analyses may use this program level EIR</li> </ul>		<p>a) The DEIR defined the program and project level components in Chapter 3. The Airport Land Use Plan was considered on a program level and the Proposed Airport Implementation Plan was considered on a project level as the SDCRAA seeks to implement certain specific improvements described to meet demand through 2015. The 10 project components included in the Proposed Airport Implementation Plan are specifically described and analyzed at a project level in Chapter 5. If</p>

<p>b. The EIR should provide additional program level analysis addressing the different development scenarios for the year 2030 that would develop 20 additional gates as outlined in Chapter 8 of the AMP.</p> <p>c. The EIR should provide additional program level analysis addressing any potential increase in gate capacity that would increase air operation capacity beyond the maximum build out of the no project alternative for the years 2020 to 2030.</p> <p>d. The EIR should further address the NTC Landfill Remediation Project in more detail to explain the linkage to the proposed implementation project.</p>	<p>future projects are proposed by the SDCRAA or its tenants, those future projects will be evaluated for conformance with the adopted Airport Land Use Plan and the program level environmental analysis included in the Draft EIR.</p> <p>b) Although environmental impacts through the year 2030 are included for analysis in the EIR, it is only included to provide information consistent with regional planning projects for traffic modeling. The Airport Master Plan developed concepts that could serve beyond 2015 on a conceptual basis and the Airport Land Use Plan was developed as a planning guide as to how airport property may be used conceptually to meet the demand for the region’s air service, However, only those 10 elements in the Implementation Plan are proposed for construction and operations at this time to meet demand through 2015. As such, SDCRAA concluded that programmatic analysis of additional 20 gates as outlined in Chapter 8 of the Airport Master Plan is speculative and not necessary.</p> <p>c) The analysis of 2030 was completed for transportation to coincide with regional planning and all other impact categories were analyzed for consistency reasons, but additional improvements are unknown at this point and thus analysis beyond those specific improvements planned to accommodate growth through 2015 would be speculative.</p> <p>d) Remediation of the former Naval Training Center (NTC) landfill is an approved project that is anticipated to be completed before the improvements addressed in the Airport Master Plan would be implemented. The SDCRAA Board certified the Former NTC Landfill Remediation Project Final EIR and approved the remediation project at its December 10, 2007 meeting. The former NTC landfill was addressed as a separate project under CEQA because it has independent utility from the Airport Master Plan evaluated in this EIR. Because the Former NTC Landfill Remediation Project was the subject of detailed analysis in a project-specific EIR, detailed discussion in the Airport Master Plan EIR is not necessary.</p>
<p>Comment 21</p>	<p>Response</p>
<p>The DEIR indicates that the “No Project” alternative could theoretically accommodate the projected 2020 activity, but it could result in poor passenger services levels resulting from crowded terminal areas. The EIR should address if the No Project alternative would result in the number of occupants exceeding the allowable occupancy load as specified by the state building code for the terminal areas or impact the</p>	<p>Although service levels at the Airport would be expected to deteriorate under the No Project Alternative, this would not lead to building occupancies in excess of allowable limits. The Draft EIR (pp. 3-5 to 3-6) acknowledges that increased crowding and congestion would be projected to occur under the No Project Alternative. The SDCRAA would not allow increased crowding to result in unsafe conditions in</p>

<p>ability for occupants to exit the terminal areas in the event of an emergency for the projected 2020 and 2030 activity.</p>	<p>general and, specifically, would not allow occupancies in excess of fire code limits. Passenger terminal occupancy levels are primarily a function of how many passengers are waiting to board aircraft—arriving passengers tend to exit terminal areas quickly and the number of employees in terminals remains fairly constant during the day. Accordingly, if necessary for fire safety reasons, the SDCRAA could place restrictions on how soon before a flight passengers could pass through security checkpoints and enter the gate areas. This would effectively limit the passenger volumes in the gate areas and in the security checkpoint lines, where crowding tends to be the worst. The SDCRAA could also require that, where feasible, queues for ticketing/check-in and security checkpoints extend out of the terminals and onto the sidewalks, thereby reducing the number of people inside the terminal at any one time. It should be noted that the SDCRAA does not envision that such measures would be necessary; however, they could be implemented if needed to ensure compliance with fire code occupancy requirements. The SDCRAA also acknowledges that such measures would represent a burden on passengers (and airlines) that would lower the quality of service for travelers, which is one reason why the Proposed Project addressed in this EIR, including the new gates and expanded terminal area, is currently proposed.</p>
<p>Comment 22</p>	<p>Response</p>
<p>In section 2.4.3, the DEIR states that the 2004 Airport Land Use Compatibility Plan (ALUCP) for SDIA designates as conditionally compatible new residences and other noise sensitive uses located within 60-65 decibel CNEL noise contours. The EIR should note that the 2004 ALUCP designates the above-mentioned uses as conditionally compatible located within the 60-85 decibel CNEL contour.</p>	<p>The text on page 2-40 has been corrected. This information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR.</p>
<p>Comment 23</p>	<p>Response</p>
<p>It appears to the City that the noise contours as shown in DEIR Figure 5.1-4 for the 2015 CNEL noise contours for the Proposed Project alternative have very small differences from the No Project alternative. DEIR Figure 5.1-17 for the 2030 CNEL noise contours proposed project show a slight increase from the no project noise contours. The EIR should indicated if Figure 5.1-17 represents a program level analysis of the level of operation associated with the full implementation of the AMP at 2030.</p>	<p>There is a minimal increase in noise contours between 2015 and 2030 as operations only increase by 90 daily operations. This is due to the limitation of the single runway configuration. The runway capacity would begin to become constrained at about 260,000 annual operations and delay would exceed established thresholds of tolerance at approximately 300,000 annual operations. This same forecast is not reached within the 2030 analysis timeline of the EIR. The level of aircraft noise is not influenced by ALUP as stated in sections 5.1.1.5. The noise analysis was extended to 2030 to be consistent with the traffic analysis. The noise analysis is project level in that it only considers the improvements associated with the Proposed Project and the Project Alternative. The</p>

		2030 contours represent the project level improvements with traffic growth estimated for 2030.
Comment 24		Response
The City is unable to determine the impact to future population and housing impacted by the proposed project's CNEL noise contours. It is unclear in the DEIR Table 5-1.5 if the population and housing data represents the San Diego Association of Government's ("SANDAG") forecasted housing and populations or 2000 Census data. The EIR analysis for this table should incorporate the most recent SANDAG 2030 forecast for population and housing, which can be reported in 5-year increments.		The EIR calculated population based on the 2002 Census Data combined with SANDAG GIS land use coverage. It is not standard practice to evaluate population projections for noise analyses unless there is extensive open land within the study area that could be developed residentially. The area within the contours for SDIA through 2030 is essentially a built-out environment (i.e. there is minimum undeveloped area that could be used for residential development). The ALUCP for SDIA seeks to reduce the development of additional non-compatible land uses and therefore with the understanding that the area surrounding SDIA has minimal open area population should not change significantly over the years.
Comment 25		Response
The City understands that the integrated noise model used in the noise analysis did not account for terrain features including the rising terrain to the northeast of runway 27. The EIR noise analysis should be adjusted or redone to account for terrain features, since it is reasonable to assume that such features will still exist in 2030.		The noise contours did account for terrain using the standard terrain feature included with the Integrated Noise Model. See Appendix B, Section B.3.1.
Comment 26		Response
The City understands that the Airport Authority has recently modified the qualification criteria for the Quiet Home Program to remove the six housing unit per multifamily building limitation as well as enhancing the program's ability to provide noise attenuation to more homes per year. The EIR should address the Quiet Home Program and its role in attenuating existing structures in areas above the 65 decibel noise level.		The Quiet Home Program is managed under the separate Part 150 process and is not implicated by the Proposed Project. A Part 150 is a voluntary FAA program that focuses on reducing non-compatible land uses subjected to aviation noise. Thus, a detailed analysis of the Quiet Home Program is beyond the scope of the EIR. Under the Part 150 process, homes that receive sound attenuation mitigation that meets the FAA requirements are considered by the FAA to be compatible with aviation noise. The analysis within the EIR does not make this distinction, but rather identifies population and housing within each contour interval analyzed. It is beyond the scope of the EIR and not necessary for the impacts analysis to identify individual homes which have been provided noise attenuation through the Quiet Home Program.
Comment 27		Response
The City understands that the Airport Authority is in the process of preparing a new Federal Aviation Administration ("FAA") Part 150 noise land use compatibility study for SDIA. The EIR noise analysis should address the role of the Part 150 study and the potential for the study's recommendations to affect future aircraft operations or impact land use-noise compatibility.		The Part 150 process is separate from the EIR. It would be speculative to analyze the operational measures that the Part 150 may include. The Part 150 process looks only five years into the future and considers noise abatement and land use measures to reduce existing and future non-compatible land uses (i.e. reduce population within future CNEL contours). Conversely, the EIR compares population and housing units between alternatives to determine if there is a significant change in

		population with the alternatives considered. The EIR also compares CNEL levels within the 65 CNEL to determine if there is a 1.5 dB CNEL increase with and without the alternative considered. The comparison indicates that there are no increases of 1.5 dB CNEL in the 65 CNEL.
Comment 28		Response
	The DEIR circulation and traffic analysis proposes traffic improvements that include additional travel lanes and turn lanes to existing surface streets as potential mitigation measures for the proposed project (AMP and Implementation Plan). The EIR should address the acquisition of right-of-way and any associated impacts to land use and on street parking, that supports adjacent commercial land use.	<p>The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies, consistent with the City of San Diego’s January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better. Section 5.3.8 identifies a proposed mitigation measure to add a lane that will remove on-street parking.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the City of San Diego to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its jurisdiction.</p> <p>Section 5.3.8 identifies the need to remove on-street parking to add a lane as a proposed mitigation measure.</p>
Comment 29		Response
	The City understands that the 2004 Airport Land use Compatibility Plan (“ALUCP”) contains policies and criteria that have the potential to affect land use at or above the 60 decibel CNEL noise contour. The EIR does not address potential land use impacts to all of the City’s community plans that would be impacted within the 2030 projected 60 decibel CNEL noise contour for the proposed project. The EIR land use analysis should include all of the impacted community plans within the 2030 projected 60 decibel CNEL noise contour for the proposed project.	The Proposed Project does not cause the effects. Consideration of individual community plans specific to the 60 CNEL was determined to be outside the scope of the EIR because the 2030 CNEL included in this EIR will be included in the SDIA ALUCP and analyzed in the EIR for the that document. Nonetheless, the EIR considers individual community plans within Section 5.2 although not for affect specific to the 60 CNEL. The SDCRAA is in the process of amending SDIA’s ALUCP, which focuses on compatibility issues attributed to the 60 CNEL. The EIR provides total population based on housing units within the 60 CNEL. However, the Proposed Project itself does not induce the 2030 contours, but rather continued growth at SDIA with or without the Proposed Project will generate the potential 2030 CNEL contours provided in the EIR.
Comment 30		Response
	The DEIR indicates that the noise contours associated with the proposed project at the 2030 projected noise level would be equal or	After further review, the text in Section 5.2 has been revised to indicate the ALUCP is being updated with the 2030 contour generated in the EIR.

<p>less than the noise contours adopted in the 2004 ALUCP and therefore, the impact to land use would less than significant. The City is unable to determine if the 2030 projected noise contours are equal or less than the 2004 ALUCP noise contours. The EIR should provide a map showing both the 2030 projected noise contours and the 2004 ALUCP noise contours.</p>	<p>The growth in the contour is, however, not attributed to Proposed Project but to continued growth of operations at SDIA due to market demand and therefore is not a significant effect of the Proposed Project. The growth in noise is being addressed in the ALUCP underway for SDIA. The ALUCP is using the 2030 CNEL contours generated in the EIR for developing compatibility strategies. For near-term noise impacts due to increased aircraft operations the SDCRAA has initiated a Part 150.</p>
<p>Comment 31</p>	<p>Response</p>
<p>The City is unable to determine if the EIR addresses impacts to land use or safety hazards from the Runway Protection Zone (“RPZ”) for each runway end. The City understands that the FAA requires that the RPZs be shown in either or both and AMP or Airport Layout Plan (“ALP”). The city understands that the RPZs for SDIA are shown in the amended 2006 ALP. The specific RPZ dimensions are based on FAA standards based on the operation characteristics of a runway as specified in FAA Advisory Circular 150/5300-14. The FAA provides guidance to the airport operator concerning the development of uses in the RPZ as specified in FAA Advisory Circular 150/5300-13. If the RPZ impacts property not owned by the airport, the FAA provides strict land use recommendations for future development, but it recommends that the airport obtain ownership of the property in the RPZ. The City understands that the purchasing of property in a RPZ may be eligible for potential FAA funding.</p>	<p>See response to General Comment #8.</p>
<p>Comment 32</p>	<p>Response</p>
<p>The Airport Authority Board, as the Airport Land Use Commission for San Diego County, has adopted the FAA land use recommendations for the RPZ in the Airport Land Use Compatibility Plan (ALUCP) for SDIA. When discussing the ALUCP, the EIR does not address the existence of the RPZ limitation or any potential existing or future impacts to land use associated with the RPZ for each runway end. The City understands that the ALUCPs incorporate the RPZ areas with land use compatibility policies for the City to implement, but neither the ALUCP nor the City defines the geographic extend of the RPZ areas. The RPZ are directly related to the existing and long-term operation of SDIA and their extent is defined by FAA criteria.</p>	<p>As stated in Chapter 2.4.3 of the Draft EIR, “the San Diego International Airport Land Use Compatibility Plan is anticipated to be adopted by the San Diego County Regional Airport Authority by 2009.”</p> <p>The Proposed Project, as described in Chapter 4 of the Draft EIR, does not propose to alter the runway or approach visibility minima at San Diego International Airport and thus will not impact the location or size of the existing Runway Protection Zones.</p> <p>As recommended by FAA, the Runway Protection Zones are depicted on the conditionally approved Airport Layout Plan (ALP) available for review by the public through the San Diego County Regional Airport Authority or through the FAA Western Pacific Region – Los Angeles Airports District Office.</p> <p>Please see Response to General Comment # 8.</p>

Comment 33		Response
	<p>The AMP addresses the operation and development of the airport up to 2030. The AMP states the following objective: "Considering compatibility with surrounding land uses and Airport Authority policies." The City is unable to determine if the Airport Authority has a policy addressing non-airport property in the RPZ. The City understands that the Airport Authority Board, at its January 2008 meeting, gave direction to its staff to provide a financial analysis addressing the acquisition of property in the RPZ areas. Given the stated objected of the AMP and recent Airport Authority Board direction, the EIR should do the following:</p> <ol style="list-style-type: none"> <li>Disclose the existence of the runway 9-27 RPZ areas;</li> <li>Provide a map of the existing and any potential future RPZ areas; and</li> <li>Provide any Airport Authority policies or FAA guidelines associated with land use compatibility in the RPZ that may impact land use including the potential of the Airport Authority to obtain ownership of property in the RPZ areas.</li> </ol>	<p>Please see Response to General Comment #8.</p> <p>As recommended by FAA, the Runway Protection Zones are depicted on the conditionally approved Airport Layout Plan (ALP) available for review by the public through the San Diego County Regional Airport Authority or through the FAA Western Pacific Region – Los Angeles Airports District Office.</p> <p>The Proposed Project, as described in Chapter 4 of the Draft EIR, does not propose to alter the runway or approach visibility minima at San Diego International Airport and thus will not impact the location or size of the existing Runway Protection Zones. Thus there are no proposed changes to the location and/or size of the existing RPZs, making analysis of the RPZ beyond the scope of the EIR.</p> <p>As currently configured, the RPZ's at SDIA contain very little privately owned land. While Airport Authority staff has, at the Authority Board's direction, initiated a financial analysis addressing the acquisition of property in the RPZ area, no actual acquisition program has been adopted.</p>
Comment 34		Response
	<p>The City understand that the DEIR includes both program and project level analyses. The EIR should address if the program level traffic analysis includes the proposed future 20 additional gates along Harbor Drive and the consolidated rental car facility, transit center, and surface parking along Pacific Highway as addressed in the different development scenarios for the year 2030 outlines in Chapter 8 of the AMP.</p>	<p>As described on page 3-1 of the EIR the proposed ALUP is considered on program level. The concepts described in Chapter 8 or the AMP is not specifically included in the EIR as additional planning is needed to fully define the facilities needed by 2030 at SDIA. The SDCRAA has initiated a Vision Plan for SDIA that will consider in detail the future of SDIA beyond 2015 now that the Airport Site Selection Program is complete, but analysis at this point of the concepts described in Chapter 8 would be speculative.</p>
Comment 35		Response
	<p>The Proposed ALUP shows a proposed transit corridor from the existing terminal area along Harbor Drive to the North side of the Airport along Pacific Highway. The Plan indicates that a portion of the corridor along Laurel Street and Pacific Highway would require the acquisition of right-of-way. The EIR should address the acquisition of right-of-way and any associated impacts to land use or circulation.</p>	<p>Because the exact location and design of the transit corridor proposed in the ALUP are not known at this time, the Draft EIR has evaluated the impacts of the transit corridor at a programmatic level. Any impacts associated with the acquisition of property for transit corridor right-of-way will be evaluated at a project specific level in future environmental documentation. In addition, the majority of the transit corridor is on airport property or on state tidelands operated by the Port of San Diego.</p>
Comment 36		Response
	<p>The City is unable to determine if proposed implementation project with the parking structure would affect the future implementation of a future</p>	<p>The proposed parking structure at Terminal 2 is set away from the terminal building and sufficient space surrounds the building to</p>

<p>light rail transit extension or other type of fixed guideway systems that may provide access between the terminal area and future multimodal transit center using the proposed transit corridor shown in the proposed Airport Land Use Plan (“ALUP”). The EIR circulation and traffic analysis at both the program and project levels should analyze any potential impacts the preferred project would have on the potential implementation of a fixed guideway system serving the Terminal 2 area.</p>	<p>accommodate a light rail or fixed guideway system that could serve both Terminals 1 and 2. The Airport Land Use Plan does propose a dedicated transit corridor on the airport that could serve vehicles on a dedicated road. This dedicated transit corridor could also serve in the future as the corridor for an automated people mover. However, there are no current plans or alignments for a light rail or fixed guideway system, therefore it would be speculative at this time to assess whether there would be any impacts to a system not proposed or designed.</p>
<p>Comment 37</p>	<p>Response</p>
<p>The DEIR proposed that the City, SANDAG, and California Department of Transportation (“Caltran”) consider providing future circulation improvements including additional travel lanes to existing surface street as potential mitigation measures for the proposed project (AMP and Implementation Plan).</p> <ul style="list-style-type: none"> <li>a. The EIR circulation and traffic analysis at both the program and project levels should consider the potential use of High Occupancy Vehicle (“HOV”) lanes from the freeway ramps to the terminal areas as a potential mitigation measure to allow and support the use of vans, shuttles, and buses for airport related passenger and work trips rather than adding new travel lanes to existing roadways.</li> <li>b. The EIR circulation and traffic analysis at both the program and project levels should provide a phasing schedule for the potential mitigation measures.</li> <li>c. The EIR circulation and traffic analysis should identify a potential process for the Airport Authority to work with the City, SANDAG, Caltrans, Metropolitan Transit System (“MTS”), and North County Transit District (“NCTD”) to identify regional, state, and federal funding sources to plan and implement potential feasible mitigation measures.</li> <li>d. The EIR circulation and traffic analysis should disclose that the potential mitigation measures may cause the need for the City to amend its affected community plans to reflect any changes to planned street classifications, roadway widening and major intersection improvement projects.</li> </ul>	<p>The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies, consistent with the City of San Diego’s January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better.</p> <ul style="list-style-type: none"> <li>a. The SDCRAA does not have jurisdiction to implement off-airport improvements. However, If the City of San Diego and Caltrans propose to implement HOV lanes from I-5 to the terminals, the Airport Land Use Plan identifies a dedicated transit corridor on airport property that could be utilized by HOVs for a portion of Laurel and North Harbor Drive. However, to extend to the freeway, the HOV lanes would have to extend off-airport onto city-dedicated streets. If these roadway improvements are proposed by the City of San Diego, the SDCRAA will coordinate with the City of San Diego and Caltrans to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its jurisdiction.</li> <li>b. The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes a phasing schedule for off-airport improvements, the SDCRAA will coordinate with the City of San Diego and Caltrans to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its</li> </ul>

		<p>jurisdiction.</p> <p>c. All of the transit and transportation agencies identified are participants of the Airport Transit/Roadway Committee that was convened by the SDCRAA in 2005. The SDCRAA proposes that this Committee develop a process to identify regional, state and federal funding sources to plan and implement on and off-airport roadway and freeway improvements.</p> <p>d. Comment noted. The SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements on city-dedicated streets within its jurisdiction.</p>
Comment 38		Response
<p>The DEIR addresses the development of an Airport Transit Plan (“ATP”) and shows a matrix with recommended transit improvements. The City understands that the ATP is not part of the AMP. The City supports the implementation of new and improved existing transit access as potential mitigation measures aimed at reducing vehicle parking and circulation impacts.</p> <ul style="list-style-type: none"> <li>a. The EIR circulation and traffic analysis at both the program and project levels should include the implementation of improvements to existing routes and new routes as addressed in the ATP, including, but not limited to remote parking/terminals with express bus flyway service and light rail transit or bus rapid transit connections to the airport terminal areas.</li> <li>b. The EIR circulation and traffic analysis at both the program and project levels should include the implementation of a comprehensive TDM plan or program for Airport Authority employees and non Airport Authority employees working at the Airport, including but not limited to providing incentives or subsidies for carpooling or vanpooling and transit pass subsidies (full or partial).</li> <li>c. The EIR should document any specific limitations, conditions, or restrictions placed the Airport Authority by the FAA limiting the funding for capital transit improvements and ongoing operations of transit serving the airport.</li> </ul>		<p>See response to General Comment #9.</p> <p>As an operator of a public commercial service airport under the rules of Title 14, Code of Federal Regulations (CFR), Part 139, the SDCRAA works with the Federal Aviation Administration (FAA) to secure entitlements and discretionary funding of airport improvements. If the City or Caltrans take action to approve and implement the road and freeway improvements identified in the EIR, the SDCRAA will request the FAA to determine the permissible use of funds.</p>
Comment 39		Response
<p>The City understands that the United States Marine Corps is planning to develop the existing access gate to Marine Corp Recruit Depot at Washington Street and Pacific Highway into the main entrance for the</p>		<p>The Airport Authority is aware of the Department of the Navy’s plans for the Washington Street entrance to the Marine Corps Recruit Depot. The area proposed for improvements is subject to legal agreements between</p>

<p>Depot, which may impact access to the North side of the airport. The EIR should address this potential impact to the circulation on and access to the North Side of the Airport.</p>	<p>the Airport Authority and the Department of the Navy, and the ultimate disposition of the entrance project is not know at this time.</p> <p>If the proposed Department of the Navy improvements are implemented in a manner that restricts Airport Authority use of the Washington Street entrance, alternative access routes will be studied and implemented.</p> <p>The SDCRAA maintains an easement to use Washington Street to access the ATCT, cargo and other facilities on the north side of the Airport, which is currently the only access to these facilities. If MCRD plans to make changes to this entry point off Pacific Highway, MCRD will be required to complete an environmental analysis to determine the impacts of this change.</p> <p>In addition, the Implementation Plan includes new access to the North area at the intersection of Sassafra and Pacific Highway (shown on FEIR Figure 2.3).</p>
<p>Comment 40</p>	<p>Response</p>
<p>In section 5.3.1.3, the DEIR states that the Series 10 SANDAG forecast uses 1995 while the Series 11 uses year 2000 as the base year for population/employment inputs. The EIR should note that the Series 9 SANDAG forecast uses 1995, Series 10 uses 2000, and Series 11 uses year 2004 as the base year for population/employment inputs. In addition, subsequent references to the Series 10 and 11 forecasts should be corrected. Forecast background information can be obtained from the SANDAG website.</p>	<p>The commenter is correct; the text has been corrected in the Final EIR on pages 5.3-6 and 5.3-7.</p>



THE CITY OF SAN DIEGO

RECEIVED

FEB 04 2008

PLANNING DEPT. #44

January 31, 2008

Department 45  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Subject: Review of Draft Environmental Impact Report to San Diego International Airport Master Plan

The City of San Diego Environmental Services Department has reviewed the public notice concerning the draft Environmental Impact Report for the San Diego International Airport Master Plan and has the following comments concerning solid waste management.

The Airport Authority should consider the types of waste that are going to be generated and how waste generation will be reduced, how materials will be recycled, and how the remainder will be disposed of. The project suggests possible expansion that could encompass as much as 430,100 square feet of space. Environmental Services suggests that the Airport Authority comply with the City Recycling Ordinance in addition to compliance with the Construction and Demolition Ordinance (attached). Environmental Services recommends that the SDCRAA submit an Integrated Waste Management Plan to assist in development of mitigation measures.

The SDCRAA should attempt to reduce the amount generated by this project by 50%. Any excess construction materials that can be recycled should be sorted to reduce costs as mixed debris is more difficult and costly to recycle than materials separated by type. The landfill at Miramar is expected to close as early as 2012 making long-term waste and recycling plans imperative. A suggested mitigation measure is for recycling bins to be furnished in every terminal and at all security check points.

The City of San Diego Environmental Services Department hopes that these suggestions will be taken into consideration in the decision regarding the Airport Master Plan Environmental Impact Report. For more information on suggestions or comments please contact the Environmental Services Department.

Sincerely,

Darin Neufeld  
Resource Management Intern  
City of San Diego  
Environmental Services Department  
(858) 573-1286

1



ORDINANCE NUMBER O-\_\_\_\_\_ (NEW SERIES)

ADOPTED ON \_\_\_\_\_

AN ORDINANCE AMENDING CHAPTER 6, ARTICLE 6 OF THE SAN DIEGO MUNICIPAL CODE BY ADDING DIVISION 6, SECTIONS 66.0601, 66.0602, 66.0603, 66.0604, 66.0605, 66.0606, 66.0607, 66.0608, 66.0609, AND 66.0610, ALL RELATING TO THE DIVERSION OF CONSTRUCTION AND DEMOLITION DEBRIS FROM LANDFILL DISPOSAL.

WHEREAS, the City operates the Miramar Landfill [Landfill], which currently is the only municipal landfill in the City; and

WHEREAS, the Landfill is expected to close between 2011 and 2013; so preserving Landfill capacity in order to extend the useful life of the Landfill for the benefit of the citizens of the City is of paramount concern; and

WHEREAS, the California Integrated Waste Management Act of 1989, Assembly Bill 939 [AB 939], requires that each local jurisdiction in the State divert 50% of waste from landfill disposal; and

WHEREAS, the City could face fines up to \$10,000 per day for not meeting State diversion mandates and may be obligated to adopt the State's Construction and Demolition recycling regulations if the City fails to timely meet those mandates; and

WHEREAS, at least 35%, or 586,000 tons, of waste going into local landfills each year originates from construction and demolition projects within the City and that amount continues to grow; and

WHEREAS, reusing and recycling construction and demolition debris is necessary both to preserve and extend the useful life of the Landfill and to further efforts to reduce waste and comply with AB 939 mandates; and

WHEREAS, construction and demolition debris recycling is proven to reduce the amount of such material deposited in a landfill; and

WHEREAS, except in unusual circumstances, it generally is feasible to divert most of the construction and demolition debris generated from most construction, demolition, and renovation projects; NOW THEREFORE,

BE IT ORDAINED, by the Council of the City of San Diego, as follows:

Section 1. That Chapter 6, Article 6 of the San Diego Municipal Code is hereby amended by adding Division 6, sections 66.0601, 66.0602, 66.0603, 66.0604, 66.0605, 66.0606, 66.0607, 66.0608, 66.0609, and 66.0610, to read as follows:

## **Division 6**

### **Construction and Demolition Debris Diversion Deposit Program**

#### **§ 66.0601 Findings**

The Council of the City of San Diego finds and declares that:

- (a) The City operates the Miramar Landfill, which is currently the only municipal landfill in the City. The Miramar Landfill currently is expected to close between 2011 and 2013. Preserving landfill capacity at the Miramar Landfill in order to extend the useful life of the Miramar Landfill for the citizens of the City is a paramount concern.
- (b) The City has made and continues to make progress in meeting the waste *diversion* requirements imposed by *AB 939*, but additional efforts, particularly in the *diversion of construction and demolition debris*, will assist the City in more quickly reaching the goal of *diverting* 50% of its waste from landfill *disposal*.

- (c) Studies show that approximately 35% of the waste generated in the City of San Diego delivered for *disposal* is *construction and demolition debris*, which could be *diverted* from landfill *disposal*.
- (d) Efforts by the City and the private sector to encourage voluntary *construction and demolition debris diversion* have not been as successful as the City had hoped and additional efforts are necessary to timely meet *AB 939* requirements.
- (e) *Construction and demolition debris diversion* deposit programs in other jurisdictions in the State, similar to the one implemented by this Division, have proven successful in increasing *diversion of construction and demolition debris* and have been favorably received by the California Integrated Waste Management Board.

**§ 66.0602 Purpose of Construction and Demolition Debris Diversion Deposit Program**

The purpose of this Division is to establish the Construction and Demolition Debris Diversion Deposit Program. This program is intended to increase the *diversion* of *construction and demolition debris* from landfill *disposal*, conserve the capacity and extend the useful life of the Miramar Landfill, and avoid the potential financial and other consequences to the City of failing to timely meet *AB 939* requirements.

**§ 66.0603 Definitions**

All defined terms in this Division appear in *italics* and are found in sections 11.0210, 66.0102, and 113.0103 of this Code, except for the terms Building Permit and Demolition/Removal Permit which refer to those terms respectively as used in the Land Development Code and which, consistent with the Land Development

Code, are not italicized in this Division. In addition, whenever the following words or phrases are used in this Division, they mean:

*AB 939* means the California Integrated Waste Management Act, codified at California Public Resources Code sections 40000 et seq.

*Certified recycling facility* means a recycling, composting, materials recovery or reuse facility which accepts *construction and demolition debris* and which has been certified by the *Director* pursuant to rules promulgated by the *Director*.

*Construction and demolition debris* means the waste building materials, packaging, and rubble resulting from construction, remodeling, repair, alteration, and/or demolition operations on pavements, houses, commercial buildings, and other *structures* and may include, but is not limited to, concrete, asphalt, wood, metals, bricks, dirt, rocks, and other inert waste.

*Director* means the Director of the Environmental Services Department (and its successor) or the designee of the Director of the Environmental Services Department (and its successor).

*Disposal* means the final deposition of *solid waste* at a permitted landfill.

*Diversion* or *Divert* means the reduction or elimination of *solid waste* from landfill *disposal*.

*Hazardous waste* has the same meaning as set forth in section 66.0102 of this Code.

*Solid Waste* means all putrescible and nonputrescible solid, semisolid, and liquid wastes, including, but not limited to, garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, *construction and demolition debris*, abandoned vehicles and parts thereof, discarded home and industrial appliances, dewatered, treated, or chemically fixed sewage sludge which is not hazardous waste, manure, vegetable or

animal solid and semisolid wastes, and other discarded solid and semisolid wastes. *Solid Waste* does not include hazardous waste, hazardous substances or medical wastes, as those terms are defined in this Chapter 6 or in State or Federal law.

*Waste Management Form Part I* means the form prepared by the City Manager on which an *applicant* for a Building Permit or Demolition/Removal Permit shall provide information including, but not limited to, the types and amounts of *construction and demolition debris* the *applicant* anticipates the *development* will generate and the expected *construction and demolition debris diversion* the *applicant* expects to achieve for that *development*.

*Waste Management Form Part II* means the form prepared by the City Manager on which the *applicant* for a Building Permit or Demolition/Removal Permit shall provide information including, but not limited to, the name and address of the *person* to whom a deposit refund, if any, shall be issued, as well as documentary evidence in a form satisfactory to the *Director* demonstrating the *construction and demolition debris diversion* the *applicant* achieved for the *development*.

**§ 66.0604 Submittal of Waste Management Form and Diversion Deposit**

- (a) Except as otherwise provided in this Division, all *applicants* for a Building Permit or a Demolition/Removal Permit, including the City of San Diego, shall submit a properly completed *Waste Management Form Part I* with the Building Permit or Demolition/Removal Permit application, in accordance with the requirements set forth in the Land Development Manual.
- (b) Except as otherwise provided in this Division, the *applicant*, including the City of San Diego, shall pay a refundable deposit at the time of submitting the Building Permit or Demolition/Removal Permit application.

- (c) No Building Permit or Demolition/Removal Permit shall be issued unless the *applicant* has submitted a properly completed *Waste Management Form Part I* and paid the required deposit.

**§ 66.0605 Establishment of Construction and Demolition Debris Diversion Deposits**

The City Council shall establish by resolution a schedule of *construction and demolition debris diversion* deposits applicable to Building Permits and to Demolition/Removal Permits. The schedule shall be reviewed and adjusted periodically to ensure the purposes of this Division are met.

**§ 66.0606 Entitlement to Refund of Diversion Deposit**

- (a) An *applicant* is eligible for a refund of the deposit paid pursuant to Section 66.0604(b) provided the *applicant* submits the following directly to the *Director* within 180 days of the final inspection date for the *development* for which the deposit was paid:

- (1) A properly completed *Waste Management Form Part II*, in accordance with the requirements set forth in the Land Development Manual, which demonstrates the *construction and demolition debris diversion* the *applicant* achieved for the *development*.

- (2) Evidence satisfactory to the *Director* that the *construction and demolition debris* generated by the *development* was *diverted*, at the applicable *diversion* rate set forth in Section 66.0606(d) below, by one or more of the following methods:

- (a) on-site reuse of the *construction and demolition debris*;
- (b) acceptance of the *construction and demolition debris* by a *certified recycling facility*; or

- (c) other donation or reuse of the *construction and demolition debris* acceptable to the *Director*.
- (b) *Construction and demolition debris* shall be measured by weight or by volume, whichever is most accurate and practicable. To the extent practicable, all *construction and demolition debris* shall be weighed on a scale.
  - (1) For *construction and demolition debris* which is weighed, the *applicant* shall use a scale which is in compliance with all federal, state, and local regulatory requirements for accuracy and maintenance of such scale.
  - (2) For *construction and demolition debris* for which measurement by weight is not practicable, the *applicant* shall measure by volume and convert the volumetric measurements to weight using the standardized rates established in the City Construction and Demolition Debris Conversion Rate Tables.
  - (3) The *Director* reserves the right, when appropriate, to establish standard weights for various types of *construction and demolition debris* items based upon accepted average weights for such items. These standard weights shall be listed in the City Construction and Demolition Debris Conversion Rate Tables.
- (c) Refunds will be based on proof, satisfactory to the *Director*, of the *construction and demolition debris diversion* the *applicant* achieved for the *development* for which the deposit was paid.
- (d) If the *Director* determines the applicant is entitled to a refund, the amount of the refund shall be in the same proportion to the deposit paid by the *applicant* as the

*diversion* rate achieved for the *development* is to the applicable *diversion* rate set forth below:

- (1) For Building Permits or Demolition/Removal Permits issued on or after the effective date of this Division through and including 180 calendar days from the effective date of this Division, the *diversion* rate shall be 50% by weight of the total *construction and demolition debris* generated by the *development*.
- (2) For Building Permits or Demolition/Removal Permits issued after 180 calendar days from the effective date of this Division, the *diversion* rate shall be 75% by weight of the total *construction and demolition debris* generated by the *development*, provided that a *certified recycling facility* which accepts mixed *construction and demolition debris* is operating in the City at a 75% *diversion* rate as of 181 calendar days from the effective date of this Division. If such a facility is not in operation as of 181 calendar days from the effective date of this Division, the *diversion* rate shall remain as set forth in Section 66.0606(d)(1) until 30 days after the City has notified the public that such a facility is available, at which time the *diversion* rate shall increase to 75% by weight of the total *construction and demolition debris* generated by the *development*;
- (e) Notice under this Division may be given by placing a display advertisement of at least one-eighth page in a newspaper of general daily circulation within the City.
- (f) The *Director* shall determine whether a *certified recycling facility* has reached a certain *diversion* rate.

- (g) The *Director* shall refund a deposit paid or collected in error.
- (h) If a Building Permit or Demolition/Removal Permit application, for which a deposit has been paid, is subsequently withdrawn or cancelled before work on the *development* has commenced, the *Director* shall refund the deposit paid by the *applicant* upon the *applicant's* submittal to the *Director* of satisfactory proof of the withdrawal or cancellation of the application.
- (i) The *Director* shall issue the refund to the *applicant* within the time established by City Council resolution.
- (j) In no event shall the refund be in an amount greater than the deposit paid by the *applicant*.

**§ 66.0607 Certified Recycling Facilities**

- (a) After at least one public hearing, the *Director* shall establish rules and regulations for certifying facilities inside or outside the City for purposes of this Division including, but not limited to, criteria for determining the *diversion* rate achieved by the facility and for verifying that the facility has obtained all applicable permits and licenses. The *Director* shall publish in the official City newspaper a notice of the adoption or amendment of these rules and regulations. The *Director* shall certify facilities in accordance with those rules and regulations.
- (b) Within ten working days after publication of the notice adopting the proposed rules and regulations pursuant to section 66.0607(a), any person in disagreement with the proposed rules and regulations may request in writing to the *Director* that proposed rules and regulations be considered by the City Council. The proposed rules and regulations shall be docketed for City

Council consideration within thirty days of the written request. The decision of the City Council with respect to the rules and regulations shall be final.

**§ 66.0608 Diversion Deposit Program Exemptions**

- (a) The following activities, alone or in combination with one another, are exempt from this Division, except if the activity or activities is/are undertaken in conjunction with *development* which otherwise is subject to this Division:
- (1) Roofing projects that do not include the tear-off of the existing roof.
  - (2) Installation, replacement, or repair of a *retaining wall*.
  - (3) Installation, replacement, or repair of a carport, patio cover, balcony, trellis, or fireplace.
  - (4) Installation, replacement, or repair of a deck.
  - (5) Installation, replacement, or repair of a *fence*.
  - (6) Installation, replacement, or repair of a swimming pool or a spa.
  - (7) Installation, replacement, or repair of a pre-fabricated *sign* which does not require modification to the *structure* to which the *sign* is attached.
  - (8) Installation, replacement, or repair of storage racks.
  - (9) *Development* which requires only an electrical permit, only a plumbing permit, or only a mechanical permit.
- (b) The following activities are exempt from this Division:
- (1) *Development* which is expected to generate only *hazardous waste* and/or *hazardous substances*.
  - (2) *Development* for which the *construction and demolition debris* deposit is less than \$100 as calculated by the Development Services Department or its successor.

**§ 66.0609 Unrefunded Diversion Deposits and Accrued Interest**

A deposit which is not refunded or claimed in accordance with this Division is the property of the City. For purposes of each and every deposit and all interest accrued thereon, the relationship between the *applicant* and the City is that of debtor-creditor, respectively. All interest accruing on each deposit is the property of the City, and the *applicant* shall have no claim upon the interest.

**§ 66.0610 Use of Diversion Deposits and Accrued Interest**

All deposits and accrued interest thereon shall be deposited into the Recycling Fund created pursuant to section 66.0135 of this Code. All deposits and accrued interest thereon shall be used solely and exclusively for the following purposes:

- (a) payment of deposit refunds, as determined by the *Director*;
- (b) payment of administrative costs of the Construction and Demolition Debris Diversion Program established by this Division;
- (c) payment of costs of programs designed to encourage *diversion of solid waste* from landfill *disposal*;
- (d) payment of costs of programs designed to develop or improve the infrastructure to *divert solid waste* from landfill *disposal*; or
- (e) payment of costs to develop or improve infrastructure to *divert solid waste* from landfill *disposal*.

Section 2. That a full reading of this ordinance is dispensed with prior to its final passage, a written or printed copy having been available to the City Council and the public a day prior to its final passage.

Section 3. That this ordinance shall take effect and be in force on the 45th day after the City has notified the public, in the manner described in section 66.0606(e) of this ordinance, that a *certified recycling facility* which accepts mixed *construction and demolition debris* is operating in the City at a 50% *diversion* rate.

APPROVED: MICHAEL J. AGUIRRE, City Attorney

By

\_\_\_\_\_  
Grace C. Lowenberg  
Deputy City Attorney

GCL:mb  
06/06/05  
08/30/05 Corr.  
09/28/05 Rev.  
Or.Dept:ESD  
O-2005-143

<b>City of San Diego Resource Management Division</b>		Signed by: Darin Neufeld, Resource Management Intern City of San Diego Environmental Services Department
Subject:	Review of Draft Environmental Impact Report to San Diego International Airport Master Plan	
Comment: 1	Subject: Solid Waste Management	Response
<p>The Airport Authority should consider the types of waste that are going to be generated and how waste generations will be reduced, how materials will be recycled, and how the remainder will be disposed of. The project suggests possible expansion that could encompass as much as 430,100 square feet of space. Environmental Services suggests that the Airport Authority comply with the City Recycling Ordinance in addition to compliance with the Construction and Demolition Ordinance (attached). Environmental Services recommends that the SDCRAA submit an Integrated Waste management Plan to assist in development of mitigation measures.</p> <p>The SDCRAA should attempt to reduce the amount generated by this project by 50%. Any excess construction materials that can be recycled should be sorted to reduce costs as mixed debris is more difficult and costly to recycle than materials separated by type. The landfill at Miramar is expected to close as early as 2012 making longer-term waste and recycling plans imperative. A suggested mitigation measure is recycling bins to be furnished in every terminal and at all security check points.</p>		<p>Thank you your comments and suggestions regarding the types and amount waste that will generated by the development proposed in the Airport Master Plan and analyzed in this EIR. As with all development projects undertaken at the Airport, the SDCRAA will be developing means and methods to minimize and manage the wastes that may be produced. Waste minimization, reuse, and recycling are up-front considerations in the SDCRAA's development planning processes. An integrated waste management plan, as recommended by the City of San Diego Environmental Services Department, is certainly one means of documenting the planning and performance of these efforts, and the SDCRAA will certainly consider such a plan or similar mechanism. Please note, however, that such a plan is not required as CEQA mitigation for the Proposed Project because the EIR did not find that the Proposed Project would have a potentially significant impact related to waste generation.</p> <p>The SDCRAA also acknowledges the City's concern for the useful life-expectancy of Miramar Landfill and intends to reduce to the maximum extent feasible the amount of waste generated by the development envisioned by the Master Plan—waste minimization makes good environmental sense and good business sense. Waste minimization, reuse, and recycling efforts related to implementation of the Airport Master Plan will go beyond the measure suggested by the City, namely, the placement of recycling bins in every terminal and at all security checkpoints (please note that recycling bins already exist at these locations).</p> <p>During 2007, the SDCRAA expanded its efforts to collect and recycle electronic waste, increased recycling education to its staff and the public, and introduced water conservation measures to reduce water waste. These program elements, along with information about other recycling efforts, are more fully described below [or in Final EIR Section 5.11.4.5]. The descriptions of ongoing waste reduction programs incorporated into this Final EIR do not represent significant new information that would change the significance findings presented in the Draft EIR, but rather are provided to demonstrate SDCRAA's waste minimization efforts.</p> <p><b>Airport Recycling Program</b> In 2002, the SDCRAA adopted a single stream-recycling program, allowing all recyclable materials to be collected in the same container. Acceptable recyclable materials include cardboard (OCC), mixed paper, old newspapers (ONP), aluminum, glass, tin cans and</p>

plastic (#1 and #2). The single-stream program has made it easier for employees and tenants to participate in the recycling program. Attention-grabbing recycle containers are placed throughout the terminals in close proximity to trash containers. In 2007, the SDCRAA budgeted \$140,000 to purchase more indoor and outdoor recycling containers to place throughout the Airport. SDCRAA and tenant office staff use desk-side recycling containers. The Airport janitorial staff, vendors, and airline companies have access to two large recycle compactors, two open top 40-yard metal only containers, one wood pallet only container (added in 2007), and several front-loading recycle bins.

Of the 268 tons of recyclable materials collected in 2007, the SDCRAA generated over \$13,000 in revenue from the sale of more than 226 tons of marketable recyclable materials that were removed from the waste stream. The SDCRAA also saved more than \$23,000 in 2007 by recycling green waste, metal, and commingled waste instead of disposing of these waste as trash.

The SDCRAA has an effective outreach program to educate potential users about the single-stream recycling program. The SDCRAA has developed a brochure that is distributed to its staff and Airport tenants to promote the single-stream recycling program. The brochure is written in both English and Spanish and is also accessible via its website. SDCRAA recycling outreach and education efforts have even been featured as a success story on the U.S. Environmental Protection Agency's "Recycle on the Go" website, <http://www.epa.gov/epaoswer/osw/conserve/onthego/documents/airports.htm#san>.

#### **Solid Waste Reduction Team**

In 2007 the SDCRAA's Environmental Affairs Department and Landside Operations Department formed the Waste Reduction Team—a group of employees and tenants who meet monthly to tackle solid waste issues at the Airport. The broad membership includes airline representatives, concessionaires and vendors, the Airport janitorial contractor, procurement specialists, real estate personnel, information technology technicians, and the Airport's municipal solid waste hauler, Allied Waste. Additionally, a staff member from the City of San Diego's Environmental Services Department is part of Team. The Team's overall objectives are to (1) track the Airport waste stream, from generation through recycling and disposal, and (2) identify, promote, and implement waste reduction initiatives.

#### **Office Waste Reduction and Recycling Program**

SDCRAA uses electronic formats for virtually all communication within and between departments. To prevent unnecessary printing of copies SDCRAA employees use e-mails with hyperlinked attachments. Electronic communication with outside entities is also preferred where feasible. "Document processing centers" have been established in shared work areas that are computer-network accessible and feature double-sided printing and copying, document scanning and electronic mailing capacity, all of which reduce the generation of waste paper and toner cartridges. Employees are encouraged to use clean waste paper for note and scratch paper. Interoffice mail, when necessary, is distributed using reusable envelopes. Waste paper recycling containers are provided at each workstation and in all shared document-processing areas, making it convenient and easy for employees to

recycle office paper. The SDCRAA also contracts for on-site confidential document destruction and recycling, making it possible for the SDCRAA to recycle 1,032 lbs of paper and save the equivalent of 86 trees (based on a conversion factor of 120 lbs of paper per tree) in 2007.

In addition to recycling and reducing the use of paper-products, SDCRAA practices Environmental Preferable Purchasing. During 2007, approximately 99% of the office paper purchased was at least 30% recycled post consumer content and 40% of the toner cartridges purchased were recycled/refurbished and had been refilled. SDCRAA does not buy boxes, packing peanuts, or bubble wrap, and 100% of the new packaging material purchased is at least 30% recycled content. Airport brochures are printed on recycled-content paper. One hundred percent of floor mats purchased are created from recycled rubber and other materials. The SDCRAA's Procurement Department purchases cleaning and maintenance supplies made with recycled materials where feasible. In 2007, SDCRAA saved over \$11,796 by purchasing recycled/refurbished toner cartridges and recycled-content office paper.

**Universal Waste (U-Waste) Collection Program and Training**

In 2006, SDCRAA initiated a U-waste program for its employees and further developed this service during 2007. There are six U-waste drop-off locations located around employee work stations. In 2007, SDCRAA collected a total of 3,801 pounds of U-waste, including fluorescent light bulbs and alkaline, cell phone, and rechargeable batteries. SDCRAA included U-waste and recycling training in its annual employee safety training.

**Electronic Waste (E-Waste) Collection**

SDCRAA hosted a week-long End-of-Summer Clean-up Event from September 17 through 21, 2007, which was open to all the nearly 5,000 people that work at the Airport. The event collected over 4 tons of E-waste that was properly recycled/disposed. Separately, the Procurement Department collected over 10 tons of E-waste. In total, more than 14 tons of E-waste was collected at the Airport and properly recycled/disposed in 2007.

**Landscape Waste Reduction**

SDCRAA plants a combination of California-native grasses, shrubs, trees, and palms on nearly all of the 12.5 acres of landscaped areas at the Airport. These native species are drought tolerant, generate smaller amount of plant litter and debris, and require less amounts of fertilizers, pesticides, and herbicides than exotic plants. Clippings generated during maintenance are left on the turf as an organic fertilizer, reducing green waste and reducing the need for fertilizers. During 2007, 1,080 cubic yards of landscape green waste were collected and recycled.

**Construction and Demolition Waste (C&D-waste) Reduction and Recycling**

SDCRAA strives to divert C&D-waste from local landfills. In previous years, the SDCRAA has diverted mortar and tile, gypsum wall board, asphalt and concrete. In 2004, the Airport conducted two construction projects that produced over 4,435 of C&D-waste; over half of these materials were reused or recycled. SDCRAA reused 44,200 cubic yards of soil, 2,450

cubic yards of asphalt, and 260 cubic yards of concrete during the construction of an Airport parking lot. Additionally, the SDCRAA recycled the dismantled and recycled all the metal generated from the replacement of large portions of the luggage/baggage conveyor system.

**Public Information**

As noted above, the SDCRAA distributes a bilingual Recycling Guide that serves as an educational tool to inform employees and tenants about the Airport's recycling program. This brochure identifies the items that can be recycled in the single-stream recycling containers and provides guidelines, facts, and statistics concerning recycling in general. Brochures are available in the Airport terminals and at various outreach events year-round. In a continuing effort to increase public awareness about waste reduction and recycling, the SDCRAA has placed illuminated billboards on display throughout the Airport terminals year-round. These billboards feature messages about the *Don't Trash California* anti-litter campaign, WildCoast's *Protect San Diego Coastal Wildlife* campaign, and the Annual California Coastal Cleanup Day.

SDCRAA is dedicated to recycling and reducing Airport waste in a variety of manners, as described above. SDCRAA formed the Waste Reduction Team in an effort to expand and improve its recycling and waste reduction programs. SDCRAA continues to educate and engage its employees, other Airport employees, and the public on the Airport's recycling program and the benefits of recycling and diverting waste from landfills. SDIA has been nationally recognized as a leader in its effort to inform the public and Airport employees on its recycling program using its bilingual recycling brochure.



THE CITY OF SAN DIEGO

RECEIVED

January 28, 2008

JAN 31 2008

Ted Anasis, Manager
Airport Planning
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

PLANNING DEPT. #44

Subject: Draft Environmental Impact Report Airport Master Plan San Diego
International Airport State Clearinghouse No. 2005091105

Dear Mr. Anasis:

Thank you for the opportunity to provide comments on the Master Plan Draft Environmental Impact Report (MPDEIR). The City of San Diego Solid Waste Local Enforcement Agency (LEA) has authority, within its jurisdiction, over implementation and enforcing state solid waste laws and regulations over active solid waste facilities and closed disposal sites. The LEA's comments on the MPDEIR are limited to solid waste handling and disposal activities:

The LEA provided comments on the Closure Plan for the Naval Training Center (NTC) Closed Landfill in a letter dated May 22, 2007 and provided comments on the Draft EIR for the closure plan dated, October 10, 2007.

The following comments address solid waste related matters relating to the MPDEIR only:

1) 5.11 Utilities and Service Systems: Contact the LEA prior to conducting any on-site construction, demolition or inert (CDI) recycling operations. Under specified circumstances processing CDI materials may be subject to California Code of Regulations, Title 14, Division 7, Chapter 3, Article 5.9, if these materials are processed on a project specific basis or as part of an on-going solid waste management plan (SWMP).

1

2) 5.11.4.5 Solid Waste Landfill:

a) Sycamore landfill expansion: The Sycamore Landfill is currently permitted to receive 3,960 tons per day. The expansion project is still under CEQA review.

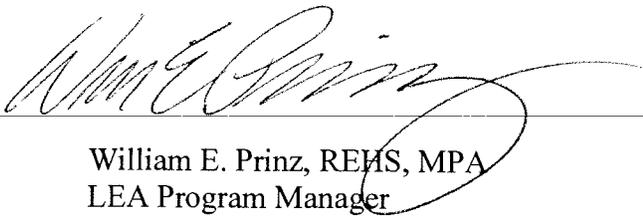
2



- b) Recycling Strategies: The City of San Diego is no longer pursuing a CDI processing and recycling facility for the West Miramar Sanitary Landfill.
- c) Solid Waste Disposal (page 325) – The West Miramar Landfill is not owned by the City of San Diego. The City operates the landfill under a lease agreement with the Marine Corp Air Station Miramar.

If you have any questions regarding this letter please call me at 619-533-3696.

Sincerely,



---

William E. Prinz, REHS, MPA  
LEA Program Manager

cc: Kelly Broughton, Development Services Director

<b>City of San Diego Solid Waste Local Enforcement Agency (LEA)</b>		Signed By: William E. Prinz, REHS, MPA LEA Program Manager
Subject	Draft Environmental Impact Report Airport Master Plan San Diego International Airport State Clearinghouse No. 2005091105	
Comment 1	Subject: 5.11 Utilities and Service Systems	Response
Contact the LEA prior to conducting any onsite construction, demolition or inert (CDI) recycling operations. Under specified circumstances processing CDI materials may be subject to California Code of Regulations, Title 14, Division 7, Chapter 3, Article 5.9, if these materials are process on a project specific basis or as part of an on-going solid waste management plan (SWMP).		Comment noted.
Comment 2	Subject: 5.11.4.5 Solid Waste Landfill	Response
<ul style="list-style-type: none"> <li>a. Sycamore landfill expansion: The Sycamore Landfill is currently permitted to receive 3,960 tons per day. The expansion project is still under CEQA review.</li> <li>b. Recycling Strategies: The City of San Diego is no longer pursuing a CDI processing and recycling facility for the West Miramar Sanitary Landfill.</li> <li>c. Solid Waste Disposal (page 325) – The West Miramar Landfill is not owned by the City of San Diego. The City operates the landfill under a lease agreement with the Marine Corp Air Station Miramar.</li> </ul>		The text of the Final EIR has been revised to reflect these comments. See Section 5.11.4. This information does not represent significant new information and does not affect the significance determinations presented in the EIR.



1255 Imperial Avenue, Suite 1000  
 San Diego, CA 92101-7490  
 (619) 231-1466 • FAX (619) 234-3407

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FEB 04 2008

FACSIMILE TRANSMITTAL FORM

PLANNING DEPT. #44

DATE: February 4, 2008  
 FAX NO. 400.2459  
 TO: Attn: Ted Anasis

FROM: Mark Thomsen TELEPHONE NUMBER: 595.4909

SUBJECT: DEIR Response

NUMBER OF PAGES TRANSMITTED 2 (including transmittal page)

NOTES: Hard copy in mail with today's post mark.

TO REPLY:

MTS General Telephone No. 619.231.1466  
 Facsimile: 9th Floor 619.234.1047  
 Facsimile: 10th Floor 619.234.3407  
 Facsimile: Executive/Confidential 619.234.3172

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 Revised 7/8/05



1255 Imperial Avenue, Suite 1000  
 San Diego, CA 92101-7490  
 (619) 231-1466 • FAX (619) 234-3407

February 4, 2008

S RTP 840.9.1 (PC 50451)

**Airport Planning**  
**San Diego County Regional Airport Authority**  
 3225 North Harbor Drive  
 P.O. Box 82776  
 San Diego, CA 92138-2776

Dear Sir or Madam:

**Subject: DRAFT ENVIRONMENTAL IMPACT REPORT, SAN DIEGO INTERNATIONAL AIRPORT  
 MASTER PLAN: METROPOLITAN TRANSIT SYSTEM COMMENTS**

The Metropolitan Transit System (MTS) submits the following comments pertaining to the revised Draft Environmental Impact Report (DEIR) associated with the San Diego International Airport (SDIA) Master Plan.

- The revised DEIR provides traffic, passenger and operations projections through 2030 but provides no analysis of impacts and no mitigations for the 2015-2030 period. When planning for SDIA improvements beyond 2015 is undertaken and impacts are revisited, the impacts on existing transit services and any necessary mitigation should be identified and incorporated into the plans.
- The revised DEIR includes a goal of increasing the transit mode share of airline passengers from the current approximate 1.2% to 5.0% but provides no information about how this increase would be achieved, what the impacts would be on existing transit services and how these impacts would be mitigated. Identification of the specific projects, impacts, mitigations and responsibility for provision are required because it is "the main goal" of the Airport Authority to effect this increase "over the next 3 to 5 years" (Section 2.4.1).

1  
2

Thank you for affording the MTS staff the opportunity to comment on the San Diego Regional Airport Authority's expansion plans for SDIA.

Sincerely,

A handwritten signature in black ink, appearing to read "Conan Cheung", written over a white background.

**Conan Cheung**  
 Director of Planning & Scheduling

cc: Paul Jablonski, Sharon Cooney – MTS  
 Bob Leiter, Dave Schumacher – SANDAG  
 Ted Anasis – SDCRAA  
 Kurt Luhrsen – NCTD



<b>Metropolitan Transit System</b>		Signed by: Conan Cheung, Director of Planning & Scheduling
Subject:	Draft Environmental Impact Report, San Diego International Airport Master Plan: Metropolitan Transit System Comments	
Comment: 1	Subject: Traffic Mitigation 2015-2030	Response
<p>The revised DEIR provides traffic, passenger and operations projections through 2030 but provides no analysis of impact and no mitigations for the 2015-2030 period. When planning for SDIA improvements beyond 2015 is undertaken and impacts are revisited, the impacts on existing transit services and any necessary mitigation should be identified and incorporated into the plans.</p>		<p>Section 5.3 presents analysis of traffic impacts and proposes potential mitigation measures attributable to project impacts where required for 2010, 2015, and 2030 under the Proposed Implementation Plan and Airport Land Use Plan. The Airport Land Use Plan contemplates airport development beyond 2015 and Section 5.3 presents the program level traffic impact analysis. As the Airport Land Use Plan was analyzed from a programmatic level, the Authority agrees that when improvements under the Airport Land Use Plan are undertaken additional environmental analysis will be conducted to analyze the project level impacts of such improvements and impacts to traffic, transit, etc. will be assessed and any mitigation will be identified.</p>
Comment 2	Subject:	Response
<p>The revised DEIR includes a goal of increasing the transit mode share of airline passengers from the current approximate 1.2% to 5.0% but provides no information about how this increase would be achieved, what the impacts would be on existing transit services and how these impacts would be mitigated. Identification of the specific projects, impacts, mitigations and responsibility for provision are required because it is “the main goal” of the Airport Authority to effect this increase “over the next 3 to 5 years” (Section 2.4.1).</p>		<p>The SDCRAA has set a goal of increasing airline passenger transit ridership from 1.2% to 5.0% in the next 3 to 5 years. Table 2-21 presents the potential transit improvements that may be implemented to achieve this goal and the responsible agency associated with each potential improvement. Section 2.4.1 provides a summary of the Airport Transit Plan, a study the SDCRAA is undertaking outside of the EIR and the SDCRAA is working with local transit, transportation and planning agencies, under a separate study, to implement measures proposed in Table 2-21. The EIR conservatively calculates traffic impacts assuming the existing airline passenger mode share and does not take credit for the 5%. The goal has been stated for informational purposes and the next phase of the Airport Transit Plan will identify which transit improvements are feasible, how they will be implemented and what, if any, impacts they might have. The Airport Transit Plan and transit ridership goal are not subject to this EIR and have been stated for informational purposes.</p>



**NORTH COUNTY TRANSIT DISTRICT  
 810 MISSION AVENUE  
 OCEANSIDE, CA 92054 - 2825  
 (760) 967-2828**

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**FAX TRANSMITTAL COVER SHEET**

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<b>DATE:</b>	January 4, 2008	<b>NO. OF PAGES:</b>	3 (INCLUDING COVER SHEET)
<b>COMPANY:</b>	San Diego County Regional Airport Authority	<b>FROM:</b>	Kurt F. Luhrsen <i>KFL</i>
<b>ATTN:</b>	Ted Anasis	<b>E-MAIL:</b>	kluhrsen@nctd.org
<b>FAX NO.:</b>	(619) 400-2459	<b>TITLE:</b>	Principal Planner
<b>PHONE NO.:</b>		<b>FAX NO.:</b>	(760) 967-2001
<b>PHONE NO.:</b>		<b>PHONE NO.:</b>	(760) 966-6546
<b>SUBJECT:</b>	Comments on Airport Draft EIR		

---

Urgent   
  For Review   
  Please Comment   
  Please Reply   
  FYI   
  Other

---

**MESSAGE:**

Attached is a comment letter from NCTD on the Draft EIR for the above referenced project.  
 Please let me know if you have any questions.

RECEIVED  
 JAN 04 2008  
 PLANNING DEPT. #44



January 4, 2008

Mr. Ted Anasis  
San Diego Regional Airport Authority (SDCRAA)  
P.O. Box 82776  
San Diego, CA 92138-2776

Dear Mr. Anasis:

**SUBJECT:** Draft Environmental Impact Report (DEIR) for the Airport Master Plan

Thank you for the opportunity to review the Draft Environmental Impact Report for the Airport Master Plan. The North County Transit District (NCTD) appreciates our continued working relationship in our effort to enhance transit services to the airport.

NCTD previously submitted comments regarding the DEIR released in 2006. NCTD has reviewed the latest version of the draft DEIR and has the following comments.

**The DEIR still fails to cite Implementation of transportation demand management (TDM) programs for employees as a mitigation measure to reduce ADT.**

The DEIR still has not discussed possible expansion of transportation demand management programs for airport employees as a means of reducing ADT. Implementation of this potential mitigation measure would require that the traffic impact analysis be updated to indicate the percentage of ADT that can be attributed to airport employees versus airport passengers, including detailed information on employee shift times for several categories of employees. A transportation coordinator should also be hired to manage the airport's TDM program for its employees.

Reduction in ADT via transit improvements can be accomplished specifically by enhancing opportunities for local residents to access the airport, and by expanding the airport's TDM program for airport employees.

**The opportunity to increase transit mode share through transit improvements is particularly significant along the I-5/COASTER corridor in North County.**

Based on the original DEIR's analysis of San Diego International Airport traffic distribution by location, 15% of airport passengers originate from cities along the COASTER corridor. The COASTER stops at 8 stations along the I-5 corridor, and serves 1,554,150 riders annually. Ridership on the COASTER is increasing at an average rate of 7% per year. COASTER service is not currently provided after 8:00 P.M. on weekdays, 8:30 P.M. on Saturdays, and there is no service available on Sundays. With the opening of the SPRINTER light rail service along the North County's east-west corridor from Oceanside to Escondido in early 2008, residents in inland North County areas will also have better transit access to the airport.

**NORTH COUNTY TRANSIT DISTRICT**  
810 Mission Avenue, Oceanside, CA 92054-2025  
760.967.2828

Mr. Ted Anasis  
January 4, 2008  
Page 2

The DEIR mentions the draft airport transit plan that is being developed; it cites expansion of COASTER service on evenings and weekends and flyaway service to Escondido Transit Center as Tier 2 recommended transit improvements. The EIR and final airport transit plan should include a detailed schedule for implementation of these improvements, in order to meet the draft airport transit plan's stated goal of increasing airport passenger transit ridership from the existing 1.2 percent to the national average of 3 to 5 percent over the next 3 to 5 years.

**The DEIR should consider the addition of bicycle facilities as an additional means of reducing ADT.**

It is likely that a significant number of airport employees ride bicycles as their primary commute mode to the airport. The DEIR should consider opportunities to encourage bicycling as a commute mode for airport employees, by potentially providing bike lanes that safely and conveniently connect to nearby bicycle facilities, such as the bike path along Harbor Drive. In addition, shower facilities should be provided for employees that bike to work.

Thank you for your consideration. If you have any questions, please contact me at (760) 966-6546 or at [kluhrsen@nctd.org](mailto:kluhrsen@nctd.org).

Sincerely,



Kurt Luhrsen  
Principal Planner

2

<b>North County Transit District</b>		Signed by: Kurt Luhrsen, Principal Planner
Subject:	Draft Environmental Impact Report (DEIR) for the Airport Master Plan	
Comment: 1	Subject: Transportation Demand Management	Response
<p>The DEIR still fails to cite implementation of transportation demand management (TDM) programs for employees as a mitigation measure to reduce ADT. The DEIR still has not discussed possible expansion of transportation demand management programs for airport employees as a means of reducing ADT. Implementation of this potential mitigation measure would require that the traffic impact analysis be updated to indicate the percentage of ADT that can be attributed to airport employees versus airport passengers, including detailed information on employee shift times for several categories of employees. A transportation coordinator should also be hired to manage the airport's TDM program for its employees.</p> <p>Reduction in ADT via transit improvements can be accomplished specifically by enhancing opportunities for local residents to access the airport, and by expanding the airport's TDM program for airport employees.</p> <p>The opportunity to increase transit mode share through transit improvements is particularly significant along the I-5/COASTER corridor in North County. Based on the original DEIR's analysis of San Diego International Airport traffic distribution by location, 15% of airport passengers originate from cities along the COASTER corridor. The COASTER stops at 8 stations along the I-5 corridor, and serves 1,554,150 riders annually. Ridership on the COASTER is increasing at an average rate of 7% per year. COASTER service is not currently provided after 8:00 PM on weekdays, 8:30 PM on Saturdays, and there is no service available on Sundays. With the opening of the SPRINTER light rail service along the North County's east-west corridor from Oceanside to Escondido in early 2008, residents in inland North County areas will also have better transit access to the airport.</p> <p>The DEIR mentions the draft airport transit plan that is being developed; it cites expansion of COASTER service on evenings and weekends and flyaway service to Escondido Transit Center as Tier 2 recommended transit improvements. The EIR and final airport transit plan should include a detailed schedule for implementation of these improvements, in order to meet the draft airport transit plan's stated goal of increasing airport passenger transit ridership from the existing 1.2 percent to the national average of 3 to 5 percent over the next 3 to 5 years.</p>		<p>See response to General Comment #9</p> <p>Comment noted. The Authority agrees there are opportunities to make the COASTER more attractive to airline passengers. Through coordination with NCTD, the Airport Transit Plan has transit improvements focused on increasing Airport users' ridership on the COASTER and other NCTD transit services (see Table 2-21). SDCRAA will continue to work with NCTD toward that goal via the Transit Agencies participation on the Airport Transit / Roadway Committee.</p> <p>The Airport Transit Plan is not part of the EIR or proposed project and will not be finalized in time to include a detailed schedule for implementation, especially since additional planning and feasibility analysis must be conducted prior to implementation of Tier 1 and Tier 2 transit improvements. All scheduling will be part of the Airport Transit Plan.</p>

Comment 2	Subject: Bicycle facilities	Response
	<p>The DEIR should consider the addition of bicycle facilities as an additional means of reducing ADT.</p> <p>It is likely that a significant number of airport employees ride bicycles as their primary commute mode to the airport. The DEIR should consider opportunities to encourage bicycling as a commute mode for airport employees, by potentially providing bike lanes that safely and conveniently connect to nearby bicycle facilities, such as the bike path along North Harbor Drive. In addition, shower facilities should be provided for employees that bike to work.</p>	<p>The Airport Authority will consider bicycle facilities as part of the Employee Transit Incentive Program under the Airport Transit Plan.</p> <p>See response to General Comment #9.</p>

VIA CERTIFIED MAIL

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FEB 04 2008

January 31, 2008

PLANNING DEPT. #44

San Diego County Regional Airport Authority  
Attn: Ted Anasis, Airport Planning  
P.O. Box 82776  
San Diego, CA 92138-2776

Subject: Comments on Draft Environmental Impact Report – San Diego  
International Airport Master Plan (October 2007)

Dear Mr. Anasis:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the San Diego International Airport Master Plan dated October 2007. As Port of San Diego (Port) tidelands are located on properties surrounding SDIA, Port staff is particularly concerned about proposed improvements, land use plan designations, or mitigation measures that may directly or indirectly affect Port properties. With this in mind, the Port submits the following comments on the DEIR:

**Chapter Three: Project Objectives, Pg 3-4, Section 3.1.4 Ground Transportation Land Use Designation.**

It is the Port's understanding that as part of the proposed Airport Land Use Plan, the rental car facilities located off-Airport along North Harbor Drive and Pacific Highway, on Port jurisdictional property, may be relocated to the North Area within a proposed Consolidated Rental Car (CONRAC) facility within the proposed designated Ground Transportation land use area. The Port requests that the Airport Authority coordinate future planning discussions regarding the proposed CONRAC with the Port.

1

**Chapter Four: Proposed Project and Alternatives, Pg 4-2, third bullet under Group Transportation land uses and Figure 4.1 Proposed Airport Land Use Plan.**

It is the Port's understanding that a portion of the proposed dedicated transit corridor (i.e. the portion of the corridor shown in orange in the proposed Land Use Plan) would be located on existing Port property. The Port requests that the Airport Authority coordinate future planning discussions regarding the proposed dedicated transit corridor with the Port.

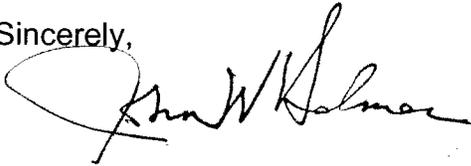
2

**Chapter 5.3 Traffic and Circulation, Pg 5.3-128, Section 5.3.8 Mitigation Measures.** The traffic mitigation measures involve roadway improvements, such as additional travel lanes and prohibition of on-street parking. However, it is unclear whether these roadway improvements would occur within the existing rights-of-way or if adjacent property (i.e. Port tidelands) would need to be acquired. Please clarify this in the DEIR.

3

Thank you again for the opportunity to comment on the DEIR. The Port looks forward to working with Airport Authority staff in a meaningful and productive manner towards achieving mutually beneficial solutions in developing our respective properties. If you would like to meet with Port staff to discuss these comments, please contact Wileen Manaois at (619) 686-6282.

Sincerely,



John W. Helmer  
Manager, Planning Services

cc: Dan Wilkens  
Annette Dahl  
Wileen Manaois

<b>Unified Port of San Diego</b>		Signed by: John W. Helmer Manager, Planning Services
Subject:	Comments on Draft Environmental Impact Report- San Diego International Airport Master Plan (October 2007)	
Comment: 1	Subject: Chapter Three: Project Objectives, Pg 3-4, Section 3.1.4 Ground Transportation Land Use Designation	Response
It is the Port's understanding that as part of the proposed Airport Land Use Plan, the rental car facilities located off-Airport along North Harbor Drive and Pacific Highway, on Port jurisdictional property, may be relocated to the North Area within a proposed Consolidated Rental Car (CONRAC) facility within the proposed designated Ground Transportation land use area. The Port requests that the Airport Authority coordinate future planning discussion regarding the proposed CONRAC with the Port.		Comment noted.
Comment 2	Subject: Chapter Four: Proposed Project and Alternatives, Pg 4-2, third bullet under Group Transportation land uses and Figure 4.1 Proposed Airport Land Use Plan	Response
It is the Port's understanding that a portion of the proposed dedicated transit corridor (i.e. the portion of the corridor shown in orange in the proposed Land Use Plan) would be located on existing Port property. The Port requests that the Airport Authority coordinate future planning discussions regarding the proposed dedicated transit corridor with the Port.		Comment noted.
Comment 3	Subject: Chapter 5.3 Traffic and Circulation, Pg 5.3-128, Section 5.3.8 Mitigation Measures	
The traffic mitigation measures involve roadway improvements, such as additional travel lanes and prohibition of on-street parking. However, it is unclear whether these roadway improvements would occur within the existing rights-of-way or if adjacent property (i.e. Port tidelands) would need to be acquired. Please clarify this in the DEIR.		The EIR identifies measures that mitigate the project's direct significant and/or cumulatively considerable traffic impacts. The majority of the roadway improvements are off-airport on city-dedicated streets. The SDCRAA does not have jurisdiction to implement off-airport improvements. However, the Airport Land Use Plan identifies a dedicated transit corridor on-airport property along Pacific Highway and North Harbor Drive that contemplates State tidelands for High Occupancy Vehicles, including a portion of State tidelands not leased by the SDCRAA along Laurel Street that is currently used as parking for Solar Turbines. If the dedicated transit corridor is to be implemented, this segment of State tidelands would be affected.



Ocean Beach Planning Board, Inc.  
P.O. Box 70184  
Ocean Beach, California 92167

December 10, 2007

San Diego County Regional Airport Authority  
Attn: Airport Planning  
P.O. Box 82776  
San Diego, CA  
92138-2776

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DEC 21 2007

PLANNING DEPT. #44

Re: *Comments on October 2007 Draft Environmental Impact Report for San Diego International Airport*

Dear Sir or Madam:

Thank you for giving the Ocean Beach Planning Board an opportunity to review and comment on the October 2007 draft Environmental Impact Report, which pertains to proposed expansions of San Diego International Airport. As representatives of one of the communities most affected by flight noise from SDIA, we're concerned that the proposed expansions could lead to more flights, and therefore more noise.

Key components of the proposed expansions include the addition of 10 new jet gates to Terminal 2 West and the construction of a new parking structure, among other improvements. The draft EIR states that expansion "is needed because forecasted growth can not be reasonably accommodated within the existing Airport facilities. Without these improvements, passenger traffic through the existing terminal buildings will become severely congested during longer periods of each day and level of service will be reduced further beyond its existing degraded level." The draft EIR also notes that "these factors could possibly induce airlines to reduce" their flight offerings "even if their projected flight schedules could technically be accommodated."

As required by the California Environmental Quality Act, the draft EIR compares the expected impacts of the proposed expansions versus the impacts of a "No Project" alternative, under which none of the proposed expansions would take place. In this comparison, the draft EIR states that the No Project alternative "does not provide for adequate level of service to accommodate growth forecast through 2015." The draft EIR notes that areas of deficiency under the No Project alternative are expected to include ticketing, security screening, passenger hold rooms, baggage claims, airport access roads and parking areas, and airport support facilities.

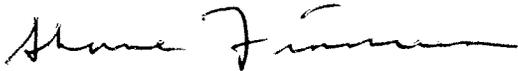
Despite this broad range of projected deficiencies under the No Project alternative – and despite the acknowledged potential for a reduction in airline flight offerings – the draft EIR maintains that *the growth in the number of passengers and flights traveling to and from SDIA would be equivalent* under either the proposed expansions or under the No Project alternative. As a result, the draft EIR concludes that *the proposed expansions would not result in any additional airplane noise* to be borne by the communities surrounding the airport.

In the opinion of the Ocean Beach Planning Board, the draft EIR fails to develop this conclusion comprehensively, particularly considering that the conclusion seems to contradict the stated reason for

expanding SDIA: to accommodate projected growth. Respectfully, we request that the final EIR for the proposed expansions of SDIA improve on the analysis in the draft EIR by incorporating these elements:

- case studies of similar expansions at other airports, and these expansions' impact on the number of flights and passengers serviced by the airports
- analysis of the potential extent of passenger "switching" to other airports and/or means of transportation given the sharp decline in SDIA customer service levels predicted under the No Project alternative
- other evidence to support or to refute the draft EIR's claim that SDIA's passenger and flight numbers will be the same with or without the proposed expansions
- plans for mitigation of additional noise from the proposed expansions, if findings suggest that additional noise is likely

Again, the Ocean Beach Planning Board appreciates the opportunity to review and comment on the October 2007 draft EIR for expansions at San Diego International Airport. As representatives of one of the communities most affected by flight noise from SDIA, we're concerned that the proposed expansions could lead to more flights, and therefore more noise. By sharing this concern – and by requesting the information described above – we aim to safeguard the interests of our community and our city, and to help facilitate responsible development at SDIA.



Shane Finneran  
Secretary, Ocean Beach Planning Board  
Representative, Airport Noise Advisory Committee

<b>Ocean Beach Planning Board, Inc.</b>		Signed by: Shane Finneran Secretary, Ocean Beach Planning Board Representative, Airport Noise Advisory Committee
Subject:	Comments on October 2007 Draft Environmental Impact Report for San Diego International Airport	
Comment: 1	Subject: Increase in flights, more noise.	Response
<p>Key components of the proposed expansion include the addition of 10 new jet gates to Terminal 2 West and the construction of a new parking structure, among other improvements. The draft EIR states that expansion “is needed because forecasted growth can not be reasonably accommodated within the existing Airport facilities. Without these improvements, passenger traffic through the existing terminal buildings will become severely congested during longer periods of each day and level of service will be reduced further beyond its existing degraded level.” The draft EIR also notes that “these factors could possibly induce airlines to reduce” their flight offerings “even if their projected flight schedules could technically be accommodated.”</p> <p>As required by the California Environmental Quality Act, the draft EIR compares the expected impacts of the proposed expansion versus the impacts of a “No Project” alternative, under which none of the proposed expansions would take place. In this comparison, the draft EIR states that the No Project alternative “does not provide for adequate level of service to accommodate growth forecast through 2015.” The draft EIR notes that areas of deficiency under the No Project alternative are expected to include ticketing, security screening, passenger hold rooms, baggage claims, airport access roads and parking areas, and airport support facilities.</p> <p>Despite this broad range of projected deficiencies under the No Project Alternative – and despite the acknowledged potential for a reduction in airline flight offerings – the draft EIR maintains that <i>the growth in the number of passengers and flights traveling to and from SDIA would be equivalent</i> under either the proposed expansions or under the No Project alternative. As a result, the draft EIR concludes that <i>the proposed expansions would not result in any additional airplane noise</i> to be borne by the communities surrounding the airport.</p> <p>In the opinion of the Ocean Beach Planning Board, the draft EIR fails to develop this conclusion comprehensively, particularly considering that</p>		<p>The commenter incorrectly summarizes the noise analysis in the Draft EIR. The noise analysis indicates that there will be increase operations and noise levels will increase with or without the Proposed Project. However, the increase will not be significant. As discussed in Section 5.1.1.5 when comparing the No Project Alternative to either the Proposed Project or the Project Alternative there, no areas will receive a 1.5 dB CNEL increase within the 65 CNEL which is the criteria for assessing significant impact. Therefore, the Proposed Project will not produce a significant noise impact.</p>

the conclusion seems to contradict the stated reason for expanding SDIA: to accommodate projected growth. Respectfully, we request that the final EIR for the proposed expansions of SDIA improve on the analysis in the draft EIR by incorporating these elements:

- case studies of similar expansions at other airports, and these expansions' impact on the number of flights and passengers serviced by the airports
- analysis of the potential extent of passenger "switching" to other airports and/or means of transportation given the sharp decline in SDIA customer service levels predicted under the No Project alternative
- other evidence to support or to refute the draft EIR's claim that SDIA's passenger and flight numbers will be the same with or without the proposed expansions
- plans for mitigation of additional noise from the proposed expansions, if findings suggest that additional noise is likely.

See General Response #7. The tables within the response illustrates multiple airports that have received terminal improvements (specifically new gates and improved gates) in recent history with the operational levels within 5 years prior and after the improvement, clearly supporting the fact that terminal improvements serve to accommodate market demand not induce traffic. SDIA itself provides a good example of the fact that growth is determined by market demand not facilities. However it is true that at some point airport facilities will cease to function without addition or improvement such is the case predicted beyond 2020 at SDIA if the Proposed Project is not implemented.

The analysis in the EIR does not assume that people will switch airports specifically; the analysis is built upon the fact that the terminal area will not be able to accommodate additional operations beyond 2020, thus the difference in operations between the No Project and Proposed Project alternatives. See Response to General Comment #7.

Operations at an airport may continue to grow with or without improvements to passenger processing facilities if demand for air service remains strong in the region. Aviation demand is driven by many factors. Airport users and airlines may be willing to continue using the airport even with a low level of service. However, as outlined in Chapter 2, Goals & Objectives, of the Draft Airport Master Plan, one of the goals of the Master Plan is to "Improve Levels of Service (LOS) for Airport customers and users."

This fact is evidenced at airports across the region, the US, and abroad. Many airports operate without modern terminal facilities indefinitely without a reduction in demand for air service. However, the SDCRAA has established goals and objectives to provide high levels of service including comfortable, efficient, facilities that meet current Americans with Disabilities Act (ADA) standards. The table attached to this comment response not only proves that increasing gates does not induce an increase in operations, it also proves that prior to adding gates, traffic grew without the improvements. See specifically the chart of growth for Washington National/Reagan National Airport.

No significant impact is expected to affect noise levels for the Proposed Project. The SDCRAA is however updating SDIA's Part 150 which will look into both preventative and corrective measures for non-compatible land use surrounding the Airport. Additionally, SDIA's ALUCP is in the process of being amended to consider a more distant future than the Part 150 process.

October 20, 2007

**Peninsula  
Community  
Planning Board**  
2239 Bolinas St.  
San Diego, CA 92107

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Dee Wylie

Ted Anasis  
Manager Airport Planning  
**San Diego County Regional Airport Authority**  
PO Box 82776  
San Diego, CA 92138-2776

**Subject:** Master Plan Draft EIR Review Period

Dear Mr. Anasis:

The Peninsula Community Planning Board (PCPB) finds the size of the new Draft EIR, and the large number of exhibits, to be overwhelming. We believe the Airport Authority needs to extend the 60-day public review and comment period to 120 days, which will give the PCPB and the interested public sufficient time to study the document. The PCPB is an all-volunteer organization and our membership cannot devote full time to studying this new document, which is what it would take with only a 60-day review period. Director Boland told the PCPB and others, on September 12, 2007, that this Draft EIR would include a 120-day review period, but now, inexplicably, the review period has been cut in half. This is a disservice to the public and organizations like the PCPB that devote time and energy to reviewing and commenting on these issues for the communities we serve.

The current 60-day period ends on November 30, 2007. That would allow the PCPB only one more regular Board meeting to discuss the matter. We do not believe we will be able to fully investigate the Draft EIR and adequately discuss our comments given this shortened schedule. If we also consider the upcoming Thanksgiving, Christmas, and New Year holidays, we will still be stretched to respond within the originally promised 120 days.

In the interest of the public that we both serve, we strongly urge the Airport Authority to grant the originally committed 120-day review and comment period. Please notify this Board of your decision.

Sincerely,  


Geoff Page  
Chair, Peninsula Community Planning Board

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OCT 25 2007

PLANNING DEPT. #44

1

<b>Peninsula Community Planning Board</b>		Signed by: Geoff Page, Chair Peninsula Community Planning Board
Subject:	Master Plan Draft EIR Review Period	
Comment: 2	Subject: Extended Review Period	Response
<p>The Peninsula Community Planning Board (PCPB) finds the size of the new Draft EIR, and the large number of exhibits, to be overwhelming. We believe the Airport Authority needs to extend the 60-day public review and comment period to 120 days, which will give the PCPB and the interested public sufficient time to study the document. The PCPB is an all-volunteer organization and our membership cannot devote full time to studying this new document, which is what it would take with only a 60-day review period. Director Boland told the PCPB and others, on September 12, 2007, that this Draft EIR would include a 120-day review period, but now, inexplicably, the review period has been cut in half. This is a disservice to the public and organizations like the PCPB that devote time and energy to reviewing and comment on these issues for the communities we serve.</p> <p>The current 60-day period ends on November 30, 2007. That would allow the PCPB only one more regular Board meeting to discuss the matter. We do not believe we will be able to fully investigate the Draft EIR and adequately discuss our comments given this shortened schedule. If we also consider the upcoming Thanksgiving, Christmas, and New Year holidays, we will still be stretched to respond within the original promised 120 days.</p> <p>In the interest of the public that we both serve, we strongly urge the Airport Authority to grant the originally committed 120-day review and comment period. Please notify this Board of your decision.</p>		<p>The comment period was extended to a total of 125 days, see response to general comment #2.</p>

November 17, 2007

Ted Anasis  
Manager Airport Planning  
San Diego County Regional Airport Authority  
PO Box 82776  
San Diego, CA 92138-2776

**Peninsula  
Community  
Planning Board**  
2239 Bolinas St.  
San Diego, CA 92107

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Dee Wylie

Subject: Master Plan Draft EIR Review Period

Re: October 31, 2007 Response letter

Dear Mr. Anasis:

The response from the San Diego County Regional Airport Authority (SDCRAA) to the Peninsula Community Planning Board's (PCPB) letter, dated October 20, 2007, requesting the EIR review and comment period be extended, was shared with the Board at its regular monthly meeting on November 15, 2007. After some discussion, the Board voted to respond with a letter recording its disapproval of the response.

The review and comment period was extended another month into January. The PCPB requested 120 days and feels the extension is not sufficient. Additionally, this month encompasses the Thanksgiving and Christmas Holidays, which further reduces the usefulness of the additional month.

The PCPB reiterates that a 120-day period is necessary. I have attached here a copy of part of the Master Plan presentation made to the PCPB that shows the intended review and comment period was indeed 120-days. The PCPB strongly urges the SDCRAA to extend the review and comment period to the 120 days originally promised the public.

Sincerely yours,



Geoff Page  
Chair - Peninsula Community Planning Board

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NOV 21 2007

PLANNING DEPT. #44  
Airport Master Plan  
Final EIR

<b>Peninsula Community Planning Board</b>		Signed by: Geoff Page, Chair Peninsula Community Planning Board
Subject:	Master Plan Draft EIR Review Period	
Comment: 1	Re: October 31, 2007 Response Letter	Response
<p>The response from the San Diego County Regional Airport Authority (SDCRAA) to the Peninsula Community Planning Board's (PCPB) letter, dated October 20, 2007, requesting the EIR review and comment period be extended, was shared with the Board at its regular monthly meeting on November 15, 2007. After some discussion, the Board voted to respond with a letter recording its disapproval of the response.</p> <p>The review and comment period was extended another month into January. The PCPB requested 120 days and feels the extension is not sufficient. Additionally, this month encompasses the Thanksgiving and Christmas Holidays, which further reduces the usefulness of the additional month.</p> <p>The PCPB reiterates that a 120-day period is necessary. I have attached here a copy of part of the Master Plan presentation made to the PCPB that shows the intended review and comment period was indeed 120-Days. The PCPB strongly urges the SDCRAA to extend the review and comment period to the 120 days originally promised to the public.</p>		<p>The comment period was extended to a total of 125 days, see response to general comment #2.</p>

---

**From:** Lance Murphy [lmurphy@cox.net]  
**Sent:** Monday, February 04, 2008 5:06 PM  
**To:** Airport Planning  
**Subject:** Attached Word document - also sent by fax

**Attachments:** PCPB-EIR Comments 2-4-08.doc



PCPB-EIR  
Comments 2-4-08.doc

Please accept the following document from the Peninsula Community Planning Board to the Draft EIR comments.  
Thank you,  
Lance

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FEB 04 2008

PLANNING DEPT. #44

# Peninsula Community Planning Board

February 4, 2008

San Diego County Regional Airport Authority  
Attn: Airport Planning  
P.O. Box 82776  
San Diego, CA  
92138-2776

Sent Via Fax, email attachment and US Post

Dear Sirs,

Please find attached the comments from the Peninsula Community Planning Board's Airport Committee regarding the Draft Environmental Impact Report for the SDIA Master Plan. We appreciate your acceptance of these comments and trust that your efforts to mitigate or remove all environmental impacts resulting from the continued expansion of Lindbergh Field.

Also attached are individual comments drafted by concerned citizens in the Point Loma area that are to be considered as individually submitted but enclosed herein to ensure that they are considered.

Sincerely,  
Lance G. Murphy  
Chair, Airport Committee  
Peninsula Community Planning Board

Attachments

Cc/ PCPB Members

**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

1. Summary

The Draft EIR is deficient in that it inappropriately uses the No Project Alternative to establish the baseline for determining the impacts of the Project. As a result, the DEIR fails to consider many impacts to be in the Project study area. And, for those items that were analyzed, the use of the No Project Alternative as the baseline for environmental impact analysis results in the impacts being inappropriately deemed insignificant or mitigated to a degree less than significant. As a result, significant future impacts to regions in the vicinity of the Airport that are directly attributable to growth in Airport activity are determined to be baseline conditions not subject to mitigation. The No Project to Project impact analysis in the DEIR circumvents the need to mitigate airport growth impacts on the surrounding communities while providing on-site mitigation measures for that growth.

1

CEQA guidelines clearly states that the baseline for analysis should be the existing environmental setting. CEQA Guidelines Section 15126.6 (e)(1) states, "The no project alternative analysis is not the baseline for determining whether the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline."

As noted by the SANDAG staff at the January 19, 2008 meeting:

***"The traffic analysis assumes that the proposed airport improvements do not generate additional trips on the road network. Projected growth in air passengers is not attributed to airport improvements identified in the airport master plan, and is assumed to occur whether or not the proposed airport improvements are made. In other words, the revised DEIR does not include a "plan-to-ground" impact comparison. Therefore, traffic impacts are understated."***

2. Safety

The operations of the Airport are approaching the theoretical limits of the single runway and are resulting in an overstressed condition that creates unacceptable hazards to the aircraft, passengers and surrounding communities. As recently as mid-January there was a runway incursion that occurred at SDIA, reported attributable to FAA Controller being over-worked. In effect that incident is one of hundreds occurring across the country as the FAA is seeing its staff of trained controllers retire and the remaining having an unacceptable level of overtime.

2

This is also leading to a condition similar to NASA's inability to acknowledge its limitations and causing unsafe operations. It is only natural for an organization in public scrutiny to avoid the appearance of incompetence, the inability to acknowledge then leads to the next level of risk – denial. As recently as yesterday, 3 February there were runway issues that caused flights to reroute to alternative airports when West winds eliminated the option of using runway 9 for ILS landings – leaving only runway 27 (a non-precision, localizer only landing). In the fog and rain of that afternoon there were multiple 'missed

**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

approaches' on landing, with some aircraft aborting their San Diego destination. When asked, the San Diego Tribune reported:

*“Dozens of arriving and departing flights were delayed at Lindbergh Field yesterday evening, but an airport spokesman blamed that mostly on bad weather elsewhere.”*

Again, this is an example of the next phase of hazardous operations – denial of the problems involved with Lindbergh Field. In reality, I was to meet guests at the airport on Sunday afternoon to find that the plane never arrived but had 3 missed-approaches and finally diverted to Long Beach Airport due to fuel limitations and the runway closure at Lindbergh. It is noteworthy that fully 60% of the 50 passengers opted to exit the aircraft in Long Beach rather than risk the flight back to Lindbergh. None of this is acknowledged by the staff of SDIA in the news reports.

As the airport approaches its operating limits it is statistically challenging its ability to conduct safe operations. While today there are many operating obstacles in the form of limited gates, taxiways, passenger throughput, and general airfield configuration, these natural buffers relieve the stress on the human components of Pilots and Flight Controllers so that they are not the sole limitation. When the runway becomes the single constraint, as proposed by this Master Plan and discussed continuations of facility improvements, there will be unbelievable and incontrovertible stress on the critical human components to maintain the production of landings and take-offs.

None of these safety issues is considered in the Draft EIR. There are no methods or mitigation considerations to identifying the impending safety breeches and preempt the hazardous growth of potential collisions and crashes.

### 3. Traffic

The DEIR is deficient in that it inappropriately uses the No Project Alternative to establish the baseline for determining the impacts of the Project. As a result, the DEIR fails to consider many roadway segments and intersections that would otherwise be in the Project study area. And, for those facilities that were analyzed, the use of the No Project Alternative as the baseline for traffic impact analysis results in the impacts being inappropriately deemed insignificant or mitigated to a degree less than significant. As a result, significant future impacts to transportation facilities in the vicinity of the Airport that are directly attributable to growth in Airport activity are determined to be baseline conditions not subject to mitigation. The No Project to Project impact analysis in the DEIR circumvents the need to mitigate airport growth impacts on the surrounding communities while providing on-site mitigation measures for that growth.

CEQA guidelines clearly states that the baseline for analysis should be the existing environmental setting. CEQA Guidelines Section 15126.6 (e)(1) states, “The no project alternative analysis is not the baseline for determining whether the proposed Project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.”

3

**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

Chapter 5 of the DEIR (pg 5-1) notes CEQA Guidelines Section 15126.6 (e)(3)(B) as an argument for using the No Project alternative as the baseline for impact analysis. This argument is flawed for at least two reasons. First, the cited Section begins with the conditional clause, "If the project is other than a land use or regulatory plan..." The project description for the DEIR notes that the Project is a Proposed Airport Land Use Plan. Second, even if Section 15126.6 (e)(3)(B) were assumed to apply, the discussion in the Guidelines section relates to the analysis of the impacts of the No Project Alternative for comparison purposes to the impacts of the Project. It does not suggest that the analysis of the impacts of the Project should use the environmental setting of the No Project Alternative as the baseline for analysis of the Project.

4

The environmental impacts of the Project must be analyzed against baseline conditions. That is the existing environmental setting, not some modeled future environmental setting analyzed with the No Project alternative. The assumption that air traffic will continue to grow with or without the project cannot be used as a basis for arguing that the significant environmental impacts of that growth are not significant in the context of a project whose purpose is to support that very growth. The arguments given in the DEIR for using the No Project Alternative as the baseline for impact analysis are akin to making a nonsensical argument that a freeway widening project need not consider environmental impacts related to noise, air quality, etc, as being significant because the widening project is only serving to provide adequate levels of service for the traffic that will occur with or without the freeway widening. In fact, a very similar argument is made in the SDIA DEIR. Section 3.2 of the DEIR states, "Implementation of the near-term Airport Master Plan recommendations is needed because forecast growth cannot be reasonably accommodated within the existing Airport facilities. Without these improvements, passenger traffic through the existing terminal buildings will become severely congested during longer periods of each day and Level of Service would be reduced further beyond its existing degraded level."

The DEIR is also deficient in its traffic analysis because it does not fully analyze the feasibility of the proposed traffic mitigation measures proposed in the DEIR. CEQA Statutes Section 21002 states "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." The analysis of the feasibility of proposed mitigations must be included in the EIR for Project consideration by the Decision-maker. The analysis cannot be pushed off to a future date of mitigation implementation. Yet, Chapter 1.7 of the DEIR states that "Subsequent to implementation of any required mitigation a peak hour roadway analysis would be conducted as part of a mitigation feasibility study to determine specific mitigation

5

**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

measures to be implemented.” Additionally, the DEIR proposes traffic mitigations on roadways outside of the jurisdiction of the Airport Authority and indicates that the feasibility of these mitigations will be discussed with the impacted jurisdictions at a later date.

Chapter 5.3.3.8 and 5.3.3.9 provide significance criteria for on-site circulation impacts. It should be noted that unlike all other circulation impact criteria in the DEIR, the on-site impacts are not compared to the No Project Alternative. Rather, the on-site traffic impacts are analyzed as the acceptability of levels of service on-site and at access points to public roadways irrespective of how these would operate in the No Project Alternative. As a result, the Project appropriately proposes to mitigate impacts when they occur on or immediately adjacent to the airport where they would directly impact airport operations. This approach to analyzing the impacts of the project results in greatly diminishing the purported impacts of the project to the off-site circulation system while supporting the mitigation of the Project’s on-site traffic impacts.

6

Chapter 5.3.4 provides rigorous analysis of existing traffic conditions in the Project vicinity. However, the DEIR does not analyze the impacts of the project using the existing conditions as the baseline for analysis. Thus, the rigorous analysis of existing conditions serves no purpose for the Decision-Maker. One can only assume that the existing conditions analysis is only included because of CEQA requirements. What is also required is that the Project’s impacts should be considered in light of these existing conditions and not some theoretical assessment of potential future impacts under a No Project Alternative.

7

Chapter 5.3.5.1 acknowledges that the Project increases Airport capacity. The impact analysis in the DEIR considers only those impacts which will occur after the existing SDIA on-site facilities have been used to their full capacity. However, the environmental setting of maximum use of existing facilities is a hypothetical setting which will not occur if the Project is approved. The No Project Alternative used as the basis for environmental impact analysis will never occur if the capacity enhancing project is approved. And, while it is used for the basis of the DEIR analysis, there is insufficient analysis in the DEIR to determine if the level of activity assumed under the No Project Alternative can even be served by the existing circulation system serving SDIA and the surrounding communities. Yet, the traffic levels assumed under the no project alternative for 2020 are used as the baseline for the Project impact analysis. There is no attempt to identify appropriate mitigation to address Airport traffic impacts that will occur between existing conditions and forecasted 2020 traffic volumes.

8

The use of the No Project Alternative as the baseline for analysis also results in inappropriately reducing the study area for the traffic impact analysis. The study area is determined by looking at the peak hour volume generated by the project at intersections and street/freeway segments in the vicinity of the project. If the volume from the project exceeds established threshold volumes for freeway or regionally significant arterial segments, then those facilities must be included in the study area. For other facilities, locations where increases in the volume to capacity ratio that exceed established

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**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

thresholds must be included in the study area. Thus, using the no project alternative rather than existing conditions as the baseline for analysis results in a greatly reduced amount of project traffic and a much smaller study area for determining project impacts.

Table 5-3.20 assumes sizeable reductions in non-SDIA traffic on Rosecrans in the 2030 scenario. These reductions are based upon assumed construction of missing connectors at the I-8/I-5 interchange. These connectors are not assumed in the 2030 Regional Transportation Plan adopted by SANDAG in November 2007 and should not be included in the project analysis. The inclusion of the connectors in the 2030 model runs used for the SDIA DEIR results in a reduction of trips in corridors accessed by SDIA trips traveling to the west on North Harbor Drive. The 2030 model takes advantage of this and assigns 32% of the SDIA trips westbound on North Harbor Drive and 67% eastbound (the trip distribution in the existing airport traffic pattern is 15% westbound and 84% eastbound) The deletion of the I-5/I-8 connector will result in an airport trip distribution pattern more similar to the existing traffic patterns. Thus, traffic impacts for the 2030 scenarios are understated. The study area and impacts to intersections and segments should be reanalyzed to reflect the updated Regional Transportation Plan.

10

Table 5-3.20 also assumes that Nimitz Blvd between Harbor and Rosecrans has the capacity of a four lane urban major. However, this street segment does not have turn pockets. Left turns are made from the #1 lane reducing the capacity of the roadway. The segment capacity should be adjusted in the table.

11

Tables 5.3-22 through 5.3-26 do not include intersections in the Peninsula, Midway, and Ocean Beach planning areas that will clearly be impacted by short and long term growth in airport traffic. These include intersections along Rosecrans Street, Nimitz Blvd and Camino del Rio W that will be used to access the communities and the freeway system. The inappropriate technique of using the No Project alternative compared to the proposed Project to determine the impacts of the Project (except for on-site impacts) results in a greatly reduced study area and avoids identifying feasible mitigation for Project impacts. While it is true that adoption of the No Project alternative would not require the identification of mitigation and development of a Mitigation, Monitoring and Reporting Program, it does not follow that the No Project alternative can therefore be used as a baseline for determining Project impacts and feasible mitigation. If the Airport Authority wishes to avoid mitigating the impacts of future increases in airport traffic, then the Board should adopt the No Project Alternative.

12

5.3.8.1 identifies mitigation for North Harbor Drive that will require the City of San Diego to adopt a new roadway classification. The section also identifies several roads that will need to be reclassified in order to implement the proposed improvements. The proposed improvements are not consistent with the City's Circulation Element and will require a General Plan amendment. This should be identified in the Land Use section of the DEIR. The section also identifies a number of street segments where capacity would be increased through widening or the removal of parking. Analysis of the impacts of this widening and parking removal should be included in the DEIR. Discussions with the City of San Diego and CCDC to determine the feasibility of these improvements should

13

**PCPB Comments Regarding SDIA Master Plan Draft EIR**  
**dated October 2007**

occur and the results of those determinations should be included in the DEIR. Otherwise, the decision-maker will be unable to make Findings on the feasibility of the Project's traffic mitigation measures.

4. Noise

The Draft EIR does not adequately address the noise impacts from the future increase in operations. As discussed in the Summary above, we believe that the noise impact is understated because the Draft EIR is using incorrect assumptions in the Baseline analysis for the NO PROJECT ALTERNATIVE. As stated in the LAX EIS/EIR dated April 2004:

***In addition to the CNEL contours prepared for the 1996 baseline and Year 2000 conditions, new legal developments have required the inclusion of additional information in this EIS/EIR. During the period of preparation of this EIS/EIR for the master plan development at LAX, the California Court of Appeal (in Berkely Jets) found that the noise impacts disclosed by the Oakland International Airport EA/EIR for development of cargo facilities and their attendant nighttime operations were, for CEQA purposes, inadequately addressed by the CNEL metric alone. The court ruled that supplemental single event analyses that have been provided solely as additional material for informational purposes should have been further expanded upon and used to delineate the effects of single event noise resulting from project actions” (LAX Master Plan Final EIS/EIR, April 2004)***

The San Diego Draft EIR does not adequately consider the Single Event noise impacts on residents that will be awakened and annoyed by the increased departures facilitated by the Master Plan expansion.

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Following submitted by Jarvis Ross,

## **CHAPTER ONE: EXECUTIVE SUMMARY**

This Environmental Impact Report was developed in accordance with the California Environmental Quality Act. Public Resources Code §§ 21000 et. seq. and the Guidelines for Implementation of the California Environmental Quality Act (California Code Regulations Title 14., §§ 15000-15387). The

**Comment:** The subject Environmental Impact Report *was not developed* in accordance with the California Environmental Quality Act Public Resources Code et. seq. Section 21003 (b), (c) and (f); Section 21083 (1), (2) and (3); Section 21100 (2) (A) & (B), and (4).

Furthermore under California code Regulations Title 14 15000-15387 Article 3 Section 15042 the Airport Authority board has the authority and therefore the legal responsibility to disapprove the subject project based upon, “significant effects upon the environment that would occur if the project were approved as proposed.”

Based upon the subject EIR’s own Executive Summary Tables 1-1 and 1-2 they project increased passengers and a need for a parking garage which means increased flights and increased vehicular ground transportation. Both of the foregoing will unequivocally result in environmentally detrimental increased air and noise pollution. The both have already been clinically identified as contributing to or causing health problems in school children. Under Title 14 Article 10 Section 15141 the voluminous hard copy subject draft E.I.R is in gross violation of the spirit of this declaration. Section 15142 under the requirements of interdisciplinary approach the subject EIR fails to responsibly place adequate weight upon the qualitative factors and places too much emphasis on quantitative, economic and technical factors. Section 15143 reinforces that the emphasis of the EIR should be upon, “the significant effects on the environment.”

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California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an objective, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT

**Comment:** The preceding statement indicates that the Airport Master Plan under CEQA required an EIR due to potential (may have), “significant environmental impacts.” [ CEQA Section 15064 (a)(1)]

By virtue of the fact that the Airport Authority did not exercise CEQA Art. 1 section 15002 (f) (2) it moves to the level of affirming that the subject Airport Master Plan proposal *does have significant environmental impacts.*

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The Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County Regional Airport Authority.

**Comment:** The preceding text is convoluted. On one hand it implies that sequential phases of development at Lindbergh field will take place if the initial one is approved and the environmental analysis anticipates this. It then implies that the cumulative environmental impacts would have to be evaluated in the future. It infers that the long range phase impacts have not been evaluated. Typically this would give weight to the future argument that phase one, if approved, has already compromised the environment. Therefore the then monetary investment in the Phase One terminal expansion should not be compromised by not proceeding with the remaining phases despite their cumulatively increased impacts upon the environment.

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## 1.1 Introduction and Background

San Diego International Airport is located in the northwest portion of the downtown area within the City of San Diego. The existing Airport site is severely constrained by its location. San Diego International Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east. Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport's proximity within two miles from Downtown San Diego.

**Comment:** The last sentence in the above paragraph presents but one of the strongest arguments *for not proceeding* with the proposed subject airport expansion at Lindbergh Field from both environmental and economic standpoints. Surrounding area density represents an increased threat environmentally to residents from increased air pollution, noise pollution, and safety. The last of these across the nation and as pointed out more recently here in San Diego on January 16<sup>th</sup> at Lindbergh Field (Source: Union-Tribune January 23, 2008) as a consequence of overworked air traffic controllers and the resulting incidents.

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San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has a single, 9,401-foot-long 200-foot-wide east-west runway, making it the busiest single-runway commercial airport in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project.

**Comment:** This second paragraph under 1.1 makes an irrefutable case for *not pursuing* the proposed project. It is already the busiest single-runway commercial airport in the world. Not mentioned but its approach and departure, RPZ's also make it among the most dangerous both to the aircraft and those upon the ground. Most recently (January 3, 2008) the S.D. Airport Authority approved human occupancy uses in the Shoreline Plaza area

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of liberty Station in direct violation of Federal, State and their own ALUCP guidelines. Prior military use and their occupancy and the right of municipalities to over rule Airport Authorities land use decisions does not extend the legal right for the Airport Authority to compromise it's responsibilities under the Federal, State and it's own ALUCP guidelines. As a consequence the proposed project elevates the level of environmental impacts of which most important are health and safety hazards.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

**Comment:** According to the trust wording stated above the trust lands (original? subsequently acquired? or both?) are to serve, "a statewide public purpose." That could be a park, golf course or in this city it could be condemned as blighted and hotels built there. Furthermore the FAA is empowered to shut an airport down for various reasons which would void the airport usage.

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**1.1.1 San Diego County Regional Airport Authority**

San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of Supervisors. The Port District's purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

**Comment:** Paragraph one indicates that the current Airport Authority has failed to fulfill it's legal obligation under S.D.C.R.A.A. Act of 2002 regarding the requirement to conduct an airport site selection program to identify a long term regional airport solution.

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**1.1.2 Airport Master Plan**

An airport master plan is a concept for future development of an airport. The goal of the San Diego International Airport Master Plan is to provide a financially and environmentally responsible guideline for future Airport development that will accommodate forecast aviation demand and remain adaptable to either a short-term or long-term future for the existing Airport site.

In order to meet this goal of the Airport Master Plan, the following overall objectives were set to guide future development at San Diego International Airport:

1. Improve levels of service for Airport customers/users
2. Improve Airport safety and security for Airport customers/users
3. Utilize property and facilities efficiently
  - a. Maintain balance of passenger volumes and operations among the Airport's facilities.
  - b. Improve tenant facilities
4. Enhance Airport access as part of the region's transportation system
5. Enhance regional economy by serving demand for air service
6. Prepare measured, incremental improvements that are cost effective and respond to the region's forecast for air service for passengers and cargo
7. Involve stakeholder and community input
8. Consider compatibility with surrounding land uses and Airport Authority policies.

**Comments:** Items 1-6 in 1.1.2, primarily are economic arguments for continued development of Lindbergh Field. As such under CEQA EIR guidelines they are not valid for consideration except as to their adverse environmental impacts upon the broader areas of airport influence. Item 7. with regard to public input as indicated in 1.8 table 1-6 there were only 21 responses to the May 2006 Draft EIR. None of these are indicated to have been from private citizens and only two were from community planning groups. The limited response brings into question the level of public outreach. The public meeting held at Portuguese Hall in Point Loma in 2006 met with resounding opposition to the Lindbergh Field Airport Master Plan yet there is no mention of it.

Item 8. in 1.1.2 needs little consideration. Anyone with common sense would acknowledge from their own observations and countless documents published by the S.D. Airport Authority in 2006 and preceding years that Lindbergh Field has been and is incompatible with surrounding land uses primarily for the reasons indicated in Executive Summary 1.8 Figure 1-1 (The following represent approximately 3/4ths of the volume of concerns.)

- (1) Human Health Risk
- (2) Noise
- (3) Traffic
- (4) Air Quality

**1.1.3 Airport Site Selection Program**

From 2003 to November, 2006, the Airport Authority conducted a comprehensive study of relocating the region's primary commercial airport or enhancing San Diego International Airport's capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Site Selection Program

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process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The voters of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego's long-term transportation needs.

The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process.

**Comment:** The then Airport Authority did authorize an exhaustive study of relocating the regions primary commercial airport. Exhaustive in that the study encompassed the absurd (proposal 6) to the ridiculous i.e. desert sites requiring unaffordable high speed transit and a declining customer base. Unfortunately what the voters turned down in 2006 was not the potential use of Camp Elliot but an ill conceived joint use proposal of MCAS (West) Miramar which was associated with the ballot. This ballot defeat has been misconstrued as authorizing the discontinuance of seeking relocation for long term needs and pouring money into an environmentally unsound expansion of SDIA for relatively short term use. In 2007 an airport authority board member is reported to have stated at a public meeting at the Point Loma Nazarene University that State Senator Chris Kehoe's bill banned the continued site selection process. At a subsequent Peninsula Community Planning Board meeting a representative of Senator Kehoe flatly denied that accusation. The last paragraph indicates an incremental improvement program of improvements (expansion)

of the present SDIA. To the public impacted by the airport this equates to a stealth approach.

**1.1.4 Activity Forecast and Planning Horizon Used for Environmental Analysis**

The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030.

The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration's 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006. the first three full years after the forecast was completed. Because the trend at San Diego International Airport is tracking above the high growth scenario, the high growth scenano will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in Table 1-1.

**Comment:** Just as September 11, 2001 had a negative impact upon air travel so will the current economic fallout impact air travel projections based upon 2004 data. The major difference is that the current crisis will very likely have a much longer duration due to the combination of inflationary impacts of fuel across the spectrum of the economy and the subprime mortgage collapse impact also upon a broad range of the economy. The SH&E Aviation Activity Forecast of 2004 and the use of, "tracking above the high growth

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scenario” as indicated above coupled with the recent economic events make the data in 1.1.4 Table 1-1 questionable at best and more than likely invalid.. be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack

**Comment:** The preceding statement of accommodation until 2020 in 1.1.4 would appear to compromise much of the argument for any expansion at Lindbergh Field especially in terms of long term demand and it’s overriding need for relocation. The additional delays resulting from high congestion are speculative over the short term (2015) due to economic factors mentioned above.

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## **1.2 Summary of Proposed Project (Preferred Alternative)**

The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:

1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.
2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.
3. Provide for future public transit options in airport land use planning.

**Comment:** Under 1.2 (1.) above air service demand as stated in earlier comments (1.1.4) is based upon outdated and optimistic data (2004-2006) and does not reflect current adverse events (2007-2008) The elements touted are largely ones of economic benefit and per CEQA not relevant to an EIR excepting their negative environmental impacts. (2.) The current facilities are incompatible with surrounding land use i.e. densely populated with large commercial areas and the city plan to increase population density in the urban areas. (3.) Providing for future public transit options in ALUP at Lindbergh Field is full of sound and theory but signifies nothing in terms of reality.(as exemplified by MTS’s light rail proposal from Old Town to University City)

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Comments from Bill Ingram, Point Loma resident

There are three major issues that have to be addressed from the information in the EIR.

**Safety:** Lindbergh Field is the busiest single-runway in the world and it is only a matter of time before an unforeseen circumstance will create a crash of an airplane at Lindbergh. (Like the recent Boeing 777) and the recent runway incursion between the Hawker Jet still on the runway while the Southwest Airline jet took off.

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Flight schedule increasing from 600 current flights to 818 projected flights will jam up the runway and not provide proper spacing between flights landing and taking off. **EIR – Appendices. A**

What is the airport authority going to do to prevent these dangers?

**Noise and Environment:** Children in schools, residents, and customers in local businesses cannot talk because of the noise of the airplanes. Schools have 164.5 min/day =496 hours per year of potential loss of education. The FAA says that the airport is in violation of increasing the number of schools next to the airport. **Appendices. B-40**

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Along with increased flights the EIR indicates there will be significant increases over CEQA thresholds of Nitrogen oxides, sulfur oxides and particulate matter falling from aircraft. Over 400 tons are being dumped on people.

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Traffic will increase from 87, 000 to 135,000 and the overflow into Point Loma will be an increase of 100% because of the overflow from the airport. This does not include traffic derived from all other development in the area, such as Marriott – Sponge Bob, Liberty Station, and Harbor Island Hotels etc.

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Thinking down the road further than 2015, 2030 or 2050 is imperative. **Put our major airport in East Elliot where it belongs.** It will provide two runways and cargo handling capability.

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Bill Ingram  
3328 Macaulay  
San Diego, 92106  
619-222-1031

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**dated October 2007**

Comments from Suhail Khalil – Point Loma Resident:  
January 29, 2008

Mr. Alan Bersin  
Executive Committee Chair  
Ms. Thella Bowens  
President / CEO  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

**RE: comment to AIRPORT MASTER PLAN (AMP) DRAFT ENVIRONMENTAL IMPACT REPORT dated October, 2007**

Dear Mr. Bersin & Ms. Bowens:

Please find my understanding and comments regarding Draft EIR document mentioned above as follows:

SDCRAA completed its DEIR on a “No Project Alternative” development baseline. Unfortunately, this approach does not allow the public or decision makers to analyze existing environmental settings as it compares to development impacts when determining if a proposed project impact may be “significant”, pursuant to California Environmental Quality Act (CEQA) and National Environment Protection Act (NEPA) guidelines. As you are aware, labels of “significant” impact require additional studies to mitigate impact, if feasible, whereas “insignificant” impact labels do not require any further study or mitigation.

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Capital improvements proposed in Phase 1 AMP to existing San Diego International Airport (SDIA) facilities include four elements: **Airfield, Terminal, Ground Transportation, Airport Support**. Proposed projects focus on incremental improvements to SDIA including construction of 10 new gates to Terminal 2 and a Remain-Over-Night parking structure to commence 2009 and be completed by 2011. The next Phase 2 of the AMP is expected to have a broader scope and focus on complete development that addresses a full integration of all capital improvements to maximize operations at SDIA beyond 2020. AMP Phase 2 implementation is expected to commence 2015 and includes improvements to the Teledyne Ryan property, a northern taxiway (safety concerns), acquisition of adjacent properties, relocation of airside operations, traffic mitigation on congested streets, adding roads and intersections serving SDIA, construction of an inter-modal transportation center at the north side of SDIA, relocation of landside operations to the north, consolidated rental car facility, and funding for a Regional Transportation Plan. Phase 1 of the AMP projects are expected to relieve projected pressures on daily operations beyond 2010 including: projected delays at commercial gates and projected pressures on existing taxiways from commercial, cargo and general aviation flights. The total number of operations (departure & arrivals) projected to increase 50% from current levels, nearing 302,652 total operations annually by 2030. Increased traffic congestion on Harbor Drive and increased CO2 emissions (pollution) is expected to increase significantly due to increased operations projected.

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It’s my understanding that you intend to adopt a **DEIR Memorandum of Understanding** between SANDAG and the City of San Diego to ensure all CEQA and NEPA guidelines are met. Also, that you will work to seek Federal Aviation Administration approvals for funding “Off-Airport Improvements” including: freeway ramps serving proposed inter-modal transportation center, mitigation of traffic congestion on North Harbor Drive and improvements of vehicular airport access from Washington, Grape, Hawthorne and Laurel Streets. It remains clear that SDIA hours of operation will not change, relocation alternatives for SDIA may be available by the year 2015 and that existing curfew violation rules and regulations are to remain the same. Public safety must never be compromised. Pollution, noise and traffic impacts must be mitigated to ensure our quality of life. I appreciate your leadership to ensure these processes are kept open and transparent for additional government agencies and public input.

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Sincerely,



Suhail Khalil  
Point Loma Resident  
(619) 224-1527 - Office  
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Controller being over-worked. In effect that incident is one of hundreds occurring across the country as the FAA is seeing its staff of trained controllers retire and the remaining having an unacceptable level of overtime.

This is also leading to a condition similar to NASA's inability to acknowledge its limitations and causing unsafe operations. It is only natural for an organization in public scrutiny to avoid the appearance of incompetence, the inability to acknowledge then leads to the next level of risk – denial. As recently as yesterday, 3 February there were runway issues that caused flights to reroute to alternative airports when West winds eliminated the option of using runway 9 for ILS landings – leaving only runway 27 (a non-precision, localizer only landing). In the fog and rain of that afternoon there were multiple 'missed approaches' on landing, with some aircraft aborting their San Diego destination. When asked, the San Diego Tribune reported:

*"Dozens of arriving and departing flights were delayed at Lindbergh Field yesterday evening, but an airport spokesman blamed that mostly on bad weather elsewhere."*

Again, this is an example of the next phase of hazardous operations – denial of the problems involved with Lindbergh Field. In reality, I was to meet guest at the airport on Sunday afternoon to find that the plane never arrive but had 3 missed approaches and finally diverted to Long Beach Airport due to fuel limitations and the runway closure at Lindbergh. It is noteworthy that fully 60% of the 50 passengers opted to exit the aircraft in Long Beach rather than risk the flight back to Lindbergh. None of this is acknowledged by the staff of SDIA in the news reports.

As the airport approaches its operating limits it is statistically challenging its ability to conduct safe operations. While today there are many operating obstacles in the form of limited gates, taxiways, passenger throughput, and general airfield configuration, these natural buffers relieve the stress on the human components of Pilots and Flight Controllers so that they are not the sole limitation. When the runway becomes the single constraint, as proposed by this Master Plan and discussed continuations of facility improvements, there will be unbelievable and incontrovertible stress on the critical human components to maintain the production of landings and take-offs.

Further, it must be stated that all licensed pilots are trained to abort approaches during inclement weather and other situations where a landing may not be executed. This is normal at all airports, regardless of their layout or operations levels. In fact, it is an indicator of aviation safety that pilots are able to exercise their judgment in such conditions.

The Authority is committed to reducing runway incursions to the lowest practicable rate of occurrence. The Authority does not operate the Air Traffic Control Tower at SDIA or make decisions about staffing the Air Traffic Control Tower. Air Traffic Control is operated by the FAA.

	<p>None of these safety issues is considered in the Draft EIR. There are no methods or mitigation considerations to identify the impending safety breaching and preempt the hazardous growth of potential collisions and crashes.</p>	
<p>Comment 3</p>	<p>Subject: Traffic – CEQA Guidelines</p>	<p>Response</p>
	<p>The DEIR is deficient in that it inappropriately uses the No Project Alternative to establish the baseline for determining the impacts of the Project. As a result, the DEIR fails to consider many roadway segments and intersections that would otherwise be in the Project study area. And, for those facilities that were analyzed, the use of the No Project Alternative as the baseline for traffic impact analysis results in the impacts being inappropriately deemed insignificant or mitigated to a degree less than significant. As a result, significant future impacts to transportation facilities in the vicinity of the Airport that are directly attributable to the growth in Airport activity are determined to be baseline conditions not subject to mitigation. The No Project to Project impact analysis in the DIER circumvents the need to mitigate airport growth impacts on the surrounding communities while providing on-site mitigation measures for that growth.</p> <p>CEQA guidelines clearly state that the baseline for analysis should be the existing environmental setting. CEQA Guidelines Section 15126.6 (33)(1) states, “The no project alternative analysis is not the baseline for determining whether the proposed Project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.”</p>	<p>See Response to General Comment #3 and #4.</p> <p>The correct CEQA reference is to Guidelines § 15126.6(e)(1). The standard for determining the effect of a proposed project is set forth in CEQA itself, and also explained in the introduction to Chapter 5 of the EIR. The EIR fulfills CEQA’s information mandate. See Response to General Comment #3.</p>
<p>Comment 4</p>	<p>Subject: Chapter 5</p>	<p>Response</p>
	<p>Chapter 5 of the DEIR (Pg 5-1) notes CEQA Guidelines Section 15126.6 (e)(3)(B) as an argument for using the No Project alternative as the baseline for impact analysis. This argument is flawed for at least two reasons. First, the cited Section begins with the conditional clause, “If the project is other than a land use or regulatory plan...” The project description for the DEIR notes that the Project is a Proposed Airport Land Use Plan. Second, even if Section 15126.6 (e)(3)(B) were assumed to apply, the discussion in the Guidelines section relates to the analysis of the impacts of the No Project Alternative for comparison purposes to the impacts of the Project. It does not suggest that the analysis of the impacts of the Project should use the environmental setting of the No Project Alternative as the baseline of the Project.</p>	<p>See response to General Comment #3.</p> <p>The applicable CEQA Guideline is § 15126.6(e)(3)(A), which states:</p> <p>When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. ... Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.</p>

<p>The environmental impacts of the Project must be analyzed against baseline conditions. That is the existing environmental setting, not some modeled future environmental setting analyzed with the No Project Alternative. The assumption that air traffic will continue to grow with or without the project cannot be used as a basis for arguing that the significant environmental impacts of that growth are not significant in the context of a project whose purpose is to support that very growth. The arguments given in the DEIR for using the No Project Alternative as the baseline for impact analysis are akin to making a nonsensical argument that a freeway widening project need not consider environmental impacts related to noise, air quality, etc., as being significant because the widening project is only serving to provide adequate levels of service for the traffic that will occur with or without the freeway widening. In fact, a very similar argument is made in the SDIA DEIR. Section 3.2 of the DEIR states, "Implementation of the near-term Airport Master Plan recommendations is needed because forecast growth cannot be reasonably accommodated within the existing Airport facilities. Without these improvements, passenger traffic through the existing terminal buildings will become severely congested during longer periods of each day and Level of Service would be reduced further beyond its existing degraded level."</p>	<p>Thus, as the Proposed Project is a revision of the existing plan or operation, the no project alternative assumes continuation of plans already in place. This is the approach taken in the EIR. The Final EIR has been revised to include the correct citation to this section as well.</p>	
<p>Comment: 5</p>	<p>Subject</p>	<p>Response</p>
<p>The DEIR is also deficient in its traffic analysis because it does not fully analyze the feasibility of the proposed traffic mitigation measures proposed in the DEIR. CEQA Statutes Section 21002 states, "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." The analysis of the feasibility of proposed mitigations must be included in the EIR for Project consideration by the Decision-maker. The analysis cannot be pushed off to a future date of mitigation implementation. Yet, Chapter 1.7 of the DEIR states that "Subsequent to implementation of any required mitigation a peak hour roadway analysis would be conducted as part of a mitigation feasibility study to determine specific mitigation measures to be implemented." Additionally, the DEIR proposes traffic mitigations on roadways outside</p>		<p>The EIR identifies measures that mitigate the project's direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies consistent with the City of San Diego's January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the City of San Diego to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its jurisdiction.</p>

of the jurisdiction of the Airport Authority and indicates that the feasibility of these mitigations will be discussed with the impacted jurisdictions at a later date.	See Response to General Comment #5	
Comment 6	Chapter 5.3.3.8 and 5.3.3.9	Response
Chapter 5.3.3.8 and 5.3.3.9 provide significance criteria for on-site circulation impacts. It should be noted that unlike all other circulation impact criteria in the DIER, the on-site impacts are not compared to the No Project Alternative. Rather, the on-site traffic impacts are analyzed as the acceptability of levels of service on-site and at access points to public roadways irrespective of how these would operate in the No Project Alternative. As a result, the Project appropriately proposes to mitigate impacts when they occur on or immediately adjacent to the airport where they would directly impact airport operations. This approach to analyzing the impacts of the project results in greatly diminishing the purported impacts of the project to the off-site circulation system while supporting the mitigation of the Project's on-site traffic impacts.		<p>The purpose of significance criteria stated in Sections 5.3.3.8 and 5.3.3.9 is to ensure that the proposed project does not cause significant impacts to public streets and that the project meets design standards. In addition to this stated significance criteria, the EIR compares the future conditions without the project to the future conditions with the project to determine whether the Proposed Project is likely to cause significant impacts. As summarized in EIR Section 5.3.8 all on-Airport roadways would operated at LOS D or better under all alternatives including the No Project alternative and therefore the Proposed Project does not causes no significant impacts and no mitigation is required.</p> <p>The commenter suggests that the EIR proposes to mitigate significant circulation impacts on Airport property. However, the EIR does not find any significant impacts to circulation with implementation of the Proposed Project. Therefore, the EIR does not propose any on-site mitigation. In addition, EIR Section 5.3.8 states that the terminal curbsides would have a curb length deficiency under the No Project condition but under the Proposed Project there would be sufficient curb length, therefore, the Proposed Project does not cause an impact to on-Airport terminal curbside facilities.</p> <p>Section 5.3.8 of the EIR also identifies measures other authorities could choose to implement for off airport facilities.</p>
Comment 7	Chapter 5.3.4	Response
Chapter 5.3.4 provides rigorous analysis of existing traffic conditions in the Project vicinity. However, the DEIR does not analyze the impacts of the project using the existing conditions as the baseline for analysis. Thus, the rigorous analysis of exiting conditions serves no purpose for the Decision-Maker. One can only assume that the existing conditions analysis is only included because of CEQA requirements. What is also required is that the Project's impacts should be considered in light of these existing conditions and not some theoretical assessment of potential future impacts under a No Project Alternative.		See Responses to General Comments #3 and #4.
Comment 8	Chapter 5.3.5.1	Response
Chapter 5.3.5.1 acknowledges that the Project increases Airport capacity. The impact analysis in the DEIR considers only those impacts		Section 5.3.5.1 states that "The Proposed Project/Preferred Alternative and East Terminal Alternative are projected to accommodate the same

<p>which will occur after the existing SDIA on-site facilities have been used to their full capacity. However, the environmental setting of maximum use of existing facilities is a hypothetical setting which will not occur if the Project is approved. The No Project Alternative used as the basis for environmental impact analysis will never occur if the capacity enhancing project is approved. And, while it is used for the basis of the DEIR analysis, there is insufficient analysis in the DEIR to determine if the level of activity assumed under the No Project Alternative can even be served by the existing circulation system serving SDIA and the surrounding communities. Yet, the traffic levels assumed under the no project alternative for 2020 are used as the baseline for the Project impact analysis. There is no attempt to identify appropriate mitigation to address Airport traffic impacts that will occur between existing conditions and forecasted 2020 traffic volumes.</p>	<p>level of air passenger activity in the future – approximately 19.5 million annual passengers (MAP) in 2010, and approximately 28.2 MAP in 2030 based upon the high growth passenger forecast approved by the FAA. The No Project Alternative would accommodate the same number of passengers through 2020 but only 26.9 MAP in 2030. Consequently, the total traffic generated by each alternative would be similar through 2020 with variations due to shuttles and other mode share changes in the No Project and Project without structure alternatives, as discussed under each alternative.”</p> <p>Accommodating forecast traffic with adequate facilities does mean that SDIA is adding capacity. The capacity of SDIA is ultimately controlled by the Airport’s single runway. The capacity of the runway is expected to be reached at approximately 300,000 annual operations. The EIR indicates that congestion in the terminal will be extensive sometime after the year 2020 if the Proposed Project is not implemented. Airport usage would continue and would increase but would do so under unfavorable conditions.</p> <p>The No Project Alternative has fewer aircraft operations than might occur with full development under the Airport Land Use Plan due to terminal constraints beyond the year 2020. Prior to that analysis year, it is assumed that the No Project and Proposed Project aircraft operations are the same and therefore will be accommodated on the existing airport road system as well. The mitigation measures provided in the EIR mitigate for the impacts actually caused by implementation of the Proposed Project—not simply impacts that are likely to occur over time regardless of project implementation.</p>	
<p>Comment 9</p>	<p>Subject:</p>	<p>Response</p>
<p>The use of the No Project Alternative as the baseline for analysis also results in inappropriately reducing the study area for the traffic impact analysis. The study area is determined by looking at the peak hour volume generated by the project at intersections and street/freeway segments in the vicinity of the project. If the volume from the project exceeds established threshold volumes for freeway or regionally significant arterial segments, then those facilities must be included in the study area. For other facilities, locations where increase in the volume to capacity ratio that exceed established thresholds must be included in the study area. Thus, using the no project alternative rather than existing condition as the baseline for analysis results in a greatly reduced amount of project traffic and a much smaller study area for determining project impacts.</p>		<p>See Response to General Comment #3.</p> <p>The study area was determined based on the SANDAG Traffic Impact Studies Guidelines, the City of San Diego Traffic Impact Manual guidelines, and City of San Diego staff direction (see page 5.3-2) to include all surrounding street segments and intersections that carry at least 50 peak hour project trips. The study area includes primary routes to the freeway both east and west of the Airport. The study area was reviewed and approved by City of San Diego staff at an EIR coordination meeting on July 26, 2007.</p>

Comment 10	Subject: Table 5-3.20	Response
	<p>Table 5-3.20 assumes sizeable reductions in non-SDIA traffic on Rosecrans in the 2030 scenario. These reductions are based upon assumed construction of missing connectors at the I-8/I-5 interchange. These connectors are not assumed in the 2030 Regional Transportation Plan adopted by SANDAG in November 2007 and should not be included in the project analysis. The inclusion of the connectors in the 2030 model runs used for the SDIA DEIR results in a reduction of trips in corridors accessed by SDIA trips traveling to the west on North Harbor Drive. The 2030 model takes advantage of this and assigns 32% of the SDIA trips westbound on North Harbor Drive and 67% eastbound (the trip distribution in the existing airport traffic pattern is 15% westbound and 84% eastbound). The deletion of the I-5/I-8 connector will result in an airport trip distribution pattern more similar to the existing traffic patterns. Thus, traffic impacts for the 2030 scenarios are understated. The study area and impacts to intersections and segments should be reanalyzed to reflect the updated Regional Transportation Plan.</p>	<p>The SANDAG 2030 Regional Transportation Plan (RTP) was adopted November 30, 2007 after the DEIR was published in October 2007. The approved 2007 RTP was not available for reference in the analysis. The 2030 Mobility Plan, completed in 2003, was used for reference of regional transportation plans and does include the I-8/I-5 connector in the 2030 highway network. Note that while the 2030 RTP completed in November 2007 does not include the I-8/I-5 connectors in the Reasonably Expected Revenue Network, it does include the connectors in the Unconstrained Revenue Network.</p> <p>The shift of airport traffic westbound grows from the existing 15% to 32% in 2030. This increase in traffic using the westbound path leaving the airport to access the freeways is contributable to the increased traffic congestion east of the airport roadways leading to the freeway.</p>
Comment 11	Table 5-3.20, continued	Response
	<p>Table 5-3.20 also assumes that Nimitz Blvd between Harbor and Rosecrans has the capacity of a four lane urban major. However, this street segment does not have turn pockets. Left turns are made from the #1 lane reducing the capacity of the roadway. The segment capacity should be adjusted in the table.</p>	<p>The capacities used for different roadway classification types refer to the volume of through-traffic that the roadways can accommodate at "midblock" sections or areas where through-traffic can have "uninterrupted" flow. This is the basic definition of highway/roadway capacities as used in the Highway Capacity Manual and adopted by various jurisdictions such as the City of San Diego in their roadway classification capacities. For Nimitz between Harbor and Rosecrans, that "uninterrupted" section would be at midblock between Harbor and the first curb cut at Shafter Street, which is classified as a four lane urban major. Intersections are not included in roadway capacity analysis.</p>
Comment 12	Tables 5.3-22 through 5.3-26	Response
	<p>Tables 5.3-22 through 5.3-26 do not include intersections in the Peninsula, Midway, and Ocean Beach planning areas that will clearly be impacted by short and long term growth in airport traffic. These include intersections along Rosecrans Street, Nimitz Blvd and Camino del Rio W that will be used to access the communities and the freeway system. The inappropriate technique of using the No Project alternative compared to the proposed Project to determine the impacts of the Project (except for on-site impacts) results in a greatly reduced study area and avoids identifying feasible mitigation for Project impacts. While it is true that adoption of the No Project alternative would not require the</p>	<p>The study area includes all street segments and intersections with 50 or more peak hour project trips per City of San Diego / SANDAG guidelines. Project trips are calculated as those trips associated with implementation of the Proposed Airport Implementation Plan compared to the No Project Alternative.</p> <p>See Response to General Comment #3.</p>

<p>identification of mitigation and development of a Mitigation, Monitoring, and Reporting Program, it does not follow that the No Project alternative can therefore be used as a baseline for determining Project impacts and feasible mitigation. If the Airport Authority wishes to avoid mitigating the impacts of future increases in airport traffic, then the Board should adopt the No Project Alternative.</p>		
<p>Comment 13</p>	<p>Section 5.3.8.1</p>	<p>Response</p>
	<p>5.3.8.1 identifies mitigation for North Harbor Drive that will require the City of San Diego to adopt a new roadway classification. The section also identifies several roads that will need to be reclassified in order to implement the proposed improvements. The proposed improvements are not consistent with the City's Circulation Element and will require a General Plan amendment. This should be identified in the Land Use section of the DEIR. The section also identifies a number of street segments where capacity would be increased through widening or the removal of parking. Analysis of the impacts of this widening and parking removal should be included in the DEIR. Discussions with the City of San Diego and CCDC to determine the feasibility of these improvements should occur and the results of those determinations should be include in the DEIR. Otherwise, the decision-maker will be unable to make Findings on the feasibility of the Project's traffic mitigation measures.</p>	<p>North Harbor Drive is classified as a primary arterial and the mitigation for additional lanes does not change the primary arterial classification for North Harbor Drive which is 8-lanes directly in front of the airport terminals. Also, additional lanes on roads classified already as "prime" and "major" were identified by the City of San Diego as not consistent with the City's Circulation Element.</p> <p>The EIR identifies measures that mitigate the project's direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies consistency with the City of San Diego's January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the City of San Diego to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its jurisdiction.</p> <p>The Mitigation Monitoring and Reporting Program identifies the parties responsible for implementing the mitigation measures.</p>
<p>Comment 14</p>	<p>Noise</p>	<p>Response</p>
<p>The Draft EIR does not adequately address the noise impacts from the future increase in operations. As discussed in the Summary above, we believe that the noise impact is understated because the Draft EIR is using incorrect assumption in the Baseline analysis for the NO PROJECT ALTERNATIVE. As stated in the LAX EIS/EIR dated April 2004:</p>		<p>See Response to General Comment #3 and #6.</p>

<p><b><i>In addition to the CNEL contours prepared for the 1996 baseline and Year 2000 conditions, new legal developments have required the inclusion of addition information in this EIS/EIR. During the period of preparation of this EIS/EIR for the master plan development at LAX, the California Court of Appeal (in Berkeley Jets) found that the noise impacts disclosed by the Oakland International Airport EA/EIR for development of cargo facilities and their attendant nighttime operations were, for CEQA purposes, inadequately addressed by the CNEL metric alone. The court ruled that supplemental single event analyses that have been provided solely as additional material for informational purposes should have been further expanded upon and used to delineate the effects of single even noise resulting from project actions” (LAX Master Plan Final EIS/EIR, April 2004)</i></b></p> <p>The San Diego Draft EIR does not adequately consider the Single Event noise impacts on residents that will be awakened and annoyed by the increased departures facilitated by the Master Plan expansion.</p>	<p>Section 5.1.2 describes the supplemental metrics used to evaluate the impact of the Proposed Project. The single event/supplemental noise analysis in the EIR considers the Berkeley Keep Jets over the Bay Committee vs. Board of Port Commissioners of the City of Oakland ruling.</p> <p>The Draft EIR set an approach and methodology, defined the regulatory framework, set a significance criterion noting that there is still no specific criterion for supplemental noise analysis, and then analyzed the potential for impact to schools and sleep disturbance. See Section 5.1.2 of the EIR.</p>	
<p>Comment 15 (submitted by Jarvis Ross)</p>	<p>Subject: Executive Summary</p>	<p>Response</p>
<p>The subject Environmental Impact Report <b><i>was not developed</i></b> in accordance with the California Environmental Quality Act Public Resources Code et. Seq. Section 21003 (b), (c), and (f); Section 21083 (1), (2), and (3); Section 21100 (2) (A) &amp; (B), and (4).</p> <p>Furthermore under California code Regulation Title 14 15000-15387 Article 3 Section 15042 the Airport Authority board has the authority and therefore the legal responsibility to disapprove the subject project based upon, “significant effects upon the environment that would occur if the project were approved as proposed.”</p> <p>Based upon the subject EIR’s own Executive Summary Table 1-1 and 1-2 they project increased passengers and a need for a parking garage which means increased flights and increased vehicular ground transportation. Both of the foregoing will unequivocally result in environmentally detrimental increased air and noise pollution. The both have already been clinically identified as contributing to or causing health problems in school children. Under Title 114 Article 10 Section</p>	<p>The EIR complies with all of CEQA’s procedural and substantive provisions. The EIR is a large document and does provide extensive qualitative data and technical factors. These data are necessary to make an informed decision based on analysis not sentiment. The EIR does focus on the impact categories that had the most potential for environmental impact, specifically traffic, noise, air quality, and land use.</p> <p>There is no factual evidence that a parking structure will increase either flights or vehicular ground transportation. The number of flights is determined by consumer demand and is limited by the capacity of the Airport’s single runway. A parking structure is actually more likely to lessen vehicular ground transportation because it will reduce the number of cars circling the airport to pick up arriving passengers.</p> <p>Noise and air pollution, of course, can have harmful impacts on children. However, the Proposed Project does not cause significant increases in noise pollution, and any effect on air quality are accompanied by mitigation. See EIR sections 5.1 (noise) and 5.5 (air quality). Most</p>	

<p>15141 the voluminous hard copy subject draft E.I.R is in gross violation of the spirit of this declaration. Section 15142 under the requirements of interdisciplinary approach the subject EIR fails to responsibly place adequate weight upon the qualitative factors and places to much emphasis on quantitative, economic and technical factors. Section 15143 reinforces that the emphasis of the EIR should be upon, “the significant effects on the environment.”</p>		<p>forecast increases in either air pollution or noise will occur with or without project implementation. Any effects caused by implementation of the Proposed Project will be mitigated. See Responses to General Comments #3 and #6.</p>
<p>Comment 16 (submitted by Jarvis Ross)</p>	<p>Subject:</p>	<p>Response</p>
<p>“California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an object, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT”</p> <p>The preceding statement indicates that the Airport Master Plan under CEQA required an EIR due to potential (may have), “significant environmental impacts.” [CEQA Section 15064 (a) (1)]</p> <p>By virtue of the fact that the Airport Authority did not exercise CEQA Art. 1 section 15002 (f) (2) it moves to the level of affirming that the subject Airport Master Plan proposal <b>does have significant environmental impacts.</b></p>		<p>The EIR does indicate that there are significant air quality and traffic impacts associated with the implementation of the Proposed Project. Mitigation for those impacts are detailed within each impact category section in Chapter 5 and summarized in Table 1-5 of the Executive Summary.</p>
<p>Comment 17 (submitted by Jarvis Ross)</p>	<p>Subject:</p>	<p>Response</p>
<p>“The Draft Environmental Impact Report issues by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are</p>		<p>The statement quoted is meant to explain that the previous analysis was expanded to review the potential environmental impacts through 2030 to match regional transportation planning timelines. The AMP only looks beyond 2015 at a programmatic level. The improvements to be made prior to 2015 will not affect the review of more long term improvements. The Proposed Project is considered cumulatively in Section 5.20 of the EIR. Future improvements will need to be analyzed cumulatively in future environmental review. At this point, no other improvements are planned, and, therefore, any review of such plans would be speculative. The approval of the Proposed Project does not imply any specific</p>

<p>proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County Regional Airport Authority.”</p> <p>The preceding text is convoluted. On one hand it implies that sequential phases of development at Lindbergh field will take place if the initial one is approved and the environmental analysis anticipates this. It then implies that the cumulative environmental impacts would have to be evaluated in the future. It infers that the long range phase impacts have not been evaluated. Typically this would give weight to the future argument that phase one, if approved, has already compromised the environment. Therefore the then monetary investment in the Phase One terminal expansion should not be compromised by not proceeding with the remaining phases despite their cumulatively increased impacts upon the environment.</p>	<p>improvements will be implemented beyond those considered on a project level in the EIR.</p> <p>The currently planned improvements are not dependent on future projects. The Proposed Project in its simplest description from a terminal perspective is the completion of the West Terminal that opened in 1996. Completion of the West Terminal does not presuppose the ultimate planning of SDIA.</p>	
<p>Comment 18 submitted by Jarvis Ross)</p>	<p>Subject: Introduction and Background</p>	<p>Response</p>
<p>The last sentence in the above paragraph [Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport’s proximity within two miles from Downtown San Diego] presents but one of the strongest arguments <b>for not proceeding</b> with the proposed subject airport expansion at Lindbergh Field from both the environmental and economic standpoints. Surrounding area density represents an increased threat environmentally to residents from increased air pollution, noise pollution, and safety. The last of these across the nation and as pointed out more recently here in San Diego on January 16<sup>th</sup> at Lindbergh Field (Source: Union-Tribune January 23, 2008) as a consequence of overworked air traffic controllers and the resulting incidents.</p>	<p>The location of SDIA is not under review in this EIR. This EIR contemplates near term improvements and airport land use control to accommodate forecast traffic through 2015. See Response to General Comment #1.</p>	
<p>Comment 19 (submitted by Jarvis Ross)</p>	<p>Subject: Section 1.1/ Runway Protection Zones</p>	<p>Response</p>
<p>“San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has 2 single 9,401-foot-long 200-foot-wide east-west runways, making it</p>	<p>SDIA is the busiest single runway commercial airport in the United States; approval of the Proposed Project will not change this fact. The SDIA market continues to grow and the SDCRAA as operators of the</p>	

<p>the busiest single-runway commercial airport in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project"</p> <p>This second paragraph under 1.1 makes an irrefutable case for <b>not pursuing</b> the proposed project. It is already the busiest single-runway commercial airport in the world. Not mentioned but its approach and departure, RPZ's also make it among the most dangerous both to the aircraft and those upon the ground. Most recently (January 3, 2008) the S.D. Airport Authority approved human occupancy uses in the Shoreline Plaza area of liberty Station in direct violation of Federal, State and their own ALUCP guidelines. Prior military use and their occupancy and the right of municipalities to over rule Airport Authorities land use decisions does not extend the legal right for the Airport Authority to compromise it's responsibility under the Federal, State and it's own ALUCP guidelines. As a consequence the proposed project elevates the level of environmental impacts of which more important are health and safety hazards.</p>	<p>Airport are responding to the market demand.</p>	
<p>Comment 20 (submitted by Jarvis Ross)</p>	<p>Subject: Airport Property land trust</p>	<p>Response</p>
<p>"The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego Country Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use."</p> <p>According to the trust wording stated above the trust lands (original? Subsequently acquired? Or both?) are to sever, "a statewide public purpose." That could be a park, golf course, or in this city it could be condemned and blushed and hotels build there. Furthermore the FAA</p>	<p>In general, tidelands trust land can have many uses to serve the public. Under current statutory authority, however, the lands administered by the SDCRAA may be used only for airport purposes.</p> <p>FAA does not have the authority to close an airport. The FAA does have the authority to issue Airport Operating Certificates for certain airports (Part 139 Program). The FAA Administrator has the statutory authority to issue airport operating certificates and establish minimum safety</p>	

<p>is empowered to shut and airport down for various reasons which would void the airport usage.</p>	<p>standards for the operation of those airports. 49 U.S.C. § 44706;14 C.F.R. Part 139.</p> <p>If the FAA finds that an airport is not meeting its obligations, it often imposes an administrative action. It can also impose a financial penalty for each day the airport continues to violate a Part 139 requirement. In extreme cases, the FAA might revoke the airport's certificate or limit the areas of an airport where air carriers can land or takeoff.</p> <p>Also, when airports accept federal grants, they agree to certain obligations pertaining to the operation, use and maintenance of the airport. The FAA has a compliance program focused on educating airports and encouraging voluntary compliance. If the FAA finds that an airport sponsor is not in compliance, it may determine that the sponsor will no longer be eligible for FAA funds. FAA Order 5100.38A, Chapter 15.</p>	
<p>Comment 21 (submitted by Jarvis Ross)</p>	<p>Subject: Failure to fulfill legal obligations under S.D.C.R.A.A. Act of 2002</p>	<p>Response</p>
<p>“San Diego International Airport was dedicated as the San Diego region’s municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of supervisors. The Port District’s purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.</p> <p>“The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member board. The San Diego County Regional Airport Authority Board is responsible for all policy and</p>	<p>The SDCRAA has completed its obligation to conduct an airport site selection process. This obligation was completed in November 2006 as described in Section 2.4.2 of the DEIR.</p>	

<p>planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.”</p> <p>Paragraph one indicates that the current Airport Authority has failed to fulfill it’s legal obligations under S.D.C.R.A.A. Act of 2002 regarding the requirement to conduct an airport site selection program to identify a long term regional airport solution.</p>		
<p>Comment 22 (submitted by Jarvis Ross)</p>	<p>Section 1.1.2</p>	<p>Response</p>
<p>Items 1-6 in 1.1.2, primarily are economic arguments for continued development of Lindbergh Field. As such under CEQA EIR guidelines they are not valid for consideration except as to their adverse environmental impacts upon the broader areas of airport influence. Item 7, with regard to public input as indicated in 1.8 table 1-6, there were only 21 responses to the May 2006 Draft EIR. None of these are indicated to have been from private citizens and only two were for community planning groups. The limited response brings into question the level of public outreach. The public meeting held at Portuguese hall in Point Loma in 2006 met with resounding opposition to the Lindbergh Field Airport Master Plan, yet there is no mention of it.</p> <p>Item 8 in 1.1.2 needs little consideration. Anyone with common sense would acknowledge from their own observations and countless documents published by the S.D. Airport Authority in 2006 and preceding years that Lindbergh Field has been and is incompatible with surrounding land uses primarily for the reasons indicated in Executive Summary 1.8 Figure 1-1 (The following represents approximately 3/4<sup>th</sup> of the volume of concerns.)</p> <ol style="list-style-type: none"> <li>1. Human Health Risk</li> <li>2. Noise</li> <li>3. Traffic</li> <li>4. Air Quality</li> </ol> <p>In addition to the preceding are the terrain and obstructions (Briefing paper SDCRAA May 16, 2006 page 6)</p>	<p>The commenter is citing the six of the eight Goals &amp; Objectives established for the Airport Master Plan. The commenter is, however, not correct that the first six goals and objectives are economic in nature. Goal number 1 is to improve levels of customer service. Goal number 2 is to provide safety and security. Goal number 3 is to provide proper balance among airport facilities. Goal number 4 is to enhance airport access. The fifth and sixth goals are economic in nature, accounting for the regional economy and a cost effective plan for airport improvements.</p> <p>Chapter 2, <i>Goals and Objectives</i>, of the Airport Master Plan, defines the process by which the Airport Master Plan goals and objectives were developed.</p> <p>Public meetings for the AMP are summarized in the AMP Public Outreach Summary Report for each year that the AMP has been on going. These reports are available at the SDCRAA offices. The previous Draft EIR comments are summarized in Section 1.8 of the EIR. The SDCRAA has maintained an open process for development of the EIR. Comments on the EIR were requested from the public, responsible agencies, and governing bodies. Only comments in writing were specifically included in the EIR. Twenty-one agencies, five comments were received by planning communities, two organizations, and 30 individuals provided comments on the October 2007 Draft EIR.</p> <p>The SDCRAA is in the process of amending the ALUCP for SDIA and has initiated an update to the Part 150 Study. These studies are</p>	

		<p>mechanisms to address compatible land use issues as the projected growth in categories mentioned by the commenter are expected with or without the implementation of the Proposed Project.</p> <p>The Proposed Project does not influence flight paths and, therefore, terrain and obstruction issues are not impacted.</p>
<p>Comment 23 (submitted by Jarvis Ross)</p>	<p>Section 1.1.3</p>	<p>Response</p>
<p>“From 2003 to November, the Airport Authority conducted a comprehensive study of relocating the region’s primary commercial airport or enhancing San Diego International Airport’s capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Selection Program process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The votes of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego’s long-term transportation needs.</p> <p>“The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process.”</p> <p>The then Airport Authority did not authorize an exhaustive study of relocating the regions primary commercial airport. Exhaustive in that the study encompassed the absurd (proposal 6) to the ridiculous i.e. desert sites requiring unaffordable high speed transit and a declining customer base. Unfortunately what the voters turned down in 2006 was not the potential use of Camp Elliot but an ill conceived joint use proposal of MCAS (West) Miramar which was associated with the ballot. This ballot defeat has been misconstrued as authorizing the discontinuance of seeing relocation for long term needs and pouring money into an environmentally unsound expansion of SDIA for relatively short term use. In 2007 an airport authority board member is reported to have stated at a public meeting at the Point Loma Nazarene University that State Senator Chris Kehoe’s bill banned the continued</p>		<p>Comment noted. This is not a comment on the content of the Draft Environmental Impact Report or Draft Airport Master Plan. This comment does not address the EIR and therefore no response is required.</p> <p>Please see section 2.4.2 of the Draft EIR for a description of the ASSP and its result.</p>

<p>site selection process. At a subsequent Peninsula Community Planning Board meeting a representative of Senator Kehoe flatly denied that accusation. The last paragraph indicates an incremental improvement program of improvements (expansion) of the present SDIA. To the public impacted by the airport this equates to a stealth approach.</p>		
<p>Comment 24 (submitted by Jarvis Ross)</p>	<p>Section 1.1.4</p>	<p>Response</p>
<p>“The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030.</p> <p>“The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&amp;E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration’s 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first full years after the forecast was completed. Because the trend as San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in Table 1-1.”</p> <p>Just as September 11, 2001 had a negative impact upon air travel so will the current economic fallout impact air travel projections based upon 2004 data. The major difference is that the current crisis will very likely have a much longer duration due to the combination of inflationary impacts of fuel across the spectrum of the economy and the subprime mortgage collapse impact also upon a broad range of the economy. The SH&amp;E Aviation Activity Forecast of 2004 and the use of, “tracking above the high growth scenario” as indicated above coupled with the</p>	<p>The SDCRAA has seen no studies or analyses indicating that the current inflationary pressures or subprime mortgage problems will have a more negative impact than September 11, 2001, the Gulf War, and earlier recessions on aviation demand in San Diego and elsewhere. Traffic at San Diego continued to grow during the 1970s, which was the last major inflationary period in the U.S., an inflationary period that was also driven by high oil prices. There is speculation that the subprime mortgage problems will result in an economic recession, but the long-term income forecasts upon which the passenger forecasts are based on averages that include both economic high growth periods and downturns. The statement "tracking above the high growth scenario" was correct at the time it was written. The FAA's latest Terminal Area Forecast (TAF) for San Diego was published in December 2007, after the increases in fuel costs and subprime mortgage lending problems had become well publicized. Nevertheless, the TAF shows 11.7 million enplanements for 2015, slightly higher than the SH&amp;E forecast of 11.4 million for the same period. There is no objectively defensible justification for lowering the long-term forecast numbers, and such an action could result in an inappropriate understatement of the projected utilization of the airport environmental impacts.</p>	

recent economic events make the data in 1.1.4 Table 1-1 questionable at the best and more than likely invalid.		
Comment 25 (submitted by Jarvis Ross)	Subject: Response to quoted text	Response
<p>“...be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack...”</p> <p>The preceding statement of accommodation until 2020 in 1.1.4 would appear to compromise much of the argument for any expansion at Lindbergh Field especially in terms of longer term demand and it’s overriding need for relocation. The additional delays resulting from high congestion are speculative over the short term (2015) due to economic factors mentioned above.</p>		The statement that the Airport could theoretically accommodate projected 2020 activity even without implementation of the Proposed Project is correct. However, without implementation of the Proposed Project, the Airport would be very congested and would operate at a low level of service. The same effects (traffic, noise, air quality) would occur but air travelers would have a much less comfortable or convenient experience and operations would be less efficient.
Comment 26 (submitted by Jarvis Ross)	Section 1.2. Summary of Proposed Project (Preferred Alternative)	Response
<p>“The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:</p> <ol style="list-style-type: none"> <li>1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.</li> <li>2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.</li> <li>3. Provide for future public transit options in airport land use planning. “</li> </ol> <p>Under 1.2 (1.) above air service demand as stated in earlier comments (1.1.4) is based upon outdated and optimistic data (2004-2006) and does not reflect current adverse events (2007-2008). The elements touted are largely ones of economic benefit and per CEQA not relevant to an EIR excepting their negative environmental impacts. (2.) The current facilities are incompatible with surrounding land use i.e. densely populated with large commercial areas and the city plan to increase population density in the urban areas. (3.) Providing for future public</p>		<p>See response to Jarvis Ross comment #24.</p> <p>The goals for the Proposed Project are indeed economic in nature as the Airport is a business; however the EIR evaluates the potential environmental impacts of the proposed improvements per CEQA.</p> <p>The overall compatibility of SDIA is reviewed through the ALUCP, this</p>

transit options in ALUP at Lindbergh Field is full of sound and theory but signifies nothing in terms of reality. (as exemplified by MTS's light rail proposal from Old Town to University City)		EIR reviewed specific project level and program level improvements.  See Response to General Comment #9.
Comment 27 (submitted by Bill Ingram)	Safety	Response
<p>Lindbergh Field is the busiest single-runway in the world and it is only a matter of time before an unforeseen circumstance will create a crash of an airplane at Lindbergh. (Like the recent Boeing 777) and the recent runway incursion between the Hawker Jet still on the runway while the Southwest Airline jet took off.</p> <p>Flight schedule increasing from 600 current flights to 818 projected flights will jam up the runway and not provide proper spacing between flights landing and taking off. <b>EIR – Appendices. A</b></p> <p>What is the airport authority going to do to prevent these dangers?</p>		<p>Safety is the SDCRAA's chief objective. No plan for the airport would be proposed unless it maintained the airport's existing safe operating environment or improved the airport's existing safe operating environment. The Proposed Project will not reduce safety at SDIA.</p> <p>The SDCRAA does not control aircraft scheduling beyond the grandfathered ability to not allow departing flights between 11 PM and 6:30 AM; the airlines control their schedules. See Airline Deregulation Act. Airlines will continue to grow their schedules based on market demand.</p> <p>The SDCRAA does not control aircraft traffic; the FAA does. The FAA's mission is to safely move aircraft through the national airspace.</p> <p>The SDCRAA will work with airlines and the FAA where possible to reflect the concerns of the surrounding communities.</p>
Comment 28 (submitted by Bill Ingram)	Noise and Environment	Response
<p>Children in schools, residents, and customers in local businesses cannot talk because of the noise of the airplanes. Schools have 164.5 min/day = 496 hours per year of potential loss of education. The FAA says that the airport is in violation of increasing the number of schools next to the airport. <b>Appendices B-40</b></p>		<p>The SDCRAA has voiced concern over new schools being constructed within noise impacted areas. The SDCRAA does not know where the commenter received the information about the FAA voicing concerns over increased schools next to the airport. However the commenter is reminded that the SDCRAA does not approve school locations. The tables in Appendix B provide total time above (in minutes) specific noise levels with the lowest level (65 dB) including the most time above. As described in Section 5.1.2.4 of the EIR time above levels (in minutes) are shown for noise levels ranging from 65 to 95 dB. Note that typical school construction would be expected to provide for exterior to indoor attenuation of 25 to 30 dB, resulting in interior noise levels of between 35 and 70 dB.</p> <p>As the data includes all daytime flights (between 7 a.m. and 7 p.m.), the results are conservative as most school days are somewhat shorter. However, that data does provide a comprehensive evaluation of the time period when many school activities occur, including after-school</p>

		<p>functions.</p> <p>The data shows that most schools in the vicinity of SDIA do not experience substantial periods of time with exterior noise levels above 80 dB, which equates to a typical interior noise level of about 55 dB. According to Figure B-8 in Appendix B, a steady 55 dB sound level is the threshold above which sentence intelligibility would begin to degrade. The values referenced in the comment are not included specifically in Appendix B and therefore direct response can not be provided.</p>
<p>Comment 29 (submitted by Bill Ingram)</p>	<p>Environmental</p>	<p>Response</p>
<p>Along with increased flights the EIR indicates there will be significant increases over CEQA thresholds of Nitrogen oxides, sulfur oxides, and particulate matter falling from aircraft. Over 400 tons are being dumped on people.</p>		<p>The air quality analysis presented in the EIR represents the total predicted ambient (i.e., outside) concentrations of the U.S. EPA “criteria” pollutants, as estimated from dispersion models with “background” concentrations (as measured from nearby downtown air monitoring stations) added. Background concentrations reflect the emissions from other nearby sources not accounted for in the dispersion modeling analysis. Importantly, the airport and the adjoining roadway network (including the freeway) were included. The dispersion models also account for the dispersal (or “drift”) of emissions from nearby off-site sources, including the freeway based on real-world meteorological conditions. See Section 5.5.5 and Appendix E, Air Quality.</p> <p>Moreover, the background concentrations used are the maximum values observed during the past three years at the downtown monitoring sites. When combined with the dispersion modeling results, the reported values represent conservatively-high concentrations and some “double-counting” of emission sources. Finally, the downtown urban environment concentrations tend to be higher than the area near the Airport. Therefore, use of airport monitoring is not necessary to reasonably estimate future pollutant levels.</p> <p>As discussed in Section 5.5.6, Impact Analysis the differences in total emissions (as opposed to ambient concentrations) between the Proposed Project (Preferred Alternative) - Airport Implementation Plan and the Baseline Conditions No Project Alternative exceed the CEQA thresholds for NO<sub>x</sub> in 2030. This outcome is due to the forecasted growth in operations at SDIA over this timeframe, with or without the planned improvements. The exceedance in NO<sub>x</sub> is produced extensively by operations that are not controlled by the SDCRAA (i.e. increased aircraft operations). These pollutants could potentially be reduced by reduced flights or use of aircraft that generate less NO<sub>x</sub></p>

emissions however these types of mitigation are not feasible because the SDCRAA cannot implement them. Because the SDCRAA can not apply these types of mitigation to reduce this specific pollutant this impact for the Airport Implementation Plan in 2030 is considered unavoidable. However, mitigation measures to reduce the effects of hazardous air pollutants defined in Section 5.16 will also serve to reduce NO<sub>x</sub> emissions.

Additionally as shown in the EIR in Section 5.5.6, the Proposed Airport Implementation Plan (and Alternative) is expected to “contribute significantly” to projected violations for the NO<sub>2</sub> (1 hour averaging time) standard in 2030. The Proposed Airport Land Use Plan, considered on a program level, also exceeds the NO<sub>2</sub> (1 hour averaging time) significance threshold for 2030 due specifically to increased vehicular traffic. As the elements of the Proposed Airport Land Use Plan become specific projects they will undergo project level analysis within CEQA documentation to determine specific impacts and potential mitigation. For the year 2010, 2015, and 2030 the Project will not contribute significantly to a projected violation as the No Project Alternative exceeds the CAAQS criteria for PM<sub>10</sub> and PM<sub>2.5</sub> and the concentrations of these pollutants remains practically the same between the No Project Alternative and the Project alternatives. See Section 5.5 pages 36-37.

Under the Airline Deregulation Act, airport operators such as the SDCRAA have no legislative authority to either spread out operations or control airport operational levels. Airlines set their own schedules to meet passenger demand. Thus, increases in air pollutants are unavoidable as operations increase. The SDCRAA has indicated mitigation measures aimed are mitigation human health risk impacts that are within the authority of the SDCRAA in Section 5.16.9. Those mitigation measures will also reduce air quality impacts. The EIR also contains mitigation measures and additional actions that will reduce the air quality impact of the Proposed Airport Implementation Plan including measures related to construction and operational activities. However, these mitigation measures are unlikely to reduce the air quality impacts to less than significant. Thus, even after the implementation of all feasible mitigation measures as identified in this EIR, the air quality impacts for the Proposed Airport Implementation Plan are considered under CEQA to be significant but unavoidable.

Comment 30 (submitted by Bill Ingram)	Traffic	Response
<p>Traffic will increase from 87,000 to 135,000 and the overflow into Point Loam will be an increase of 100% because of the overflow from the airport. This does not include traffic derived from all other development in the area, such as Marriott – Sponge Bob, Liberty Station, and Harbor Island Hotels etc.</p>		<p>The EIR traffic analysis uses the SANDAG traffic model to project background traffic within the study. The SANDAG model includes traffic related to the Naval Training Center/Liberty Station development including the Nickelodeon Hotel and other planned hotel development. The forecast of regional background traffic are described in Section 5.3.1.4.</p>
Comment 31 (submitted by Bill Ingram)	Future Planning	Response
<p>Thinking down the road further than 2015, 2030, or 2050 is imperative. <b>Put our major airport in East Elliot where it belongs.</b> It will provide two runways and cargo handling capability.</p>		<p>See Response to General Comment #1. This EIR contemplates improvements to SDIA for near term improvements and designation of land uses on Airport for future planning. Section 4.4.2.2 contemplates the use of another Airport. However using another airport does not meet the project objectives for the Proposed Project.</p>
Comment 32 (submitted by Suhail Khalil)		Response
<p>SDCRAA completed its DEIR on a “No Project Alternative” development baseline. Unfortunately, this approach does not allow the public or decision makers to analyze existing environmental settings as it compares to development impacts when determining if a proposed project impact may be “significant”, pursuant to California’s Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) guidelines. As you are aware, labels of “significant” impact require additional studies to mitigate impact, if feasible, whereas “insignificant” impact labels do not require any further study or mitigation.</p> <p>Capital improvements proposed in Phase 1 AMP to existing San Diego International Airport (SDIA) facilities include four elements: Airfield, Terminal, Ground Transportation, Airport Support. Proposed projects focus on incremental improvements to SDIA including construction of 10 new gates to Terminal 2 and a Remain-Over-Night parking structure to commence 2009 and be completed by 2011. The next Phase 2 of the AMP is expected to have a broader scope and focus on complete development that addresses a full integration of all capital improvements to maximize operations at SDIA beyond 2020. AMP Phase 2 implementation is expected to commence 2015 and includes improvements to the Teledyne Ryan property, a northern taxiway (safety concerns), acquisition of adjacent properties, relocation of airside operations, traffic mitigation on congested streets, adding roads</p>		<p>See Response to General Comment #3.</p> <p>The commenter interprets the Proposed Project as Phase 1 and the ALUP as Phase 2; this is not a correct interpretation. The Proposed Project identifies the improvements to be built whereas the ALUP is meant to provide a future look at airport land uses and thereby guide future consideration for possible developments beyond 2015, much like a General Plan for a city. The ALUP does not include a specific timeline or specific projects. Future planning efforts and decisions by the SDCRAA Board will determine specific improvements for the land uses identified in the ALUP.</p>

and intersections serving SDIA, construction of an inter-modal transportation center at the north side of SDIA, relocation of landside operations to the north, consolidated rental car facility, and funding for a Regional Transportation Plan. Phase 1 of the AMP projects are expected to relieve projected pressures on daily operations beyond 2010 including: project delays at commercial gates and projected pressures on existing taxiways from commercial, cargo and general aviation flights. The total number of operations (departures & arrivals) projected to increase 50% from current levels, nearing 302, 652 total operations annually by 2030. Increased traffic congestion on Harbor Drive and increased CO2 emissions (pollution) is expected to increase significantly due to increased operations projected.

It's my understanding that you intend to adopt a **Draft Memorandum of Understanding** between SANDGAG and the City of San Diego to ensure all CEQA and NEPA guidelines are met. Also, that you will work to seek Federal Aviation Administration approvals for funding "Off-Airport Improvements" including: freeway ramps serving proposed inter-modal transportation center, mitigation of traffic congestion on North Harbor Drive and improvements of vehicular airport access from Washington, Grape, Hawthorne and Laurel Streets. It remains clear that SDIA hours of operation will not change, relocation alternatives for SDIA may be available by the year 2015 and that existing curfew violations rules and regulations are to remain the same. Public safety must never be compromised. Pollution, noise and traffic impacts must be mitigated to ensure our quality of life. I appreciate your leadership to ensure these processes are kept open and transparent for additional government agencies and public input.

Air pollutant emissions will increase with increased operations, but those operational increases will not be induced by the Proposed Project. The EIR identifies mitigation measures for air pollutant increase in sections 5.16.7. See Response to General Comment #3.

As an operator of a public commercial service airport under the rules of Title 14, Code of Federal Regulations (CFR), Part 139, the SDCRAA works with the Federal Aviation Administration (FAA) to secure entitlements and discretionary funding of airport improvements. If the City or Caltrans take action to approve and implement the road and freeway improvements identified in the EIR, the SDCRAA will request the FAA to determine the permissible use of funds.

Safety is the SDCRAA's chief objective. No plan for the airport would be proposed unless it maintained the airport's existing safe operating environment or improved the airport's existing safe operating environment. The SDCRAA will not compromise public safety.

All potential significant environmental effects of the project will be mitigated, as described throughout Chapter 5.

February 4, 2007

San Diego County Regional Airport Authority  
Attn: Airport Planning  
P.O. Box 82776  
San Diego, CA 92138-2776

We appreciate the opportunity to review and comment on the October 2007 draft EIR for expansions at San Diego International Airport. As a representative of one of the communities most affected by flight noise from SDIA, I've included the comments of others also concerned that the proposed expansions could lead to more flights, more traffic, baggage and air traffic congestion as well as more noise.

First, the San Diego County Regional Airport Authority has operated for 6 years on a Variance that has been EXPIRED for THREE of the Six years, *without yet accomplishing the Requirements to the Community* (Noise Monitors are still unplaced and unequal in number to those on the East Side, the 'less impacted' by Noise). Exemplifying such 'Lack of good will,' adherence to agreed upon policy and 'follow through' to this community, we question their Incentives or Motivations to seriously consider the Impacts to the Peninsula Community and to earnestly 'listen' and incorporate Peninsula resident's, experts and professional's comments, especially Technical. As such, we have no confidence in the Authority's intentions address our questions in an Advisory capacity as included in the Airport's 'stated goal' of 'public input'. *How will the Airport Authority incorporate into the Master Plan the very accurate technical expertise and experience of professional and experienced members of our Community and of their own industry? Will these comments be used to not only safeguard the interests of our community and city, but help facilitate Responsible Development at SDIA?*

Second, as we fought with the Airport Authority for more than 2 mos. to attain even a 120-day review of this EIR, we later learned under CEQA, and under the CA Public Resources Code, Section 21091.5, is already REQUIRED:

**California Public Resources Code Section 21091.5**

"Notwithstanding subdivision (a) of Section 21091, or any other provision of this division, the **public review period for a draft environmental impact report** prepared for a proposed project involving the **expansion or enlargement of a publicly owned airport requiring the acquisition** of any tide and submerged lands or other lands **subject to the public trust for commerce**, navigation, or fisheries, or any interest therein, **shall be not less than 120 days.**"

Again, why the Deception? We have lost confidence in both the Airport Authority's respect of our residents, professionals and their comments.

In our review of the 'Master Plan's EIR,' we note that it is difficult to compare this EIR to any accessible 'Master Plan'. The "20-year" minimum state/federal requirement for Master Plans is not included in any references, as this EIR and appendices solely address this apparently 'first phase' to accomodate needs at SDIA for only the next seven years, until "2015." It is also 'not accessible' on line, nor provided at any public library. Few

of the public in Peninsula are 'privy' to any of the past Master Plan Studies, nor their more 'comprehensive' and negative Impacts to this community. *Why has not the Entire Master Plan been developed and proposed before this EIR is presented to the Public?* Without such, the EIR is Not ready to be 'adopted.' An 'incremental viewing' of the first phase is all that is addressed in the EIR, and is insufficient to meet state requirements as well as for any Relevant Review. Longer term 'plans' are briefly referred to in several sections of the EIR, as more than what is being stated... *Why is this Long Term Master Plan not Accessible to the Public? Is this even a legal process if it does Not include at least a full 20-year ' projection of the 'Master Plan' to be compared to?*

**Considering this, below are comments/problems on the 'development' process that this this has somehow 'avoided.' SDIA Master Plan EIR's 'Non-compliance' with the Cal Trans/FAA 'Best Practices' methodology of presenting an EIR for Airport Expansions are noted by numbers enclosed by these [ ] .**

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In checking out the following Best Practices methodology for the creation of the EIR for SDIA's Lindbergh Field, the differences are amazing. An 'earlier version' was supposedly available, then removed. No [ ] 'redlining' was accomplished for the public to be made aware of the 'differences' in the 'changed EIR,' though it went from a supposed '385 pages' to approximately, '585 pages' with another 1500 or so additional pages of 'difficult-to-access' appendices', some in 'accessible' pdf files, most, not.

To access such data, for review, as quoted, "in California, the state requirements frequently appear to add extensive volume to the Federal documents," it was obviously made so large and so 'unreasonably lengthy,' to discourage review by the public, [ ] clearly violating state guidelines.

For example, Air Quality in the Appendix Volume II, included in E-9, Annual Aircraft Operations, minutes of Taxi time and Remain over night 'changes' to 'emissions,' in any 'alternative' in any year the particulate emissions (p. E-10), regardless of an 'increase in operations' of over 25%, are predicted to be 'negligible' ("<0.01 for PM 2.5?) from all ground support equipment, with any project after the year 2015? *Why all this excess paperwork, repeated in both the EIR AND the Appendix?* 'Dimple' explanations are not substantiated with anything but models of hypothetical numbers with little explanation for the public to understand, especially as it is obvious that there will be necessary increases in ground support equipment to service such needs. Increases of 'baggage tractors, catering, lavatory, fuel,' etc. (page E-11), surely will increase correspondingly with the increase of Additional aircraft needing servicing, as exemplified (time wise, delay wise) in the recent examples given by the Airport Consultant Steve Beeks (1-08), for the [ ] at JFK airport, which has resulted in an increase of "

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[ ] More important are the comparisons to evaluate in ground, runway and air traffic congestion and delays, than simply the 'noise.' Obviously this will result in an Increased 'Emissions' both from service vehicles, as well as aircraft taxi time Emissions and are just 'briefly' mentioned as being 'significant,' yet are *Not considered* as 'having significant impact' on the adjacent communities around Lindbergh Field, as the EIR Assumes that an 'un-named source' will 'coordinate' the 'changeout of environmentally-friendly service vehicles.' This 'assumption' along with others, point out just one mistake of the EIR in not

**considering the 'Short Term AND Long Term Environmental Consequences, as quoted below in 'summary tables.' [(3)]**

**[(4)] How incredible that Table E-34 to E-43 are not placed side by side or vertically, so that the differences (seemingly miniscule) are not seen easily. In effect, the accumulation of pollutants is quite substantial, growing by 1/3 at least in Particulate Matter, SD's latest 'failure' in 2 of 3 air quality measures.**

**At the same time, as quoted below in [(5)], the additional information on the "historic architectural survey" of SDIA did not need to include the entire explanation of why certain buildings were kept or not (200 pages!), nor the 'history' of the airport. More important is the 'future development' of SDIA, and such Impacts to San Diego and SDIA's surrounding communities. In addition, data such as proposed 'schedule of bids' for construction included "0" for any dates (repeatedly), times, lengths of contracts, etc. , included at Least 50 pages of non-important 'inconsequential' "data for data's sake," again, violating Best Practices.(below):**

### **"Best Practices for Environmental Impact Statement Management**

**FAA Guide: July 2001 (Updated January 2002)**

#### **Managing the Scope and Size of Environmental Documents**

From the very beginning of compliance with the National Environmental Policy Act (NEPA), there has been a conflict between the need to prepare legally sufficient Environmental Impact Statements and Environmental Assessments and the need to manage the size of these documents. The regulations promulgated by the Council on Environmental Quality (CEQ) in 1978 established a *target size for EIS's as "normally not to exceed 150 pages in length and for proposals of unusual scope or complexity 300 pages"* (40 CFR 1502.7). In 1981, as a part of additional guidance (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations), *CEQA issued an opinion that Environmental Assessments should not exceed 10-15 pages in length*. Even a casual review of documents recently approved by FAA would indicate that these policies are honored more in their breach than in their compliance.

**The Problem.** Susan Smillie and Lucinda Swartz identified three reasons Federal agencies fail to meet or even approach the page limits established by CEQ in a paper presented to the convention of the National Association of Environmental Professionals in May 1997. These reasons are (1.) A requirement by counsel to "beef up" EIS's in the hope that volume will deter potential litigants or in the event the deterrence fails that the agency can argue "it's in there somewhere." (2.) **Failure to properly scope the document;** and (3.) In the case of EA's, preparation of "mini-EIS's" rather than an appropriate assessment. It appears that, in addition, in those states where joint Federal/state environmental documents are prepared such as in California, the state requirements frequently appear to add extensive volume to the Federal documents. [(2)]

**Some Proposed Solutions.** Several potential techniques for reducing the size of NEPA documents are included below. You should always keep in mind that in attempting to reach a particular size goal, you cannot sacrifice the "hard look" that is required by NEPA.

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**Scoping.** When preparing an EIS, the scoping process provides the first and generally one of the best opportunities to keep the document from excessive growth later. A *proper analysis* of the scope of the project will allow limitations on what has to be analyzed later. It is particularly important at this stage to understand the nature of the decision that is to be supported by the contents of the environmental document.

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**Tiering.** Tiering is a concept supported by the CEQ Regulations (40 CFR 1508.28), which provides a process for analysis of broad conceptual proposals followed by narrower site-specific analyses incorporating the earlier work by reference. Tiering has limited utility in most airport projects, but it may prove useful in some circumstances, in particular in the case of siting proposed new airports.

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**Incorporation by Reference.** Documents *not directly used in an EIS* should be incorporated by reference. If this is done, *care should be taken that documents referenced are reasonably available* to any reviewer who wants to review them.

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### EIS Documents

- **Purpose and Need:** A *well-written statement of the purpose and need* for the project (not why a document was prepared) lays the groundwork for a well-written, disciplined EIS document.
- **Alternatives Including the Proposed Action:** It is frequently possible to reduce the size of EIS's by taking special care in describing the alternatives in this section. Since it is normally the practice to compare the impacts of the various alternatives in detail in the environmental consequences section, detailed comparisons of impacts may be avoided here. One suggestion used recently in a DEIS -- *a summary table comparing the proposed project and its alternatives in this section, referring to the detailed discussions in the subsequent environmental consequences section.* (3)
- **Affected Environment:** Because significant amounts of data are generally available on current conditions, *there is a tendency to "load up" an EIS with such data simply because it is there.* One method that seems to help is to limit the affected environment description to a relatively minor discussion of where the proposed project is located and general conditions in the area, and to include specific *detailed information in the Environmental Consequences* section which follows. In doing this, you should take care not to simply transfer the problem from one chapter to another.

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For EA's you should consider *combining the affected environment and environmental consequences* section, which *will eliminate the tendency to duplicate material.*

- **Environmental Consequences:** This section should *focus on significant impacts.* If a project or any of its alternatives has little or no impact in a certain impact

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category, that should be clearly stated and not repeated over and over. It may be useful to duplicate applicable portions of the comparative table discussed under alternatives above so as to provide a graphic comparison of the project and its alternatives under specific impact topics. ((#))

- **Appendices:** You should take care to include as appendices all of the information necessary for a reasonable review of the document, but not to include data for data's sake. (5) If it appears that appendices are growing beyond a reasonable size, you should consider reducing them to electronic format and making them available either on-line or in the form of a compact disk.

**Environmental Assessments.** The three purposes of an EA as outlined in CEQ's Forty Most Asked Questions are: (1.) Briefly provide sufficient evidence and analysis to determine whether to prepare an EIS; (2.) Aid an agency's compliance with NEPA when no EIS is necessary (i.e. it identifies alternatives and mitigation); and (3.) Facilitate preparation of an EIS when one is necessary. Since the EA is intended to be a concise document, it should not contain long descriptions or detailed data that the agency may have gathered. Rather, it should contain a brief discussion of the need for the proposal, alternatives to the proposal, environmental impact of the proposal and alternatives, and a list of persons and agencies consulted (see 40 CFR 1508.9 (b)). There are circumstances in which a voluminous EA is needed, but these should be exception rather than the rule.

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**EA vs. EIS.** When a proposed action at first blush appears *to be on the borderline of significant impacts*, it is always possible to proceed with a Draft EIS and subsequently to convert the document to a FONSI if impacts are shown not to be significant upon further investigation and/or mitigation. The advantage to this approach is that time can be saved by avoiding a two-step EA-EIS process if an EIS proves to be required. The immediate initiation of an EIS assures that the contractor selection and scoping conform to EIS requirements. The Notice to Prepare an EIS should alert agencies and the public that environmental impacts may be shown not to be significant, in which case the document would be concluded as a FONSI. The decision to complete the document as either an EIS or FONSI would normally be made after agency and public review and comment on the Draft EIS. The decision to pursue this type of approach to an environmental document involves discretionary judgment by the FAA. There is no mandated requirement."

15

Most difficult to believe is that this entire 2,000+ page EIR has little to 'no' 'Environmental Consequences,' constantly stating that there are 'negligible significant impacts.' Obviously, with this type of EIR (statements of 'no impacts') no valid discussion or presentation by Airport Authority (AA) officials of any 'impacts' at Planning Board meetings or public meetings is possible.

16

Such limited access (such as to the Existing SDIA ALUCP-sections unable to be 'copied' and pasted via online research into the responses/comments), makes it difficult for responsible references to be used in such discussion (below, highlighted). Pls. Note that Few of the Airport Authority's EIR/supporting documents were 'accessible' to cut and 'paste' into examples for discussion, violating the Guidelines below:

17

## "Best Practices for Environmental Impact Statement Management

### FAA Guide: July 2001 (Updated January 2002)

#### Use of Technology

A highly advantageous best practice is the effective use of state-of-the-art data bases, analytical tools, electronic communications and information storage.

- All EIS documentation should be available in electronic format. Working documents should be in Word format so that revisions and editing can be done. Final versions of Draft and Final EISs and RODs should be in pdf format with document links that can be read by Adobe Acrobat.
- The efficiency of environmental document preparation and FAA internal reviews can be maximized with electronic communication and review of draft materials, including the internal use of red-lined (1) versions to highlight the changes made since the previous draft.
- The FAA EIS project manager and EIS consultant, in consultation with an FAA environmental attorney, should agree at the beginning of the process on the way the consultant should electronically compile the administrative record."

As described in (15126.2), the EIR "**Shall Identify and Focus on the Significant Environmental Effects of the proposed Project.**" Its 'assessments' shall include:

What are the 'Direct' and 'Indirect' Significant effects of the project on the Environment? They are Not 'clearly identified and described in the EIR clearly.' Most are noted for the short-term as 'meeting the goals of 2015,' merely 7 years away, as opposed to the requirement of the 'Master Plan' for 20+ yrs.. Real Long-term effects are rarely described in comparison for some items' such as those below.

18

Relevant specifics' Not included are:

The 'resources involved.' Not included are: Emergency Facilities, Paramedics, Hospital Access. Short Term or Long Term Transit funding and the assurance that such 'mentioned' but not assured as part of this EIR or Master Plan, 'Intermodal Concept' will ever be approved or funded, nor even be 'sufficiently planned' for the need. Such 'ideas' have only recently been brought up by outside consultants, and are not 'part of this EIR, as described.

19

'Physical Changes' Not included are: Traffic 'Mitigation' for off-site, severely impacted streets roads and intersections on and through the Peninsula, handling a minimum of 'double' its existing traffic from Harbor Drive to over 85% of the Airport's increased traffic. If added traffic increases from an existing 87,000 to 135,000 at SDIA, more than 40,800 ADAs will most likely resort to use the Peninsula's Exit roads as a result of the existing congestion on Laurel, Harbor Drive and Grape St., already at 85%

20

'capacity.' The environmental impacts of Noise, Gross increases in Particulate matter and toxic chemicals, as well as increased Safety Risks are Not included.

21

'Alterations to ecological systems'. Not included are: Changes in the least tern nesting, increases in the 'Hard Noise reflection' as the Airport adds buildings and Concrete.

'Health and Safety Problems caused by the Physical Changes. Not mentioned are: Air Pollution, Lack of Emergency Transportation for Minor or Major mishaps with the Areas's 3 main corridors flooded with gridlock traffic, Lack of Planning for the future for the Increased Air Capacity and Cargo needs that will cause SDIA to stress seriously its Safety Requirements, both in the Air and on the Ground.

22

'Scenic Quality (as a resource base) Effects'. Not mentioned are: SDIA's physical site is on the most valuable property in San Diego. To 'cover it' as a natural resource with constant 'additions' with such a limited space constraint for its purpose is indeed a 'waste.'

23

'Bringing people and development into the area', Not mentioned are those that have already constitute an 'emergency-access constrained area and will be a growing major problem. This project will have the effect of attracting people to the area and end up having huge Congestion that increases the risks, both on the air and on the ground for 'safe access' to emergency facilities. The Peninsula has No major Emergency Facility - for a 75,000+ member community! Pollutants that were involved and observed when the dump's 'surface' was leveled for property transfer: Benzene, vinyl chloride, lead, mercury among other dangerous air/chemical pollutants, are still in the dump. In addition, cacinogenic chemicals such as formaldeyde 1,3 Butadiene, Acetaldehyde and Acrolein (pages H-2 through H-5) which are used in the 'construction process alone, will only Add to the Risks associated with this Construction. Why is the Airport Authority 'charged', instead of the military, with the 'clean up process?' What 'precautions' are in the 'Safety Plan,' which is mentioned, but not 'referred to,' anywhere?

24

**NOISE (& near end, re: noise tables):**

The draft EIR additionally concludes that *the proposed expansions would not result in any additional airplane noise to be borne by the communities* surrounding the airport. As the forecast found on Table 1 in the 'Comparison of SH & E Forecast and Actual Activity' (page I-4), and in the recent AA disclosures at meetings have shown that the "High unconstrained forecast ..used for the environmental analysis" (page I-3), is completely out of date, as original '*enplanements' and 'operations' forecasts that were made in 2005 for the years 2010 through possibly 2012 or 2013 have ALREADY BEEN PASSED in Actuality.* Considering that the EIR fails to 'work out' its conclusion of 'no noise impact' comprehensively in the EIR to prove this and considering that the conclusion itself 'contradicts' the stated reason for expanding SDIA: to accommodate projected growth, these 'high estimates' should need to be 'readjusted,' as well as Impacts of Noise and Pollutants to the surrounding communities.

25

### 6.3 Growth Inducing Impacts (NOISE):

p. 6-3, #6. Would the project foster Growth at the Airport?

As discussed in Chapter 3, ...the project would not 'add passengers' or 'flights' at the Airport. HOWEVER, the existing Noise Ordinance does Allow the Airlines to ADD Additional Flight Operations as long as Flight Hour restrictions are not Exceeded. **Additional flights are allowed and would be accommodated**, regardless of whether the Proposed project is approved or built. Additional flights could result from air carrier decisions regarding market forces and unmet demand, rather than the availability of specific SDIA facilities. *How does this 'assure adjacent neighbors that Noise Will NOT Increase?*

26

#### **AIR POLLUTION (& below):**

Especially interesting were the limited locations of pollution impacts, especially with NTC's new residential areas and Banker's Hills 'increasing redevelopment densities' (especially those off Spruce St.) *being so close to any 'downwind' SDIA Operations-related increases in pollution*, which appear completely contradictory to the Airport's 'goals' by Ordinance to 'Reduce Impact on surrounding communities.' It appears from the Appendixes on E-25 & E-27, that the only 'sites' for pollutant impact measurement seem to be in commercial/retail zoning, military or 'public spaces', border fences and the downtown bases for AIR POLLUTION. **No 'receptors' appear near the immediately adjacent or 'downwind' communities of Mission/Bankers Hills Resident areas (Where hot air holding pollutants will rise to the residential areas and/or become trapped with the fog) nor the Peninsula/Old Midway/Old Town Resident populations, immediately 'affected by Air Pollutants.** The nearest is '2 miles southeast of the airport in downtown San Diego,' and are quoted as "may differ from the airport area." *How is the Air Quality of those in the vicinity of SDIA determined? Why are there not Air Monitors in all of these areas?*

27

In the construction phases, P. 6 of 9 mentions that **'new surface parking lots & vehicle circulation areas would be constructed west of Terminal 2 West.'** This is the area where there is a toxic dump. *How is this going to be constructed without impacting the employees, visitors, residents & military being impacted by large pockets of toxic contamination, where as occurred in 2000, when NTC's Toxic dump was 'leveled & covered?'* From toxic fumes alone, 8 military recruits doing 'outdoor training' just downwind, were injured/worse during training, all ending up in the Nearest Hospital, over 30 minutes distance, with traffic. 3 died before they reached the hospital off Washington St. in Mission Hills. *Why is this not identified as a 'significant effect' to residents surrounding or downwind of the proposed construction?*

28

As noted on P. 6-1 in the EIR of **Significant Irreversible Effects ..**

**"The Proposed Project could potentially result in and/or contribute incrementally to air quality impacts" ...and as described in Section 5.16, "the proposed project increases the potential Acute (short term) incremental health impacts (non-cancer) in RESIDENTIAL, SCHOOL, RECREATIONAL AREAS and off-site workers.** This outcome is likely driven principally by acrolein with lesser contributions from formaldehyde." This is extremely disturbing as is the **just as likely event of an aircraft crash on or around SDIA with its limited runway aligned with runway overcapacity at proposed future gates, as exemplified in just one recent case study at JFK.** This

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violates any semblance of 'discussing carefully' the 'Significant Environmental Impacts to those living around SDIA'. *What are the Airports Plans to increase the measurement and monitoring and reporting for measuring Air Quality and Safety in the communities around SDIA?*

**SAFETY:**

Re-Reading the 2004 ALUCP in detail, there is much that appears to be 'missing' with regards to the '*Safety of persons on the Ground*'. In the 2004 ALUCP, there are certain 'measures' that were requested, accumulated from Past History and from projections into the future. Described in a very clear manner..these same questions' compilations have been asked repeatedly of the AA in ANAC meetings. Some of these 'calculations' have been tracked the past few years as a result of requests from the current ANAC members, ie. 'number of missed approaches' per month, somewhat similar to the 2004's request for 'near misses', others have not yet been tracked yet, ie. "number of Head to Head operations per month," which is specifically mentioned in the 'safety study' as part of the ALUCP. *Recently requested as public information, Why has the AA not yet put them online nor are they available for the General Public to access for review in determining the Safety of such an 'increase in capacity' to Lindbergh Field? ' In recent meetings with & calls to Airport representatives (DF), the public has been denied access to such "monthly reports," stating that they are "not still in storage on their data bases."* This alone is disturbing, after finding some of the exact same parameters being requested, reported and part of the 2004 and earlier ALUCP requirements.

30

*For either an Aircraft Crash, a Military Fuel Depot explosion, or Toxic Air Release, What parameters have been shown or determined as 'Safe' for emergency access from SDIA? Area emergency department figures show in 2004, that Paramedic/Emergency access, to all communities in Peninsula is constrained. At already 'over 8 minutes,' think of the added emergency access restrictions with an aircraft crash, perhaps one that lands 1/2 in an 1/2 out of the channel with NTC businesses smack in the middle of it, in the Runway Protection Zone, or on top of Loma Portal Homes, how much time will it take for emergency crews to respond with the added traffic? Mr. Webb remembers the difficulty for 'emergency access' with the marines mentioned above. With the increased density already of an 'overbuilt church, school and commercial land use at NTC,' with more planned, what assurances are there that any 'emergency' will be adequately provided for with 'Medical Access?' Where in the EIR is the added Stress in this System with Traffic, Hospital & Safety personnel access addressed? 'Effects on Public Emergency Service Access (as a resource base)' have Not been mentioned. Nor have any changes been mentioned that have occurred due to the 'Impacts' to Safety via Emergency Vehicles Access.*

31

The Draft EIR needs to be revised to address the actual environmental impacts associated with actual aircraft operations and actual passenger use, **not the level of impacts associated with forecasts that have been consistently exceeded in projections**, even by the admission of the San Diego County Regional Airport Authority. Consider this brief (explained in detail following) evaluation of the 'goals' of this Master Plan (with comments):

32

Goals & Forecast:

1. Improve 'air service & customer service.' SDIA is already in 'the top 10 in country,' for its size. The EIR (below) fails to prove that it will accomplish anything 'significant' after 2015. Since any 'improvements' will barely be completed by then, little 'significant improvement' appears to be possible, while at the same time the Peninsula's 75,000+ person population will be Hugely Impacted by Construction Congestion on one of their ONLY THREE ingress/egress points, Harbor Drive. <i>Where are the 'changes' to accomodate travel during this time for both residents as well as passengers?</i>	33
2. Improve airport Access. Little was evident in the EIR's 'mitigation' for traffic impacts expected in ingress/egress to or through Peninsula's public roads, <i>what 'plans' will help the adjacent community to deal with a reduced level of access with all the increased traffic 'funnelled into' our communities?</i>	34
3. Utilize developable land. This may be 'possible' for the benefit of the Airport Authority, but <i>where is the benefit to the pubic?</i> Access to much of it appears still be constrained as to access.	35
4. Enhance Airport Access as part of the region's transportation system. Again, <i>where &amp; when is this to be accomplished? Is it 'part of this 'phase of the EIR?'</i> <i>Where is the funding for this?</i>	36
5. Improve Regional Economy. Doubtful as surely the AA will benefit, but (because of small plane capacity only) who will benefit are: Denver, Phoenix, March AFB (our cargo) & LAX. Heavily Detriment will be to our Regional traffic on the frwys. which will increase in necessity of carrying Majority of our Cargo to March AFB, Ontario & LAX. <i>Who has looked at the Long Range impact of continuing to Ship 90%+ of our cargo to these other airports? How much are we 'giving away'?</i>	37
6. Meet AA Financial Goals. This is not 'described in this Master Plan.' <i>What 'Financial Goals' does the Airport Leadership have?</i>	38
7. Involve 'stakeholders' & 'public input.' At the Thurs. 1/24 meeting of Special Advisory Committee, it was stated by a PR consultant, that " <i>any 'technical information' from the 'public' would Not be listened to, "because we don't need it," and that the AA will simply 'listen to the public' to learn how to 'appease them' and how to make their own 'plans,' a more palatable 'sell.'</i> This appears that the Airport Authority does not intend to do anything of the sort. As evidence of exactly such, at another meeting just prior to this 'private agenda' of the AA's 'Special Advisory Committee,' the AA's 'moderator', in rude and discriminating behavior toward a Planning Group member from our area , who arrived to speak (during "Public Input") at another planning area's 'Airport Meeting,' described the 'double talk' displayed by the Airport Authority's Management team. Degrading and discrediting a volunteer Professional in their own field, they refuted in advance, anything this volunteer had to share with 'other, naive, public members of the San Diego community also concerned with the future of this city'. This display of preponderance of 'superiority' is disgusting and shameful for a 'public employee.' <i>Where is the assurance that any of our comments will be considered and integrated into this EIR?</i>	39

8. Improve terminal Efficiency and Capacity. As an airport affiliate at the airport states:

"I am a tour guide who works inside the terminals to greet guests. With 10 new gates, God knows how many passengers increase an hour, The terminal, which is not being increased in size, will in NO way be able to accommodate thousands of more passengers. Baggage claim is packed as is, and luggage is slow.. The only time Terminal 2 is slow is after 5:00 pm. I doubt these "possible 10 more planes an hour" will be after 5:00 pm. There is one escalator down to baggage claim and as it is the descent is slow and there are many people at the bottom to greet their friends and family. I see a horrible bottleneck. *Where is this going to 'get better?'*" SB

40

9. Increase Airfield Safety, Efficiency and Capacity." Farthest from it. Unless the AA 'learns from the mistakes of other airports, ie. JFK who they just PAID a consultant to hear, who informed them of the '17% increase in operations' (aircraft at gates) and the' 247% increase in DELAY & CONGESTION, both at the airport & its terminals as well as in the streets & air connections around them. *Where are we assured we aren't making the same mistakes, wasting our future on special interest profits for the short term?* As the 'human element' of inaccuracy, error, etc. takes place with less experienced "Pilots (1-08 news), Air Traffic Controllers (12-07 news) as a recently retired Aircraft Crash Management Executive commented, "SDIA is well past its statistical accident rating."

41

10. Improve Ground Transportation Efficiency. *How is this possible, as Increasing the bottlenecks at N. Harbor Drive to the Peninsula, increasing the traffic use (even by bus or shuttle) down Laurel St., Grape St., to the North or South side of the airport will only increase the congestion substantially on Laurel St. & Pacific Hwy.?* This is an ill-conceived and destructive plan, doomed to cause major havoc.

42

11. Increase 'compatibility' with surrounding land uses. *How does 'increasing RON parking aprons 'increase the compatibility' of having loud Noisy and dangerous Jets take off, non-stop for 3 hours from 6:30 am to 9:30 am? and possibly again at 11:30, 4:30 pm, & 8:30pm til 11:30 pm over Residential Homes and children in Schools?*

43

12. Complement the Site Selection. *How does this plan 'find a new Long Term Site for San Diego?* There isn't one iota of 'complementary' movement at this airport, in this plan. Increasing 'by maximizing' on a severely limited site, decreasing Safety margins will only result in the inevitable, stress on the 'weakest link,' the human side...air traffic control, pilot error, 'space' in the air or on the ground. Page 4 of 9 in the Notice of Preparation states how " **by 2015, operational delays are forecasted to reach congestion levels that would limit further growth in airline flights without the addition of another runway at SDIA.**" This completely 'contradicts the goals of ASSP programs, as p. 5 of 9 says, these 'improvements' will 'continue its mission of serving SD's commercial air transportation needs as forecasted through 2015. That will happen with 'no change,' as the data shows, little 'problems' until 2020. The 'changes proposed will only Increase and accentuate the Risk of Failure at SDIA to be able to handle increased ground traffic, as well as air traffic, as in JFK, but much 'riskier' at the world's second busiest one runway airport.

44

AA - 1996 Received from Cal Trans Dept. of Transportation, Division of Aeronautics, MS #40, the understanding that it, the Division, as a Responsible Agency, must ensure that the proposal is in full compliance with CEQA.

45

CEQA, Public Resources Code Section 21096, Requires that Caltrans Airport Land Use Planning Handbook (handbook) be Utilized as a resource in the preparation of

Environmental Documents for projects within an airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that Should be Applied to All Public Use Airports and is published on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/>. Noted on Page 2 is that according to CA public Utilities Code (PUC) Section 21676.c requires that "Each public agency within the boundaries of an airport land use commission plan shall, PRIOR to the modification of its Airport Master Plan, Refer such proposed change to the Airport Land Use Commission."

**"The Airport Land Use Commission must then determine Whether the Proposed Master Plan is Consistent or Inconsistent with the Adopted Compatibility Plan for that Airport. ... "key to protecting an airport and the people residing and working in the vicinity of an airport" are the ... "Airport Land Use Commissions and Airport Land Use Compatibility Plans!"**

Sandy Hesnard, Aviation Environmental Specialist, State Clearinghouse, Cal Trans.

*Please, show us WHERE this plan actually 'protects the people residing ...in the vicinity of the SDIA airport?' Where are the CEQA reports on the ACTUAL Increased IMPACTS (changes) to the "People, Students, Children and Home Values in the Communities" Surrounding SDIA (Sunset Cliffs, Upper OB, Peninsula/Mission Beach/Pacific Beach/South Soledad Mtn. & Birdrock) over the past 10 years? For the next 20? There is Not a current, Updated 'Adopted Land Use Compatibility Plan,' or **Part 150 Study completed**, though operations have 'Increased substantially,' far Above their predicted rates of 1-1.5% per year. Actual operations increased more than 2% to 6% per year for the past 4 years since 2003 (ALUCP based on 2003 data), setting historical records. Such 'Environmental Impacts' were calculated on inaccurate projections for both Operations and Capacity, resulting in Incomplete and FALSE Projections of 'future impacts' and 'mitigation' needs for Safety, Traffic and Noise. Part of the problem is that the Airport Authority has Not Placed on Public Access sites, the compilation of important monthly statistics. What will be the real increases in Operations, if the existing EIR is based on Incorrect Projections? What will be the Real Increases in Operations and Airport Capacity and Impact to the communities surrounding SDIA as a Result of the "Increased Gate Operations Capacity (and # of new gates)?"*

46

47

As the EIR relies upon such inaccurate projections, now proven incorrect, they already skew the information, based upon those projections. We question the forecasts. *How can Airport Authority Commissioners even 'attempt to approve an EIR' without "accurate airport-related noise, traffic and safety impacts on the surrounding community," those that can only accurately determined without the information contained in more accurate reports from a currently ordered Part 150 study and updated ALUCP, in process? is ASSUMED to grow from approximately "187,700 annual tons" in 2005 to approximately 622,100 annual tons in 2030!" What is the annual tonnage in Air Cargo measured at in 2007? This is more than 3 times of that in 2005. What is this 'new trip rate' that this was estimated on?*

48

**Repeated in both the EIR and the Appendix are:**

Noted Increased traffic along major egress and ingress routes in the Point Loma area including Harbor Drive, Rosecrans Street, Nimitz Boulevard, and Pacific Hwy. *When are the Peninsula's other feeder streets, already impacted with new 'surrounding developments' from NTC to be addressed in the Draft EIR? When are the 'segments' on Nimitz Blvd., between Rosecrans and Hwy. 8, Rosecrans St., between Lytton and Hwy. 5, Harbor Drive, between Nimitz and Canon St., Chatsworth Blvd., between Barnett and Nimitz to be addressed? As well, when are the 'intersections' on these routes to be included as 'impacted' by the expansion? They are not even mentioned.*

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**Appendix D Traffic & Circulation:**

D.6, etc. al, Intersections & those with 'Significant Traffic Impacts', Turning Volumes, Land Use Plan, etc. al. - these all 'require coordination' with the City of San Diego "in order to mitigate any 'potential' significant effects." This is unacceptable as the Peninsula is still dealing, 10 years after the 'agreements with the City on NTC's development, with unaccomplished 'traffic mitigation.' Where are the actual 'traffic, signal, freeway entrance/exit mitigations,' with funding? There is Nothing Projected for the Peninsula Area, except a 'one lane-(to 5 lanes) expansion on Rosecrans Street from Nimitz to Lytton St. which is far too little, far too late. Our area will become the 'most impacted', as the 'escape route' when Laurel Street, Grape, Hawthorn and Harbor Drive, under the EIR scenario, have increased over their 100% capacity, that in today's numbers have Only a 15% increased capacity (D-1.4). It is doubtful that the City of San Diego will have sufficient Eminent Domain Capacity or funding to 'accomodate' the 'Mitigation measures' that are described from pages 202 to 252. "Cumulative Impacts" as stated, are relying on the **9/01 NTC Precise Plan** and **N. Harbor Drive Embarcadero's '01** requirements and do not include any of the North Harbor Drive, nor Shelter Island **Proposed Projects for Cumulative Impacts.** Repeatedly in the Under Tables D-91 to the end of the Section, with the 'implementation Plan Alternative (w/parking structure),' indicate clearly that there are **major 'Significant Traffic Impacts' as soon 'as 2020.'** Having traveled these intersections and entries onto the freeways, with even an additional 18,000 persons (one airline coming online at one gate) per month will indeed increase the 'assumed delay' far longer than the '1 second'. Most are already at D, E or F LOS already. And the year '2025? All 'would experience an increase in delay?' *Still the EIR states this is 'no significant change?'* This kind of illogical removal of responsibility to cumulative impacts is quickly receiving distrust and will require actual 'mitigation,' immediately, Prior To any Expansion, not afterward, to avoid 'Major Detrimental Impacts on surrounding communities.'

50

51

Comments from Attorneys representing the Port of San Diego site the inadequacy of the Draft in *Disclosing Actual Impacts for Traffic Mitigation Deficiencies.* Noting the EIR had not addressed how 'the transfer or closure of existing off-site parking and rental car facilities will result in adverse changes to the physical environment,' is only the first problem. The Port's concern may be s a reduction in revenue from such 'unmitigated effects.' We repeat their comment, "*The DEIR fails to correctly assign responsibility for Cumulative Traffic Impacts,*" and ... "*falsely assumes* that the implementation of the

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master plan will have "No significant traffic impacts, since airport traffic is expected to increase anyway."

*Where is the 'cumulative impact with analysis' that determines (Which) 'mitigation measures' that will be accomplished for any impacts attributable directly to increases in airport-related traffic," and specifically for Off-Site Traffic Impacts? Who will pay for it? How will funding for Off-Site Impacts (road conditions, traffic light and sign mitigation) to the Peninsula's main Collectors (Rosecrans, Nimitz, W. Pt. Loma Blvd., Catalina, Chatsworth), and Feeder Streets be accomplished to avoid a reduced Quality of Life? Increasingly in the Traffic Section of the EIR, the 'assumptions' are rife, redundant and repetitive to a point that is incomprehensible, ie.*

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*concerning conflicting statements 'assuming lower airport traffic because of increased use of transportation shuttles' (both for airport employees as well as passengers), then 'assuming that increasing amounts of traffic will be coming from increased use of and number of shuttles.' Where are such examples in real life for such use? As SDIA will not be having the Trolley, Coaster or other 'transit' assured at this point of being 'available and funded' to meet their future needs, what will this 'not included in this EIR, Intermodal Center' 'connect to?' There are far too many parking, traffic and transport 'use' assumptions, and those, are based on data that are over 5 to 8 years old and do Not include the 'underprojected' Recent, Major Increases in Operations and Passenger throughput over the past 4 years. Similar to the 'assumptions in the Air Quality section quoted by the Port District's Attorneys, where is the 'discussion of assumptions' for this 'technical data' (reams of it) on Traffic & Circulation?*

54

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56

In the Land Use Planning Section, As described in 5.2.3 CEQA State Guidelines, Appendix G, the proposed Project would have a significant land use compatibility impact if it results in:

**1. "Disruption or Division of the Physical Arrangement of an established community;"** Though on p. 5.2-17, it states that such 'traffic mitigation measures would 'not' physically divide existing communities, but rather would 'improve connections,' quite disconcerting is the fact that there are *no 'changes' that have been shown to Peninsula's residents and Planning Board to prove that in the future, the Airport will not have to resort to 'removing one of our major corridor streets, Rosecrans, or to continue to expand to meet 'unrealistic air transport demand.' When have these 'mitigation changes for Rosecrans or other major corridors or feeder streets been presented to PCPB?* The section notes 'Traffic and Circulation would be the only activities that would occur outside the immediate area of the Airport,' yet it fails to provide any real 'mitigation' of such.

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**2. Substantial or extreme land use incompatibility with adjacent or nearby existing and proposed land uses, resulting in significant incompatibility or nuisance impacts."** As stated on 5.2-17, there is "no significant change in the noise contours to the peninsula Community based on the Proposed Project". This is a contradictory statement. Is not 'a heavy and densified concentration of *increased noise and pollution from increased aircraft at an extremely limited site (661 acres) with major terrain limitations and fog inversion layers, encouraging 'nuisance impacts?' Are they not also encouraging More Incompatible Land Uses to the nearby existing residential and school land uses, many that existed long before the establishment of "SDIA or Lindbergh Field?"*

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As to the "SD Airport Environs Overlay Zone, and its "aim to protect public from Noise or Hazards associated with airport operations at SDIA," the EIR falsely states "that the Proposed Airport Land Use Plan would be 'consistent' with the stated purposes of the AEOZ." It is a 'pie in the sky' statement that to state that "it would Not Significantly Change Noise Exposure within the Airport Influence Area," as it denies the Reality of the irresponsibility of the Airport Authority and the City of San Diego to address the future needs of the entire City and County by ignoring the impacts of both Noise & Hazard as well as the Historical Significance of our large and long-established community. Already, the City of San Diego has ignored the guidelines of the ALUCP and allowed 2 major schools, including preschools in the Noise Impact and Airport Impact Influence area. ***By substantially increasing flight operations,(25%+) will not Noise, Safety and Pollution Hazards be increased to these children? Won't the entire area become devalued as aircraft and subsequent encroachment upon 'new areas' of the Peninsula are exposed to Noise from aircraft diverted from established pathways, for separation and 'safety' maneuvers?***

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A most incredibly condemning statement of this EIR is the one on 5.2.7 under 'cumulative impacts,' with regard to "cumulative land use impacts would occur when the incremental effect of a project or projects combine to produce a significant effect." Stating, without any knowledge of 'future projects,' "cumulative developments envisioned would be consistent with the land uses defined in the Land Use plans and policies for the SDIA Project Area AND the Surrounding Areas." "Consequently, these future developments when combined with the Proposed Project **would Not Result in Any Significant Land Use Impacts.**" *Is this the 'future prophecy of the AA's consultant to already 'know' all proposed projects in the future, for both SDIA AND the Surrounding areas? ie. Peninsula? Harbor Drive? Shelter Island Drive? Midway?*

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The first 'Assumptions ie. D.5.2.3.6 Realizing that "Ongoing growth in airport-related traffic cannot be separated for planning or mitigation purposes from improvement projects designed to increase the Airport's Current Capacity and service levels," they clearly state what we are saying now, from experience and from many, many consultant reports, that ***such expansion and increase in capacity without 'pre-constructed traffic mitigation,' will have immediate, extremely "cumulative" negative results on "local and areawide traffic."*** ***Where are the Cumulative Effects to the Surrounding Peninsula described, more than a minor impact on the Rosecrans (Nimitz to Barnett) or the Parking Impacts with Removal of the NTC airport parking spots available at the Hotel site north of the Channel? As opposed to D.5.1.3.7, Will not that 'removal' immediately effect the Parking situation? How will the increase of a huge parking structure Not add to the congestion at the already congested entry ramps and freeway segments for I-5 and I-8? (D.5.2.3.4), "whether with parking structure or without?"***

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D.5.1.3.6 Transit - As stated "Under the Implementation Plan (with parking structure) **No Existing or planned transit routes would be modified. Therefore, no significant IMPACT Would occur to transit operations and No mitigation is required.**" *Doesn't this prove that the 'increased costs for the 'Intermodal transport Center' has 'no effect' on the actual transportation system? Where is the 'substantiation' for this 'summary?'* *Due to the already congested routes in and out of SDIA for autos, with no 'modifications proposed with increased 'Ground Operations of 25% or more', how can it be assumed that there will NOT be any 'mitigation required?'* *Where are the studies of the impacts*

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*of already stressed 'street segments' of Nimitz & Rosecrans (p. 5.3-16), as 5.3.3.9 Significance Criteria Requires?*

The measures detailed in the DEIR (MM 5.3-1, MM 5.3-2 and MM 5.3-3) do not appear to have changed, and the 'funding for these measures' does not appear 'assured' at this point. (Mr. Peace's 'Intermodal Center' is extremely limited in its specific 'meeting of need,' requiring far more comprehensive study as commented on by AA members months ago). Public Review, Real Property Acquisition and funding for such traffic 'mitigation' is barely mentioned in this EIR. *Which "mitigation measures" will be 'accomplished' with this 'Phase' of the Master Plan? Will they be completed before the Additional Gates are completed? What 'Infrastructure Guarantees' does the Airport Authority assure its surrounding communities and Port District of, in the undertaking of this Proposal? Our communities are weary of the 'build now' and mitigate 'later,' irresponsible acts of this City, County and State. Any 'Airport Proposal' Must include both Immediate Plans and Funding assurance for Immediate Mitigation, not only 'during construction,' but permanent and guaranteed funding for ongoing 'mitigation' as this proposed 'expansion' will have, impacting the Peninsula, its residents, businesses and visitors in the most negative manner of all communities. Specifically, where are the reserves, funding reserves or insurance for such Increased Liability, not limited to: Ongoing Traffic Mitigation to avoid increased Accidents, Increased Traffic and Air Congestion, Ground and Air Operations Delays, Business losses and loss of lives? What are the 'Subsequent, Necessary Expansions' that will be Required for SDIA and all of San Diego County, to meet its 'air transportation' needs? Is this not what THIS EIR supposed to do? This is supposed to be a Long Term Plan, "a Minimum 25-year projection according to the existing ALUCP, yet includes no defined predictions for 'accommodating' air transportation needs other than "at capacity regardless of 'operational expansions' to the year 2015."*

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In Appendix B, with few pages (B-1 through B-17) describing '*technical details' of potential impacts of Noise and its Effect on People,*' *there is Nothing here that relates to the Actual Noise effects on specific surrounding communities' populations, nor mention of any 'mitigation' necessary to cover litigation exposures. Where are the reports of 'hearing losses' already accrued in the area from the Noise from SDIA's encroaching and growing Noise Patterns? Are they growing, how much will such health risks be expanded, as per (goal #11)? Certainly, the AA has had years of recorded reports? Litigation? Defining 'general effects' is disingenuous, indicating that there are 'increasing effects,' yet the report claims only 'minor, insignificant effects' or changes, after the Airport Authority's own 'report' discloses 'Disclaimers of Non-Accuracy of their Noise Monitors' (INM) because of the 'varied topography' and 'hard and soft ground coverage'. "INM can overstate or understate the Noise exposure levels due to terrain (including buildings) in the vicinity of SDIA and the prevalence of both hard and soft ground coverage." 'Hard' being defined further as equivalent to concrete coverage, buildings and even water, noted "at SDIA, they tend to reflect and Increase Noise Exposure." What are the REAL Noise and Health (lack of sleep) Impacts on Persons surrounding SDIA, considering the Hard, Soft and Topographical Constraints of the Airport in the middle of San Diego?*

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(Appendix A of EIR Appendix I)  
Comment Summary of 2006 Master Plan DEIR SDIA&  
CNEL Contours/Nighttime Analysis Charts:

It is interesting, on Page B-28 to note how the "in the Proposed Project ..." as would be expected" (BY WHOM?) ..the differences between the contours for the Proposed Project versus the No Project Alternative are "small." *With a 25% MINIMUM Increase in the Potential Flight Operations at the Airport (per gate and with 10 New gates), How are these determined as 'SMALL?'* Between the Flights from the No Project, East Terminal Project and the Preferred Project, some diagrams appear to put vague (no one can 'read' the precise locations, there are No roads) and 'inconsistent determinations of less flights' vs. 'more' or to have 'less impact' at nighttime or daytime or with different projects. K.I.S.S. principle applies here. If there is a **'25% increase in potential Aircraft taking off (& more potential because each GATE can have multiple planes loading many planes per day),** it will be a 'Substantial Change.' It is not even as simple as JFK's 'example of operations increasing by 17%-planes at the existing gates!' We are looking at a *SINGLE RUNWAY*. With varying aircraft Not Subject to Any Specific 'SLOT,' there is No Method of "Predicting" when and Where those Planes will be directed with weather conditions: fog, wind, rain, etc. Also, p. B-27, does not include any 'restrictions on the use of MD83, MD80 series or B737s, regardless of where they 'take off from', they still impact the CNELs in the air with schools & residences at such a close distance from the single runway. *Are there any 'proposed restrictions' to 'mitigate' for these continued and potentially 'increasing' operations?* Ground noise or air noise A 'model' is just that, a poor predictor of Actual Results. Looking at Real Life examples such as JFK are more predictable. Past results of similar reality or 'Actual Operations and Passenger Activity' is a better predictor than the 'fiction' (ie. the 'model forecasts' done for SDIA concerning 'passenger and operations projection), presented here.

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Eg. The 'differences' shown on the Figure B 17 & Figure B-23 between the 2005 Base, Proposed, and Alternative appear to clearly show that by 2020, areas of the Peninsula that have had very few flights south of the 275 heading (for emergency separation), will now be Negatively subjected to New Noise and Pollution of Substantially by increasing amounts Aircraft Operations. Both Daytime AND Nighttime Impacts will affect the homes of Tens of Thousands, the Health of tens of Thousands of Household Occupants and correspondingly, Property Tax values for San Diego. This is supposed to 'help the economy?' Most likely it will 'help the Airport Authority with their Financial Goals(#6 ), but at what 'expense' to the long term economical 'goal' for San Diego (goal #5)? *To be stuck in traffic, or at a beachside resort or sand spot, Impacted constantly from the Noise, Pollution and Safety Risks of a Congested International Airport 'Takeoff' or 'Landing' Runway, how is this going to 'help' San Diego's Tourism?*

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*What about the increase of Particulate Matter Pollution over the area, increasing from "400 tons to 600 tons annually?" That is a 1/3 increase in pollution! How is this considered, 'not significant?' How does this add to the goal of "Increase 'compatibility' with surrounding land uses?"* In 1-24 Executive Summary, the Air Quality Impacts ASSUME that "uses in the flight path to the east & west..are vacant." Not so. *Immediately to the west are buildings at former NTC that expect to have 40-50 employees..where are the CEQA guidelines 'met' in this 'plan?'* This is indeed, 'AVOIDABLE. The CAAQS for this pollutant (PMs, NOX & VOC) will be in

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Violation. After reading the Summary of Impacts and Mitigation Measures, being Stuck in F LOS on Any of the Routes or from to SDIA, without 'mitigation' will 'help' tourism or business in downtown San Diego? These 'Environmental-Noise, Pollution, Traffic & Safety Impacts' are all considered "Less than Significant?" Historical uses of such 'mitigation measures' suggested or 'encourage and facilitated' in the EIR are seldom actually used. Who will 'coordinate' the ground service equipment replacement program to 'monitor' the use of 'alternative to ground service, diesel-fueled equipment? Such 'Impacts' are incompletely discussed in the EIR as to their "Impacts" to the surrounding community, and when commented on briefly in the Draft EIR in 2006, they were barely mentioned.

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The History of the Airport's Operations and Abuse of Regulations is documented, repeatedly in the ANAC's records over the past 10 years. No Analysis of such reported 'Impacts' are Included in the EIR. As detailed repeatedly, with Only One runway, there will be More Homes Impacted with Noise, Pollution and Safety Risks. With the increases of Traffic that have not been Compiled Comprehensively to address the Changes in operations/passenger loads since 2005, and without such future 'already-approved projects' surrounding the Airport and 'presently proposed ones,' this EIR is woefully Out of Date, does Not give accurate Details of Impacts (maps do not include 'readable streets') and are difficult to 'mark' in compiling comments from the .pdf files provided as 'supplemental materials.' Existing ALUCP regulations are impossible to 'access' without Retyping or Copying word for word, page for page, every segment.

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This has been made the most difficult EIR to address, we believe, on purpose to further thwart the efforts of those who will be Harmed most. The Airport Authority's Webmaster is extremely Disingenuous in copying the corrupt pathways of the City of San Diego's Leadership. Who will 'benefit' while the majority of San Diego will be subject to Gross Congestion Impacts, both on the Ground and in the Air and Incredible Delays, both in the Air and on the Ground, subjecting this City and County to future unproductive 'Costs' in Studies, Litigation and in 'Mitigation' after there are Major Operational 'Human-caused' Accidents and Mishaps? What are the "plans" to prepare for these?

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**B.5 Aircraft Noise Analysis Summary Tables: Schools**

Tables B-8 through B-10

Calculations of times (minutes) that Schools (Children) are Subjected to Noise in levels that are UNLAWFUL are woefully inaccurate. In both the Vicinities the Peninsula and East Side Schools, such 'computerized calculations' are an Insult to the Parents, Health of the Children and the Residents that are subject to the REAL HEALTH IMPACTS on Hearing. At 104 decibels, over 3 minutes exposure Will Cause Permanent Hearing Damage, especially in the ears of young \*Preschoolers And Kindergarten\* Children.

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These Tables appear quite Lame, being extremely close, whether in terms of "No Project Alternative", "East Terminal Alternative" OR "Preferred Project Alternative," all of which will have a Marked Change, for Any Increase, either 3/7 gates or 10 gates of Increased Operations. This does Not Consider REAL IMPACTS to the Health And Safety of the Children in the Communities surrounding the Airport. Where are the reports of Noise increases at each school over the past 10 years? In stating, (5.1-11), "data shows that most schools..do not experience substantial periods of time with exterior noise levels above 80 db", please remember that these 'estimates' are only with CNEL, Not Single Event Noise Levels! Where is the estimate of the periods of time that the

**Exterior Noise Levels are Above 80db? Or Above 100 db at such close schools as Loma Portal, St. Charles, Correia, Barnard, Dewey and at additional Preschools in the area? These are potentially the most 'damaged populations', where are the Data on the Actual Time Periods of Exterior Exposure to such Risks? Examples (from 2010 to 2030-Highest Impacted schools to lowest):**

Alternative	No Project Altern.	Preferred Alternative	East Terminal
Loma Portal	65 db 84 to 111	84.4 to 119.8 min.	83.2 to 118.9
	75 db	10.5 to 17	
	80db	2.8 to 4.1*	
PLHS	76 to 104	77 to 112 min.	75 to 111 min.
<p><i>How absolutely ridiculous-a 25% Increase in Planes = a 25 to 40-minute Change of exposure or a 'difference in projects' from 'none' being Only "Less than one minute" to 7 minutes Difference, is "less than significant"(5.1.16 Noise)? And this going from apprx. 574 flights/day to 819/day, a 235+ aircraft per day increase? Will there be a 'limit' as to 'when NOISY planes can take off?' Will there be 'regulations' between 7:30 and 10:30 or 11:30 and 3:30 pm? No! Aren't these the Busiest times for Aircraft to take off and also those in which young children are Exposed outside? Yes. How is this 'mitigated' for such a "Health, Safety &amp; Welfare charge? Where is the assurance, and by when, that the entire fleet of planes into SDIA will have only 25 minutes out of the approx. 300 additional flights per day will be 'converted' to less noisy planes at such a CLOSE distance to 7-10 schools? 60 minutes more per day is a 'better approximation' and is Unacceptable to meet 'goal # 9 ( in actuality is in direct opposition to it!)</i></p>			
Correia	65 db 75 to 99	76 to 108 75 db 14.5 to 24.2	74 to 107 And these do Not
Include		80 db 3.9 to 3.72 *	the Preschools!*
Barnard	65 db 51 to 72	51 to 78	50 to 77.2
Dewey	65 db 67.8 to 100	68.1 to 108.6 70 db 5.4 to 6.1 *	67.1 to 108
HTH Middle	65 db 80 to 112	80.5 to 121.2 75 db 18.7 to 25.9* 80 db 3.4 to 3.9*	75.8 to 116
OB	53.2 to 78.7		
Sacred Heart	55 to 76.9	55 to 82	54.5 to 80.8
St. Charles	99.1 to 130.1	98.3 to 139.4 75 db 28.8 to 39.7* 80 db 6.1 to 8*	99.5 to 140.3

Again, this is Contrary to the Goals of the ALUCP, the Goals of the Airport Authority Master Plan (Goal #9) as it increases Hazards to the Health, Safety and Welfare of the surrounding communities, especially to those 'least able to speak', our Children.

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Cal Trans; Traffic CNEL 'changes':

In Table B-11, page B-73 & B-13, page B77, It is *hard to believe that 'Traffic CNELs'* for either the Proposed Project or the East Terminal Alternative, With Parking Structure, *will be 'Only Slightly better'(or better at All!!)* if reading these computations properly. Especially in the 'Nimitz roadway' with 'Alternative' compared to 2005. Obviously there Have been '*Increased CNEL Traffic Noise Levels since then with the increased operations, but where is the Actual Data? Where are these numbers coming from? Where are the assured 'Billions of dollars for alternative transit' installed, in order to achieve this? What 'transit' will it connect to? Is the 'use of on-site shuttles' supposed to account for this?* It is extremely hard to understand any kind of methodology that would State and 'Show' such '*Reduced CNEL levels for Traffic*' as are exemplified here-Just based on other studies done and brought forward by Your Consultants (S.B.) recently it is highly implausible to achieve such 'lower' levels of Noise statistics with the increased capacity & operations (I'd like to see 'actual CNELs', since '05) much less, with an Increase of 25% of Ground Transportation Capacity/Operations.

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As a member of the ALUCP ATAG, it is amazing that such 'detail' is reported as 'necessary' for Non-Residential Streets when the 'Ambient Noise' from the Freeway (Hwy. 5) & Harbor Drive is all around the Retail, Commercial & Resort areas now, and is asked to '*be Exempted' as a consideration in the future because of its 'non-impact!*' It appears ridiculous to consider any '*Increase in Traffic CNEL' in any area but a 'residential area,'* as an Airport IS Noisy already as are 'commercial roadways', Hwy 5, PCH, etc.. At Lindbergh, any 'Traffic Noise' is pretty much 'lost in the constant or ambient din' except when in adjacent Residential areas on the West side, as the freeway traffic IS NOT 'AMBIENT,' there, it is NOT Present at all!

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In table B-12 p. 75 & B-14, B-79, it is incredible to see, at "Peak Hour Road Traffic CNEL compared to 'No Project' AND at 'Daily Road Traffic CNEL compared to No Project'" that there is ONLY an Extremely Slight Increase in Traffic Noise, and that ONLY Noticed, by 0.10 at the 2030 mark for the 'impacts' to the Peninsula! How is this able to show a '*zero net' CNEL level for Traffic*' here, as for "85% of existing traffic" (*not able to Continue the 'preferred, normal route south from the Airport,'* as it is already at '85% capacity'), when the Only resulting 'other' way OUT is via Nimitz to Rosecrans (then Chatsworth, Sports Arena, West Pt. Loma Blvd., Barnett?-etc.). To have mostly "0" effect on Traffic Noise, when the Residents of NTC, Loma Portal, OB and Peninsula will all have to deal with, not just with 'increased Traffic Noise,' but with jammed up traffic on Each of their 3 main emergency access corridors, including buses! If studied thoroughly, these diagrams Clearly Show that there is NO Problem with the present 'Daily Traffic CNEL' OR 'Peak Hour Road Traffic CNEL' for the next 22 years, if there is NO PROJECT!

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In summary, these are just a few of the inaccuracies, through incomplete reporting or estimations and unsubstantiated 'Assumptions.' In effect, this EIR does not follow the 'best management practices' in many aspects, leaves out adherence to important policies already part of state or CEQA laws in evaluating such expansion proposals and essentially, leaves much for the public to question in determining its true 'environmental effects.

Cynthia Conger, Committee Member PCPB, 4425 Pt. Loma Ave., San Diego CA

<b>Peninsula Community Planning Board</b>		Signed by: Cynthia Conger, Committee Board Member
Subject:		
Comment: 1	Subject: Noise Monitors	Response
<p>First, the San Diego County Regional Airport Authority has operated for 6 years on a Variance that has been EXPIRED for THREE of the Six years, <i>without yet accomplishing the Requirements to the Community</i> (Noise Monitors are still unplaced and unequal in number to those on the East Side, the 'less impacted' by Noise). Exemplifying such "lack of good will," adherence to agreed upon policy and 'follow through' to this community, we question their Incentives or Motivations to seriously consider the Impacts to the Peninsula Community and to earnestly 'listen' and incorporate Peninsula resident's, experts and professional's comments, especially Technical. As such, we have no confidence in the Authority's intentions address our questions in an Advisory capacity as included in the Airport's 'stated goal' of 'public input'. <i>How will the Airport Authority incorporate into the Master Plan the very accurate technical expertise and experience of professional and experienced members of our Community and of their on industry? Will these comments be used to not only safeguard the interests of our community and city, but help facilitate Responsible Development at SDIA?</i></p>		<p>The Variance has not expired; SDIA's Variance has not been granted by the State because the SDCRAA is waiting for the Administrative Law Judge (ALJ) to make his determination since the Variance went to Hearing.</p> <p>The SDCRAA tried to install all the planned noise monitors as part of the upgrade to its noise monitoring system. Due to community concerns, the SDCRAA did not receive approval to install the last noise monitor on the "west side". As the system exists now, SDCRAA has 14 noise monitors on the "west side" and 10 noise monitors on the "east side".</p> <p>The Airport Authority prepared a Preliminary Draft Airport Master Plan published in September 2007 that has been available on the Authority website and was integrated into the launch of a new Authority website <a href="http://www.sanplan.com">www.sanplan.com</a>. The SANPlan website focused entirely on providing the public and community with opportunities for professional and experienced members of the community to review and provide input on the draft Airport Master Plan. In addition, during the public review period for the Draft EIR, over 10 community meetings were held throughout San Diego County, including two in the Peninsula Community, to describe the proposed Airport Master Plan and garner input and comments. These public comments and feedback have been reviewed and considered by the Airport Authority in the development of the Airport Master Plan and the environmental analysis.</p>
Comment 2	Subject: CEQA Procedures	Response:
<p>Second, as we fought with the Airport Authority for more than 2 mos. to attain even a 120-day review of this EIR, we later learned under CEQA, and under the CA Public Resources Code, Section 21091.5, is already REQUIRED:</p> <p>California Public Resources Code Section 21091.5:</p> <p>"Notwithstanding subdivision (a) of Section 21091, or any other provision of this division, the public review period for a draft environmental impact report prepared for a proposed project involving the expansion or enlargement of a publicly owned airport requiring the acquisition of any tide and submerged lands or other lands subject to</p>		<p>See Response to General Comment #2.</p>

<p>the public trust for commerce, navigation, or fisheries, or any interest therein, shall not be less than 120 days.”</p> <p>Again, why the Deception? We have lost confidence in both the Airport Authority’s respect of our residents, professionals and their comments.</p>	
<p>Comment 3      Subject: Long Term Master Plan</p>	<p>Response</p>
<p>In our review of the ‘Master Plan’s EIR,’ We note that it is difficult to compare this EIR to any accessible “Master Plan”. The “20-years” minimum state/federal requirement for Master Plans is not included in any references, as this EIR and appendices solely address this apparently ‘first phase’ to accommodate needs at SDIA for only the next seven years, until “2015.” It is also ‘not accessible’ online, nor provided at any public library. Few of the public in Peninsula are ‘privy’ to any of the past Maser Plan Studies, nor their more ‘comprehensive’ and negative Impacts to this community. <i>Why has not the Entire Maser Plan been developed and proposed before this EIR is presented to the Public? Without such, the EIR is not ready to be ‘adopted.’ An ‘incremental viewing’ of the first phase is all that is addressed in the EIR, and is insufficient to meet state requirements as well as for any Relevant Review. Longer term ‘plans’ are briefly referred to in several sections of the EIR, as more than what is being stated...Why is this Long Term Maser Plan not Accessible to the Public? Is this even a legal process if it does Not include at least a full 20-year projected of the ‘Master Plan’ to be compared to?</i></p>	<p>All components of the Airport Master Plan are accessible to the public. The Preliminary Draft Airport Master Plan for San Diego International Airport was published in September 2007. It has been available for review since publication at the San Diego County Regional Airport Authority offices, located on Harbor Drive in San Diego. An electronic copy of the document is available on the Internet at <a href="http://www.sanplan.com">www.sanplan.com</a> or at <a href="http://www.san.org">www.san.org</a>. Further, the Preliminary Draft Airport Master Plan was available for review upon its first publication in May 2007.</p> <p>The Draft Environmental Impact Report for the Airport Master Plan for San Diego International Airport was published in October 2007. It has been available for review since publication at the San Diego County Regional Airport Authority offices, located on Harbor Drive in San Diego and in local libraries. An electronic copy of the document is available on the Internet at <a href="http://www.sanplan.com">www.sanplan.com</a> or at <a href="http://www.san.org">www.san.org</a>.</p> <p>Guidance for airport master plans is provided by the Federal Aviation Administration’s Advisory Circular 150/5070-6B, Airport Master Plans. Environmental Impact Reports (EIR) are prepared under the direction of the State of California’s California Environmental Quality Act (CEQA).</p> <p>As stated in Chapter 1.2 of the Draft EIR, “the Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015.” As further stated in Chapter 1.2, “the Proposed Airport Land Use Plan is a program level planning guide to ensure that Airport facilities are planned with thought and foresight to serve the greatest number of Airport users.”</p> <p>As stated in Chapter 1.2.2 of the Draft EIR, Proposed Airport Implementation Plan (with Parking Structure), “the Airport Implementation Plan (with Parking Structure) would include PROJECT-level approvals for those elements that are to be designed and constructed through 2012 and operate through 2015 and beyond.”</p>

	<p>As stated in Section 2.2.2, as a result of comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these improvements are developed and become described for environmental consideration, additional environmental review will be undertaken by the San Diego County Regional Airport Authority.</p>
Comment 4	Subject: Response
<p>Considering this, below are comments/problems on the 'development' process that this has somehow 'avoided.' SDIA Master Plan EIR's 'Non-compliance' with the Cal Trans/FAA 'Best Practices' methodology of presenting an EIR for Airport Expansions are noted by numbers enclosed by these [(#)]</p> <p>In checking out the following <u>Best Practices methodology</u> for the creation of the EIR for SDIA's Lindbergh Field, the differences are amazing. An 'earlier version' was supposedly available, then removed. No [(1)] 'redlining' was accomplished for the public to be made aware of the 'differences' in the 'changed EIR,' though it went from a supposed '385 pages' to approximately '585 pages' with another <u>1500 or so additional pages of 'difficult-to-access' appendices</u>, some in 'accessible' pdf file, most, not.</p>	<p>The SDCRAA felt that a redlined EIR would be confusing considering all the sections within the document that were modified to include additional years of analysis and explanation of including more analysis years.</p> <p>All appendices were available on the SDIA website. Eighteen pages of Appendix E were inadvertently missed with the initial publication in October 2007. Upon finding out that these pages were missing, the website was updated to include the missing pages in November. The missing pages were summarized in Section 5.19 in table format and would not hinder review of the overall section.</p>
Comment 5	Subject: Lengthy Document Response
<p>To access such data, for review, as quoted, "in California, the state requirements frequently appear to add extensive volume to the Federal documents," it was obviously made so large and so 'unreasonably lengthy,' to discourage review by the public, [(2)] clearly violating state guidelines.</p> <p>For example, <u>Air Quality</u> in the Appendix Volume II, included in E-9,</p>	<p>The Draft EIR is a CEQA document; the Federal document is still being developed.</p> <p>The Appendix materials pertaining to Air Quality are intended to provide</p>

<p>Annual Aircraft Operations, minutes of Taxi time and Remain over night 'changes' to 'emissions,' in any 'alternative' in any year the particulate emissions (p. E-10), regardless of an 'increase in operations' of over 25%, are predicted to be 'negligible' ("<math>&lt;0.01</math> for PM 2.5?) from all ground support equipment, with any project after the year 2015? Why all this excess paperwork, repeated in both the EIR AND the appendix? 'Dimple' explanations are not substantiated with anything but models of hypothetical numbers with little explanation for the public to understand, especially as it is obvious that there will be necessary increases in ground support equipment to service such needs. Increases of 'baggage tractors, catering, lavatory, fuel,' etc. (page E-11), surely will increase correspondingly with the increase of Additional aircraft needing servicing, as exemplified (time wise, delay wise) in the recent examples given by the Airport Consultant Steve Beeks (1-01), for the <u>"17 % increase in gate use at JFK airport, which has resulted in an increase of 247% of congestion and delays.</u> More important are the comparisons to evaluate in ground, runway and air traffic congestion and delays, than simply the 'noise'. Obviously as aircraft taxi time Emissions and are just 'briefly' mentioned as being 'significant,' yet are <i>Not considered</i> as 'having significant impact' on the adjacent communities around Lindbergh Field, as the EIR Assumes that an 'un-named source' will 'coordinate' the 'changeout of environmentally-friendly service vehicles.' This 'assumption' along with others, point out just one <u>mistake of the EIR in not considering the "Shore Term AND Long Term Environmental Consequences,</u> as quoted below in 'summary tables.' [(3)]</p>	<p>more detailed information and data on this comparatively technical topic than was provided in the main sections of the EIR. Out of necessity and for clarity, some of these materials are repetitious, but consistent.</p> <p>See response Peninsula Community Planning Board to Comment #29 (submitted by Bill Ingram).</p>	
<p>Comment 6</p>	<p>Subject: Air Quality Tables</p>	<p>Response</p>
<p>[(4)] How incredible that Table E-34 to E-43 are not placed side by side or vertically, so that the differences (seemingly miniscule) are not seen easily. In effect, the accumulation of pollutants is quite substantial, growing by 1/3 at least in Particulate Matter, SD's latest 'failure' in 2 of 3 air quality measures.</p>	<p>See response to your Comment # 5.</p>	
<p>Comment 7</p>	<p>Subject: Unnecessary information and Document Length</p>	<p>Response</p>
<p>At the same time, as quoted below in [(5)], the additional information on the "historic architectural survey" of SDIA <u>did not need to include</u> the entire explanation certain buildings were kept or not (200 pages!), nor the 'history' of the airport. More important is the 'future development' of SDIA, and such Impacts to San Diego and SDIA's surrounding communities. In addition, data such as proposed 'schedule of bids' for construction included '0' for any dates (repeatedly), times, lengths, of</p>	<p>While the commenter may not be interested in the historic resources at the Airport, others are, and specific resource agencies need this data for review of the Proposed Project. The construction schedules were included to allow others to understand timelines (although no specific dates were provided) for phase of work to determine construction equipment use for air quality analysis.</p>	

<p>contracts, etc., included as Least 50 pages of non-important 'inconsequential' "data for data's sake," again, violating Best Practices. (below):</p> <p>"Best Practices for Environmental Impact Statement Management, FAA Guide: July 2001 (Updated January 2002)"  <i>Managing the Scope and Size of Environmental Documents</i>  "From the very beginning of compliance with the National Environmental Policy Act (NEPA), there has been a conflict between the need to prepare legally sufficient Environmental Impact Statements and Environmental Assessments and the need to manage the size of these documents. The regulations promulgated by the Council on Environmental Quality (CEQ) in 1978 established a <i>target size for EIS's as "normally not to exceed 150 pages in length and for proposals of unusual scope or complexity 200 pages"</i> (40 CFR 1502.7). In 1981, as a part of additional guidance (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations), <i>CEQA issues an opinion that Environmental Assessments should not exceed 10-15 pages in length.</i> Even a casual review of documents recently approved by FAA would indicate that these policies are honored more in their breach than in their compliance.</p> <p><b>The Problem:</b> Susan Smillie and Lucinda Swartz identified three reasons Federal agencies fail to meet or even approach the page limits established by CEQ in a paper presented to the convention of the National Association of Environmental Professionals in May 1997. These reasons are (1.) <u>A requirement by counsel to "beef up" EIS's in the hope that <b>volume will deter potential litigants</b> or in the event the deterrence fails that the agency can argue "it's in there somewhere,"</u> (2.) <b>Failure to properly scope the document;</b> and (3.) In the case of EA's, preparation of "<b>mini-EIS's</b>" rather than an appropriate assessment. It appears that, in addition, in those states <b>where joint Federal/state environmental documents are prepared such as in California, the state requirements frequently appear to add extensive volume to the Federal documents. [(2)]</b></p>	<p>Again, this document was prepared based on CEQA. The FAA's environmental review document is under development using FAA guidelines. The commenter should understand that all documents can not be reduced to 200 pages if complicated impacts are involved.</p> <p>Comment noted; none of the reasons cited are applicable to this EIR.</p>
<p>Comment 8      Subject: Some Proposed Solutions: General</p> <p><b>Some Proposed Solutions.</b> Several potential techniques for reducing the size of NEPA documents are included below. You should always keep in mind that in attempting to reach a certain size goal, you cannot sacrifice the "hard look" that is required by NEPA.</p>	<p>Response</p> <p>Comment noted, the SDCRAA agrees that Federal documentation should not be shortened artificially to meet a guideline for documentation size.</p>

Comment 9	Subject: Some Proposed Solutions to lengthy Environmental Assessments: Scoping	Response
<p><b>Scoping.</b> When preparing an EIS, the scoping process provides the first and generally one of the best opportunities to keep the document from excessive growth later. A <i>proper analysis</i> of the scope of the project will allow limitations on what has to be analyzed later. It is particularly important at this stage to understand the nature of the decision that is to be supported by the contents of the environmental document.</p>		<p>This document is an EIR, not an EIS. The previous EIR was used by the SDCRAA to develop the additional analysis included in the October 2007 EIR.</p>
Comment 10	Subject: Subject: Some Proposed Solutions to lengthy Environmental Assessments: Tiering	Response
<p><b>Tiering.</b> Tiering is a concept supported by the CEQ Regulations (40 CFR 1508.28), which provides a process for analysis of broad conceptual proposals followed by narrower site-specific analyses incorporating the earlier work by reference. Tiering has limited utility in most airport projects, but it may prove useful in some circumstances, in particular in the case of siting proposed new airports.</p>		<p>This document does employ the concept of tiering by considering the ALUP element of the Proposed Project at a program level.</p>
Comment 11	Subject: Subject: Some Proposed Solutions to lengthy Environmental Assessments: Incorporation by Reference	Response
<p><b>Incorporation by Reference:</b> Document <i>not directly used in an EIS</i> should be incorporated by reference. If this is done, <i>care should be taken that documents referenced are reasonably available</i> to any reviewer who wants to review them.</p>		<p>This document is an EIR, and in Section 2.5 incorporates other documents by reference. All documents incorporated by reference were reasonably available.</p>
Comment 12	Subject: Tips on writing EIS Documents	Response
<p><b>Purpose and Need:</b> A <i>well-written statement of the purpose and need</i> for the project (not why a document was prepared) lays the groundwork for a well-written, disciplined EIS document.</p> <p><b>Alternatives Including the Proposed Actions:</b> It is frequently possible to reduce the size of EIS's by taking special care in describing the alternatives in this section. Since it is normally the practice to compare the impacts of the various alternatives in detail in the environmental consequences section, detailed comparisons of impacts may be avoided here. On suggestion recently in a DEIS—a <i>summary table comparing the proposed project and its alternatives</i> in this section, referring to the detailed discussion in the subsequent environmental consequences section [(3)]</p> <p><b>Affected Environment:</b> Because significant amounts of data are generally available on current conditions, there <i>is a tendency to “load</i></p>		<p>This is an EIR and, therefore, describes the purpose and need of the project as the project objectives. These objectives are identified in Section 3.1 and 3.2.</p> <p>The number of alternatives analyzed was adequate for the proposals considered at SDIA. It should be noted that CEQA does not require detailed analysis of all alternatives. NEPA, however, requires that all alternatives carried forward for consideration be analyzed equally.</p> <p>The Affected Environment in the EIR is described in the Environmental Setting of each impact category detailed in Chapter Five. The</p>

	<p><i>up” an EIS with such data simply because it is there. One method that seems to help is to limit the affected environment description to a relatively minor discussion of where the proposed project is located and general conditions in the area, and to include specific <i>detailed information in the Environmental Consequences</i> section which follows. In doing this, you should take care not to simply transfer the problem from one chapter to another.</i></p>	<p>Environmental Setting for each impact category is commensurate to the potential for impact.</p>
<p>Comment 13</p>	<p>Subject: Subject: Tips on writing EA Documents</p>	<p>Response</p>
	<p>For EA’s you should consider <i>combining the affected environment and environmental consequences</i> section, which <i>will eliminate the tendency to duplicate material.</i></p> <p><b>Environmental Consequences:</b> This section should <i>focus on significant impacts</i>. If a project or any of its alternatives has little or no impact in a certain impact category, that should be clearly stated and not repeated over and over. It may be useful to duplicate applicable portions of the comparative table discussed under alternatives above so as to provide a graphic comparison of the project and its alternatives under specific impact topics. [(4)]</p> <p><b>Appendices:</b> You should take care to include as appendices all of the information necessary for a reasonable review of the document, but not to include data for data’s sake [(5)] If it appears that appendices are growing beyond a reasonable size, you should consider reducing them to electronic format and making them <i>available either online</i> or in the form of a compact disk.</p>	<p>The EIR does just that, the Environmental Setting is followed directly by the potential environmental consequences.</p> <p>The environmental consequences for each impact category were analyzed in accordance with applicable significance thresholds. Documentation was written to specifically meet those requirements.</p> <p>Appendices were made available on-line on the SDIA website (<a href="http://www.san.org/airport_authority/airport_master_plan/EIR.asp">http://www.san.org/airport_authority/airport_master_plan/EIR.asp</a>).</p>
<p>Comment 14</p>	<p>Subject: General EA tips</p>	<p>Responses</p>
	<p><b>Environmental Assessments:</b> The three purposes of an EA as outlined in CEQ’s Forty Most Asked Questions are: (1.) Briefly provide sufficient evidence and analysis to determine whether to prepare and EIS; (2.) Aid an agency’s compliance with NEPA when no EIS is necessary (i.e. it identifies alternatives and mitigation); and (3.) Facilitate preparation of an EIS when one is necessary. Since the EA is intended to be a concise document, it should not contain long descriptions or detailed data that the agency may have gathered. Rather, it should contain a brief discussion of the need for the proposal, alternatives to the proposal, environmental impact of the proposal and alternatives, and a list of persons and agencies consulted (see 40 CFR 1508.9 (b)). There are circumstances in which a voluminous EA is needed, but these should be exception rather than the rule.</p>	<p>The document provided for comment is an EIR; EA comments are not applicable.</p>

Comment 15	Subject: EA vs. EIS	Response
	<p><b>EA vs. EIS</b> When a proposed action at first blush appears <i>to be on the borderline of significant impacts</i>, it is always possible to proceed with a Draft EIS and subsequently to convert the document to a FONSI if impacts are shown not to be significant upon further investigation and/or mitigation. The advantage to this approach is that time can be saved by avoiding the two-step EA-EIS process if an EIS proves to be required. The immediately initiation of an EIS assures that the contractor selection and scoping conform to EIS requirements. The Notice to Prepare and EIS should alert agencies and the public that environmental impacts may be shown not to be significant, in which case the document would be concluded as a FONSI. The decision to complete the document as either an EIS or FONSI would normally be made after agency and public review and comment on the draft EIS. The decision to pursue this type of approach to an environmental document involves discretionary judgment by the FAA. There is not mandated requirement.”</p>	<p>This comment is not relevant to the EIR document under review.</p>
	<p>Comment 16      Subject: Lengthy document</p> <p>Most difficult to believe is that this entire 2,000+ page EIR has little to ‘no’ ‘Environmental Consequences,’ constantly stating that there are ‘negligible significant impacts.’ Obviously, with this type of EIR (statements of ‘no impacts’) no valid discussions or presentation by Airport Authority (AA) officials of any ‘impact’ at Planning Board meetings or public meetings is possible.</p>	<p>Response</p> <p>The level of analysis completed was necessary to conclude that the Proposed Project would have minimal impact on the environment with the exception of traffic and air quality.</p>
	<p>Comment 17      Subject: Compliance with Best Practices</p> <p>Such limited access (such as to the Existing SDIA ALUCP-sections unable to be ‘copied’ and pasted via online research into the responses/comments), makes it difficult for responsible references to be used in such discussions (below, bolded). Pls. Note that Few of the Airport Authority’s EIR/supporting documents were ‘accessible’ to cut and ‘paste’ into examples for discussion, violating the Guidelines below:</p> <p>“Best Practices for Environmental Impact Statement Management” <i>FAA Guide: July 2001 (Updated January 2002)</i>, Use of Technology  “A highly advantageous best practice is the effect use of state-of-the-art data bases, analytical tools, electronic communications and information storage.</p> <ul style="list-style-type: none"> <li>• All EIS documentation should be available in electronic format. Working documents should be in Word format so that revisions and editing can be done. <b>Final versions of Draft and Final EISs and RODs should be in pdf format with document</b></li> </ul>	<p>Response</p> <p>Comment noted.</p> <p>The guidance the commenter quotes is guidance for the coordination between FAA consultants and FAA; this guidance is not meant as guidance for public review.</p>

<p><b>links that can be read by Adobe Acrobat.</b></p> <ul style="list-style-type: none"> <li>• The efficiency of environmental document preparation and FAA internal reviews can be maximized with electronic communication and review of draft materials, <b>including the internal use of red-lined [(1)] versions to highlight the changes made since the <i>previous</i> draft.</b></li> <li>• The FAA EIS project manager and EIS consultant, in consultation with an FAA environmental attorney, should agree at the beginning of the process on the way the consultant should electronically compile the administrative record.”</li> </ul>		
Comment 18	Subject: Long-term effects	Response
<p>As described in (15126.2), the EIR “<b>Shall Identify and Focus on the Significant Environmental Effects of the proposed Project.</b>” It’s ‘assessments’ shall include:</p> <p><i>What are the ‘Direct’ and ‘Indirect’ Significant effects of the project on the Environment? They are not ‘clearly identified and described in the EIR clearly.’ Most are noted for the short-term as ‘meeting the goals of 2015,’ merely 7 years away, as opposed to the requirement of the ‘Master Plan’ for 20+ years. Real Long-term effects are rarely described in comparison for some items’ such as those below.</i></p>		<p>The EIR analyzes project-level and program-level impacts as appropriate. The direct impacts of both the project-level and program-level portions of the Proposed Project are defined in impact analysis of each impact category analyzed in detail in Chapter 5.</p> <p>Indirect or secondary effects are reasonably foreseeable and caused by a project, but occur at another time or place. The CEQA Guidelines explain that:</p> <p>“...Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems” § 15358(a)(2).”</p> <p>As stated in Section 15126.2(d) of the Guidelines, a growth-inducing impact could occur if:</p> <p>“ ...the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in the service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.”</p> <p>As stated in Section 6.3 the Proposed Project is not growth-inducing project and will not change land use patterns, population density, or growth rates. Therefore, the Proposed Project does not produce indirect or secondary effects.</p>

Comment 19	Subject: Resources involved	Response
<p>“Relevant Specifics” not included are:</p> <p>The Resources Involved: Not included are: Emergency Facilities, Paramedics, Hospital Access. Short Term or Long Term Transit funding and the assurance that such ‘mentioned’ but not assured as part of this EIR or Master Plan, “Intermodal Concept” will ever be approved or funded, nor even be ‘sufficiently planned’ for the need. Such ‘ideas’ have only recently been brought up by outside consultants, and are not ‘part of’ this EIR, as described.</p>		<p>Emergency facilities are addressed in Section 5.17 of the EIR. Figure 5.17-1 shows the locations of fire stations, police stations and hospitals near the airport, and Section 5.17.4.5 discusses emergency responses and facilities. Impacts to emergency services (including emergency facilities, paramedics and hospital access) would be less than significant for the reasons described in EIR Section 5.17.5.</p>
Comment 20	Subject: Physical Changes	Response
<p>Physical Changes: Not included are: Traffic ‘Mitigation’ for off-site, severely impacted streets roads and intersections on and <u>through the Peninsula</u>, handling a minimum of ‘double’ its existing traffic from Harbor Drive to over 85% of the Airport’s increased traffic. If added traffic increases from an existing 87,000 to 135,000 at SDIA, more than 40,800 ADAs will most likely resort to use the Peninsula’s Exit roads as a result of the existing congestion on Laurel, Harbor Drive, and Grape St., already at 85% ‘capacity.’ The environmental impacts of Noise, Gross increases in Particulate matter and toxic chemicals, as well as increased Safety Risks are Not included.</p>		<p>Mitigation measures for all impacted streets and intersections are provided in EIR Section 5.3.8. It is not clear what the statement “handling a minimum of ‘double’ its existing traffic from Harbor Drive to over 85% of the Airport’s increased traffic” is based on. The current split of airport traffic to the west and east on North Harbor Drive is 85% and 15% respectively, meaning 15% of airport traffic uses the roadways west of the Airport toward the Peninsula. In 2030 the split of traffic to the west increases from 15% to 30%, partly attributable to an increase in congestion east of the Airport along North Harbor Drive, Laurel, etc.</p> <p>Traffic under the Proposed Airport Implementation Plan increases to 135,000 average daily trips (ADT) compared to 128,750 ADT under the no project alternative in 2030 and mitigation resulting from traffic impacts to streets and intersections surrounding the airport are presented in Section 5.3.8.</p> <p>The environmental impacts of noise are provided in Section 5.1, air quality impacts are include in Sections 5.5, 5.16, and 5.19. The Proposed Project does not increase safety risks.</p>
Comment 21	Subject: Alterations to ecological systems	Response
<p>Alterations to ecological systems: Not included are: Changes in the least tern nesting, increases in the ‘Hard Noise reflection’ as the Airport adds buildings and Concrete.</p>		<p>The least tern population at SDIA has thrived despite the high noise levels associated with nesting areas located in runway and taxiway ovals immediately adjacent to jet aircraft operations (“nesting ovals”). As indicated in EIR Figures 5.1-1 and 5.8-1, the nesting ovals are within the 75 CNEL contour. The area surrounding the nesting ovals is already almost entirely paved, and the only place where new building construction would occur near the nesting ovals is within the former Teledyne Ryan leasehold to the southwest. Specific development plans for the former Teledyne Ryan leasehold have not been identified; however, given the least terns’ ability to thrive within the 75 CNEL</p>

		contour, adverse effects from “hard noise reflection” from future building in the former Teledyne Ryan leasehold are not anticipated. As stated in the EIR (see Draft EIR pg. 5.8-6), however, it would be speculative, and therefore beyond the scope of the current EIR, to address the specific effects of as-yet-unidentified future development on least terns at SDIA. When specific new developments at SDIA are proposed, further analysis of potential effects on the nesting least tern population at SDIA would be conducted, including (as applicable), an analysis of hard noise reflection.
Comment 22	Subject: Health and Safety Problems caused by the Physical Changes	Response
Health and Safety Problems caused by the Physical Changes: Not mentioned are: Air Pollution, Lack of Emergency Transportation for Minor or Major mishaps with the Area’s 3 main corridors flooded with gridlock traffic, Lack of Planning for the future for the Increased Air Capacity and Cargo needs that will cause SDIA to stress seriously its Safety Requirements, both in the Air and on the Ground.		<p>A detailed analysis of the proposed project’s impacts on air quality can be located in Chapter 5.5, Air Quality, of the Draft EIR.</p> <p>A detailed analysis of the proposed project’s impacts on ground transportation can be located in Chapter 5.3, Traffic and Circulation, of the Draft EIR.</p> <p>A detailed analysis of the proposed project’s impacts on hazardous materials can be found in Chapter 5.15, Hazards and Hazardous Materials. Analysis of the proposed project’s impacts on risk can be found in Chapter 5.16, Human Health Risk Assessment.</p> <p>A detailed analysis of the proposed project’s impacts on public services can be located in Chapter 5.17, Public Services, of the Draft EIR. Emergency response criteria and conditions are described in subsection 5.17.2, Regulatory Framework.</p> <p>San Diego International Airport complies with 14 Code of Federal Regulations Part 139 which states that “an airport must agree to certain operational and safety standards and provide for such things as firefighting and rescue equipment.” The airport would not be able to serve scheduled and unscheduled air carrier aircraft with more than 30 seats without meeting 14 CFR Part 139 criteria and maintaining its operating permit. Compliance with 14 CFR Part 139 is mandatory for any operator of a U.S. airport that chooses to serve air carrier operations covered by the regulation. Thus, now and in the future, the San Diego County Regional Airport Authority must meet established safety criteria in order to operate in compliance with Federal law.</p>
Comment 23	Subject: Scenic Quality (as a resource base) Effects	Response
Scenic Quality (as a resource base) Effects. Not mentioned are: SDIA’s		Comment noted.

physical site is on the most valuable property in San Diego. To 'cover it' as a natural resource with constant 'additions' with such a limited space constraint for its purpose is indeed a 'waste'.		
Comment 24	Subject: Bringing people and development into the area	Response
<p>Bringing people and development into the area. Not mentioned are those that have already constitutes an 'emergency-access constrained area and will be a growing major problem. This project will have the effect of attracting people to the area and end up having huge Congestion that increases the risks, both on the air and on the ground for 'safe access' to emergency facilities. The <b>Peninsula has No major Emergency Facility</b> – for a 75,000+ member community! Pollutants that were involved and observed when the dump's 'surface' was leveled for property transfer: Benzene, vinyl chloride, lead, mercury among other danger air/chemical pollutants, are still in the dump. In addition, cacinogenic [sic] chemicals such a formaldehyde 1,3 Butadiene, Acetaldehyde and Acrolein (pages H-2 through H-5) which are used in the 'construction process alone, will only Add to the Risks associated with the Construction. <i>Why is the Airport Authority 'charged', instead of the military, with the 'clean up process?' What 'precautions' are in the 'Safety Plan,' which is mentioned, but not 'referred to,' anywhere?</i></p>		<p>Please see Chapter 6.3, Growth Inducing Impacts, of the Draft EIR. As stated in Chapter 6.3: "The Proposed Project accommodates forecast growth at the Airport through 2015. With or without the proposed improvements, operations will grow at SDIA and additional employees will be necessary to accommodate the additional operations."</p> <p>Please see Chapter 2.4.4, Former Naval Training Center (NTC) Landfill Remediation Project Environmental Impact Report" of the Draft EIR. It is assumed that the commenter is referring to the NTC landfill, with respect to the "dump's 'surface' was leveled for property transfer." This site has undergone extensive environmental testing to determine the landfill contents and to delineate the extent of soil/groundwater contamination. A site remediation plan has also been developed which contains provisions for protecting public health and safety. See Response to Metropolitan Wastewater Department #1 regarding NTC landfill Scope of Work. These provisions include the sampling of excavated waste materials, soils, groundwater and air as well as the implementation of control measures to help insure that the risks to neighboring communities are kept to a minimum.</p>
Comment 25	Subject: Forecast Inaccuracy	Response
<p>The draft <b>EIR additionally concludes that <i>the proposed expansions would not result in any additional airplane noise to be bourn by the communities</i></b> surrounding the airport. As the forecast found on Table 1 in the "Comparison of SH &amp; E Forecast and Actual Activity" (page I-4), and in the recent AA disclosures at meetings have shown that the "High unconstrained forecast...used for the environmental analysis" (page I-3), is completely out of date, as the original <b><i>"enplanements' and 'operations' forecast that were made in 2005 for the years 2010 through possibly 2012 or 2013 have ALREADY BEEN PASSED in Actuality.</i></b> Considering that the EIR fails to 'work out' its conclusion of 'no noise impact' comprehensively in the EIR to prove this and considering that the conclusion itself 'contradicts' the stated reason for expanding SDIA: to accommodate projected growth, these 'high estimates' should need to be 'readjusted,' as well as Impacts of Noise and Pollutants to the surrounding communities.</p>		<p>The commenter summarizes the noise analysis incorrectly. There will be increases in noise, but none of the increases will be caused by the Proposed Project. Noise increases are projected to occur with or without project implementation. Furthermore, none of the projected increases will be significant.</p> <p>Mitigation measures are included for air pollutant impacts in Sections 5.5 and 5.16.</p>

Comment 26	Subject: 6.3 Growth Inducing Impacts (NOISE)	Response
<p>p. 6-3 #6 Would the project foster Growth at the Airport? As discussed in Chapter 3,...the project would not 'add passengers' or 'flights' at the airport. HOWEVER, the existing Noise Ordinance does Allow the Airlines to ADD Additional Flight Operations as long as Flight Hour restrictions are not Exceeded. <b>Additional flights are allowed and would be accommodated</b>, regardless of whether the Proposed project is approved or built. Additional flights could result from air carrier decisions regarding market force and unmet demand, rather than the availability of specific SDIA facilities. <i>How does the 'assure adjacent neighbors that Noise Will NOT Increase'?</i></p>		<p>See Response to General Comment #7. The EIR indicates that noise will increase, but that the increase will not be the result of the Proposed Project nor will the increases be significant. Noise will continue to grow around SDIA as long as the single runway configuration allows additional flights. Implementation of the Proposed Project will not change this.</p>
Comment 27	Subject: Air pollution (& below)	Response
<p>Especially interesting were the limited locations of pollution impacts, especially with NTC's new residential areas and Banker's Hills 'increasing redevelopment densities' (especially those off Spruce St.) <i>being so close to any 'downwind' SDIA Operations-related increases in pollution, which appear completely contradictory to the Airport's 'goals' by Ordinance to "reduce Impact on surrounding communities.'</i> It appears from the Appendixes on E-25 &amp; E-27, that the only 'sites' for pollutant impact measurements seem to be in commercial/retail zoning, military or 'public spaces', border fences and the downtown bases for AIR POLLTION. <b>No 'receptors'</b> appear near the immediately adjacent or 'downwind' communities of Mission/Bankers Hills Resident areas (Where hot air holding pollutants will rise to the residential areas and/or become trapped with the fog) <u>nor the Peninsula/Old Midway/Old Town Resident populations, immediately 'affected by Air Pollutants.</u> The nearest is '2 miles southeast of the airport in downtown San Diego,' and are quoted as "may differ from the airport areas." <i>How is the Air Quality of those in the vicinity of SDIA determined? Why are there not Air Monitors in all of these areas?</i></p>		<p>See response to your Comment # 5. Please see Chapter 2.4.4, Former Naval Training Center (NTC) Landfill Remediation Project Environmental Impact Report" of the Draft EIR.</p> <p>The air quality analysis presented in the EIR represents the total predicted ambient (i.e., outside) concentrations of the U.S. EPA "criteria" pollutants, as estimated from dispersion models with "background" concentrations (as measured from nearby downtown air monitoring stations) added. Background concentrations reflect the emissions from other nearby sources not accounted for in the dispersion modeling analysis. Importantly, the airport and the adjoining roadway network (including the freeway) were included.</p> <p>Moreover, the background concentrations used are the maximum values observed during the past three years at the downtown monitoring sites. When combined with the dispersion modeling results, the reported values represent conservatively-high concentrations and some "double-counting" of emission sources. Finally, the downtown urban environment concentrations tend to be higher than the area near the Airport.</p> <p>Monitored data is not necessary to assess impact as impact is determined based on future conditions.</p>
Comment 28	Subject: Air pollution	Response
<p>In the construction phases, P.6 of 9 mentioned that '<b>new surface parking lots &amp; vehicle circulation areas would be constructed west of Terminal 2 West.</b>' This is the area where there is a toxic dump. <i>How is this going to be constructed without impacting the employees, visitors, resident &amp; military being impacted by large pockets of toxic contamination, where as occurred in 2000, when NTC's Toxic dump</i></p>		<p>Please see Chapter 2.4.4, Former Naval Training Center (NTC) Landfill Remediation Project Environmental Impact Report" of the Draft EIR.</p>

	<p>was 'leveled &amp; covered?' From toxic fumes alone, 8 military recruits doing 'outdoor training' just downwind, were injured/worse during training, all ending up in the Nearest Hospital, over 30 minutes distance, with traffic. 3 died before they reached the hospital off Washington St. in Mission Hills. <i>Why is this not identified as a 'significant effect' to residents surrounding or downwind of the proposed construction?</i></p>	
Comment 29	Subject: Air pollution	Response
	<p>As noted on P. 6-1 in the EIR of <b>Significant Irreversible Effects</b>. "The proposed Project <i>could potentially result in and/or contribute incrementally to air quality impacts</i>"...and as described in Section 5.16, "<i>the proposed project increases the potential Acute (short term) incremental health impacts (non-cancer) in RESIDENTIAL, SCHOOL, RECREATIONAL AREAS and off-site workers</i>. This outcome is likely driven principally by acrolein with lesser contributions from formaldehyde." This is extremely disturbing as is the <i>just as likely event of an aircraft crash on or around SDIA with its limited runway aligned with runway overcapacity at proposed future gates</i>, as exemplified in just one recent case study at JFK. This violates any semblance of 'discussing carefully' the "Significant Environmental Impacts to those living around SDIA". <i>What are the Airport's Plans to increase the measurement and monitoring and reporting for measuring Air Quality and Safety in the communities around SDIA?</i></p>	<p>The Health Risk Assessment (Section 5.16) and Air Quality analysis (Section 5.5) included an analysis of sensitive receptors within the area surrounding the Airport. These sensitive receptors included residences, schools, workers, and recreational locations. The analysis found no significant or adverse health impact on these sensitive receptors.</p>
Comment 30	Subject: Safety	Response
	<p>Re-Reading the 2004 ALUCP in detail, there is much that appears to be 'missing' with regards to the "<i>Safety of persons on the Ground</i>". In the 2004 ALUCP, there are certain 'measures' that were requested, accumulated from Past History and from projections into the future. Described in a very clear manner...these same questions' compilations have been asked repeatedly of the AA in ANAC meetings. Some of these 'calculations' have been tracked the past few years as a result of requests from the current ANAC members, ie. 'number of missed approaches' per month, somewhat similar to the 2004's request for 'near misses', other have not yet been tracked yet. ie. 'number of Head to Head operations per month," which is specifically mentioned in the 'safety study' as part of the ALUCP. <i>Recently requested as public information, Why has the AA not yet put them online nor are they available for the General Public to access for review in determining the Safety of such an 'increase in capacity' to Lindbergh Field?</i> In recent meetings with &amp; calls to Airport representatives (DF), the public has been denied access to such "monthly reports," stating that they are "not still in storage on their data bases." This alone is disturbing, after</p>	<p>This comment does not address the Draft EIR or the Airport Master Plan. Further information regarding the ALUCP can be found at <a href="http://www.sanplan.com">www.sanplan.com</a>.</p>

finding some of the exact same parameters being requested, reported and part of the 2004 and earlier ALUCP requirements.		
Comment 31	Subject: Safety	Response
<p><i>For either an Aircraft Crash, a Military Fuel Depot explosion, or Toxic Air Release, What parameters have been shown or determined as 'Safe' for emergency access from SDIA? Area emergency department figures show in 2004, that Paramedic/Emergency access, to all communities in Peninsula is constrained. At already 'over 8 minutes,' think of the added emergency access restrictions with an aircraft crash, perhaps one that lands ½ in an ½ out of the channel with NTC business smack in the middle of it, in the Runway Protection zone, or on top of Loma Portal Homes, how much time will it take for emergency crews to respond with the added traffic? Mr. Webb remembers the difficulty of 'emergency access' with the marines mentioned above. With the increased density already of an 'overbuild church, school and commercial land use at NTC,' with more planned, what assurances are there that any 'emergency' will be adequately provided fro with 'Medical Access?' Where in the EIR is the added Stress in this System with Traffic, Hospital &amp; Safety personnel access addressed? 'Effects on Public Emergency Service Access (as a resource base)' have Not been mentioned. Nor have any changes been mentioned that have occurred due to the 'Impacts' to Safety via Emergency Vehicles Access.</i></p>		<p>While catastrophic aircraft emergencies, such as the potential scenarios mentioned in this comment, are possible, they are considered extremely unlikely (with the last such major incident associated with SDIA occurring nearly 30 years ago). Given the very low likelihood of such an event and the range of geographic locations and time of day where and when such an event could potentially occur, it would be extremely speculative to address the specific emergency response measures that would take place or the associated response times of emergency service providers. Section 5.17 of the EIR describes the various agencies responsible for providing emergency responses at SDIA an in the surrounding community. Included in Section 5.17 are descriptions of on-Airport emergency response facilities and requirements, City of San Diego Fire Department facilities and response requirements, over-water emergency response, and the "City of San Diego Emergency Plan." Based on the information and analysis contained in Section 5.17, the EIR adequately addresses potential emergency response issues.</p>
Comment 32	Subject:	
<p>The Draft EIR needs to be revised to address the actual environmental impacts associated with actual aircraft operations and actual passenger use, <b>not the level of impacts associated with forecasts that have been consistently exceeded in projections</b>, even by the admission of the San Diego County Regional Airport Authority. Consider this brief (explained in detail following) evaluation of the 'goals' of this Master Plan (with comments):</p>		<p>Environmental analysis for this EIR is based upon comparing future conditions with the Proposed Project against future conditions without the Proposed Project. See Response to General Comment #3.</p> <p>See Chapter 1.1.4 of the Draft EIR, Activity Forecast and Planning Horizon Used for Environmental Analysis. As stated within Chapter 1.1.4, "growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first three full years after the forecast was completed. Because the trend at San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report." Thus the commenter is correct that the growth for the years 2004, 2005, and 2006 has been tracking above the forecast. This, however, does not necessarily negate the validity of the forecast throughout its entire range to 2030.</p>
Comment 33	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Improve 'air service &amp; customer service.'</b> SDIA is already in 'the top 10 in country,' for its size. The EIR (below) fails to prove that it will</p>		<p>Traffic mitigation measures are presented in Chapter 5.3.8 of the Draft EIR, Mitigation Measures. Specific traffic mitigations to street segments</p>

<p>accomplish anything ‘significant’ after 2015. Since any ‘improvements’ will barely be completed by then, little ‘significant improvement’ appears to be possible, while at the same time the Peninsula’s 75,000+ person population will be Hugely Impacted by Construction Congestion on one of their ONLY THREE ingress/egress points, Harbor Drive. <i>Where are the ‘changes’ to accommodate travel during this time for both residents as well as passengers?</i></p>	<p>serving the Peninsula Community are presented in Chapter 5.3.8.1, Street Segments on pages 5.3-129 to 5.3-158.</p> <p>Construction impacts related to traffic are summarized in Chapter 5.3.6 and construction traffic mitigation is presented in Chapter 5.3.8.10.</p>
<p>Comment 34      Subject: Evaluation of Master Plan Goals</p>	<p>Response:</p>
<p><b>Improve airport Access.</b> Little was evident in the EIR’s ‘mitigation’ for traffic impacts expected in ingress/egress to or through Peninsula’s public roads, <i>what ‘plans’ will help the adjacent community to deal with a reduced level of access with all the increased traffic ‘funneled into’ our communities.</i></p>	<p>Please see response to your Comment #33. This comment is regarding traffic mitigation measures and is similar in nature to Comment 33.</p>
<p>Comment 35      Subject: Evaluation of Master Plan Goals</p>	<p>Response:</p>
<p><b>Utilize developable land.</b> This may be ‘possible’ for the benefit of the Airport Authority, but <i>where is the benefit to the public? Access to much of it appears still to be constrained as to access.</i></p>	<p>San Diego International Airport is a public commercial service airport serving the public air passengers of the San Diego region, both visitors and residents alike. The Airport’s use of developable land for providing improved facilities will help provide a higher level of service, safety, and convenience for airport customers/users who are members of the general public, both residents of and visitors to the San Diego region.</p>
<p>Comment 36      Subject: Evaluation of Master Plan Goals</p>	<p>Response:</p>
<p><b>Enhance Airport Access as part of the region’s transportation system.</b> Again, <i>where &amp; when is this to be accomplished? Is it ‘part of this ‘phase’ of the EIR?’ Where is the funding for this?</i></p>	<p>Improvements to the airport’s ground transportation system associated with the proposed implementation plan are outlined in the Draft EIR in Chapters 4.1.2.4 (Construct New Second Level Road/Curb and Vehicle Circulation Serving Terminal Two), 4.1.2.5 (Construct New Parking Structure and Vehicle Circulation Serving Terminal Two), 4.1.2.6 (Relocate and Reconfigure SAN Park Pacific Highway), and 4.1.2.7 (Construct a New Access Road from Sassafras Street/Pacific Highway Intersection). Section 5.3 Traffic and Circulation analyzes the potential impact on traffic and circulation. The Mitigation Monitoring and Reporting Program identifies a timeline and responsible parties for mitigation measures.</p>
<p>Comment 37      Subject: Evaluation of Master Plan Goals</p>	<p>Response:</p>
<p><b>Improve Regional Economy.</b> Doubtful as surely the AA will benefit, but (because of small plane capacity only) who will benefit are: Denver, Phoenix, March AFB (our cargo) &amp; LAX. Heavily [sic] Detriment will be to our Regional traffic on the frwys. Which will increase in necessity of carrying Majority of our Cargo to March AFB, Ontario &amp; LAX. <i>Who has looked at the Long Range impact of continuing to Ship 90%+ of our cargo to these other airports? How much are we ‘giving away’?</i></p>	<p>As stated in Chapter 1.1.2 of the Draft EIR, Airport Master Plan, one of the Master Plan objectives is to “enhance [the] regional economy by serving demand for air service.” The proposed project meets this objective by providing additional airport facilities that will help the airport meet the forecast demand for air service through 2015. There is no evidence to suggest that the proposed project will result in a reduction of cargo activity at SDIA below the project demand.</p>

Comment 38	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Meet AA Financial Goals.</b> This is not 'described in this Master Plan.' What 'Financial Goals' does the Airport Leadership have?</p>		<p>As stated in Chapter 1.1.2 of the Draft EIR, Airport Master Plan, the Master Plan goal is to "provide a financially and environmentally responsible guideline for future Airport development that will accommodate forecast aviation demand and remain adaptable to either a short-term or long-term future for the existing Airport site."</p> <p>Detailed financial objectives were presented in Chapter Two of the Draft Airport Master Plan and are stated here:</p> <p>"Financial objectives present priorities for handling the costs associated with the varying infrastructure improvements presented in the Master Plan. The financial objectives are listed below:</p> <ul style="list-style-type: none"> <li>• Recognize the finite availability of funds to improve the Airport.</li> <li>• Involve financial stakeholders in the planning process and respond to their concerns.</li> <li>• Balance improvement plans with the ability to amortize the capital costs during an appropriate period of time.</li> <li>• Maximize the Airport's non-airline revenue-generating capability with consideration of concessions opportunities, parking, on-airport lease agreements, and other means." </li></ul>
Comment 39	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Involved 'stakeholders' &amp; 'public input'.</b> At the Thursday, 1/24 meeting of Special Advisory Committee, it was stated by a PR consultant, that "any 'technical information' from the 'public' would Not be listened to, "because we don't need it," and that "the AA will simply 'listen to the public' to learn how to 'appease them' and how to make their own 'plans,' a more palatable 'sell.' This appears that the Airport Authority does not intend to do anything of the sort. As evidence of exactly such, at another meeting just prior to this 'private agenda' of the AA's "Special Advisory Committee,' the AA's 'moderator', in rude and discriminating behavior toward a Planning Group member from our area, who arrived to speak (during "Public Input") at another planning area's 'Airport Meeting,' described the 'double talk' displayed by the Airport Authority's Management team. Degrading and discrediting a volunteer Professional in their own field, they refuted in advance, anything this volunteer had to share with 'other, naïve, public members of the San Diego community also concerned with the future of this city'. This display of preponderance of 'superiority' is disgusting and shameful for a 'public employee.' Where is the assurance that any of our comments will be considered and integrated into this EIR?</p>		<p>Comment noted. The response to comments on the Draft EIR follow California Code of Regulations, Title 14, Division 6, §15088, <i>Evaluation of and Response to Comments</i>. The SDCRAA has thoughtfully reviewed and responded to all comments received on the Draft EIR.</p>

Comment 40	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Improve terminal Efficiency and Capacity.</b> As an airport affiliate at the airport states: "I am a tour guide who works inside the terminal to greet guests. With 10 new gates, God knows how many passengers increase an hour, The terminal, which is not being increased in size, will in NO way be able to accommodate thousands of more passengers. Baggage claim is packed as is, and luggage is slow. The only time Terminal 2 is slow is after 5:00 pm. I doubt these "possible 10 more planes an hour" will be after 5:00 pm. There is one escalator down to baggage claim and as it is the descent is slow and there are many people at the bottom to greet their friends and family. I see a horrible bottleneck. <i>Where is this going to 'get better?'</i>" SB</p>		<p>As stated in Chapter 4.1.2.1 of the Draft EIR, Expand Existing Terminal Two West with Ten New Gates, the Terminal Two West expansion would include approximately 430,100 square feet of additional space.</p> <p>As stated in Chapter 4.1.2.1 of the Draft EIR, Expand Existing Terminal Two West with Ten New Gates, "the existing Terminal Two West baggage claim area would be reconfigured to improve service for arriving passengers and their baggage from both Terminal Two West and Terminal Two East."</p>
Comment 41	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Increase Airfield Safety, Efficiency and Capacity.</b> Farthest from it. Unless the AA 'learns from the mistakes of other airports, ie. JFK would they just PAID a consultant to hear, who informed them of the '17% increase in operations' (aircraft at gates) and the '247% increase in DELAY &amp; CONGESTION, both at the airport &amp; its terminals as well as in the streets &amp; air connections around them. <i>Where are we assured we aren't making the same mistakes, wasting our future on special interest profits for the short term?</i> As the 'human element' of inaccuracy, error, etc. takes place with less experience "Pilots (1-08 news), Air Traffic Controllers (12-07 news) as a recently retired Aircraft Crash Management Executive commented, "SDIA is well past its statistical accident rating"</p>		<p>Comment noted. This comment does not pertain to the project and the example cited does not pertain to the situation at SDIA.</p> <p>Safety is the SDCRAA's chief objective. No plan for the airport would be proposed unless it maintained the airport's existing safe operating environment or improved the airport's existing safe operating environment. The SDCRAA will not compromise public safety.</p>
Comment 42	Subject: Evaluation of Master Plan Goals	Response:
<p><b>Improve Ground Transportation Efficiency.</b> <i>How is this possible, as Increasing the bottlenecks at N. Harbor Drive to the Peninsula, increasing the traffic use (even by bus or shuttle) down Laurel St, Graft St, to the North or South side of the airport will only increase the congestion substantially on Laurel St &amp; Pacific Hwy?</i> This is an ill-conceived and destructive plan, doomed to cause major havoc.</p>		<p>As stated in Chapter 2 of the Draft Airport Master Plan:</p> <p>"Ground transportation objectives provide guidelines for improving airport access, parking, and vehicle circulation. The ground transportation objectives are listed below:</p> <ul style="list-style-type: none"> <li>• Improve airport access for both private vehicles and public transit to meet anticipated population growth and vehicular demand.</li> <li>• Ensure the safe and efficient flow of traffic in and out of the Airport.</li> <li>• Reconfigure the roadway system to avoid congestion points that lead to traffic delays and confusion.</li> <li>• Organize the ground transportation facilities to provide sufficient"</li> </ul>

		<p>A description of the proposed ground transportation improvements can be found in Chapter 4 of the Draft EIR, Proposed Project and Alternatives.</p> <p>A description of the traffic analysis and proposed traffic mitigation measures for roadways surrounding SDIA can be found in Chapter 5.3 of the Draft EIR, Traffic &amp; Circulation.</p>
Comment 43	Subject: Evaluation of Master Plan Goals	Response:
	<p><b>Increase ‘compatibility’ with surrounding land uses.</b> <i>How does ‘increasing RON parking aprons ‘increase the compatibility of having loud Noisy and dangerous Jets take off, non-stop for 3 hours from 6:30 am to 9:30 am? And possibly again at 11:30, 4:30 pm, &amp; 8:30 pm til 11:30 pm over Residential Homes and children in Schools?’</i></p>	<p>As stated in Chapter 1.1.2 of the Draft EIR, Airport Master Plan, “the following overall objectives were set to guide future development at San Diego International Airport: 8. Consider compatibility with surrounding land uses and Airport Authority policies.”</p> <p>As described in Chapter 4.1.2.2 of the Draft EIR, Construct New Aircraft Parking and Replacement Remain-Over-Night Aircraft Parking Apron, the proposed implementation plan includes a new apron facility to accommodate up to ten jet aircraft in a configuration suitable for Remain-Over-Night parking. This component of the proposed implementation plan is located on existing airport property.</p> <p>The noise analysis does not specifically address RON noise as the impact of take-off and landing far exceeds the noise produced by aircraft taxing from their RON to a gate for loading. The analysis in Section 5.2 details potential noise changes for schools specifically and found that there will be no significant impact on schools due to the Proposed Project.</p>
Comment 44	Subject: Evaluation of Master Plan Goals	Response:
	<p><b>Complement the Site Selection.</b> <i>How does this plan ‘find a new Long Term Site for San Diego?’ There isn’t one iota of ‘complementary’ movement at this airport, in this plan. Increasing ‘by maximizing’ on a severely limited site, decreasing Safety margins will only result in the inevitable, stress on the “weakest link,’ the human side...air traffic control, pilot error, ‘space’ in the air or on the ground. Page 4 of 9 in the Notice of Preparation states how “by 2015, operational delays are forecasted to reach congestion levels that would limit further growth in airline flights without the addition of another runway at SDIA.” This completely ‘contradicts’ the goals of the ASSP programs, as p. 5 of 9 says, these ‘improvements’ will ‘continue its mission of serving SD’s commercial air transportation needs a forecasted though 2015. That will happen with ‘no change,’ as the data shows, little ‘problems’ until 2020. The ‘changes proposed will only Increase and</i></p>	<p>See Response to General Comment #1. As outlined in Chapter 2 of the Draft Airport Master Plan, the Master Plan was initiated while the Airport Site Selection Program (ASSP) was underway. Thus, the alternatives developed for the Master Plan needed to be compatible with any potential outcome of the ASSP. Therefore, the proposed implementation plan was conceived to serve demand through 2015 as, regardless of the outcome of ASSP, it was understood that the existing airport would remain in operation through at least 2015 to 2020.</p>

accentuate the Risk of Failure at SDIA to be able to handle increased ground traffic, as well as air traffic, as in JFK, but much 'riskier' at the world's second busiest one runway airport.		
Comment 45	Subject: From comment from Caltrans	Response:
<p>Received from <u>Cal Trans Dept. of Transportation, Division of Aeronautics, MS #40</u>, the understanding that it, <u>the Division</u>, as a Responsible Agency, <u>must ensure</u> that the proposal is <u>in full compliance with CEQA</u>.</p> <p>CEQA, Public Resources Code Section 21096, Requires that Caltrans Airport Land Use Planning Handbook (handbook) be Utilized as a resource in the preparation of Environmental Documents for projects within an airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that Should be Applied to All Public Use Airports and is published online at [<a href="http://www.dot.ca.gov/hq/planning/aeronaut">http://www.dot.ca.gov/hq/planning/aeronaut</a>]. Noted on page 2 is that according to CA public Utilities Code (PUC) Section 21676.c requires that "Each public agency within the boundaries of an airport land use commission plan shall, PRIOR to the modification of its Airport Master Plan, Refer such proposed change to the Airport Land Use Commission."</p> <p>"The Airport Land Use Commission must the determine <b>Whether the Proposed Master Plan is Consistent</b> or inconsistent with <u>the Adopted Compatibility Plan for that Airport. ...</u>"key to protecting an airport and the people residing and working in the vicinity of an airport" are the ..."<u>Airport Land Use Commissions and Airport Land use Compatibility Plans!</u>" Sandy Hesnard, Aviation Environmental Specialist, State Clearinghouse, Cal Trans.</p>		<p>The Airport Land Use Planning handbook was considered in development of the EIR.</p> <p>An amendment to SDIA's ALUCP is underway and the 2030 contour included within this EIR is being used within the ALUCP for compatibility planning.</p>
Comment 46	Subject: Evaluation of Master Plan Goals	Response
<p><i>Please, show us WHERE this plan actually 'protects the people residing ...in the vicinity of the SDIA airport?' Where are the CEQA reports on the <b>ACTUAL Increased IMPACTS (changes)</b> to the "People, Students, Children and Home Values in the Communities" Surrounding SDIA (Sunset Cliffs, Upper OB, Peninsula/Mission Beach/Pacific Beach/South Soledad Mtn, &amp; Birdrock) over the past 10 years? For the next 20 years?</i></p>		<p>The EIR provides existing conditions at the time of the initial NOP (2005) and projects environmental conditions with and without the Proposed Project through 2030. The forecast approved by the FAA in June 2005 was used to analyze the alternatives, this forecast considers past operational levels to project future levels. Potential impacts must be considered in a future setting. These are requirements of CEQA analysis.</p>
Comment 47	Subject: Operations in Land Use Compatibility Plan and Part 150	
<p>There is Not a current, Updated 'Adopted Land Use Compatibility Plan,' or <b>Part 150 Study completed</b>, though operations have 'Increased</p>		<p>The CLLUP for SDIA, a predecessor to the ALUCP, was amended in 2004. The ALUCP is expected to be complete in 2009. A Part 150</p>

	<p>substantially,' far <b>Above their predicted rates of 1-1.5% per year.</b> Actual operations <b>increased more than 2% to 6% per year for the past 4 years</b> since 2003 (ALUCP based on 2003 data), setting historical records. Such '<b>Environmental Impacts</b>' were <b>calculated on inaccurate projections</b> for both Operations and Capacity, resulting in <b>Incomplete and FALSE Projections of 'future impacts' and 'mitigations' needs for Safety, Traffic and Noise.</b> Part of the problem is that the Airport Authority has Not Placed on Public Access sites, the compilation of important monthly statistics. <i>What will be the real increases in Operations, if the existing EIR is based on Incorrect Projections? What will be the Real Increases in Operations and Airport Capacity and Impact to the communities surrounding SDIA as a Result of the "Increased Gate Operations Capacity (and # of new gates)?"</i></p>	<p>Study Update was initiated in January 2008. The Part 150 Study will be based on the FAA-approved forecast.</p> <p>The projected growth rate in operations is approximately 2.3 percent from 2002 through 2015, when the airfield constraint is reached, higher than the 1-1.5 percent that was asserted. As of 2006, actual airport operations (excluding overflights) were 209,491 slightly less than the 211,875 operations that had been forecast. The commenter provides no basis for the conclusion that operations and capacity projections are inaccurate.</p> <p>Because all environmental analyzes are based on projecting the future, only historical data can ever determine the real impacts of improvements.</p>
Comment 48	Subject: Forecasts	
	<p>As the EIR relies upon such inaccurate projections, now proven incorrect, they already skew the information, based upon those projections. We question the forecasts. <i>How can Airport Authority Commissioners even 'attempt to approve an EIR' without "accurate airport-related noise, traffic and safety impacts on the surrounding community," those that can only accurately determined without the information contained in more accurate reports from a currently ordered Part 150 study and updated ALUCP, in process? Is ASSUMED to grow from approximately "187,000 annual tons" in 2005 to approximately 622,100 annual tons in 2030!" What is the annual tonnage in Air Cargo measured at in 2007? This is more than 3 times of that in 2005. What is this 'new trip rate' that this was estimated on?</i></p>	<p>The forecast for SDIA, approved by the FAA, is the approved forecast upon which facilities and environmental review must be based. See previous comment. There is no basis for the assertion that the projections are "now proven incorrect." The 2030 annual tonnage projection was obtained from the SH&amp;E forecast; it was not assumed. The annual tonnage (freight and mail) at San Diego in 2007 was 154,689.1 tons.</p> <p>A 'new trip rate' of 2.31 was used in the Land Use Plan traffic analysis to determine traffic volumes related to air cargo activity. This trip rate was based on similar domestic air cargo facilities at LAX (see the proposed Airport Land Use Plan, North Area discussion on Page 5.3-67). This trip rate is independent from the cargo forecast and is applied to the forecast of cargo tonnage (622,100 tons in 2030) to determine future cargo related traffic. The cargo tonnage is determined in the forecasting process. The trip rate used in the Airport Land Use Plan results in a higher ratio of traffic vehicles to cargo tonnage than current operations because the Airport Land Use Plan assumes on-site facilities to sort cargo goods would be constructed on Airport property. This on-site sorting would result in increased vehicle trips to deliver goods to the air cargo site. Currently goods are sorted off-site and brought to the Airport only to be loaded on the airplanes. Only the Airport Land Use Plan provides an on-site sorting facility.</p>
Comment 49	Subject: Traffic	Response
Repeated in both the EIR and the Appendix are increased traffic along major egress and ingress routes in the Point Loma area including		The EIR addresses traffic impacts resulting from implementation of the Proposed Project and identifies associated mitigation in EIR Section

	<p>Harbor Drive, Rosecrans Street, Nimitz Boulevard, and Pacific Hwy. <i>When are the Peninsula's other feeder streets, already impacted with new 'surrounding developments' from NTC to be addressed in the Draft EIR? When are the 'segments' on Nimitz Blvd., between Rosecrans and Hwy. 8, Rosecrans St. between Lytton and Hwy. 5, Harbor Drive between Nimitz and Canon St, Chatsworth Blvd between Barnett and Nimitz to be addressed? As well, when are the 'intersections' on these routes to be included as 'impacted' by the expansion? They are not even mentioned.</i></p>	<p>5.3.8.</p> <p>The NTC is not owned by the SDCRAA and all referenced development was subject to an EIR (not conducted by SDCRAA). However, forecast traffic resulting from development of NTC was included in the background traffic used in the Airport Master Plan EIR traffic analysis (see Section 5.3.1.4).</p> <p>The study area for this EIR is identified in EIR Figure 5.3-1 and was determined as all street segments and intersections that would have at least 50 peak hour project trips, per City of San Diego guidelines.</p>
<p>Comment 50</p>	<p>Subject: Traffic Mitigation</p>	<p>Response</p>
	<p>D.6 etc al, Intersection &amp; those with 'Significant Traffic Impacts', Turning Volumes, Land Use Plan, et. al. –these all 'require coordination' with the City of San Diego "in order to mitigate any 'potential' significant effects." This is unacceptable as the Peninsula is still dealing, 10 years after the 'agreements with the City on NTC's development, with unaccomplished 'traffic mitigation.' Where are the actual 'traffic, signal, freeway entrance/exit mitigations' with funding? There is Nothing Projected for the Peninsula Area, except a 'one-lane-(to 5 lanes) expansion on Rosecrans Street from Nimitz to Lytton St. which is far too little, far too late. Our area will become the 'most impacted', as the 'escape route' when Laurel Street, Grape, Hawthorn and Harbor Drive, under the EIR scenario, have increased over their 100% capacity, that in today's number have Only a 15% increased capacity (D-14). It is doubtful that the City of San Diego will have sufficient Eminent Domain Capacity or funding to 'accommodate' the 'Mitigation measures' that are described from pages 202 to 252. "Cumulative Impacts" as stated, are relying on the <b>9/01 NTC Precise Plan</b> and N. Harbor Drive <b>Embarcadero's '01</b> requirements and do not include any of the North Harbor Drive, nor Shelter Island Proposed Projects for Cumulative Impacts.</p>	<p>Any mitigation to City Streets and Intersections must be coordinated with the City as the Airport Authority has no authority to make changes to another agency's facilities. EIR Section 5.3.8 presents all proposed mitigation for potentially significant traffic impacts resulting from implementation of the Proposed Project.</p> <p>As described in Cumulative Impacts EIR Section 5.3.7, General Plan Zoning which is assumed to be similar or more intense than the actual project development was used to forecast traffic in all areas where specific projects were not included in the SANDAG model. This results in the background and resulting cumulative traffic being estimated at a higher more conservative level than is expected. Therefore, traffic associated with the General Plan Zoning is more than sufficient to incorporate potential future development along North Harbor Drive and the Shelter Island Projects.</p>
<p>Comment 51</p>	<p>Subject: Traffic Mitigation</p>	<p>Response</p>
	<p>Repeatedly in the Under Tables D-91 to the end of the Section, with the 'implementation plan Alternative (w/ parking structure),' indicate clearly that there are <b>major 'Significant Traffic Impacts' as soon 'as 2020.'</b> Having traveled these intersections and entries onto the freeways, with</p>	<p>All street segments, intersects, freeway ramps and segments that are currently operating at LOS E or F are identified in EIR Section 5.3.4. The EIR uses the City of San Diego and State of California significance criteria thresholds presented in Section 5.3.3 to identify significant</p>

<p>even an additional 18,000 persons (one airline coming online at one gate) per month will indeed increase the 'assumed delay' far longer than the '1 second'. Most are already at D, E or F LOS already. And the year 2025? All 'would experience an increase in delay?' <i>Still the EIR states this is 'no significant change?'</i> This kind of illogical removal of responsibility to cumulative impacts is quickly receiving distrust and will require actual 'mitigation,' immediately, Prior To any expansion, not afterward, to avoid 'Major Detrimental Impacts on surrounding communities.'</p>	<p>impacts resulting from the Proposed Project. Mitigation for all significant impacts is identified in Section 5.3.8.</p>	
<p>Comment 52</p>	<p>Subject: Cumulative Traffic Impact</p>	<p>Response</p>
<p>Comments from Attorneys representing the Port of San Diego site the inadequacy of the Draft in <i>Disclosing Actual Impacts for Traffic Mitigation Deficiencies</i>. Noting the EIR had not addressed how 'the transfer or closure of existing off-site parking and rental car facilities will result in adverse changes to the physical environment', is only the first problem. The Port's concern may be a [sic] reduction in revenue from such 'unmitigated effects.' We repeat their comment, "<i>The DEIR fails to correctly assign responsibility for <u>Cumulative Traffic Impact</u>" and ...<b>falsely assumes</b> that the implementation of the master plan will have <u>"No significant traffic impacts, since airport traffic is expected to increase anyway."</u></i></p>	<p>The commenter is referencing the Port's comments on the previous version of the DEIR (May 2006). The Port had three comments on the October 2007 DEIR indicating that the SDCRAA has satisfied concerns on the previous version of the EIR. The cumulative impact on traffic has been adequately assessed using regional traffic data provide by SANDAG. The EIR indicates that because the LOS for many streets surrounding SDIA are already at reduced levels of service that minimal increase in traffic cause the LOS to drop to E or F. Where this increase is due to the Proposed Project and a potentially significant impact is identified per the Significance criteria stated in Section 5.3.3 mitigation measures are identified in Section 5.3.8.</p>	
<p>Comment 53</p>	<p>Subject: Cumulative Traffic Impacts</p>	<p>Response</p>
<p><i>Where is the 'cumulative impact with analysis' that determines (Which) 'mitigation measures' that will be <u>accomplished</u> for any impacts <u>attributable directly to increase in airport-related traffic.</u>" and specifically for Off-Site Traffic Impacts? Who will pay for it? How will funding for Off-Site Impacts (road conditions, traffic light and sign mitigation) to the Peninsula's main Collectors (Roscrans, Nimitz, W. Pt. Loma Blvd., Catalina, Chatsworth), <b>and Feeder Streets</b> be accomplished to avoid a reduced Quality of Life?</i></p>	<p>Cumulative Impacts are discussed in EIR Section 5.3.7.</p> <p>Potentially significant impacts and proposed mitigation resulting from the Proposed Implementation Plan are identified in EIR Section 5.3.8.</p> <p>As an operator of a public commercial service airport under the rules of Title 14, Code of Federal Regulations (CFR), Part 139, the SDCRAA works with the Federal Aviation Administration (FAA) to secure entitlements and discretionary funding of airport improvements. If the City or Caltrans take action to approve and implement the road and freeway improvements identified in the EIR, the SDCRAA will request the FAA to determine the permissible use of funds.</p>	
<p>Comment 54</p>	<p>Subject: assumptions, contradictions in traffic</p>	<p>Response</p>
<p>Increasingly in the Traffic Section of the EIR, the 'assumptions' are rife, redundant and repetitive to a point that is incomprehensible, i.e. Concerning conflicting statements 'assuming lower airport traffic because of increased use of transportation shuttles' (both for airport employees as well as passengers), then 'assuming that increasing amounts of traffic will be coming from increased use of and number of</p>	<p>As described in EIR Section 5.3.5.1, Airport Trip Generation and Background Traffic, most airport vehicle trips increase relative to growth of originating and terminating passenger (those beginning and ending their trips in San Diego) growth while schedule driven vehicles such as public buses and Authority-operated inter-terminal and employee shuttles, which operate according to schedule not passenger demand,</p>	

shuttles.'		will grow at a slower rate. This slower growth results in a slight trend down in trip generation rates. However, as remote facilities such as parking lots fill up there will not be a noticeable difference in overall airport trip generation as two trips are required per party: one in a private vehicle and one in a shuttle as opposed to one trip in a private vehicle to the terminal area. The increased demand at these facilities will also result in more shuttles serving the airport.
Comment 55	Subject: Use of Shuttles	Response
	<i>Where are such examples in real life for such use? As SDIA will not be having the Trolley, Coaster or other 'transit' assured at this point of being 'available and funded' to meet their future needs, what will this 'not included in this EIR, Intermodal Center' 'connect to?'</i>	<p>The EIR's Airport Land Use Plan alternative does include an Intermodal Transportation Center on the north side of the airport. As described in EIR Section 5.3.5.2, page 5.3-64, the transportation center would provide a pedestrian connection to the Washington Street Trolley Station, a potential stop for buses along Pacific Highway, and a kiss-and-fly drop off area allowing passengers to be dropped off outside the terminal area. The Transit Center is evaluated at a programmatic level in the Airport Land Use Plan with a conservative assumption that no private vehicles would be removed from North Harbor Drive due to the Transit Center.</p> <p>Additional planning and environmental planning will occur prior to construction of facilities included in the Airport Land Use Plan.</p>
Comment 56	Subject: Traffic Assumptions	Response
	There are far too many parking, traffic, and transport 'use' assumptions, and those, are based on data that are over 5 to 8 years old and do Not include the 'under projected' Recent, Major Increases in Operations and Passenger throughput over the past 4 years. Similar to the 'assumptions in the Air Quality section quoted by the Port District's Attorney, where is the 'discussion of assumption' for this 'technical data' (reams of it) on Traffic & Circulation?	EIR Section 5.3.1 presents the approach, methodology, data, modeling process and associated assumptions.
Comment 57	Subject: Land Use Compatibility Impacts	Response
	<p>In the Land Use Planning Section, As described in 5.2.3 CEQA State Guidelines, Appendix G, the proposed Project would have a significant land use compatibility impact if it results in:</p> <p><b>“Disruption or Division of the Physical Arrangement of an established community”</b> Though on p 5.2-17, it states that such 'traffic mitigation measures would 'not' physically divide existing communities, but rather would 'improve connections,' quite disconcerting is the fact that there are <i>no 'changes' that have been shown to Peninsula's residents and Planning Board to prove that in the future, the Airport will not have to resort to 'removing one of our major</i></p>	<p>Any proposed mitigation measures that includes off airport property will be coordinated appropriately.</p> <p>All mitigation measures were included in the Draft EIR and were therefore available for PCBC and others to review. The SDCRAA will coordinate with and proceed through PCPB as part of implementation process.</p> <p>See Response to General Comment #5.</p>

	<p>corridor streets, Rosecrans, or to continue to expand to meet 'unrealistic air transport demand.' <b>When have these 'mitigation changes for Rosecrans or other major corridors or feeder streets been presented to PCPB?</b> The section notes 'Traffic and Circulation would be the only activities that would occur outside the immediate area of the Airport,' yet it fails to provide any real 'mitigation' of such.</p>	
Comment 58	Subject: Land Use Compatibility Impacts	Response
	<p><b>“Substantial or extreme land use incompatibility with adjacent or nearby existing and proposed land uses, resulting in significant incompatibility or nuisance impacts.”</b> As stated on 5.2-17, there is “no significant change in the noise contours to the peninsula Community based on the Proposed Project”. This is a contradictory statement. Is not ‘a heavy and densified concentration of <i>increased noise and pollution from increased aircraft at an extremely limited site (661 acres) with major terrain limitations and fog inversion layers,</i> encouraging ‘nuisance impacts?’ <i>Are they not also encouraging More Incompatible Land Uses to the nearby existing residential and school land uses, many that existing long before the establishment of “SDIA or Lindbergh Field?”</i></p>	<p>There will be no significant change to noise levels due to the Proposed Project, see Section 5.1.1. Increases to the Time Above metric for schools within the Peninsula Community area are provided in Appendix B. See response to Peninsula Community Planning Comment 28 (submitted by Bill Ingram).</p> <p>As stated on Page 5.2-17, in Chapter 5.2.5 of the Draft EIR, Impact Analysis, under the heading <i>Peninsula Community Plan</i>, “there is no significant change in the noise contours to the Peninsula Community based on the Proposed Project.”</p> <p>As described in Section 5.1 noise levels are expected to increase with additional operations at the Airport, these increases in traffic are not attributable to the Proposed Project but to forecast demand. The supplemental noise analysis indicates that there will no significant impacts.</p>
Comment 59	Subject: Land Use Compatibility Impacts	Response
	<p>As to the “SD Airport Environs Overlay Zone, and its “aim to protect public from Noise or Hazards associated with airport operations at SDIA, “the EIR falsely states “that the Proposed Airport Land Use Plan would be ‘consistent’ with the stated purpose of the AEOZ.” It is a ‘pie in the sky’ statement that to state that “it would Not Significantly Change Noise Exposure within the Airport Influence Area,” as it denies the Reality of the irresponsibly of the Airport Authority and the City of San Diego to address the future needs of the entire City and County by ignoring the impacts of both Noise &amp; Hazard as well as the Historical Significant of our large and long-established community.</p> <p>Already the City of San Diego has ignored the guidelines of the ALUCP and allowed 2 major schools, including preschools in the Noise Impact and Airport Impact Influence Area. <b><i>By substantially increasing flight operations, (25%+) will not Noise, Safety and Pollution Hazards be increased to these children? Won’t the entire area become devalued as aircraft and subsequent encroachment upon ‘new</i></b></p>	<p>The City’s actions are not controlled by the SDCRAA.</p> <p>The Proposed Project does not induce operations; increased operations are a function of greater demand. See Response to General Comment #7. By the year 2030 operations are forecast to grow substantially when compared to 2005 operations. Operations at an airport will continue to grow with or without improvements if the market for the airport is healthy. Noise and air pollutants will increase as described in sections 5.1, 5.5, 5.16, and 5.19.</p> <p>In the future with advanced navigational aids, it is expected that separation requirements will actually be reduced. Future Part 150 studies will seek to apply noise abatement measures to reduce population in the impacted area. Federal regulations provide for a manner in which airport operators prepare noise studies. 14 C.F.R. § 150. This then becomes the basis for implementing noise mitigation measures. This process is called “Part 150.”</p>

<b>areas' of the Peninsula are exposed to Noise from aircraft diverted from established pathways, for separation and 'safety' maneuvers?</b>		See response to your Comment #58).
Comment 60	Subject: Land Use Compatibility Impacts	Response
<p>A most incredibly condemning statement of this EIR is the one on 5.2.7 under 'cumulative impacts,' with regard to "cumulative land use impacts would occur when the incremental effect of a project or projects combine to produce a significant effect." Stating, without any knowledge of 'future projects,' "cumulative developments envisioned would be consistent with the land uses defined in the Land Use plans and policies for the SDIA Project Area AND the Surrounding Areas." "Consequently, these future developments when combined with the Proposed Project <b>would Not Result in Any Significant Land Use Impacts.</b>" <i>Is this the 'future prophecy of the AA's consultant to already 'know' all proposed projects in the future, for both SDIA AND the Surrounding areas? ie. Peninsula? Harbor Drive? Shelter Island Drive? Midway?</i></p>		<p>The SDCRAA acknowledges that it is not possible to know the details of each future development project and the extent to which each project will be compliant with its applicable land use plan(s). During the preparation of this EIR, a reasonable effort was made to identify future development through review of land use plans and, as applicable, contacts with local government staff (see EIR Section 5.20). Note that CEQA does not require a lead agency to provide "crystal ball" inquiry during the preparation of environmental documents. (Towards Responsibility in Planning v. City Council of the City of San Jose (1988) 200 Cal.App.3d 671, 681; Resident's Ad Hoc Committee v. Board of Trustees (1979) 89 Cal.App.3d 274, 286.). To the contrary, "when the nature of future development is nonspecific and uncertain, an EIR need not engage in 'sheer speculation' as to future environmental consequences" (Marin Municipal Water District v. KG Land California Corporation (1991) 235 Cal.App.3d 1652, 1662). For the purposes of this analysis, it is reasonable to assume that local governments would require that future developments be consistent with the applicable land use plans, and, barring specific evidence to the contrary, it would be speculative to address potential future developments that would not be consistent with applicable land use plans. Specifically with regard to the Proposed Project addressed in this EIR, the adoption of the proposed Airport Land Use Plan and the development of the Airport property consistent with that Airport Land Use Plan would not result in a cumulatively considerable contribution toward a cumulative land use impact with regard to any of the criteria addressed in Section 5.2.3 of the EIR.</p>
Comment 61	Subject: Land Use Compatibility Impacts	Response
<p>The first "Assumptions i.e. D.5.2.3.6 Realizing that "<i>Ongoing growth in airport-related traffic cannot be separated for planning or mitigation purposes from improvement projects designed to increase the Airport's Current capacity and service levels,</i>" they clearly state what we are saying now, from experience and from many, many consultant reports, that <b><i>such expansion and increase in capacity without 'pre-constructed traffic mitigation,' will have immediate, extremely "cumulative" negative results on "local and area wide traffic."</i></b> <b><i>Where are the Cumulative Effects to the Surrounding Peninsula</i></b></p>		<p>The Section referenced by the commenter does not include the material quoted. The Proposed Project is specifically meant to improve level of service for growth in airport operations that will occur with or without implementation of the Proposed Project, not increase capacity. See Response to General Comment #7. As described in Section 2.2.2 the runway sets the capacity for SDIA. Improvements to the terminal facility including parking structures do not increase the capacity of the Airport.</p>

	<p><b>described, more than a minor impact on the Rosecrans (Nimitz to Barnett) or the Parking Impacts with Removal of the NTC airport parking spots available at the Hotel site north of the Channel?</b> As opposed to D.5.1.3.7, <i>Will not that 'removal' immediately effect the Parking situation? How will the increase of a huge parking structure Not add to the congestion at the already congested entry ramps and freeway segments for I-5 and I-8? (D.5.2.3.4), "whether with parking structure or without?"</i></p>	
Comment 62	Subject: Traffic Mitigation	Response
	<p>D.5.1.3.6 Transit- As stated "Under the Implementation Plan (with parking structure) <b>No Existing or planned transit routes would be modified.</b> Therefore, <b>no significant IMPACT Would occur to transit operations and No mitigation is required.</b>" <i>Doesn't this prove that the 'increased costs for the 'Intermodal transport Center' has 'no effect' on the actual transportation system? Where is the 'substantiation' for this 'summary?' Due to the already congested routes in and out of SDIA for autos, with no 'modifications proposed with increased 'Ground Operations of 25% or more', how can it be assumed that there will NOT be any 'mitigation required?' Where are the studies of the impacts of already stressed 'street segments' of Nimitz &amp; Rosecrans (p 5.3-16), as 5.3.3.9 Significance Criteria Requires?</i></p>	<p>As stated in EIR Section 5.3.5.2, No existing or planned transit routes would be modified by the Proposed Project. The intermodal transportation center is included the Airport Land Use Plan, not the Proposed Implementation Plan, and as stated in EIR Section 5.3.5.2, bus routes along Pacific Highway could be re-routed into the intermodal transportation center. The SDCRAA does not operate the public buses along Pacific Highway and does not have control over whether or not a bus route is re-routed but does disclose this is possible and could add time to those routes.</p> <p>The EIR commenter's statement that the 'increased costs for the intermodal transportation center has no effect on the actual transportation system is speculative and no statement or correlation is made in the EIR.</p> <p>The EIR uses the significance criteria reported in Section 5.3.3 to determine significant traffic impacts and does propose mitigation (see Section 5.3.8) for all potentially impacted street segments.</p>
Comment 63	Subject: Mitigation Measures 5.3-1, 5.3-2, and 5.5-3	Response
	<p>The measures detailed in the DIER (MM 5.3-1, MM 5.3-2, and MM 5.3-3) do not appear to have changed, and the 'funding for these measures' does not appear 'assured' at this point. (Mr. Peace's 'Intermodal Center' is extremely limited in its specific 'meeting of need,' requiring far more comprehensive study as commented on by AA members months ago). Public Review, Real Property Acquisition and funding for such traffic 'mitigation' is barely mentioned in this EIR. <i>Which "mitigation measures" will be 'accomplished' with this 'Phase' of the Master Plan? Will they be completed before the Additional Gates are completed? What 'Infrastructure Guarantees' does the Airport Authority assure its surrounding communities and Port District of, in the undertaking of this Proposal?</i></p>	<p>It is unclear what the commenter is referring to in this first sentence as having not changed relative to 'The measures detailed in the DIER (MM 5.3-1, MM 5.3-2, and MM 5.3-3) do not appear to have changed'.</p> <p>As an operator of a public commercial service airport under the rules of Title 14, Code of Federal Regulations (CFR), Part 139, the SDCRAA works with the Federal Aviation Administration (FAA) to secure entitlements and discretionary funding of airport improvements. If the City or Caltrans take action to approve and implement the road and freeway improvements identified in the EIR, the SDCRAA will request the FAA to determine the permissible use of funds.</p>

	<p>An Intermodal Center located off the Airport and referenced in this comment is not part of the Proposed Project and is a subjective study independent of the Master Plan and EIR.</p> <p>Section 5.3 Traffic and Circulation analyzes the potential impact on traffic and circulation and identifies mitigation measures and other improvements related to traffic impacts. A Mitigation Monitoring and Reporting Program will be adopted by the SDCRAA.</p>	
Comment 64	Subject: Mitigation Funding	Response
<p>Our communities are weary of the ‘build now’ and mitigate ‘later,’ irresponsible acts of this City, County, and State. Any ‘Airport Proposal Must include both Immediate Plans and Funding assurance for Immediate Mitigation, not only ‘during construction,’ but permanent and guaranteed funding for ongoing ‘mitigation’ as this proposed ‘expansion’ will have, impacting the Peninsula, its residents, businesses and visitors in the most negative manner of all communities. <i>Specifically, where are the reserves, funding reserves or insurance for such increased Liability, not limited to: Ongoing Traffic Mitigation to avoid increased Accidents, Increased Traffic and Air Congestion, Ground and Air Operations Delays, Business losses and loss of lives? What are the ‘Subsequent, Necessary Expansions’ that will be Required for SDIA and all of San Diego County, to meet its ‘air transportation needs? Is this not what THIS EIR supposed to do? This is supposed to be a <b>Long Term Plan</b>, “a Minimum 25-year projection according to the existing ALUCP, yet includes no defined predictions for ‘accommodating’ air transportation needs other than “at capacity regardless of ‘operational expansions’ to the year 2015.”</i></p>		<p>The EIR identifies measures that mitigate the project’s direct significant and/or cumulatively considerable traffic impacts. For information purposes only, the EIR also identifies consistent with the City of San Diego’s January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better.</p> <p>The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the City of San Diego to evaluate those off-airport road improvements that are eligible to utilize airport revenues. In addition, the SDCRAA will coordinate with the City of San Diego in its role as the lead agency for the evaluation and implementation of road improvements within its jurisdiction.</p>
Comment 65	Subject: Noise	Response
<p>In Appendix B, with few pages (B-1 through B-17) describing ‘technical details’ of potential impacts of Noise and its Effect on People,” there is Nothing here that relates to the <b>Actual Noise effects</b> on specific surrounding communities’ populations, nor mention of any ‘mitigation’ necessary to cover litigation exposures. Where are the reports of ‘hearing losses’ already accrued in the area from the Noise from SDIA’s encroaching and growing Noise Patterns? Are they growing, how much will such health risks be expanded, as per (goal #1)? Certainly, the AA has had years of recorded reports? Litigations?</p>		<p>Appendix B is a general guide to noise and its effects and the environmental decision is based on projected noise not actual noise.</p> <p>Hearing loss is typically found where people have been subjected to 85 decibels habitually (more than eight hours a day). Many experts agree that continual exposure to more than 85 decibels is dangerous. In light of this information there should be not hearing loss in the communities surrounding SDIA.</p> <p>To put this in perspective, a lawnmower in operation or truck traffic is typically measured at 90 decibels while a jet engine is measured at about 140 decibels if the exposure is within 100 feet of the engine. While single event noise may reach levels above 85 decibels in areas in</p>

		<p>proximity to the runways this level of noise is not currently experienced for extended timeframes nor is it forecast to occur. The analysis indicates that the increases to noise levels due to continued growth due to demand at the Airport will not have significant health affects on the surrounding communities.</p> <p>The noise office maintains noise level and complaint records but does not have records of health affects related to noise. There has been no law suits brought against the Airport claiming hearing loss.</p>
Comment 66	Subject: Noise	
	<p>Defining 'general effects' is disingenuous, indicating that there are 'increasing effects,' yet the report claims only 'minor, insignificant effects' or changes, after the Airport Authority's own 'report' discloses 'Disclaimers of Non-Accuracy of their Noise Monitors' (INM) because of the 'varied topography' and 'hard and soft ground coverage'. "INM can overstate or understate the Noise exposure levels due to terrain (including buildings) in the vicinity of SDIA and the prevalence of both hard and soft ground coverage." 'Hard' being defined further as equivalent to concrete coverage, buildings and even water, noted "at SDIA, they tend to reflect and Increase Noise Exposure." <i>What are the REAL Noise and Health (lack of sleep) Impacts on Persons surrounding SDIA, considering the Hard, Soft, and Topographical Constraints of the Airport in the middle of San Diego?</i></p>	<p>Neither CEQA nor NEPA require new research for environmental analysis, standard models are employed to project potential impact.</p> <p>The issue of terrain is accommodated within the Federally approved INM, terrain data was incorporated into the model. The commenter is referring to a long standing issue with the model that can not be solved within this EIR; the EIR used Federally accepted modeling techniques. The latest version of INM allows the user to select soft ground surfaces or calculation of noise without lateral attenuation being applied to propeller-driven aircraft or helicopters. The EIR used the most recent version of the INM (version 7.0) to analyze noise impacts at SDIA. The analysis completed for the Airport compares future conditions to determine impact, modeling is the only way to project future impact and the modeling must be based on standard practices. INM is the current standard for aviation noise modeling.</p>
Comment 67	Subject: CNEL Contours/Nighttime Analysis Charts	
	<p>It is interesting, on Page B-28 to note how the "in the Proposed Project..." as would be expected (BY WHOM?) ...the differences between the contours for the Proposed Project versus the No Project Alternatives are "small." <i>With a 25% MINIMUM Increase in the Potential Flight Operations at the Airport (per gate and with 10 New gates), How are these determined as 'SMALL?'</i> Between the Flights from the No Project, East Terminal Project and the Preferred Project, some diagrams appear to put vague (no one can 'read' the precise locations, there are No roads) and 'inconsistent determinations of less flights' vs. 'more' or to have 'less impact' at nighttime or daytime or with different projects. K.I.S.S principle applies here. If there is a <b>25% increase in potential Aircraft taking off</b> (&amp; more potential because <i>each GATE can have multiple planes loading many plans per day</i>), it will be a 'Substantial Change.' It is not even as simple as JFK's</p>	<p>The result is expected because the difference in operations between the Proposed Project and the No Project Alternative are minimal. In example from Tables 2-18 and 2-19 the difference in daily operations is only 50 flights (or about 7%).</p> <p>In order to show the extent of the contours clearly it was necessary to limit the naming of roads and features in the noise graphics. It is clear that nighttime and evening operations have more impact and for that reason the CNEL metric includes decibel penalties for evening and nighttime operations. The number of planes using each gate is projected and described in Section 2.2.3 of the DEIR. Indeed the use of the gates informed the ability to accommodate forecast demand.</p> <p>The prediction of where aircraft will fly during bad weather conditions is</p>

<p>'example of operations increasing by 17%-planes at the existing gates'! We are looking at a <i>SINGLE RUNWAY</i>. With varying aircraft Not Subject to Any Specific 'SLOT,' <u>there is No Method of "Predicting" when and Where those Planes will be directed with weather conditions: fog, wind, rain, etc.</u> Also, p. B-27, does not include any 'restrictions on the use of MD83, MD80 series or B737s, regardless of where they 'take off from', they still impact the CNELs in the air with schools &amp; residences as such a close distance from the single runway. <i>Are there any 'proposed restrictions' to 'mitigate' for these continued and potentially 'increasing' operations?</i> Ground noise or air noise A 'model' is just that, a poor predictor of Actual Results. Looking at Real Life examples such as JFK are more predictable. Past results of similar reality or 'Actual Operations and Passenger Activity' is a better predictor than the 'fiction' (ie. the 'model forecasts' done for SDIA concerning passenger and operations projects), presented here.</p>	<p>developed using previous radar data and flight plans for the airport being modeled. It is very rare that an aircraft would not follow the standard flight pattern and therefore inconsequential to modeling impacts. Even during bad weather aircraft use standard flight routes.</p> <p>There are no restrictions on MD83, MD80, or B737s other than the curfew that applies to all aircraft. Aircraft can depart from SDIA between 6:30 a.m. and 11:30 p.m.</p> <p>The Part 150 Update currently underway will investigate ways to abate noise impact however it should be noted that the noise contours for SDIA are reflective of aircraft performance capabilities.</p> <p>Prediction of noise impacts is the only way to analyze future noise impact.</p>	
<p>Comment 68</p>	<p>Subject: Noise Differences between 2005 and 2020</p>	<p>Response</p>
<p>The 'differences' shown on the Figure B-17 and Figure B-23 between the 2005 Base, Proposed, and Alternative appear to clearly show that by 2020, areas of the Peninsula that have had very few flights south of the 275 heading (for emergency separation), will now be Negatively subjected to New Noise and Pollution of Substantially by increasing amounts Aircraft Operations. Both Daytime AND Nighttime Impacts will affect the homes of Tens of Thousands, the Health of tens of Thousands of Household Occupants and correspondingly, Property Tax values for San Diego. This is supposed to 'help the economy?' Most likely it will 'help the Airport Authority with their Financial Goals (#6), but at what 'expense' to the long term economical 'goal' for San Diego (goal #5)? <i>To be stuck in traffic, or at a beachside resort or sand spot, Impacted constantly from the Noise, Pollution, and Safety Risks of a Congested International Airport 'Takeoff' or 'Landing' Runway, how is this going to 'help' San Diego's Tourism?</i></p>		<p>Figures B-17 and B-23 indicate that when comparing the 2020 Proposed Project and No Project Alternatives there is very little impact because of the Proposed Project (blue indicates no change and green indicates few flights). The flight tracks used to model the Proposed Project and No Project Alternatives are the same, the difference is in operational numbers projected.</p> <p>The property value impacts of aviation noise have been studied on multiple occasions with publication of study results beginning in the mid 1970s, to-date there is still no definitive answer. For individuals who might work at (or near) the airport or who use the airport for travel, the benefits of proximity can be reflected in residential property values. Because it is possible for an airport to have both negative and positive effects on property values, the net effect can be negative or positive. Separation of aviation noise from other noise emitters has always been at issue for determining a specific property value impact due to aviation noise. Some studies have found that impact due to aviation noise is negligible while others have found the impact to be upwards of 10 percent. A 2003 study by J. Nelson, Department of Economics, Pennsylvania State University entitled "Meta-Analysis of Airport Noise and Hedonic Property Values: Problems and Prospects" found that the "cumulative noise discount in the U. S. is about 0.5% to 0.6% per decibel at noise exposure levels of 75 dB or less". Hedonic means of or relating to utility. A hedonic property value model is one where the independent variables are related to quality; e.g. the quality of a property that one</p>

		<p>might buy. For this study 20 hedonic property value studies are analyzed, covering 33 estimates of the noise discount for 23 airports in Canada and the United States (Nelson, Jon P: Aircraft Noise and the Market for Residential Housing: 50/78/24, Sept. 1978 (Available from NTIS as PB 297 681). Specifically, at DNL above 65 dB, the effect is about 1% per additional dB; at DNL between 60 and 65 dB, the effect is about 0.5% per additional dB; below 55 dB DNL, no effect has been measured (Nelson, Jon P., "Hedonic Property Value Studies of Transportation Noise: Aircraft and Road Traffic", Proceedings of the International Symposium on Hedonic Methods in Real Estate, Geneva, Switzerland, June 2007.). From this status of current research is it expected that the Proposed Project will have an insignificant affect on property tax values in San Diego.</p> <p>The forecast indicates that San Diego has strong visitor appeal and thus the future includes increased demand for flights to the City. Providing adequate air service at SDIA will provide economic benefits for the City.</p>
Comment 69	Subject: Air Quality	Response
	<p><i>What about the increase of Particulate Matter Pollution over the area, increasing from '400 tons to 600 tons annually?' That is a 1/3 increase in pollution! How is this considered, 'not significant'? How does this add to the goal of "increase 'compatibility' with surrounding land uses?"</i></p> <p>In 1-24 Executive Summary, the Air Quality Impacts ASSUME that "uses in the flight path to the east &amp; west...are vacant." Not so. Immediately to the west are buildings at former NTC that expect to have 40-50 employees...where are the CEQA guidelines 'met' in this 'plan?' This is indeed AVOIDABLE. The CAAQA for this pollutant (PMs, NOX &amp; VOC) will be in Violation.</p>	<p>See response Peninsula Community Planning Board to Comment #29 (submitted by Bill Ingram).</p>
Comment 70	Subject: Mitigation	Response
	<p><i>After reading the Summary of Impacts and Mitigation Measure, being Stuck in F LOS on Any of the Routes to or from SDIA, without 'mitigation' will 'help' tourism or business in downtown San Diego? These 'Environmental-Noise, Pollution, Traffic &amp; Safety Impacts' are all considered "Less than Significant?"</i> Historical uses of such 'mitigation measures' suggested or 'encourage and facilitated' in the EIR are seldom actually used. Who will 'coordinate' the ground service equipment replacement program to 'monitor' the use of 'alternative to ground service, diesel-fueled equipment? Such 'Impacts' are incompletely discussed in the EIR as to their "Impacts" to the surrounding community, and when commented on briefly in the Draft EIR in 2006, they were barely mentioned.</p>	<p>The EIR identifies measures that mitigate the project's direct significance and/or cumulatively considerable impacts. For those mitigation measures to be implemented on the airport or by the airport, a Mitigation Monitoring and Reporting Program will be adopted by the Airport Authority.</p> <p>For information purposes only, the EIR also identifies, consistent with the City of San Diego's January 2007 CEQA Significance Determination Thresholds guidelines, those improvements that may restore and maintain the traffic facility to an acceptable Level of Service defined by the City of San Diego to be LOS D or better. In many cases, the mitigation and the improvements are the same. Per the City guidelines,</p>

		<p>measures required The SDCRAA does not have jurisdiction to implement off-airport improvements. If the City of San Diego proposes to implement the roadway improvements identified, the SDCRAA will coordinate with the FAA to identify those off-airport road improvements that are eligible to utilize airport revenues.</p> <p>The Mitigation Monitoring and Reporting Program identifies the responsible parties for implementing the mitigation measures.</p>
Comment 71	Subject:	Response
<p>The History of the Airport's Operations and Abuse of Regulations is documented, <i>repeatedly in the ANAC's records over the past 10 years. No Analysis of such reported 'Impacts' are Included in the EIR. As detailed repeatedly, with Only One runway, there will be More Homes Impacted with Noise, Pollution and Safety Risks. With the increases of Traffic that have not been Compiled Comprehensively to address the Changes in operations/passenger loads since 2005, and without such future 'already-approved projects' surrounding the Airport and 'presently proposed ones,' this EIR is woefully Out of Date, does Not give accurate Details of Impacts (maps do not include 'readable streets') and are difficult to 'mark' in compiling comments from the pdf files provided as 'supplemental materials.' Existing ALUCP regulations are impossible to 'access' without Retyping or Copying word for word, page for page, every segment.</i></p>		<p>The EIR does indicate that there will be more noise and air pollutant emissions generated by the Airport in the future. However, implementation of the Proposed Project will not result in these increases relative to a no-action scenario.</p> <p>Increasing demand for air service in the San Diego region will result in increasing flight operations at SDIA regardless of the proposed terminal improvements through 2020.</p> <p>The analysis of potential impact is based on forecast operations for 2010, 2015, 2020, 2025, and 2030.</p> <p>The EIR captured regional growth in the traffic analysis by including future roadway traffic volumes as forecast using the Series 10 [San Diego] Regional Transportation Model which is maintained and run by .SANDAG as stated in Section 5.3.1.3 of the EIR. Specifically the traffic model incorporates forecasted airport growth, immediate surrounding growth and regional growth as reflect in the Series 10 socio-economic input data.</p> <p>The graphics were developed at a scale that allows the extent of the CNEL noise levels to been seen on an 8.5 by 11 inch page. Only Interstate Highways were identified to increase readability on the graphic.</p> <p>The current ALUCP is accessible on the SDIA website.</p>
Comment 72	Subject:	Response
<p>This has been made the most difficult EIR to address, we believe, on purpose to further thwart the efforts of those who will be Harmed the most. The Airport Authority's Webmaster is extremely Disingenuous in copying the corrupt pathways of the City of San Diego's Leadership. Who will 'benefit' while the majority of San Diego will be subject to</p>		<p>The Draft EIR was made available on the SDCRAA website, at public libraries, as well as at the SDCRAA offices.</p> <p>The general public benefits from adequate aviation services at SDIA. Aviation and ground traffic delays will grow regardless of the Proposed</p>

<p>Gross Congestion Impacts, both on the Ground and in the Air and Incredible Delays, both in the Air and on the Ground, subjecting this City and County to future unproductive 'Costs' in Studies, Litigation, and in 'Mitigation' after there are Major Operational 'Human-caused' Accidents and Mishaps? What are the "plans" to prepare for these?</p>	<p>Project by 2030. The next planning phase for the Airport Master Plan will consider long term solutions for aviation growth in San Diego. Regional Transportation planning will necessarily focus on the growth of congestion in San Diego. The SDCRAA is not sure what accidents and mishaps the commenter is writing about but the SDCRAA and the FAA always consider safety for the flying public when airport improvements are reviewed.</p>	
<p>Comment 73</p>	<p>Subject: Noise Exposure to Schools</p>	<p>Response</p>
<p>Tables B-8 through B-10: Calculations of times (minutes) that Schools (Children) are Subjected to Noise in levels that are UNLAWFUL are woefully inaccurate. In both the Vicinities the Peninsula and East Side Schools, such 'computerized calculations' are an Insult to the Parents, Health of the Children and the Residents that are subject to the REAL HEALTH IMPACTS on Hearing. At 104 decibels, over 3 minutes exposure <i>Will Cause Permanent Hearing Damage, especially in the ears of young *Preschoolers and Kindergarten* Children.</i> These tables appear quite lame, being extremely close, whether in terms of "No Project Alternative", "East Terminal Alternative" OR "Preferred Project Alternative," all of which will have a Marked Change, for Any Increase, either 3/7 gates or 10 gates of Increased Operations. This does Not Consider REAL IMPACTS to the Health And Safety of the Children in the Communities surrounding the Airport. <i>Where are the reports of Noise increases at each school over the past 10 years?</i> In stating, (5.1-11), "data shows that most schools...do not experience substantial periods of time with exterior noise levels above 80 db", please remember that <b>these 'estimates' are only with CNEL, Not Single Even Noise Levels! Where is the estimate of the periods of time that the Exterior Noise Levels are Above 80 db? Or Above 100db at such close schools as Loma Portal, St. Charles, Correia, Barnard, Dewey and at additional Preschools in the area?</b> <i>These are potentially the most 'damaged populated', where are the Data on the Actual Time Periods of Exterior Exposure to such Risks?</i> Examples (from 2010 to 2030 – Highest Impacted schools to lowest): [See Appendix B, Table B-10; comments written throughout the table are transcribed in the following comments]</p>	<p>There are no established statutory or regulatory standards for analyzing time above metrics. The EIR evaluated multiple decibel levels to allow the reader to understand that at higher decibel levels there is minimal time experienced above the level considered. The reader should understand that standard conversation between two people occurs at 60 decibels and at 80 decibels conversation is interrupted. Additionally the noise levels indicated are for exterior noise which does not consider the attenuation of the buildings themselves. The only way to analyze future impact is to model it.</p> <p>There are no schools that will receive 104 decibels for over three minutes. The EIR has no regulatory requirement to report noise levels from the past. The EIR does however project noise levels at schools surrounding SDIA for the all the years analyzed in the EIR.</p> <p>The noise values provided for the school analysis is not in CNEL but in Time Above by 5 dB intervals starting with 65 decibels. Note that 60 decibels is the normal level of conversation so the analysis provides detail for the minutes above normal conversation for each year. Time Above is a supplemental metric that defines the number of minutes per day that noise exceeds a specific A-weighted sound level threshold. In review of the Time Above tables in Appendix B it can be seen that the highest decibel level experienced for any time is 95 decibels and exposure to this level is less than a minute. Additionally the exposures are exterior values; the attenuation of the building would lower these values by 15 decibels to 25 decibels thereby reducing aircraft generated noise to sound of a conversation in most cases. As described in Section 5.1, there are no significant impacts associated with the Proposed Project.</p>	
<p>Comment 74</p>	<p>Subject: Noise Table</p>	<p>Response</p>
<p><i>How absolutely ridiculous- a 25% Increase in Planes = a 25 to 40-minute Change of Exposure or a 'difference in project' from 'none' being Only "Less than one minute" to 7 minutes Difference, is "less than</i></p>	<p>The thresholds of significance are described in Sections 5.1.1.3 and 5.1.2.3; none of the differences in noise levels analyzed exceed these thresholds.</p>	

	<p>significant" (5.1.16 Noise)? And this going from approx. 574 flights/day to 819/day, a 235+ aircraft per day increase? Will there be a 'limit' as to 'when NOISY planes can take off?' Will there be 'regulations' between 7:30 and 10:30 or 11:30 and 3:30 pm? No! <u>Aren't these the Busiest times for Aircraft to take off and also those in which young children are Exposed outside?</u> Yes. How is this 'mitigated' for such a "Health, Safety, &amp; Welfare charge? Where is the assurance, and by when, that the entire fleet of planes into SDIA will have only 25 minutes out of the approx. 300 additional flights per day will be 'converted' to less noisy planes at such a CLOSE distance to 7-10 schools? <u>60 minutes more per day is a 'better approximation' and is Unacceptable to meet 'goal #9 (in actuality is in direct opposition to it!)</u></p>	<p>The restriction of aircraft operations must be considered under the requirements of FAA Airport Noise and Access Restrictions 14 CFR Part 161 (<a href="http://www.faa.gov/airports_airtraffic/airports/environmental/airport_noise/part_161/">http://www.faa.gov/airports_airtraffic/airports/environmental/airport_noise/part_161/</a>), although multiple airports have undertaken the analysis requirements to restrict access to their airports any real success has been very limited.</p> <p>The SDCRAA has no control over the actual aircraft that are flown in and out of SDIA; the airlines operating at the Airport make the decisions on fleet. However, the FAA adopted a new noise standard for subsonic jet airplanes and subsonic transport category large airplanes. The noise standard requires that the latest available noise reduction technology is incorporated into new aircraft designs. The noise standard, Stage 4, applies to any person submitting an application for a new airplane type design on and after January 1, 2006. The noise standard is intended to provide uniform noise certification standards for Stage 4 airplanes certificated in the United States and those airplanes that meet the new International Civil Aviation Organization Annex 16 Chapter 4 noise standard. The adoption of Stage 4 standards for new jet aircraft will serve to reduce noise impacts in the future. Those Stage 4 changes are not included in the noise analysis for the EIR therefore the analysis is conservative in that it likely over estimates noise attributed to the fleet mix that will serve SDIA by 2030.</p>
Comment 75	Subject: Noise Table	Response
	And these [referring to the schools in the tables] do Not Include *the Preschools*!	All schools included in the SANDAG data base were modeled. The SANDAG data base did not include preschools, however there were no significant impacts to any school analyzed and it therefore reasonable to assume that there would be no significant impact to preschools.
Comment 76	Subject: Noise Table	Response
	Again, this is Contrary to the Goals of the ALUCP, the Goals of the Airport Authority Master Plan (Goal #9) as it increases Hazard to the Health, Safety and Welfare of the surrounding communities, especially to those 'least able to speak', our Children.	The commenter is referencing goals identified in the ALUCP. The ALUCP is not a subject of this project or this EIR.
Comment 77	Subject: Traffic CNEL Changes	Response
	In Table B-11, page B-73 & B-13, page B-77, it is <i>hard to believe that 'Traffic CNELs' for either the Proposed Project or the east Terminal Alternative, With Parking Structure, will be 'Only Slightly better' (or better at All!!!)</i> if reading these computations properly. Especially in the 'Nimitz roadway' with 'Alternative' compared to 2005. Obviously there	<p>The EIR analysis is based on projection of future noise levels, actual data would not influence the analysis except to confirm the models analysis of existing conditions.</p> <p>This EIR considers the near-term improvements needed on airport to</p>

	<p>Have been 'increased CNEL Traffic Noise Levels since then with the increased operations, but where is the Actual Data? Where are these numbers coming from? Where are the assured 'Billions of dollars for alternative transit' installed, in order to achieve this? What 'transit' will it connect to? Is this 'use of on-site shuttles' supposed to account for this? It is extremely hard to understand any kind of methodology that would State and 'Show' such 'Reduced CNEL levels for Traffic' as are exemplified here-Just passed on other studies done and brought forward by Your Consultants (S.B) recently it is highly implausible to achieve such 'lower' levels of Noise statistics with the increased capacity &amp; operations (I'd like to see 'actual CNELs', since '05) much less, with an Increase of 25% of Ground Transportation Capacity/Operations.</p>	<p>accommodate forecast demand and the assignment of land uses within the airport property to focus future planning efforts for more long-term improvements. Alternative transit while contemplated in the traffic and circulation analysis included in Section 5.3 is not focus of this EIR. The SDCRAA is participating in a multi-agency committee to identify opportunities to improve transit access to the SDIA and the improvements brought forward by this plan are provided in Table 2-21 of the EIR. The Proposed ALUP designates Ground Transportation land uses in the North Area that may include an intermodal transit center and a proposed transit corridor connecting to the South Area.</p> <p>The noise analysis for surface traffic was completed using appropriate modeling techniques; the results indicate that there will be no noticeable increases in noise levels with the Proposed Project.</p>
<p>Comment 78</p>	<p>Subject: Traffic CNEL, noise residential areas</p>	<p>Response</p>
	<p>As a member of the ALUCP ATAG, it is amazing that such 'detail' is reported as 'necessary' for Non-Residential Streets when the "Ambient Noise" from the Freeway (Hwy. 5) &amp; Harbor Drive is all around the Retail, Commercial &amp; Resort areas now, and is asked to 'be Exempted' as a consideration in the future because of its 'non-impact!' It appears ridiculous to consider any 'Increase in Traffic CNEL' in any area but a 'residential area,' as an Airport IS Noisy already as are 'commercial roadways', Hwy 5, PCH, etc. At Lindbergh, any 'Traffic Noise' is pretty much 'lost in the constant or ambient din' <u>except with in adjacent Residential areas on the West side, as the freeway traffic IS NOT 'AMBIENT,' there, it is NOT Present at all!</u></p>	<p>The EIR's analysis of noise impacts to both residential and non-residential land uses (such commercial) is appropriate. Neither CEQA nor its implementing guidelines restrict noise impact analyses to only residential areas, and, as indicated in EIR Table 5-1.8, noise compatibility standards apply to the whole range of potential land uses within a community. More specifically with regard to non-residential areas potentially affected by the Proposed Project, the City of San Diego has interior noise impact planning requirements for Commercial buildings as well as residential buildings. For these reasons, the EIR and its noise technical appendices evaluate potential noise effects (specifically including projected-related surface traffic noise) in non-residential as well as residential areas.</p>
<p>Comment 79</p>	<p>Subject:</p>	
	<p>In table B-12 p. 75 &amp; B-14, p. 79, it is incredible to see, at "<u>Peak Hour Road Traffic CNEL</u> compared to 'No Project" AND at '<u>Daily Road Traffic CNEL</u> compared to No Project" that there is ONLY an <u>Extremely Slight Increase in Traffic Noise, and that ONLY Noticed, by 0.10 at the 2030 mark for the 'impact to the Peninsula!</u> How is this able to show a 'zero net' <u>CNEL level for Traffic</u>' here, as for "85% of existing traffic" (not able to Continue the 'preferred, normal route south from the Airport,' as it is already at 85% capacity'), when the Only resulting 'other' way OUT is via Nimitz to <b>Rosecrans (then Chatsworth, Sports Arena, West Pt. Loma Blvd., Barnett-?- etc).</b> To have <u>mostly "0" effect on Traffic Noise, when the Residents of NTC, Loma Portal, OB and Peninsula will all have to deal with, not just with 'increased Traffic Noise,' But with jammed up traffic on Each of their 3 main emergency access</u></p>	<p>As noted in this comment, analysis of surface traffic noise (as included in EIR Section 5.1 and EIR Appendix B) indicates that traffic noise impacts associated with the Proposed Project generally would not be noticeable compared to the noise increases associated with the No Project Alternative. Specific to surface traffic CNEL levels along Nimitz Boulevard in the Peninsula Community, modeling indicates that the Proposed Project would have essentially the same traffic noise impact as the No Project Alternative (0.0 to 0.1 decibel increase in CNEL levels).</p> <p>The surface traffic noise impact analysis in EIR Section 5.1 and Appendix B incorporated anticipated future traffic volumes (see EIR Appendix D) into the U.S. Department of Transportation, Traffic Noise</p>

**corridors, including buses!** If studied thoroughly, these diagrams Clearly Show that there is NO problem with the present “Daily Traffic CNEL’ OR ‘Peak Hour Road Traffic CNEL’ for the next 22 years. If there is NO PROJECT!

Model to provide an accurate prediction of future traffic noise impacts. The accuracy of the U.S. Department of Transportation, Traffic Noise Model with respect to the project area was field-verified by comparing observed traffic counts and measured traffic noise with the corresponding noise levels predicted by the model (see EIR Table 5.1-10 and Figure 5.1-56 for noise measurement locations). Thus, while the results of the surface traffic noise analysis may seem “incredible” to this commenter, the results were arrived at using the best available traffic data, current U.S. Department of Transportation modeling, and field verification. Accordingly, the analysis presented in the Draft EIR is adequate and no change to that analysis is required in response to this comment.



SANNoise  
PO Box 70194  
San Diego, CA 92167

Feb. 4, 2008

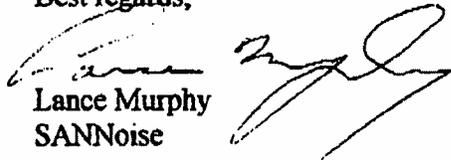
San Diego County Regional Airport Authority  
Attn: Airport Planning  
P.O. Box 82776  
San Diego, CA  
92138-2776

Dear Sirs,

Please accept the following comments from concerned citizens group SANNoise as its contribution to your efforts to distribute and solicit input concerning the Draft EIR for the SDIA Master Plan.

We appreciate the opportunity to participate in this process and second the comments prepared by other members of our community and the Planning Boards of Ocean Beach and Point Loma. Rather than duplicate their concerns, we will keep our's brief and not unnecessarily add to volume of commentary.

Best regards,

  
Lance Murphy  
SANNoise

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FEB 04 2008

PLANNING DEPT. #44

**1. Noise**

**The noise generated by Lindbergh is to be controlled in compliance with the CALTRANS variance that is regularly extended. In addition to the other comments made by citizens and the Planning Boards of Ocean Beach and Point Loma, it is obvious by the continued increase in operations with no firm plan to relocate the airport that it is in violation with the statutes.**



1

**2. Pollution**

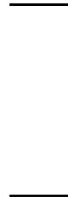
**The air pollution resulting from the continued expansion will exceed the levels allowed by the California Air Quality regulations and cannot be mitigated.**



2

**3. Traffic**

**The growth in traffic through the Western exit on Harbor will create unmitigated traffic jams in the Peninsula and will eventually overwhelm the eastern neighborhoods if the expansion continues in the north-west area as anticipated by the Transit Plan.**



3

**4. Growth of the region**

**The San Diego region and Southern California area will not be s**



4

<b>SANNoise</b>		Signed by: Lance Murphy, SANNoise
Subject:		
Comment: 1	Subject: Noise	Response
<p>The noise generated by Lindbergh is to be controlled in compliance with the CALTRANS variance that is regularly extended. In addition to the other comments made by citizens and the Planning Boards of Ocean Beach and Point Loma, it is obvious by the continued increase in operations with no firm plan to relocate the airport that it is in violations with the statutes.</p>		<p>The commenter is correct. SDIA operates under a variance that has been extended in the past and is currently awaiting approval of the variance. The SDCRAA has initiated a Part 150 Update that will contemplate the near term improvements that can be made by noise abatement and furthering of Quiet Home Program and is amending SDIA's ALUCP to conclude the 2030 CNEL contour included in this EIR. Achievement of a "zero noise impact area" (as defined in the Regulations) during the term of the requested variance is technologically and economically impractical and infeasible.</p>
Comment 2	Subject: Pollution	Response
<p>The air pollution resulting from the continued expansion will exceed the levels allowed by the California Air Quality regulation and cannot be mitigated.</p>		<p>See response Peninsula Community Planning Board to Comment #29 (submitted by Bill Ingram).</p>
Comment 3	Traffic	Response
<p>The growth in traffic through the Western exit on Harbor will create unmitigated traffic jams in the Peninsula and will eventually overwhelm the eastern neighborhoods if the expansion continues in the north-west area as anticipated by the Transit Plan.</p>		<p>The Transit Plan is a separate study from the EIR and does not depend on the Proposed Project. It appears that the commenter is referring to the Airport Land Use Plan which contemplates development on the north side of the Airport. In addition, the Proposed Airport Implementation Plan contemplates expansion of Terminal 2 on the south side of the Airport. No alternative contemplates development of the north-west of the airport which is owned by the U.S. government and used by MCRD.</p> <p>All traffic impacts associated with the Proposed Project are identified in EIR Section 5.3. The study area includes all street segments and intersections that have at least 50 peak hour trips project trips, per City of San Diego CEQA guidelines. North Harbor Drive and Nimitz Boulevard to the south of the Airport and Rosecrans to the west of the Airport are included in the study area. Potential significant impacts to these street segments resulting from the Proposed Project along with proposed mitigation measures are identified in Section 5.3.8.</p>
Comment 4	Growth of the region	Response
<p>The San Diego region and South California area will not be s</p>		<p>The commenter did not complete their comment and therefore no response is provided.</p>

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FEB 04 2008

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PLANNING DEPT. #44

FACSIMILE DOCUMENT

DATE: February 4, 2008

TO: Attention: Airport Planning / Mr. Ted Anasis

FIRM: San Diego County Regional Airport Authority

CITY, STATE: San Diego, CA

FAX TELEPHONE NO.: 619.400.2459

CONFIRMING NO.: 619.400.2400

FROM: Stephen L. Marsh

DIRECT DIAL: 619.699.2418 DIRECT FAX: 619.645.5363

USER/CLIENT/MATTER: 07531 / 18158-00020

TRANSMITTING: 5 PAGES (including cover page)

CLIENT/MATTER: 18158-20

**ADDITIONAL COMMENTS OR INSTRUCTIONS** Transmitted herewith are Comments on the Draft Environmental Impact Report for the San Diego International Airport Master Plan on behalf of Jimsair Aviation Services, Inc.

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 BETWEEN THE HOURS OF 8:00 a.m. AND 6:00 p.m.  
 AFTER 6:00 p.m. AND ON WEEKENDS, CALL 619.699.2478.**

TIME/DATE TRANSMITTED BY OPERATOR: February 4, 2008 at

**(TO BE COMPLETED BY SENDER)**  
 ATTORNEY: Stephen L. Marsh  
07531 / 18158-00020  
 (USER/CLIENT/MATTER NUMBER)

**(TO BE COMPLETED BY OPERATOR)**  
 TIME: \_\_\_\_\_  
 DATE: February 4, 2008  
 OPERATOR: \_\_\_\_\_  
 FAX TELEPHONE NO.: 619.400.2459  
 CONFIRMING NUMBER: 619.400.2400  
 RECIPIENT'S NAME: Mr. Ted Anasis  
 PAGES TRANSMITTED: 5

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18158-00020

February 4, 2008

*Via Facsimile and  
United States Mail*

San Diego County Regional Airport Authority  
Attention: Mr. Ted Anasis (Airport Planning)  
Post Office Box 82776  
San Diego, CA 92138

**Re: *Comments on the Draft Environmental Impact Report for the San Diego  
International Airport Master Plan – SDCRAA #EIR-06-01***

Dear Mr. Anasis:

I am writing on behalf of Jimsair Aviation Services, Inc. ("Jimsair") to comment on the Draft Environmental Impact Report ("DEIR") for the San Diego International Airport ("SDIA") Master Plan SDCRAA #EIR-06-01 promulgated in October 2007. As an interested organization, current tenant of the Airport and a stakeholder, Jimsair has the following comments:

- 1. The DEIR fails to comply fully with Public Resources Code section 21091(d)(2)(B), which requires that the written response shall describe the disposition of each issue raised by commenters. The DEIR claims at page 1-25 that "The comments that were received have been addressed throughout the text of this Draft EIR." However this bare claim is insufficient, especially in light of the fact that many of the comments made to the original DEIR have not been addressed. For example, several of the comments contained in our letter of September 15, 2006, are being repeated in this letter because it is not apparent from examination of this DEIR that they have been considered. 1
- 2. This revised DEIR purports to include project-level review for the construction of new general aviation facilities on 12.4 acres as part of the proposed Airport Implementation Plan. However, the level of detailed analysis is insufficient to satisfy the requirements for project-level review in a number of respects. For example: 2
  - a. The use of only 12.4 acres of land for general aviation is insufficient to meet even present demand. Jimsair has previously advised the SDCRAA that additional land is required to support general aviation operations; *i.e.*, Jimsair has requested

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San Diego County Regional Airport Authority  
 Attention: Mr. Ted Anasis  
 February 4, 2008  
 Page 2

an addition of three acres to the existing 11.4 acres to support this existing demand, the need for which has been well documented in previous submissions. Consequently, 12.4 acres is inadequate to meet existing demand and certainly inadequate to meet projected additional demand through 2015 as suggested in the DEIR.

- b. The discussion of the Airport Land Use Plan and the Implementation Plan should include reference to the fact that areas designated for "Airport Support" uses potentially include more than one Fixed Base Operator ("FBO"). For example, because FAA regulations do not permit the grant of an exclusive right, a second FBO, either full service or limited use, could potentially be located either in the north airport area or in the areas to the south of the runway, designated for Airport Support purposes. On point is the fact that, in the context of Jimsair's complaint filed against the SDCRAA before the FAA, the SDCRAA stated that it was considering more than one FBO and that the Request for Qualifications issued in March 2006 reflected that consideration. Certainly, the DEIR should be revised to conform to the SDCRAA's representations to the FAA that the Authority is in fact considering more than one FBO for the airport. It has been Jimsair's consistent position that the Authority is already legally obligated to begin planning for a second FBO at Lindbergh Field and that such planning should be reflected in this DEIR.
- c. Regarding the Airport Implementation Plan, Table 5-15.2 in the Hazards and Hazardous Materials section of the DEIR (Section 5.15) correctly includes the Airport Fuel Farm (Site No. 6) as a site or facility with the potential to contain hazardous wastes or environmental contamination. However, the Table omits the underground storage tank at Jimsair. While there has been no reported environmental contamination or leaks from the storage tank at Jimsair, it should be included as a fuel storage facility for completeness and to ensure there are no misunderstandings or later objections to the EIR for failure to include this potential impact.
- d. The DEIR does not include a reference to the likely storage of aviation fuel at the proposed new FBO facility. While this will not create any additional significant environmental impacts as it is merely a continuation of existing operations in a relocated area, it should be included in the EIR (1) because the FAA previously ruled that the Port District (and by inference the Authority) cannot grant an

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5



San Diego County Regional Airport Authority  
Attention: Mr. Ted Anasis  
February 4, 2008  
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exclusive right to the Consortium for fuel operations at the Airport, and (2) to ensure there are no misunderstandings or grounds for future challenge.

- e. The inclusion of proposed construction of new general aviation facilities on the north area of the airport in the Airport Implementation Plan and its required detailed project-level review is premature in light of the fact that the Airport Master Plan has not been completed. Thus, the potential cumulative impacts resulting from moving the general aviation support facilities cannot be determined adequately. Project-level review should be deferred until the Master Plan for the north area has been completed.

6

- 3. Given that the Airport Master Plan has not been fully completed, project-level review for the entire Airport Implementation Plan is not yet possible.

- a. Unless and until the Master Plan for the entire airport is completed, the cumulative impacts of the Implementation Plan cannot be determined. For example, if the completed Master Plan, taking into account long-term airport needs (*i.e.*, beyond 2015), determines that some or all of the terminal facilities should be relocated from the south side to the north side of the airport, this phase of implementation would require construction of new facilities on the north side, and the later phase would require demolition of the recently completed facilities and replacement construction, all of which will result in very significant financial and environmental impacts that have not been analyzed. Consequently, the Authority must Master Plan the entire airport – even if it implements the projects in phases – before it will be able to comply fully with CEQA’s environmental review requirements.

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- b. The assumptions of airport capacity being reached by 2015, such as those on page 3-2 which suggest that by 2015 airport facilities will become so congested that they will be “inadequate to safely and efficiently handle the forecast passenger volume,” contradict the FAA’s own estimates that full capacity will not be reached at SDIA until 2025. Thus, there is no urgent need to rush this project through and there is plenty of time to allow for the development of a complete Airport Master Plan and for adequate environmental review of the cumulative impacts of that plan.

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- c. Also, the asserted safety concerns referenced in the DEIR are not well founded. For example, the DEIR states at section 3.2.4.1 that aircraft taxing on Taxiway C

**LUCE FORWARD**  
ATTORNEYS AT LAW • FOUNDED 1873  
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

San Diego County Regional Airport Authority  
Attention: Mr. Ted Anasis  
February 4, 2008  
Page 4

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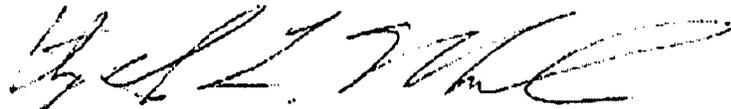
direct high-velocity jet blast onto the general aviation apron. However, there has been no single reported incident involving this alleged phenomenon. It appears to involve nothing more than pure speculation.

- 4. In section 1.2.1, the DEIR correctly points out that SDIA resides on tidelands, which are held in the public trust and that any proposed land uses must be consistent with the California Tidelands Trust requirements. The DEIR then concludes without analysis or support that the four categories of land use (Airfield, Terminal, Ground Transportation and Air Support) are all consistent with the California Tidelands Trust requirements. While it may be true that these general categories are consistent with those requirements, such a conclusory statement is not sufficient. Clearly, the implementation of those land uses must be examined in detail to ensure that every facet of implementation remains consistent with the Tidelands Trust requirements. The DEIR lacks this level of detailed analysis. We recommend that the DEIR address this issue in more detail.

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Jimsair appreciates the opportunity to comment on this DEIR and looks forward to reviewing the Final EIR. Please contact me if you have any questions regarding these comments. Please forward a copy of the Final EIR to my attention for future review.

Very truly yours,



Stephen L. Marsh  
of  
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

SLM/rj

cc: Mr. Phil Bracamonte  
Lee Burdick, Esq.

101070124.2

<b>Luce, Forward, Hamilton &amp; Scripps LLP on behalf of Jimsair Aviation Services, Inc</b>		Signed by: Stephen L. March
Subject:	Comments on Draft Environmental Impact Report for the San Diego International Airport Master Plan – SDCRAA #EIR-06-01	
Comment: 1	Subject: Public Resources Code	Response
<p>The DEIR fails to comply fully with Public Resources Code section 21091 (d)(2)(B), which requires that the written responses shall describe the <u>disposition</u> of each issue raised by commenters. The DEIR claims at page 1-25 that “The comments that were received have been addressed throughout the text of this Draft EIR.” However this bare claim is insufficient, especially in light of the fact that many of the comments made to the original DEIR have not been addressed. For example, several of the comments contained in our letter of September 15, 2006 are being repeated in this letter because it is not apparent from examination of this DEIR that they have been considered.</p>		<p>This Draft EIR is an update from the May 2006 Draft EIR. We updated the Draft EIR to consider (1) additional years (2015 to 2030) and (2) the Proposed Project without a parking structure. Because this Draft EIR replaces the previous Draft EIR, CEQA does not require responses to comments submitted for the May 2006 Draft EIR. Responses to comments on October 2007 Draft EIR are responded to individually.</p>
Comment 2	Subject: Inadequate acreage	Response
<p>This revised DEIR purports to include project-level review for the construction of new general aviation facilities on 12.4 acres as part of the proposed Airport Implementation Plan. However, the level of detailed analysis is insufficient to satisfy the requirements for project-level review in a number of respects. For example:</p> <p>a. The use of only 12.4 acres of land for general aviation is insufficient to meet even present demand. Jimsair has previously advised the SDCRAA that additional land is required to support general aviation operations; <i>i.e.</i>, Jimsair has requested an addition of three acres to the existing 11.4 acres to support this existing demand, the need for which has been well documented in previous submissions. Consequently, 12.4 acres is inadequate to meet existing demand and certainly inadequate to meet projected additional demand through 2015 as suggested in the DEIR.</p>		<p>As stated in Chapter 3.2.4.1 of the Draft EIR, General Aviation Improvements, the proposed project’s general aviation facility improvements “on 12.4 acres would meet the minimum general aviation facility requirement for 2015 as outlined in the Airport Master Plan.” A detailed analysis of the proposed general aviation facilities is presented in Chapter 7.4.2 of the October 2007 Draft Airport Master Plan, which is referenced in the above Draft EIR text. The Draft Airport Master Plan does acknowledge that Jimsair has requested a leasehold expansion to as much as 14 acres. However, the Airport Master Plan states that modest amounts of additional general aviation service could be accommodated on a leasehold of 12.4 acres with a more efficient layout than currently exists. This comment is directed at the Airport Master Plan, not the sufficiency of the analysis in the EIR and thus does not require further discussion. The use of 12.4 acres of land for general aviation does not demonstrate that the “level of detailed analysis is insufficient to satisfy the requirements for project-level review.”</p>
Comment 3	Subject: FBO regulations	Response
<p>b. The discussion of the Airport Land Use Plan and the Implementation Plan should include reference to the fact that areas designated for “Airport Support” uses potentially include more than one Fixed Base Operator (“FBO”). For example, because FAA regulations do not permit the grant of an exclusive right, a second FBO, either full service or limited use, could potentially be located either in the north airport area or in</p>		<p>The EIR does not concern itself with the specifics of the number of FBOs but analyzes the impacts for general aviation facilities as described in Sections 4.1.2.8 and 4.1.2.9. The number of FBOs does not influence the impact of general aviation facilities; the impact is assessed by the area set aside for general aviation. As such, the fact that SDCRAA may be considering more than one FBO is not an environmental impact and does not require discussion in the EIR.</p>

	<p>the areas to the south of the runway, designated for Airport Support purposes. On point is the fact that, in the context of Jimsair's complaint filed against the SDCRAA before the FAA, the SDCRAA stated that it was considering more than one FBO and that the Request for Qualifications issued in March 2006 reflected that consideration. Certainly, the DEIR should be revised to conform to the SDCRAA's representations to the FAA that the Authority is in fact considering more than one FBO for the airport. It has been Jimsair's consistent position that the Authority is already legally obligated to begin planning for a second FBO at Lindbergh Field and that such planning should be reflected in this DEIR.</p>	
Comment 4	Subject: Table 5-15.2	Response
c.	<p>Regarding the Airport Implementation Plan, Table 5-15.2 in the Hazards and Hazardous Materials section of the DEIR (section 5.15) correctly includes the Airport Fuel Farm (Site No. 6) as a site of facility with the potential to contain hazardous wastes or environmental contamination. However, the Table omits the underground storage tank at Jimsair. While there has been no reported environmental contamination or leaks from the storage tank at Jimsair, it should be included as a fuel storage facility for completeness and to ensure there are no misunderstandings or later objections to the EIR for failure to include this potential impact.</p>	<p>Comment noted and the underground storage tank at Jimsair will be added to the list of sites with the potential to contain environmental contamination.</p>
Comment 5	Fuel Storage Take	Response
d.	<p>The DEIR does not include a reference to the likely storage of aviation fuel at the proposed new FBO facility. While this will not create any additional significant environmental impacts as it is merely a continuation of existing operations in a relocated area, it should be included in the EIR (1) because the FAA previously ruled that the Port District (and by inference the Authority) cannot grant an exclusive right to the Consortium for fuel operations at the Airport, and (2) to ensure there are no misunderstandings or grounds for future challenge.</p>	<p>Comment noted. This comment does not refer to any potential environment condition or effect. Therefore, no response is required.</p>
Comment 6	Project-level Review	Response
e.	<p>The inclusion of proposed construction of new general aviation facilities on the north area of the airport in the Airport Implementation Plan and its required detailed project-level review is premature in light of the fact that the Airport Maser Plan has not been completed. Thus, the potential cumulative impacts resulting from moving the general aviation support</p>	<p>The Draft Airport Master Plan is incorporated in the Draft EIR by reference and addresses several facilities at the airport including the general aviation facilities north of Runway 9-27. The Draft EIR evaluates the potential impacts of all of the components of the proposed project, including the relocation of general aviation facilities to 12.4 acres located in the north area to allow for airfield improvements to improve</p>

	facilities cannot be determined adequately. Project-level review should be deferred until the Master Plan for the north area has been completed.	aircraft circulation and safety.
Comment 7	Project level-review not possible	Response
	<p>Given that the Airport Master Plan has not been fully completed, project-level review for the entire Airport Implementation Plan is not yet possible.</p> <p>a. Unless and until the Maser Plan for the entire airport is completed, the cumulative impacts of the Implementation Plan cannot be determined. For example, if the completed Master Plan, taking into account long-term airport needs (<i>i.e.</i> beyond 2015), determines that some or all of the terminal facilities should be relocated from the south side to the north side of the airport, this phase of implementation would require construction of new facilities on the north side, and the later phase would require demolition of the recently completed facilities and replacement construction, all of which will result in very significant financial and environmental impacts that have no been analyzed. Consequently, the Authority must Master Plan the entire airport-even if it implements the projects in phases-before it will be able to comply fully with CEQA’s environmental review requirements.</p>	<p>The Airport Master Plan provided full detail for the implementation of facilities to meet demand through 2015. As part of the near term improvements to SDIA, the SDCRAA has determined that the layout of General Aviation facilities must be reconfigured to better address forecast demand. The Airport Land Use Plan that is included in the Proposed Project considers airport land uses that would be desirable as concepts are developed to accommodate growth at SDIA beyond 2015. As the comment suggests, because project level details of the impacts of implementation of the Airport Land Use Plan, that portion of the EIR is done programmatically. Further environmental review will be necessary as specific projects not presently address in this EIR are approved to implement the Airport Land Use Plan.</p>
Comment 8	Airport Capacity	Response
	<p>b. The assumptions of airport capacity being reached by 2015, such as those on page 3-2 which suggest that by 2015 airport facilities will become so congested that they will be “inadequate to safely and efficiently handle the forecast passenger volume, “contradict the FAA’s own estimates that full capacity will not be reached at SDIA until 2025. Thus, there is no urgent need to rush this project through and there is plenty of time to allow for the development of a complete Airport Master Plan and for adequate environmental review of the cumulative impacts of that plan.</p>	<p>This comment does not identify an environmental impact, but rather it is concerned with the timing of the Airport Master Plan.</p> <p>The San Diego International Airport Aviation Activity Forecast prepared by SH&amp;E published in 2004 and approved by the FAA in 2005 indicates on page 124 that at 260,000 annual operations both general aviation and military operational growth will cease due to rising congestion. General aviation users and operators typically avoid airports with extensive congestion especially when there are other local options. The FAA and the SH&amp; E forecast do not concern themselves with terminal facilities only airfield constrains.</p> <p>The single runway at SDIA is currently not at capacity. The single runway configuration at SDIA can accommodate from 49 operations per hour during bad weather conditions to 55 operations per hour during good weather conditions. This information is provided in Chapter 7 of the Airport Master Plan which is incorporated by reference in the EIR. Table 2-9 provides the hourly operations at San Diego International</p>

	<p>Airport, this table illustrates that in 2005 the Airport is below capacity.</p> <p>As stated previously the runway capacity, according to SH&amp;E's analysis, would begin to become constrained at about 260,000 annual operations and delay would exceed established thresholds of tolerance at approximately 300,000 annual operations. This same forecast is not reached within the 2030 analysis timeline of the EIR. Specifically the airfield will not reach capacity by 2030 however airfield delays will begin to mount around 2015. Review of the Tables 2-12 through 2-20 indicate that beyond 2015 there are multiple hours that will experience 50 plus operations per hour which results in building delay through some parts of the day.</p> <p>Although the runway will not reach capacity until the airport reaches approximately 300,000 annual operations the land side facilities will meet their breaking point beyond 2020. See Section 2.2.3.1 of the EIR for more details. The Proposed Project in the EIR provides infrastructure to accommodate the demand with better levels of service through 2015. Future planning efforts will contemplate the long-term future. The cumulative analysis provided in Section 5.20 considers the known potential improvements projected for the area of SDIA.</p>
Comment 9	Safety Concerns
c.	<p>Also the asserted safety concerns referenced in the DEIR are not well founded. For example, the DEIR states at section 3.2.4.1 that aircraft taxiing on Taxiway C direct high-velocity jet blast onto the general aviation apron. However, there has been no single reported incident involving this alleged phenomenon. It appears to involve nothing more than pure speculation.</p>
	<p>Response</p> <p>The improvement of airport safety and security for Airport users/customers is an objective of the San Diego County Regional Authority as set forth in Chapter 1.1.2 of the Draft EIR, and Chapter 2 of the Draft Airport Master Plan.</p> <p>As described Chapter 3.2.4.1 of the Draft EIR, and in Chapter 7.4.2 of the Draft Airport Master Plan, the proximity of the ramp area at the Jimsair FBO to Taxiway C presents the potential for safety hazard as turbojet aircraft utilizing Taxiway C to reach the east end of Runway 9-27 must turn and direct their jet blast directly onto the Jimsair apron area. The proximity of the apron area to the centerline of existing Taxiway C is 130 feet. As operations at the Airport continue to grow, it is expected that the frequency of operations on Taxiway C will increase exacerbating the potential for this hazard to occur.</p> <p>Further, as described in Chapter 3.2.1.3 of the Draft EIR, Taxiway C does not meet the FAA's currently recommended separation criteria for runway-taxiway centerline separation or for taxiway centerline separation from other fixed or moveable objects.</p>

		<p>The remedy for this non-standard separation is to reconstruct Taxiway C north of its current location, then relocate the taxiway object free area further north of its current location thus placing further restrictions on the use of apron areas north of Runway 9-27. The proposed project reconstructs the airfield facilities according to the recommended separation standard and relocates the general aviation facilities such that the ramp areas are a safe distance from taxiing aircraft where jet blast will not be directed onto ramp areas frequented by passengers and crew alike.</p>
Comment 10	Section 1.2.1	Response
<p>The DEIR correctly points out that the SDIA resides on tidelands, which are held in the public trust and that any proposed land uses must be consistent with the California Tidelands Trust requirements. The DEIR then concludes without analysis or support that the four categories of land use (Airfield, Terminal, Ground Transportation and Air Support) are all consistent with the California Tidelands Trust requirements. While it may be true that these general categories are consistent with those requirements, such a conclusory statement is not sufficient. Clearly, the implementation remains consistent with the Tidelands Trust requirements. The DEIR lacks this level of detailed analysis. We recommend that the DEIR address this issue in more detail.</p>		<p>The proposed ALUP designates land uses that are consistent with the California Tidelands Trust. The Trust requires that the lands be used for statewide purpose; as specifically recognizing in the San Diego County Regional Airport Authority Act, the Airport serves this purpose.</p>

**From:** Warren Anne

**Sent:** Wednesday, January 30, 2008 3:20 PM

**To:** Bowens Thella; Anasis Theodore; alan bersin; anne sheehan; bob watkins; bi  
desmond; jim panknin; pedro orso-delgado; ramona finnilla; tony young; Zettel Cl

**Subject:** NECA Letter of Support for Draft EIR



**San Diego Chapter**

9350 Waxie Way  
Suite 540  
San Diego, CA 92123

ph. **858-571-6322**  
(858-571-NECA)

fax. 858-571-6323

January 28, 2008

Mr. Alan Bersin, Chairman  
Board of Directors  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Dear Mr. Bersin:

San Diego International Airport (SDIA) is a vital economic engine for our region. Not only does the Airport support the tourism industry, but also the business traveler and the San Diego resident who wants to travel for pleasure. The Airport also creates jobs – more than 100,000 are either directly or indirectly related to the airport. Almost \$10 billion per year is added to our local economy.

As a frequent flyer myself, I am always impressed with how convenient and accessible our airport is to the user. But, I can also see the growth in usage and the urgent need for its expansion in terms of capacity and efficiency.

It is that urgent need that compels the National Electrical Contractors Association, San Diego Chapter (NECA) to fully support the Draft Environmental Impact Report and its Preferred Alternative (10 new jet gates, airfield improvements, two-level roadway and parking garage at Terminal 2 and other enhancements). The elements of the project in the EIR that your Board will soon contemplate certifying are clearly what are needed at this time.

NECA sees this proposal as a worthwhile project unto itself, and an essential first step to helping meet demand for air transportation in the San Diego County region. We applaud the San Diego County Regional Airport Authority for moving forward with the Phase 1 of the Airport Master Plan and we look forward to participating in the ongoing effort to define the long-term vision for SDIA.

Sincerely,

  
Andrew Berg  
Executive Manager

cc: Members of the Board of Directors, Airport Authority  
Ms. Thella F. Bowens, CEO, Airport Authority  
Mr. Tedd Anasis, Manager-Airport Planning, Airport Authority

[www.necasandiego.org](http://www.necasandiego.org)

<b>National Electrical Contractors Association</b>		Signed by: Andrew Berg
Subject:	Comments on Draft Environmental Impact Report for the San Diego International Airport Master Plan	
Comment 1	Subject: Need for Proposed Project	Response
<p>San Diego International Airport (SDIA) is a vital economic engine for our region. Not only does the Airport support the tourism industry, but also the business traveler and the San Diego resident who wants to travel for pleasure. The Airport also creates jobs – more than 100,000 are either directly or indirectly related to the airport. Almost \$10 billion per year is added to our local economy.</p> <p>As a frequent flyer myself, I am always impressed with how convenient and accessible our airport is to the user. But, I can also see the growth in usage and the urgent need for its expansion in terms of capacity and efficiency.</p> <p>It is that urgent need that compels the National Electrical Contractors Association, San Diego Chapter (NECA) to fully support the Draft Environmental Impact Report and its Preferred Alternative (10 new jet gates, airfield improvements, two-level roadway and parking garage at Terminal 2 and other enhancements). The elements of the project in the EIR that your Board will soon contemplate certifying are clearly what are needed at this time.</p> <p>NECA sees this proposal as a worthwhile project unto itself, and an essential first step to helping meet demand for air transportation in the San Diego County region. We applaud the San Diego County Regional Airport Authority for moving forward with the Phase I of the Airport Master Plan and we look forward to participating in the ongoing effort to define the long-term vision for SDIA.</p>		Comment noted.

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### 1.9.1.3 Individual Comments and Responses

This section contains the comments from the public which are summarized and responded to in **Table 1-8**. The comments have been transcribed exactly as they were received and the response can be found accompanying the comment. Additionally, the original comments have been marked with a number corresponding them to the table. The originals of the comments can be found directly after the comment response table.

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	<b>Name</b>	<b>Date received</b>	<b>Method of Receipt</b>	<b>Subject</b>	<b>Comment</b>	<b>Response</b>
1	Darrell Roberson	October 9, 2007	Email	Second Runway	Why not fill in around Harbor Island, relocate the hotel, restaurants and marinas and construct a runway on Harbor Island?	The Proposed Project intends, within a time frame much shorter than that which would result from any relocation of SDIA, to make improvements to the existing facility. Consideration of alternative airport locations would have to be addressed through a different process—the Airport Site Selection Program. See Response to General Comment #1.
2	Wayne Smith	October 9, 2007	Email	Realignment/ Reconfiguration Proposal	For years the realignment/ reconfiguration of the San Diego Airport (Lindbergh Field) has been an ongoing problem. Instead of continuing to obtain MCAS Miramar, which will never happen, my ongoing concern and question is this: “Why has the MCRD adjacent to the airport ever been discussed or considered publicly?” My proposal is move the MCRD to Camp Pendleton where it should be and should have been years ago where most of the Marine training is done during and immediately after recruit training. With the MCRD relocated, Lindbergh Field can then be expanded thereby providing all the required area for the necessary infrastructure needed now and for many future generations. The bottom line is: The MCRD location is and has been the most logical for expansion/realignment/ reconfiguration of the current airport Lindbergh Field.	<p>The Proposed Project intends, within a time frame much shorter than that which would result from any relocation of SDIA, to make improvements to the existing facility. Consideration of alternative airport locations would have to be addressed through a different process—the Airport Site Selection Program. See Response to General Comment #1.</p> <p>Unless and until the Marine Corps determines to relocate MCRD, the SDCRAA has no ability to acquire or use that land. Therefore, this possibility would not be a feasible alternative.</p>
3	Chantal Saipe	October 10, 2007	Email	Future Plans	Please plan on a direct link to I-5 to avoid the current congestion on local roads and the convoluted route to I-5.	<p>The commenter’s proposal is appreciated, but there is no direct comment on the Draft EIR. The Proposed Project would not have any effects on I-5 and local roads different from what would occur without implementation of the Proposed Project.</p> <p>CEQA only requires mitigation for impacts caused by the Proposed Project.</p>

Table 1-8  
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(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
						Current congestion cannot be caused by a project not yet implemented.  See Response to General Comment #4.
4	Lance Murphy	October 17, 2007	Email	Airport Master Plan Draft EIR	The current <u>Environmental Page for the Draft EIR</u> has only the link to the primary volume, and excludes the figures and appendices. This has been a problem for several persons in my community that have requested internet access to this important and lengthy document. Although many items are hyperlinked to Figures in this document's online version – the time delays in accessing these links are un-workable.	The EIR is an extensive document, problems with linking are noted. Hard copies of the document were available at SDCRAA offices and local libraries if viewing the document from the website provided too cumbersome.
5	Lance Murphy	October 17, 2007	Email	Airport Master Plan Draft EIR	The 'Archives' section of the Airport website has now deleted the links to the prior 2006 Draft EIR and other documents which people have requested for comparing the two Draft EIR documents. In fact, the Airport Master Plan section of the "Archives" has only 2 citations—can there be any less information? This is unacceptable if the term "Archive" is to be understood as to the common English Definition: Archive (per Merriam-Webster): 1: a place in which public records or historical documents are preserved; <i>also</i> : the material preserved—often used in plural 2: a repository or collection especially of information	The October 2007 Draft EIR is the only EIR under review. The 2006 Draft EIR was removed to avoid confusion. Any comments provided herein should address the 2007 Draft EIR only.
6	Joe Varley	October 19, 2007	Email	Meeting Schedule Link	Draft Environmental Impact Report. "View meeting schedule". The VIEW meeting schedule does not show any meetings scheduled.	The "View meeting schedule" link has been removed from the website.
7	Ross Jarvis	October 21, 2007	Email	Multiple Project Impacts and Report-time	We have no evidence that these three projects [referring to SDIA Airport (20+ year) Master Plan's EIR, The Port Authority's Plan to narrow part of Harbor Drive, The plan to place the Nickelodeon "Sponge Bob" resort hotel	See Section 5.20, Cumulative Impacts, for consideration of other projects with potential to add impact cumulatively to the Proposed Project. . The following plans were considered in the cumulative

Table 1-8  
**Responses to Public Comments**  
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					<p>between the airport and Harbor Drive] are being looked at in concert with one another. This is a disaster in the making if allowed to proceed as is.</p>	<p>analysis:</p> <ul style="list-style-type: none"> <li>▪ City of San Diego General Plan</li> <li>▪ Community Plans/Precise Plans</li> <li>▪ SANDAG Regional Plans</li> <li>▪ Port of San Diego Plans</li> </ul> <p>The cumulative analysis summarized projections contained in adopted general plan or related planning documents where information on large proposed developments in the Airport vicinity was available. The adopted community plans and other planning documents applicable to the area surrounding SDIA define the general type and intensity of foreseeable future development to which the project's incremental impacts would be added to create cumulative impacts. These plans take into consideration projects that are proposed, planned and underway, as well as those that can be anticipated in the foreseeable future. CEQA does not require the analysis of speculative impacts. CEQA Guideline §15145.</p> <p>The EIR does include as background traffic, all forecasts of future traffic resulting from development of all plans and projects accepted by the San Diego City Council (presented in EIR Section 5.20). Including:</p> <ul style="list-style-type: none"> <li>▪ The Naval Training Center/Liberty Station Precise Plan which accounts for development of the Nickelodeon [Sponge Bob] resort hotel and mixed use commercial development that</li> </ul>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
						<ul style="list-style-type: none"> <li>▪ accounts for the Von's supermarket The Sunroad Harbor Island Hotel and Port Master Plan Amendment which includes the narrowing of Harbor Island Drive from 4 lanes to 3 lanes.</li> </ul> <p>Note the SDCRAA does not have authority to halt projects under review by the Port Authority.</p>
8	Ross Jarvis	October 21, 2007	Email	Extension Request	The Airport Authority has released their Draft EIR for the Master Plan expansion. It includes an immediate 10 gates and other improvements. They have also been discussing additional phases with 10 more gates to fully utilize the runway's maximum capacity, but that is not in the current Draft EIR. This new document is about 550 pages without the Addendum/Appendix. The public, both lay persons and professionals need more time to evaluate this document.	See Response to General Comment #2.
9	Ross Jarvis	October 21, 2007	Email	Traffic	There is no way that any traffic studies have taken these three projects as one with their total impacts. All three projects must be brought to the table together for public input plus an evaluation of the impacts of the Navy base (personnel) that is being moved from Texas to Point Loma. There is also the planned relocation of the Von's supermarket to Liberty Station.	<p>See response to your Comment # 7</p> <p>The EIR includes, as background traffic, all forecasts of future traffic resulting from development of all plans and projects accepted by the San Diego City Council as described in Section 5.20. See also EIR Section 5.3.7 for a discussion of cumulative traffic impacts.)</p>
10	Ross Jarvis	October 21, 2007	Email	Extension Request	Meanwhile, please address a letter to Mr. Ted Anasis requesting the original 120 day review period as was first promised by Mr. Boland at the September 12 <sup>th</sup> meeting at the Nazarene University.	See Response to General Comment #2.
11	Ross Jarvis	October 22, 2007	Letter	Runway Protection Zones	The FAA has guidelines and SDIA has an ALUCP that provides for displaying RPZs in the Airport Influence Area and the restrictions therein. The Master Plan projects increased activity and with that comes increased risks on	Please see Response to General Comment #8.

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>the ground in the RPZs. It is the ground level counterpart of the Sunroad debacle.</p> <p>The FAA is quite clear that even though SDIA does not own the land in the RPZ that they have specific obligations concerning it. The Master Plan slide presentations do not portray the RPZs nor do they indicate the restrictions there in.</p> <p>There already exists a direct violation in the Liberty Station RPZ and several proposed one. This authority abdicated its responsibility in addressing this when the Shoreline Plaza project was brought before the city council.</p> <p>The existing direct violation is a prohibited parking lot in direct alignment with the runway within the Western RPZ. The projected violations are places of assembly within existing buildings within the Western RPZ.</p> <p>The city's Development Services claims that the Airport Authority did not respond to the project within the allotted timeframe therefore this would signify approval and leave the Airport Authority Liable in the event of a crash in the RPZ.</p> <p>Both of these also come under the state utility codes with regard to airports and public safety.</p>	<p>The Airport works closely with the FAA to minimize risks related to structures or activities within RPZs. With respect to Liberty station, the City of San Diego approved that project and it was under construction prior to the creation of the SDCRAA. Therefore, the SDCRAA had no ability to affect that project.</p>
12	Ross Jarvis	October 22, 2007	Letter	Failure of coordination	<p>Secondly, is the failure of three public agencies to coordinate their projects that will all impact Harbor Drive traffic.</p> <p>SDIA's Airport Master Plan and its EIR do not</p>	<p>See your response to Comment #7.</p> <p>Construction impacts will be mitigated as feasible, and construction-related traffic</p>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>address the following.</p> <ul style="list-style-type: none"> <li>-The Port Authority's Plan to narrow part of Harbor Drive</li> <li>-The plan to place the Nickelodeon "Sponge Bob" resort hotel between the airport and Harbor drive immediately to the SE of the channel</li> <li>-The Navy closing a base in Texas and moving those personnel to Point Loma</li> <li>-The Von's grocery store that will be relocating to Liberty Station</li> </ul> <p>Initially a construction nightmare and a long term traffic mess on Harbor Drive.</p>	<p>impacts and mitigation are identified in Section 5.3.8 of the EIR.</p> <p>Construction impacts will be mitigated as feasible and construction related traffic impacts and mitigation is identified in Section 5.3.8 of the EIR.</p>
13	Ross Jarvis	October 22, 2007	Letter	Extension	Please act prudently to move the EIR to 120 days.	See Response to General Comment #2.
14	Ross Jarvis	October 22, 2007	Letter	Master Plan Slide presentation	[C]orrect the Master Plan Slide presentation to show the RPZ violations and notify the city of the same.	The commenter's proposal is appreciated, but there is no direct comment on the Draft EIR.
15	Joe Varley	October 22, 2007	Email	Traffic	<p>The report does not consider the impact on traffic and air quality by the addition of 10 gates at Terminal 2. The traffic plan alone is flawed and does not mitigate the increased impact of entry and exit traffic from 10 additional gates onto Harbor Drive BOTH westbound and eastbound.</p> <p>The report does not consider the increased traffic impact on westbound Harbor Drive to Rosecrans caused by the Airport Expansion,</p>	<p>The EIR addresses traffic and air quality impacts from the implementation of the Proposed Project in Section 5.3 (Traffic and Circulation), 5.5 (Air Quality), and 5.16 (Human Health Risk Assessment). Mitigation is provided within each of the sections as appropriate and feasible.</p> <p>EIR Section 5.3 assesses traffic impacts to North Harbor Drive both west and east of the Airport and Rosecrans resulting</p>

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					the Port District development in the ACH Plan as well as the impact from the Sponge Bob Hotel project.	from the Proposed Project. Background traffic also assumed traffic resulting from all community and agency plans including the Port of San Diego Master Plan and the Naval Training Center/ Liberty Station precise plan which includes the Nickelodeon (Sponge Bob) Hotel.  See also Response to Public Comment #7.
16	Joe Varley	October 22, 2007	Email	Cumulative Impacts	The report does not include the cumulative impact on noise, traffic and air quality caused by the Airport expansion and other development nearby but attempts to portray the Airport expansion as the only project in the area.  Why is the Port development and the City plans not considered in the overall results of traffic, noise, and air pollution?	See Section 5.20 for cumulative impact analysis and Response to Public Comment #12.  They are considered in the cumulative impacts section. See Section 5.20
17	Joe Varley	October 22, 2007	Email	Other Projects in the area	The report fails to consider or include any other projects in the area.  The report failed to contact the Port District and the City and NTC to become aware of the many currently planned projects that will impact the Airport plan and attempts to put out a report as a stand alone project which it is not.  As a result of that failure important environmental impacts were not identified and no mitigation plan is mentioned.	See Response to Public Comment #7.  Mitigation for each impact category is disclosed in Chapter 5 and is summarized in Table 1-5 within the Executive Summary. The EIR reflects the results of consultation with the City and the Port. NTC has been closed for years and is being redeveloped under approvals granted by City before was SDCRAA created.
18	Joe Varley	October 22, 2007	Email	Multiple Projects	The noise, traffic, and air quality and parking on Harbor drive will be impacted by the Airport Plan and when put in proper context with NTC, Spongebob Hotel, Port District narrowing of N.	The SDCRAA is only responsible for mitigation for the impacts caused by the Proposed Project. The EIR does include mitigation of the Proposed Project's

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					Harbor Drive, Port district plan for PLN Marina Green, Port District plan for Driscoll's Wharf, these impacts must be mitigated if the Airport Authority EIR is to be considered a realistic report based on all the information available.	impacts, as discussed throughout Chapter 5.  See Response to Public Comment #7. Planned development outside of SDCRAA's control is included in Section 5.20, Cumulative Impacts.
19	Joe Varley	October 22, 2007	Email	Traffic	The report appears to be aware of the impact the plan has on eastbound Harbor Drive traffic. The report fails to identify the increased bottleneck on eastbound traffic will severely increase west bound traffic searching for Rosecrans and Nimitz to escape the traffic jam and get to I-5 and I-8. Point Loma, Roseville, the Midway district will all be impacted but none of this is considered in this flawed report.  I urge the EIR to be rejected.	The traffic analysis presented in EIR, Section 5.3 accounts for traffic patterns surrounding the Airport. The existing split of traffic 85% east / 15% west on North Harbor Drive increases to 70% east / 30% west in 2030, partially due to increased congestion east of the airport. This results in increased traffic on Rosecrans and Nimitz.
20	John Karpinski	October 30, 2007	Email	Lindbergh Expansion	I have drawn a 100 gate/two runway scaled map of how Lindbergh could be expanded without any land acquired from MCRD. If interested please contact me at my home address.	Comment noted.
21	Paul Zablonty	November 1, 2007	Email	Trolley/Coaster	I would like to see the trolley connection to the terminals given a higher priority. I think that the trains should get people to the terminals within the first phase of the project.	The commenter's proposal is appreciated, but there is no direct comment on the Draft EIR. The extension of the Trolley or other fixed guideway is not part of this EIR but is the subject of future planning for the Airport in conjunction with MTS who owns and operates the Trolley.
22	Karen Voigt	November 5, 2007	Email	Lindbergh Field	I read the article in Sunday's Union Tribute (I-4) regarding proposed expansion of the airport terminal. I'd say we're putting some nice icing	Comment noted.

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					on a bad cake! Until we get more than one runway, we should make do with the terminals as they now exist.	
23	David Elmore	November 5, 20087	Email	San Diego Airport Planning	<p>I respectfully propose that a thoughtful, unbiased review of the San Diego Airport Planning program be undertaken. I have previously lived in Oxnard, N.Y., and Houston, and when moving to San Diego 4 years ago, found the city management approach to be ineffectual, emotional, and unable to focus and organize its problems. San Diego lacks a strong city manager, relying instead on city council, mayor, and commissions such as the airport planning group. For this reason, airport planners need to be particularly careful, strong, and do their homework in a scientific manner.</p> <p>I travel domestically and abroad, over 70,000 miles annually. I see a lot of innovative improvements in airport design, traveler management, and overall traffic flow. I am amazed by the lack of foresight by the airport planners in San Diego. The need for a safe, easy access, multiple runway airport is critical here. The current location, where the original airport existed for over half a century is not an adequate site for the type of facility that will soon be needed; and needed to grow over the next 50 years.</p> <p>While currently stressed with air traffic, San Diego International seeks to lure more intercontinental carriers to their airport, with attractive financial incentives (while the city deficit is burdensome). Likewise, closing our eyes, and hoping Tijuana or some other local area will step up to the plate with an adequate</p>	Comment noted.

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					<p>airport – is embarrassing.</p> <p>The idea of adding gates to the current single runway airport, located near a large portion of the cities residents – shuttling travelers from terminal to these additional airports... is such a horrible idea that I can't imagine who would support it, unless they received some form of kick back. What a frustrating, demeaning way to treat air travelers, and city residents.</p> <p>It is really time to decide to do things in a quality, correct fashion. Find a local site where a new airport of adequate size can be built, with future growth anticipated. There are already several areas with fairly good transportation access, and not too far from the city – and package this deal, and get started.</p>	<p>Please see General Response to Comment #1.</p>
24	James Gilhooly	November 6, 2007	Letter	Traffic	<p>The referenced EIR for the subject expansion has to be current not predicated on vintage projects. (The report is very similar to the America's CuP EIR made in 2000.)</p> <p>For example there are seven large city maintenance – navy and private development projects scheduled through 2010 in the Point Loma area. (Scott stream – Harbor Dr. North – Rosecrans – Shelter Island, etc, etc,) (See enclosure) The projects with their heavy construction trucks and equipment will cause disastrous congestion on the corridor serving roads to highways 805 &amp; 5 &amp; the airport.</p> <p>To complete the gridlock scenario the regional port authority are now planning the airport expansion. I took this time to peruse the Draft</p>	<p>The EIR for the Airport Master Plan was developed in 2006/2007 specifically for the Proposed Project and is not based on previous EIRs for Airport or other development.</p> <p>The SDCRAA is only responsible for mitigation for the impacts caused by the Proposed Project. The EIR does include mitigation of the Proposed Project's impacts, as discussed throughout Chapter 5.</p> <p>See Response to Public Comment #7. The EIR does not contain the quoted</p>

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					<p>EIR for the Airport. "All of the projected development in the Harbor Dr., Scott St, and Rosecrans areas <u>has been ignored.</u>"</p> <p>An environmental Impact Report has to reflect the potential negative/positive effects on the regional/business traffic, housing in the area surrounding the project; with a view to protecting the social, cultural, environmental, historic resources of the area to the greatest extent possible.</p> <p>The port should recognize the importance of maintaining favorable relations with the community; by ignoring the heavy project development in the area, the port clearly shows an indifferent attitude to the community.</p>	<p>language.</p> <p>The SDCRAA is the agency responsible for improvements at SDIA, not the Port.</p>
25	Catherine Kurland	November 8, 2007	Email	Drop-off passenger improvement	I would like to suggest the possibility of providing diagonal parking with exit lane in front of vehicle in the passenger drop-off areas rather than the current parallel parking—more efficient and much less frustrating. (Similar to St. Louis Lambert Airport)	The commenter's proposal is appreciated, but there is no direct comment on the Draft EIR.
26	Darrell Roberson	November 14, 2007	Email	Second Runway	Why not fill in around Harbor Island, relocate the marinas, Sheraton Hotel etc and build a runway there? Connecting taxiways can cross over Harbor Drive at each end of the runway. Since the approach path would be over downtown, use that runway only for takeoffs.	The Proposed Project intends, within a time frame much shorter than that which would result from any relocation of SDIA, to make improvements to the existing facility. Consideration of alternative airport locations would have to be addressed through a different process—the Airport Site Selection Program. See Response to General Comment #1.
27	Tom Stewart	November 26, 2007	Email	Missing Tables	We have noticed that "Section 5.19 Greenhouse Gas Emissions' of the October 2007 DEIR, in the first paragraph on page 5.19-3 refers to Tables E-64 through E-83 in Appendix E...' However, in the Appendix E posted on the website, tables for 'Part I Air Quality" end at Table E-52 (hardcopy page E-	The commenter is correct the pages cited were inadvertently left out of the initial document but were provided on November 26, 2007. The tables referenced are summarized in Tables in Tables 5-19.1 and 5-19.2.

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					45 or PDF page 52 of 207) and then it goes into "Part II Construction Emissions". Apparently table E-53 through at least Table E-83 were inadvertently left out of the posted Appendix E. If you could locate the missing pages/tables and email them to us as soon as you can we would appreciate it.	
28	Bill Ingram	November 26, 2007	Email	Requesting Extension	Due to the 2000 pages of the EIR, I believe it is in the [b]est interest of the community and the planning groups to have the full 120 days to examin[e] and make comment on the content of the EIR. It is appreciated that it was extended to 90 days.	See response to General Comment #2.
29	Marylou LoPreste	December 3, 2007	Email	Overgrowth,  Noise, and  Air Quality	<p>As a long time resident of Point Loma, over 30 years, and business owner, Fisherman's Landing, Sun Harbor Marina, I feel I am very qualified to comment on the EIR for the airport expansion. I am the first to admit that I love the convenience of the airport as I live in La Playa and have only a 10 minute commute to the airport.</p> <p>However, I am also seeing many other indicators of over-growth that really detracts from the convenience of the airport. My neighborhood used to be a peaceful and quiet neighborhood. However in recent year, the sound of aircraft starts at 7 AM and goes into the night. The dust and grit from the exhausts of the planes goes everywhere. The air quality is not the best for one living on the water. An airport does NOT belong in residential areas! The traffic on Harbor Drive today is awful, with the cruise ships and the airports combined. Why is there no talk of the growth factor? Why do we continue to build and build thereby detracting the quality of life?</p>	The commenter's proposal is appreciated, but there is no direct comment on the Draft EIR.

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					I strongly oppose any kind of expansion of the airport and really think it is time to get off the stick and find another area, away from homes and schools to build an airport for the future.	
30	James Whalen	December 6, 2007	Letter	Phase 1 Airport Master Plan	<p>This letter is regarding the San Diego International Airport Phase I Airport Master Plan Draft Environmental Impact Report of October, 2007. The Master Plan calls for the building of 10 additional airline gates at the western end of Terminal 2, and a new terminal for private planes on the east side of the airfield. However, the EIR fails to adequately address the increased number of flights the airport will have once these renovations are made.</p> <p>Please provide information on why there are no planned mitigation measures for these additional flights.</p>	<p>Chapter 1.6 of the Draft EIR, Environmental Effects and Mitigation Measures presents a summary of environmental effects and mitigation measures associated with the proposed project. Further detail regarding mitigation measures can be located in Chapter 5 of the Draft EIR, Environmental Setting, Consequences, and Mitigation Measures.</p> <p>Implementation of the AMP will not cause any additional flights. The number of flights is limited by the Airport's single runway.</p> <p>See also Response to General Comment #7.</p>
31	Ross Jarvis	February 4, 2008	Letter	Executive Summary	<p>The subject Environmental Impact Report <b>was not developed</b> in accordance with the California Environmental quality Act Public Resources Code et. Seq. Section 21003 (b), (c), and (f); Section 21083 (1), (2), and (3); Section 21100 (2) (A) &amp; (B), and (4).</p> <p>Furthermore under California cod Regulation Title 14 15000-15387 Article 3 Section 15042 the Airport Authority board has the authority and therefore the legal responsibility to disapprove the subject project based upon, "significant effects upon the environment that would occur if the project were approved as proposed."</p> <p>Based upon the subject EIR's own Executive</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter.</p> <p>Please see Response to Comment #15 in the Peninsula Community Planning Comments."</p>

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					Summary Table 1-1 and 1-2 they project increased passengers and a need for a parking garage which means increased flights and increased vehicular ground transportation. Both of the foregoing will unequivocally result in environmentally detrimental increased air and noise pollution. The both have already been clinically identified as contributing to or causing health problems in school children. Under Title 114 Article 10 Section 15141 the voluminous hard copy subject draft E.I.R is in gross violation of the spirit of this declaration. Section 15142 under the requirements of interdisciplinary approach the subject EIR fails to responsibly place adequate weight upon the qualitative factors and places too much emphasis on quantitative, economic and technical factors. Section 15143 reinforces that the emphasis of the EIR should be upon, "the significant effects on the environment."	
32	Ross Jarvis	February 4, 2008	Letter	CEQA requirements	<p>"California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an object, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT"</p> <p>The preceding statement indicates that the</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #16 in the Peninsula Community Planning Comments."</p>

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					<p>Airport Master Plan under CEQA required an EIR due to potential (may have), "significant environmental impacts." [CEQA Section 15064 (a) (1)]</p> <p>By virtue of the fact that the Airport Authority did not exercise CEQA Art. 1 section 15002 (f) (2) it moves to the level of affirming that the subject Airport Master Plan proposal <b>does have significant environmental impacts.</b></p>	
33	Ross Jarvis	February 4, 2008	Letter	Convolutel Text/environmental analysis	<p>"The Draft Environmental Impact Report issues by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #17 in the Peninsula Community Planning Comments."</p>

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					<p>Regional Airport Authority.”</p> <p>The preceding text is convoluted. On one hand it implies that sequential phases of development at Lindbergh field will take place if the initial one is approved and the environmental analysis anticipates this. It then implies that the cumulative environmental impacts would have to be evaluated in the future. It infers that the long range phase impacts have not been evaluated. Typically this would give weight to the future argument that phase one, if approved, has already compromised the environment. Therefore the then monetary investment in the Phase One terminal expansion should not be compromised by not proceeding with the remaining phases despite their cumulatively increased impacts upon the environment.</p>	
34	Ross Jarvis	February 4, 2008	Letter	Lindbergh Field safety	<p>The last sentence in the above paragraph [Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport’s proximity within two miles from Downtown San Diego] presents but one of the strongest arguments <b>for not proceeding</b> with the proposed subject airport expansion at Lindbergh Field from both the environmental and economic standpoints. Surrounding area density represents an increased threat environmentally to residents from increased air pollution, noise pollution, and safety. The last of these across the nation and as pointed out more recently here in San Diego on January 16<sup>th</sup> at Lindbergh Field (Source: Union-Tribune January 23, 2008) as a consequence of overworked air traffic controllers and the resulting incidents.</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #18 in the Peninsula Community Planning Comments.”</p>

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35	Ross Jarvis	February 4, 2008	Letter	Section 1.1/ Runway Protection Zones	<p>“San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has 2 single 9,401-foot-long 200-foot-wide east-west runways, making it the busiest single-runway commercial airport in the nation. San Diego International Airport’s air service continues to grow based upon the growing region’s demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project”</p> <p>This second paragraph under 1.1 makes an irrefutable case for <b>not pursuing</b> the proposed project. It is already the busiest single-runway commercial airport in the world. Not mentioned but its approach and departure, RPZ’s also make it among the most dangerous both to the aircraft and those upon the ground. Most recently (January 3, 2008) the S.D. Airport Authority approved human occupancy uses in the Shoreline Plaza area of liberty Station in direct violation of Federal, State and their own ALUCP guidelines. Prior military use and their occupancy and the right of municipalities to over rule Airport Authorities land use decisions does not extend the legal right for the Airport Authority to compromise it’s responsibility under the Federal, State and it’s own ALUCP guidelines. As a consequence the proposed project elevates the level of environmental impacts of which more important are health and safety hazards.</p>	See Response to Peninsula Community Planning Board in Planning Group Comments letters (Ross Jarvis) Comment #19.
36	Ross Jarvis	February 4, 2008	Letter	Airport Property land trust	<p>“The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County</p>	This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #20 in the Peninsula Community Planning

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					<p>Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use."</p> <p>According to the trust wording stated above the trust lands (original? Subsequently acquired? Or both?) are to sever, "a statewide public purpose." That could be a park, golf course, or in this city it could be condemned and blushed and hotels build there. Furthermore the FAA is empowered to shut and airport down for various reasons which would void the airport usage.</p>	Comments."
37	Ross Jarvis	February 4, 2008	Letter	Failure to fulfill legal obligations under S.D.C.R.A.A. Act of 2002	"San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of supervisors. The Port District's purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a	This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #21 in the Peninsula Community Planning Comments."

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					<p>local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.”</p> <p>“The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.”</p> <p>Paragraph one indicates that the current Airport Authority has failed to fulfill it’s legal</p>	

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					obligations under S.D.C.R.A.A. Act of 2002 regarding the requirement to conduct and airport site selection program to identify a long term regional airport solution.	
38	Ross Jarvis	February 4, 2008	Letter	Section 1.1.2	<p>Items 1-6 in 1.1.2, primarily are economic arguments for continued development of Lindbergh Field. As such under CEQA EIR guidelines they are not valid for consideration except as to their adverse environmental impacts upon the broader areas of airport influence. Item 7, with regard to public input as indicated in 1.8 table 1-6, there were only 21 responses to the May 2006 Draft EIR. None of these are indicated to have been from private citizens and only two were from community planning groups. The limited response brings into question the level of public outreach. The public meeting held at Portuguese hall in Point Loma in 2006 met with resounding opposition to the Lindbergh Field Airport Master Plan, yet there is no mention of it.</p> <p>Item 8 in 1.1.2 needs little consideration. Anyone with common sense would acknowledge from their own observations and countless documents published by the S.D. Airport Authority in 2006 and preceding years that Lindbergh Field has been and is incompatible with surrounding land uses primarily for the reasons indicated in Executive Summary 1.8 Figure 1-1 (The following represents approximately 3/4<sup>th</sup> of the volume of concerns.)</p> <ol style="list-style-type: none"> <li>1. Human Health Risk</li> <li>2. Noise</li> <li>3. Traffic</li> </ol>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #22 in the Peninsula Community Planning Comments."</p>

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					<p>4. Air Quality</p> <p>In addition to the preceding are the terrain and obstructions (Briefing paper SDCRAA May 16, 2006 page 6)</p>	
39	Ross Jarvis	February 4, 2008	Letter	Relocation	<p>“From 2003 to November, the Airport Authority conducted a comprehensive study of relocating the region’s primary commercial airport or enhancing San Diego International Airport’s capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Selection Program process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The votes of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego’s long-term transportation needs.</p> <p>The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process.”</p> <p>The then Airport Authority did not authorize an exhaustive study of relocating the regions primary commercial airport. Exhaustive in that the study encompassed the absurd (proposal 6) to the ridiculous i.e. desert sites requiring unaffordable high speed transit and a declining</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #23 in the Peninsula Community Planning Comments.”</p>

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					<p>customer base. Unfortunately what the voters turned down in 2006 was not the potential use of Camp Elliot but an ill conceived joint use proposal of MCAS (West) Miramar which was associated with the ballot. This ballot defeat has been misconstrued as authorizing the discontinuance of seeing relocation for long term needs and pouring money into an environmentally unsound expansion of SDIA for relatively short term use. In 2007 an airport authority board member is reported to have stated at a public meeting at the Point Loma Nazarene University that State Senator Chris Kehoe's bill banned the continued site selection process. At a subsequent Peninsula Community Planning Board meeting a representative of Senator Kehoe flatly denied that accusation. The last paragraph indicates an incremental improvement program of improvements (expansion) of the present SDIA. To the public impacted by the airport this equates to a stealth approach.</p> <p>The SDCRAA needs to get back on course and look into relocating the International Airport more than ten years ago the postal service relocated their mail processing center to North County in anticipation that a new airport would be located near there. The Navy vacated Miramar and in like manner the Marines could also. To argue that Miramar is essential to national defense may be likened to the French depending upon the Maginot Line in WWII. When the Marines were displaced from El Toro they wanted to go to March Airforce Base. The Navy facing economic cutbacks hut up trading their land rights for other benefits as exemplified by the Navy/Manchester deal at downtown San</p>	

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					Diego. Developers want East Miramar. When it goes there goes the best location for San Diego's new International airport. The major pluses are it is largely open space, already has public transit (rail) nearby and the Marines would have almost 15 years to relocate.	
40	Ross Jarvis	February 4, 2008	Letter	Effect of economic fallout on forecast	<p>"The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issues by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030.</p> <p>The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&amp;E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration's 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first full years after the forecast was completed. Because</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #24 in the Peninsula Community Planning Comments."</p>

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					<p>the trend as San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in Table 1-1.”</p> <p>Just as September 11, 2001 had a negative impact upon air travel so will the current economic fallout impact air travel projections based upon 2004 data. The major difference is that the current crisis will very likely have a much longer duration due to the combination of inflationary impacts of fuel across the spectrum of the economy and the subprime mortgage collapse impact also upon a broad range of the economy. The SH&amp;E Aviation Activity Forecast of 2004 and the use of, “tracking above the high growth scenario” as indicated above coupled with the recent economic events make the data in 1.1.4 Table 1-1 questionable at the best and more than likely invalid.</p>	
41	Ross Jarvis	February 4, 2008	Letter	Section 1.1.4/need for relocation	<p>“...be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack...”</p> <p>The preceding statement of accommodation until 2002 in 1.1.4 would appear to compromise much of the argument for any expansion at Lindbergh Field especially in terms of long term demand and it's overriding need for relocation. The additional delays resulting from high congestion are speculative over the short term (2015) due to economic factors mentioned.</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #25 in the Peninsula Community Planning Comments.”</p>

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42	Ross Jarvis	February 4, 2008	Letter	Transit Center and current facilities	<p>“The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:</p> <ol style="list-style-type: none"> <li>1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.</li> <li>2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.</li> <li>3. Provide for future public transit options in airport land use planning. “</li> </ol> <p>Under 1.2 (1.) above air service demand as stated in earlier comments (1.1.4) is based upon outdated and optimistic data (2004-2006) and does not reflect current adverse events (2007-2008). The elements touted are largely ones of economic benefit and per CEQA no relevant to an EIR excepting their negative environmental impacts. (2.) The current facilities are incompatible with surrounding land use i.e. densely populated with large commercial areas and the city plan to increase population density in the urban areas. (3.) Providing for future public transit options in</p>	<p>This comment is a duplicate of one provided by Jarvis Ross in the Peninsula Community Planning Board letter. Please see Response to Comment #24 in the Peninsula Community Planning Comments.”</p> <p>Also see response to your comment #40</p>

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					<p>ALUP at Lindbergh Field is full of sound and theory but signifies nothing in terms of reality. (as exemplified by MTS's light rail proposal from Old Town to University City)</p> <p>Furthermore Ms. Rosa Munoz, PE Utilities Engineer, Public Utilities Commission letter to SDCRAA Staff member Ted Anasis of February 16, 2006 raised serious issues regarding the transit proposals. As a transit center is being used as leverage for approval of phase one it should be reviewed and be subject to approval by the Public Utilities commission <b>prior to approval of the subject EIR.</b></p>	<p>Ms. Munoz's letter refers to the safety of railroad crossings, and safety improvements of the type proposed are not within the Authority's control or ability to implement. Inclusion of an intermodal transit center in the Airport Land Use Plan is not the type of rail system referenced in Ms. Munoz's NOP 2006 comment letter.</p>
43	Ross Jarvis	February 4, 2008	Letter	Airport Land Use Plan	<p>"The San Diego County Regional Airport Authority proposes to adopt an Airport Land Use Plan that:</p> <ul style="list-style-type: none"> <li>-Depicts the boundaries of San Diego International Airport; and</li> <li>-Designates the land uses on the Airport."</li> </ul> <p>The Proposed Airport Land Use Plan is a policy document only. The Proposed Airport Land Use Plan is a figure that depicts the properties and boundaries under the planning jurisdiction of San Diego County Regional Airport Authority."</p> <p>The preceding statements may be interpreted as in direct violation of the intent of an Airport Land Use Plan under State and Federal guidelines. An ALUP is subordinated and subject to the provisions in its ALUCP. Due to the small amount of available acreage and its site location observance of the 2004 ALUCP is</p>	<p>The Airport Land Use Plan proposed in this EIR is necessary for on airport land use planning. The entire airport property is available for airport uses. Designating specific uses in no way hinders the Airport Land Use Commission from its mission of seeking compatible land uses in vicinity of the Airport. Specifically the Commission is concerned with off-airport land use control. The powers of the Commission are not meant to give the Commission jurisdiction over the operation of the Airport.</p> <p>See response to General Response #8 regarding the RPZ comment.</p>

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					critical yet it is not mentioned in the Executive Summary. The maps used in the EIR depicting the airport are grossly negligent in failing to include the RPZs. The Airport Master Plan will have direct and escalated safety concerns in these areas.	
44	Ross Jarvis	February 4, 2008	Letter	Compromised guidelines, Runway Protection Zones	<p>“The Proposed Airport Land Use Plan is a program level planning guide to ensure that Airport facilities are planning with thought and foresight to serve the greatest number of Airport users. With limited physical space available for Airport purposes, the Proposed Airport Land Use Plan guides and groups similar Airport uses to insure compatible, shared, and orderly development of Airport facilities. The adoption of the Proposed Airport Land Use Plan may incorporate mitigation measures that would be requirements and conditions for future projects to reduce environmental impacts. In addition, the Proposed Airport Land Use Plan may be modified or amended in the future to respond to changes in the demand for Airport facilities as identified in future passenger, operations, and cargo forecasts.”</p> <p>The first sentence in the above paragraph highlights the overriding consideration given to the economic impacts as opposed to the environmental impacts in this EIR. The current Airport Authority has already compromised the FAA, the State and its own ALUCP guidelines in its sanctioning occupancy (safety) violations in the RPZ of adjoining Liberty Station. Increased activity (flights) will incur unmitigatable adverse safety, air quality and noise impacts upon the communities surrounding Lindbergh Field. The speculative reduction in noise from planes is subject to the</p>	The selected test merely describes the intent of the Airport Land Use Plan and its associated policies. It does not give economic considerations priority over environmental impacts. The environmental impacts of the Airport Land Use Plan are described in Chapter 5 of the Draft EIR.

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					<p>economic conditions of the individual airlines which has generally been unfavorable to the majors in recent years.</p> <p>There is escalating concerns about safety around airports due to concerns about air traffic controllers being in short supply and their resulting fatigue (Union-Tribune 2/4/2008)</p>	<p>The SDCRAA does not control the airspace attached to SDIA, the FAA does. The FAA's mission is to safely move aircraft through the national airspace.</p>
45	Ross Jarvis	February 4, 2008	Letter	Need for relocation	<p>"The Proposed Airport Land Use Plan designates properties that are contemplated by the San Diego County Regional Airport Authority to be used for future Airport purposes. The former Teledyne Ryan property generally located between the Airport and North Harbor Drive, south of Taxiway B and east of the Commuter Terminal is depicted for use as airfield, ground transportation, and airport support. Until such time as the area is remediated and determined available for development the land use can not be specifically determined. Once the remediation is complete, the San Diego County Regional Airport Authority will develop specific project improvements consistent with the Proposed Airport Land Use Plan and conduct an environmental analysis at a PROJECT level for any airport facilities proposed to be constructed and operated."</p> <p>The above paragraph further supports the airport impacted public in surrounding communities concerns of a stealth approach in the future Lindbergh Field expansion rather than the timely initiation of relocation.</p>	<p>The SDCRAA has completed the review of proposed improvements at SDIA in a forthright manner responding to all applicable regulations required for environmental review of the Proposed Project. See also Response to General Comment #1.</p>
46	Ross Jarvis	February 4, 2008	Letter	Air Quality, Table 1-4	<p>"The Airport Implementation Plan (with Parking Structure) would include PROJECT-level approvals for those elements that are to be designed and constructed through 2012 and</p>	<p>The commenter is correct.</p> <p>The air quality analysis presented in the EIR represents the total predicted</p>

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					<p>operate through 2015 and..."</p> <p>The basic premise of an onsite parking structure defeats alternate transit and environmental air quality control. As indicated above [see comment in appendix for map] there are no air quality monitoring stations in the proximity of Lindbergh Field. The subject map is furnished by the state Air Resources Board may be found at:  <a href="http://www.arb.ca.gov/aqd/metrpt/sd.pdf">http://www.arb.ca.gov/aqd/metrpt/sd.pdf</a></p> <p>Note that the monitors to the South all lie to the windward side of the freeway and thereby do not reflect the worst vehicular emissions.</p> <p>Out of 25 cities with the worst air pollution in the USA Forbes ranks San Diego number 8. Ultra-fine particulate matter has been linked with premature death, cardiovascular disease and respiratory illness, according to the California Air Resources Board. Though it takes Americans an average of 25 minutes to drive to work (or an airport), according to 2005 U.S. Census Bureau figures the board estimates that over 50% of a person's daily exposure to ultra-fine particles can occur during a commute. Likewise, a 2005 study by researchers at the University of Southern California's Keck School of Medicine showed that long-term exposure to ambient particulate matter may contribute to atherosclerosis, the hardening and narrowing of the arteries. This contradicts the conclusions of "less than significant" drawn in the Summary of Environmental Effects in 1.6 Table 1-4.</p>	<p>ambient (i.e., outside) concentrations of the U.S. EPA "criteria" pollutants, as estimated from dispersion models with "background" concentrations (as measured from nearby downtown air monitoring stations) added. Background concentrations reflect the emissions from other nearby sources not accounted for in the dispersion modeling analysis. Importantly, the airport and the adjoining roadway network (including the freeway) were included. The dispersion models also account for the dispersal (or "drift") of emissions from nearby off-site sources, including the freeway based on real-world meteorological conditions. See Section 5.5.5 and Appendix E, Air Quality.</p> <p>Moreover, the background concentrations used are the maximum values observed during the past three years at the downtown monitoring sites. When combined with the dispersion modeling results, the reported values represent conservatively-high concentrations and some "double-counting" of emission sources. Finally, the downtown urban environment concentrations tend to be higher than the area near the Airport. Therefore, use of airport monitoring is not necessary to reasonably estimate future pollutant levels.</p> <p>As discussed in Section 5.5.6, Impact Analysis the differences in total emissions (as opposed to ambient concentrations) between the Proposed</p>

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						<p>Project (Preferred Alternative) - Airport Implementation Plan and the Baseline Conditions No Project Alternative exceed the CEQA thresholds for NO<sub>x</sub> in 2030. This outcome is due to the forecasted growth in operations at SDIA over this timeframe, with or without the planned improvements. The exceedance in NO<sub>x</sub> is produced extensively by operations that are not controlled by the SDCRAA (i.e. increased aircraft operations). These pollutants could potentially be reduced by reduced flights or use of aircraft that generate less NO<sub>x</sub> emissions however these types of mitigation are not feasible because the SDCRAA cannot implement them. Because the SDCRAA can not apply these types of mitigation to reduce this specific pollutant this impact for the Airport Implementation Plan in 2030 is considered unavoidable. However, mitigation measures to reduce the effects of hazardous air pollutants defined in Section 5.16 will also serve to reduce NO<sub>x</sub> emissions.</p> <p>Additionally as shown in the EIR in Section 5.5.6, the Proposed Airport Implementation Plan (and Alternative) is expected to “contribute significantly” to projected violations for the NO<sub>2</sub> (1 hour averaging time) standard in 2030. The Proposed Airport Land Use Plan, considered on a program level, also exceeds the NO<sub>2</sub> (1 hour averaging time) significance threshold for 2030 due specifically to increased vehicular traffic. As the elements of the Proposed Airport Land Use Plan become specific projects</p>

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						<p>they will undergo project level analysis within CEQA documentation to determine specific impacts and potential mitigation. For the year 2010, 2015, and 2030 the Project will not contribute significantly to a projected violation as the No Project Alternative exceeds the CAAQS criteria for PM<sub>10</sub> and PM<sub>2.5</sub> and the concentrations of these pollutants remains practically the same between the No Project Alternative and the Project alternatives. See Section 5.5 pages 36-37.</p> <p>Under the Airline Deregulation Act, airport operators such as the SDCRAA have no legislative authority to either spread out operations or control airport operational levels. Airlines set their own schedules to meet passenger demand. Thus, increases in air pollutants are unavoidable as operations increase. The SDCRAA has indicated mitigation measures aimed are mitigation human health risk impacts that are within the authority of the SDCRAA in Section 5.16.9. Those mitigation measures will also reduce air quality impacts. The EIR also contains mitigation measures and additional actions that will reduce the air quality impact of the Proposed Airport Implementation Plan including measures related to construction and operational activities. However, these mitigation measures are unlikely to reduce the air quality impacts to less than significant. Thus, even after the implementation of all feasible mitigation measures as identified in this EIR, the air quality impacts for the</p>

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						Proposed Airport Implementation Plan are considered under CEQA to be significant but unavoidable.
47	Ross Jarvis	February 4, 2008	Letter	Table 1-3, Section 1.4.1	<p>[See Table 1-3 in Section 1.4.1]</p> <p>The above is a classical case of creating a false premise (that relocation would have to be completed by 2015) to justify an end result. There is no environmental prerequisite for this timeline. It is purely conjecture and based upon theoretical economics.</p> <p>There is ample Airport Authority documentation that supported looking at alternate sites in 2006 on the assumption that construction would not be completed for approximately 15 years (2021). One or two years later to claim it is unfeasible, is ludicrous. February 4, 2008 is an abdication of the responsibility of the SDCRAA to continue to look for a new location.</p>	<p>The Proposed Project is necessary at this time to provide for a better level of service efficiency and safety for operations at SDIA through 2015 at a level of service that the public expects at SDIA. Without the proposed improvements the airport experience for travels will be diminished and operations more expensive and inefficient. See response to Peninsula Community Planning, comment #29 by Bill Ingram in the Agency Responses.</p> <p>See Response to General Comment #1.</p>
48	Ross Jarvis	January 4, 2008	Letter	Section 1.5, specifically the list of environmental areas to be studied in further detail in Chapter Five	<p>The summation of Noise, Land use planning, Traffic and Circulation, Air Quality, Human Health Risk Assessment, and Cumulative effects as being "Effects Found Not to be Significant" is both ludicrous and irresponsible.</p> <p>To attempt to justify them in 1.7 by stating that they would occur anyways is again overlooking the necessity for relocating the airport.</p>	<p>Comment noted.</p> <p>See Response to General Comment #1.</p>
49	John French	January 9, 2008	Email	Increased traffic: mitigation and future impacts	<p>As a resident of the Hillcrest community I am acutely aware of the near round the clock congestion on Laurel, Kettner and other streets leading to the Harbor Drive approach to the Airport. A reasonably diligent review of the EIR revealed no mention of this airport related congestion. I trust that you are attending to this issue and will implement</p>	<p>EIR Section 5.3 presents traffic analysis for the Proposed Project and includes streets, intersections and freeways surrounding the airport, including Laurel and Kettner Boulevard. Mitigation for significant impacts resulting from the implementation of the Proposed Project are identified in Section 5.3.8.</p>

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					some actions to mitigate the current and future impacts.	
50	James Frost	January 9, 2008	Letter	Section 2.2.2	<p>It is not clear why the traffic forecast and EIR are projected to 2030 while facilities are projected to fulfill needs only to 2015. If the EIR is meant to cover the period to 2030, the impact of expanding and operating facilities must likewise be to 2030.</p> <p>The EIR states that airport capacity is constrained by runway capacity. While this may be true for aircraft operations, the use of larger aircraft over time to serve increasing passenger demand will generate an ever growing number of passengers which will require increased terminal facilities to serve both passengers and aircraft. The proposed expansion covers only operation and passenger growth until 2015 while the EIR implies that the airport will continue operations at least until 2030. The EIR should be amended to cover the effects of necessary facility expansion for the period from 2015 to 2030.</p>	<p>As stated in Section 2.2.2 of the EIR, the analysis was extended to 2030 for purposes of matching the timeframe employed by other agencies for regional transportation planning. Because the improvements to the Airport beyond 2015 were only programmatically reviewed in the current Airport Master Plan, improvements needed for continued viability of the Airport need to be fully vetted prior to environmental review.</p> <p>The SDCRAA initiated the next phase of planning for SDIA in February 2008 (Vision Plan). The findings of the Vision Plan will be reviewed environmentally in the future.</p>
51	James Frost	January 9, 2008	Letter	Section 2.2.2	<p>The ultimate "capacity" of the airport must be defined to include both maximum runway operations and maximum passengers that can be accommodated in the largest possible aircraft mix.</p>	<p>There are many variables that determine an airport's capacity including landside components, terminal components, and airside components such as the runway. However, the airport's ultimate capacity is determined by the least capacious component of the entire system. At SAN, this has been established as the runway. Further, the most capacious mix of aircraft may not necessarily include the largest actual aircraft as larger aircraft require more separation both on the ground and in the air reducing their total numbers.</p>

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52	James Frost	January 9, 2008	Letter	Section 2.2.2	The Summary of Annual Forecasts indicates that design peak hour passenger projections were not determined or included. It is difficult to understand how facilities can be properly sized without this critical number.	<p>The EIR analysis is based on an annual average day. Peak hours are accounted for within this average day. See tables 2-9 through 2-20 for peak hours (look within the Total Aircraft Operations column).</p> <p>Exhibit 5-3 of the San Diego International Airport Aviation Activity Forecast prepared by SH&amp;E published in 2004 and approved by the FAA in 2005 indicates that there is no real variation on a monthly or seasonal basis of operations at SDIA. Specifically the flight schedule is consistent through out the year. For development of the forecast the average day was used for the full year unlike other airports that would consider a peak month for facility analysis. A maximum day is not analyzed in the EIR as annual average day is meant to incorporate the small peaks and valleys of operations experienced at SDIA.</p>
53	James Frost	January 9, 2008	Letter	Section 3.0	<p>While the EIR states that its objective is to “assess the environmental impact of the proposed Master Plan projects with significant effects”, there is no analysis of whether the proposed projects themselves are the most desirable solution for current and future airport expansion programs.</p> <p>Initially, the Airport authority must clearly establish what levels of service are desired and economically feasible for current and future timeframes for both landside and airside services. In order to make an intelligent analysis, the costs, economic impacts and acceptable levels of inconvenience must be</p>	<p>The Airport Master Plan, which is incorporated into the Draft EIR by reference, analyzed the projects incorporated into the Proposed Project to accommodate the current and future requirements of SDIA.</p> <p>For a discussion on levels of service, please see Chapter 2 of the Airport Master Plan, Goals &amp; Objectives, for a discussion of the desired levels of service</p>

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					documented for various scenarios. In the EIR there is no indication that this has been done other than vague statements that some delays and inconvenience may be associated with various proposals.	at the airport.  For a discussion of costs, see Table 9-2, Terminal Alternatives Cost Comparison, in Chapter 9 of the Airport Master Plan.  For further discussion on the evaluation of concepts and alternatives please see Chapters 8 and 9 of the Airport Master Plan regarding concept development and evaluation.
54	James Frost	January 9, 2008	Letter	Section 3.0	<p>There are only two principal proposals presented for airport development in the EIR: essentially all or nothing. The possibility of a North Terminal is dismissed out of hand as unworkable. The “all” proposal, and its derivatives, envision the airside build out to maximum runway operational capacity combined with landside terminal development on the south to match (expanded terminals, aircraft parking/gates, parking garages, and two level curbs). The “Nothing” proposal is exactly that: retaining the existing facilities and nothing in the way of additional development. Both options as presented are unrealistic.</p> <p>The “All” proposal, while it maximizes airport capacity, passenger convenience and minimizes operational delays, comes at a significant cost, perhaps in the range of \$600 million or more depending on what road works are included. No economic analysis is presented to justify this expenditure. The “nothing” proposal likewise has no economic analysis of the very real costs of delay, inconvenience and the mandatory replacement of critical airport elements simply because they</p>	<p>One objective of the Proposed Project is to accommodate near-term facility requirements at the level of service established in the Airport Master Plan goals and objectives (Chapter 2). The proposed improvements will be needed regardless of future needs that will be defined in the next phase of airport planning.</p> <p>Commenter is correct that the EIR considered what the environmental conditions would be in the absence of project implementation. This is required by the CEQA Guidelines. The CEQA Guidelines require evaluation of a “no project” Alternative. CEQA Guidelines § 15126.6(e).</p>

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					<p>wear out over time.</p> <p>In summary, to make an intelligent evaluation of the proposed airport development proposals, a complete evaluation of each proposal must be made including: the physical (airport land use plan), landside facilities, the airside operational aspects, and the economic costs. Only then can a comprehensive, meaningful and comparative EIR be prepared. History has shown in airport development planning that there is usually a better way than “All” or “Nothing” proposals. It consists of examining the “Middle Ground” between the two extremes. There is no evidence that this has been done.</p>	<p>The AMP thoughtfully contemplated the specific improvements necessary to provide an adequate LOS at the Airport through 2015, and to that end reviewed landside and airside facilities. The Airport Land Use Plan considered in the EIR contemplates land use designations to meet demand beyond 2015 but only in a programmatic manner. Multiple concepts were review in order to determine the specifics of the Proposed Project. The EIR is intended to describe the environmental impacts of the project. The economic analysis of the project rests with the SDCRAA but does not influence the environmental analysis.</p>
55	James Frost	January 9, 2008	Letter	Section 4.0; level of airfield operational service	<p>Determine what are acceptable levels of delay.</p> <p>Propose options, such as auctioning landing slots, to spread peak hour operations.</p> <p>Investigate impact of peak hour spreading related to increased total overall operations capacity.</p> <p>Determine effect of limited/diverting general aviation traffic to other airports.</p> <p>Develop multiple scenarios for both directions of runway use (RW27 and RW9)</p>	<p>According to the FAA’s Airport Benefit Cost Analysis Guidance, “Average delay per operation of 10 minutes or more may be considered severe.” However, “acceptable” delay may vary from airport to airport due to the many variables associated with airport capacity and delay. The SDIA forecast, San Diego Aviation Activity Forecasts developed by SH&amp;E and approved by the FAA, indicates that with 294,200 annual operations during good weather conditions the average delay per operation will be 20.1 minutes; this level of delay will be unacceptable.</p> <p>The FAA, airport proprietors, and air carriers use congestion management strategies to align the demand for airfield capacity with the limited supply at an airport. The primary objective of</p>

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						<p>congestion management programs is to increase the efficient use of airports. Such programs may include regulatory and/or economic measures designed to manage the number of flight operations during peak use periods in a day, potentially limiting the number of operations during peak periods or shifting them to less congested times of the day. In the context of airport congestion, Congress has articulated a policy that artificial restrictions on airport capacity are not in the public interest and should be imposed to alleviate air traffic delays only after other reasonably available and less burdensome alternatives have been tried. Airline Deregulation Act, 49 U.S.C. §47101(a)(9)(A)(B). Artificial restraints on operations constrain the ability of air traffic to grow in accordance with market forces.</p> <p>The auctioning of landing and take-off rights requires legislative authority. The SDCRAA does not currently have this type of legislative authority. 49 U.S.C. § 41713(b)(1).</p> <p>Because SDIA has one runway, the ultimate throughput (combined number of arrival and departure operations per hour) is 55-56 operations in good weather. Combine this with limited operating hours and the position of the airport on the west coast and the potential for spreading peak hour operations has limited applicability.</p> <p>Under FAA grant assurances and</p>

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						<p>regulations, the SDCRAA can not force general aviation to use other facilities because it is a public airport and transportation facility.</p> <p>For a discussion of airfield operations at SAN, please see Chapter 3 of the Airport Master Plan, Inventory. The airfield use section starts on Page 3-19 where it is stated that Runway 27 (west flow) is used for arrivals and departures 97% of the time. Details regarding runway use patterns at the Airport are described in Chapter 3, Inventory, of the Airport Master Plan.</p>
56	James Frost	January 9, 2008	Letter	Section 4.0; Level of Passenger Service	<p>Determine what are acceptable levels of delay/inconvenience and their impact on landside facilities (parking, curb lengths, ticketing, public areas, security, support services, circulation, gate lounges).</p> <p>Establish maximum vs. optimal criteria for walking distances between critical elements.</p> <p>Examine passenger and operational inconvenience and cost when comparing</p>	<p>The San Diego International Airport Master Plan is incorporated by reference into the Environmental Impact Report. Please see the following chapters of the Airport Master Plan:</p> <p>Landside facility levels of service: Chapter 1, Goals &amp; Objectives, Chapter 3, Inventory, Chapter 7, Facility Requirements, Chapter 9, Concept Evaluation and Refinement, Chapter 10, Implementation of Preferred Alternative.</p> <p>Walking distances: Chapter 1, Goals &amp; Objectives, Chapter 3, Inventory, Chapter 7, Facility Requirements, Chapter 9, Concept Evaluation and Refinement, Chapter 10, Implementation of Preferred Alternative.</p> <p>Operations/Costs/Implementation: Chapter 9, Concept Evaluation and Refinement, Chapter 10, Implementation</p>

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					<p>single versus two level curb solutions.</p> <p>Explore cost and inconvenience of terminal modifications resulting from construction of two level curb.</p>	<p>of Preferred Alternative.</p> <p>The EIR is intended to describe the environmental impacts of the project. The economic analysis of the project rests with the SDCRAA but does not influence the environmental analysis.</p>
57	James Frost	January 9, 2008	Letter	Section 4.0; Parking	<p>Define passenger and visitor demand for short, medium, and long term.</p> <p>Analyze various pricing structures for parking services and their effect on demand.</p> <p>Determine combined parking capacities on and off site.</p> <p>Analyze possibility of remote check-in at a parking lot curbside.</p> <p>Examine impact of promoting remote parking to spread peak hour demand and reduce curbside lengths.</p> <p>Investigate using no or minimal parking structures and providing increased parking at Teledyne-Ryan site and in north SANpark to meet demand.</p>	<p>The commenter's proposal is appreciated, but there is no direct comment on the Draft EIR.</p> <p>On-site parking capacity was taken into account during the traffic analysis (Section 5.3). On-site parking demand was accommodated to the extent possible based on existing and project capacity. Parking demand beyond the on-site capacity was assumed to be accommodated off-site. All existing off site parking demand was assumed to be accommodated off site in future years.</p>
58	James Frost	January 9, 2008	Letter	Section 4.0; Public Transit	<p>Verify goal to increase public transit use to only 5 to 6 percent of passengers. Coastal corridor communities (served by existing transit lines) generate approximately 20 percent of airport passengers. Existing Trolley service covers large portions of Mission Valley, East County and South Bay. Given this coverage, there is the possibility of much higher public transit use.</p>	<p>Comment noted. See response to General Comment #9.</p>

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					<p>Investigate alternatives to significantly increase use of public transit by close integration with Coaster, Amtrack, Trolley and bus services.</p> <p>Explore high capacity, high frequency, dedicated shuttle loop from airport to cruise ship terminal to Santa Fe Station and back to airport.</p> <p>Determine impact of increasing public transit to reduce: roadway requirements and congestion, curbside lengths, pollution, rental car areas, and on and offsite parking.</p> <p>Compare investment required to improve public transit with costs of providing increased automobile infrastructure (on and off side) including parking.</p>	
59	James Frost	January 9, 2008	Letter	Section 4.0; Airport Support Services	<p>Air Cargo: Study relocation/consolidation of air cargo to north side of airport to improve land utilization, access and reduce traffic on Harbor Drive.</p> <p>Rental Car: Investigate moving rental car operations to Teledyne-Ryan site to allow for development of existing harbor side location.</p> <p>Investigate moving rental car operations to north side to reduce Harbor Drive congestion.</p> <p>Aircraft Catering: Investigate adequacy and appropriateness of existing location. Consider relocation to increase apron area, reduce service traffic and increase efficiency.</p> <p>Utilities, Waste Water, Water Supply:</p>	<p>Air cargo facilities are on the north side of SDIA. The only remaining cargo operation on the south side is anticipated to relocate to the north side of the Airport in the near future.</p> <p>The ground transportation/airport support land use designation is proposed for the Teledyne Ryan site. Rental car facilities are a potential use of the ground transportation land use designation on the north side of the Airport.</p> <p>As stated in Chapter 3.5.7, Other Airport Support Facilities, of the Draft Airport Master Plan, "Sky Chefs, the airline catering service provider, vacated from the buildings immediately south of the USPS facility in early 2005. As of March</p>

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					Investigate adequacy of supply and waste water processing related to proposed expansion. Verify effect of increased storm drain runoff from paved areas.	<p>2006, the buildings remain vacant." Thus, there is not currently a flight kitchen operating at SDIA.</p> <p>Please see Section 5.11, Utilities and Service Systems, of the Draft EIR for a complete analysis of utilities and their adequacy to serve the proposed project.</p> <p>As stated in Section 5.6.5 of the Draft EIR all future development will be subject to the Airport Storm Water Mitigation Plan (SWMP), airport storm drains may require upgrades to contain the future storm flow.</p>
60	James Frost	January 9, 2008	Letter	Section 4.0; Airport Development Phasing	<p>Show development and associated costs by phase since all construction cannot be executed simultaneously.</p> <p>Determine associated delays/inconvenience fore each phase.</p> <p>Determine environmental impact by phase.</p> <p>Coordinate phasing with Life Cycle Analysis.</p>	<p>A schedule for construction is provided in appendix E, phases of work are defined.</p> <p>The construction will be phased and organized to reduce delays and inconvenience to airport users. However those practices are not defined for the EIR nor or they required for the EIR. Noise and traffic impacts due to construction were analyzed for purposed of the EIR.</p> <p>The EIR is intended to describe the environmental impacts of the project. The economic analysis of the project rests with the SDCRAA but does not influence the environmental analysis. Life cycle is considered in the determination of capital development and maintenance costs of the project.</p>
61	James Frost	January 9, 2008	Letter	Section 4.0; Airport Life Cycle Analysis	Determine life expectancies of critical airport elements	Comment noted. CEQA does not require examination of life cycle costs. Please see the Airport Master Plan for a

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					<p>Prepare coordinated phased construction/replacement of elements.</p> <p>Maximize critical element lifespan while maintaining operational efficiency.</p> <p>Perform life cycle analysis for each proposed project scenario.</p> <p>Relate life cycle analysis to Airport Development Phasing program.</p>	discussion of the project planning process including analysis of costs, and implementation.
62	James Frost	January 9, 2008	Letter	Section 4.0; North Unit Terminal	<p>Provide detailed reasons for rejection of possible North Unit Terminal. Separate unit terminals function well at many airports especially when used by a dedicated carrier such as Southwest which has a large market share and few off-line passenger transfers.</p> <p>Examine effect on South Terminal landside requirements when approximately 30 percent of passengers are removed to North Unit Terminal. May result in no significant land/airside expansion at South Terminal.</p> <p>Compare construction inconvenience/delays associated with North Terminal development vs. South Terminal.</p> <p>Create an initial unit terminal design that could be the “anchor” for moving all passenger terminal operations to north side in future.</p>	Please see Chapter 8.2 of the Airport Master Plan for a discussion of Concept F, which included a 12 gate terminal to be constructed north of Runway 9-27. Concept F was determined not to best meet the Airport Master Plan Goals and Objectives as defined in Chapter 2. A North Terminal concept is also discussed in Section 4.4.2.4 of the Draft EIR.
63	James Frost	January 9, 2008	Letter	Section 4.0; Future (Post 2030) North Terminal Complex Development	<p>Investigate development of north terminal complex to replace existing terminal facilities.</p> <p>Investigate and seek commitment to occupy Marine Corps Recruit Training base.</p>	See Chapter 8.2 of the Airport Master Plan for a discussion of Concept F, which included a 12 gate terminal to be constructed north of Runway 9-27. Concept F was determined not to best meet the Airport Master Plan Goals and

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					<p>Develop plan for landside access (freeway and transit) to site.</p> <p>Prepare integrated plan to shift facilities to north side on phased basis.</p> <p>Analyze and compare costs (construction and ongoing operational) of balanced, new North Terminal complex with expanding and maintaining existing South Terminal complex</p>	<p>Objectives as defined in Chapter 2. A North Terminal concept is also discussed in Section 4.4.2.4 of the Draft EIR.</p> <p>The suggestions made by the commenter are beyond the scope of the Draft EIR under review.</p> <p>The EIR is intended to describe the environmental impacts of the project. The economic analysis of the project rests with the SDCRAA but does not influence the environmental analysis.</p>
64	James Frost	January 9, 2008	Letter	Section 5.0 – Environmental Setting, Consequences and Mitigation Measures, Introduction	<p>Justify how the EIR can be formulated for the year 2030 when all impacts are related to airport development plans for the year 2015. This anomaly implies that all potential impacts beyond 2015 are suspect and unverifiable.</p> <p>Explain exactly how “the proposed project does not <i>induce</i> (italics added) operations”. This claim is a splitting of differential hairs to imply that larger, more convenient, accessible, operationally efficient airside and landside facilities will not encourage, permit, facilitate, and allow etc. additional use. The supposition that only passenger need (demand) will produce additional usage demeans the credibility of the entire EIR.</p>	<p>As stated in Section 2.2.2 of the EIR the analysis was extended to 2030 for purposes of matching the timeframe employed by other agencies for regional transportation planning. Because the improvements to the Airport beyond 2015 were only reviewed at a programmatic level in the current Airport Master Plan improvements needed for continued viability of the Airport need to be fully vetted prior to environmental review.</p> <p>The SDCRAA initiated the next phase of planning for SDIA in February 2008 (Vision Plan). The findings of the Vision Plan will be reviewed environmentally in the future.</p> <p>See response to General Comment #7.</p>
65	James Frost	January 9, 2008	Letter	Section 5.2 Land Use Planning	<p>Consider the relocation the rental car facility to “on site” to allow for public use of the waterfront areas.</p> <p>Develop plans for the promotion of public transit for high intensity use. Current EIR</p>	<p>The airport property is limited and is dedicated to aviation specific uses. However, the Proposed Airport Land Use Plan does envision (with the ground transportation land use designation) a consolidated rental car facility on site as</p>

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					envisions no changes other than that a general desire to increase the use of public transit to 5 percent of passengers from the current 1.2 percent.	described in Section 3.1.4.  See response to General Comment #9.
66	James Frost	January 9, 2008	Letter	Section 5.3 Traffic and Circulation	Explore specific improvements, modifications and additions to the public transit system to increase use.  Examine the impact of increased use of public transit use to reduce: roadway capacities; parking; curbside lengths; rental car areas; road and freeway congestion.  See 5.3.8.1 Street Segments to gain an appreciation of proposed of site road works necessary to accommodate vehicle traffic. Provide responsible parties and cost allocation for these road works.	See response to General Comment #9.  The Mitigation Monitoring Reporting Program identifies the parties responsible for implementing the mitigation measures.
67	James Frost	January 9, 2008	Letter	Section 5.3.8.3	Explain how EIR covers the requirement and impacts of widening I-5 by one lane in each direction “which is more than necessary” (i.e. imperative) to accommodate additional airport traffic.	The EIR proposes potential mitigation which will be coordinated with the agency responsible for the specific street, intersection, or freeway. In the case of I-5, Caltrans and the Federal Highway Administration would be the lead agencies.  The Mitigation Monitoring Reporting Program identifies the parties responsible for implementing the mitigation measures.  The statement “Freeway widening is more than necessary to mitigate the freeway impacts” (EIR Section 5.3.8.3) under the Airport Land Use Plan means that the improvement is more than sufficient to mitigate the impacts and actually provides additional freeway

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					Delineate construction timeframe, parties responsible and how the costs will be allocated.	capacity not that the project is imperative  The construction schedule is provided in Appendix E. The Parties that may perform construction would determine any allocation of costs. The EIR focuses on the environmental impact of the Proposed Project.
68	James Frost	January 9, 2008	Letter	Section 5.5 – Air Quality	<p>Explain how cited air quality data is valid when it is collected on a monitoring site “Downtown” and 2 miles away from the airport. Data collected in highly urbanized sites can radically differ from an open airport site.</p> <p>Account for pollutant drift and dispersal over areas immediately east of the Airport site.</p> <p>Examine impacts of how significantly increased use of public transit can improve air quality.</p>	<p>As discussed above comment response #46.</p> <p>The air quality analysis presented in the EIR represents the total predicted ambient (i.e., outside) concentrations of the U.S. EPA “criteria” pollutants, as estimated from dispersion models with “background” concentrations (as measured from nearby downtown air monitoring stations) added. Background concentrations reflect the emissions from other nearby sources not accounted for in the dispersion modeling analysis. Importantly, the airport and the adjoining roadway network (including the freeway) were included. The dispersion models also account for the dispersal (or “drift”) of emissions from nearby off-site sources, including the freeway based on real-world meteorological conditions. See Section 5.5.5 and Appendix E, <i>Air Quality</i>.</p> <p>Moreover, the background concentrations used are the maximum values observed during the past three years at the downtown monitoring sites. When combined with the dispersion modeling results, the reported values</p>

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					<p>Explain how increases in various emissions are “considered significant but unavoidable” when it is theoretically possible to limit or spread out the number of aircraft operations (5.5.10) and make them “avoidable”.</p> <p>Explain justification for increasing aircraft and vehicle activity which leads to increased pollution given that facility is non-compliant and will be non-compliant in 4 of 5 categories (5.5.29) in 2030.</p>	<p>represent conservatively-high concentrations and some “double-counting” of emission sources. Finally, the downtown urban environment concentrations tend to be higher than the area near the Airport. Therefore, use of airport monitoring is not necessary to reasonably estimate future pollutant levels.</p> <p>Under the Airline Deregulation Act, airport operators such as the SDCRAA have no legislative authority to either spread out operations or control airport operational levels. Airlines set their own schedules to meet passenger demand. Increases in air pollutants are unavoidable as operations increase. The SDCRAA has indicated mitigation measures within the authority of the SDCRAA that will address human health risk impacts in Section 5.16.9, which will also reduce air quality impacts. Despite these measures, as explained in Response to Comment #46, impacts will remain significant.</p> <p>The SDCRAA does not control aircraft or vehicular traffic, forecasts indicate that the increased traffic will occur and the SDCRAA seeks to accommodate the forecast traffic level.</p> <p>See Response to General Comments #9 for issues relating to transit.</p>
69	James Frost	January 9, 2008	Letter	Section 5.6 – Hydrology and Water Quality	Describe means of storm water runoff treatment and subsequent water re-use to	As stated in Section 5.6.5 all future development will be subject to the Airport Storm Water Management Plan (SWMP)

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					<p>meet objectives of 5.6.3.1 and 5.6.4.6.</p> <p>Show area devoted to water reclamation on Airport Land Use plan to comply with 5.11.2</p>	<p>which requires that all municipal activities provide for best management practices for new development. The Airport SWMP can be reviewed at: <a href="http://www.san.org/airport_authority/environmental_affairs/environmental_protection/stormwater_plan.asp">http://www.san.org/airport_authority/environmental_affairs/environmental_protection/stormwater_plan.asp</a> . The ability to re-use water is limited at SDIA due to water uses, specifically the SDIA has little use of water that would not be subjected to potential contamination.</p>
70	James Frost	January 9, 2008	Letter	Section 5.13	<p>5.18.1 General Approach and Methodology: Explain how there “would not be indirect noise impacts at parks or recreation areas located under SDIA flight paths (such as Balboa Park and Ocean Beach), given increase aircraft operations.</p> <p>Justify how, given increased levels of passenger traffic, “the Proposed Project would not generate increased levels of residents or <i>visitors</i> (italics added) to San Diego, (therefore) it would not result in increased demand for or use of, parks or other recreational areas.”</p>	<p>Section 5.1 of the Draft EIR determined that there will not be any significant noise impacts associated with the Proposed Project. Potential increases in flights from now until 2020 are not caused by the proposed project, but instead would occur even without project implementation. Thus, increased passenger traffic is not due to the project.</p> <p>The proposed growth in traffic is forecast due to market demand as described in San Diego International Airport Aviation Activity Forecasts, SH&amp;E, as approved by the FAA in June 2005.</p>
71	James Cash	January 13, 2008	Email	Future Plans	<p>As Capt for a major airline, there are my thoughts.</p> <ol style="list-style-type: none"> <li>1. build an elevated high speed train from San to LAX, you can go anywhere in the world from LAX.</li> <li>2. move all general aviation to nearby gilespe field</li> <li>3. move all cargo carriers (FED-EX/UPS/ECT) to brown filed. They do-not need to fly into Lindberg</li> </ol>	<ol style="list-style-type: none"> <li>1. Comment noted.</li> <li>2. The FAA does not permit public airports to restrict use by specific types of aircraft operators. Further some GA activity at SAN is too large to utilize other regional airports.</li> <li>3. The FAA does not permit public airports to restrict use by specific types of aircraft operators.</li> </ol>

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					<p>4. with the price of fuel for jets getting ever higher the days of the 50 seat RJs are going away, limit 100 seat jets for Lindberg field – now there will be no congestion at SAN</p> <p>5. the tourist now have a close in airport that everybody likes</p> <p>6. move the terminal over to the northeast side to take advantage of the trolley and train, also I-5 is right there for easy on and off. You could have water access for the hotels in the bay as well...</p>	<p>4. Comment noted.</p> <p>5. Comment noted,</p> <p>6. Please see Chapter 8.2 of the Airport Master Plan for a discussion of Concept F, which included a 12 gate terminal to be constructed north of Runway 9-27. Concept F was determined not to best meet the Airport Master Plan Goals and Objectives as defined in Chapter 2. A North Terminal concept is also discussed in Section 4.4.2.4 of the EIR.</p>
72	Michael Huff	January 25, 2008	Letter	Expansion	How is it possible that you could even consider expanding the capacity of Lindberg International Airport. The current situation is intolerable! I do not see anything in the expansion plan that is going to reduce the environmental impact on those of us that live near the airport. I find it interesting that you would stop a project that would effect the life style of a Lease Tern but not give the same consideration to Human Beings.	Comment noted. The proposed project does not increase capacity. The Airport's capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.
73	Michael Huff	January 25, 2008	Letter	Land Use	If you were reviewing the airport as a new use for the land, there is no way that you all it to be built in its current location? How then can you make a disastrous condition even worse?	The Airport exists at its current location and the question is not whether to build an airport because one already exists. This project seeks to improve the quality of service not to increase passengers, planes, or capacity.
74	Michael Huff	January 25, 2008	Letter	Process	Why am I not mailing this to the organization that is actually conducting the EIR instead of the Airport Authority?	The SDCRAA as the lead agency wanted to be sure that all received comments were logged correctly and provided to the consultant team developing the EIR.
75	Suhail Khalil	January 30, 2008	Letter		SDCRAA completed its DEIR on a "No Project Alternative" development baseline. Unfortunately, this approach does not allow the public or decision makers to analyze	This comment is a duplicate of one provided by Suhail Khalil in the Peninsula Community Planning Board letter. Please see Response to Comment #32

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					existing environmental settings as it compares to development impacts when determining if a proposed project impact may be “significant”, pursuant to California’s Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) guidelines. As you are aware, labels of “significant” impact require additional studies to mitigate impact, if feasible, whereas “insignificant” impact labels do not require any further study or mitigation.	in the Peninsula Community Planning Comments.”
76	Suhail Khalil	January 30, 2008	Letter		Capital improvements proposed in Phase 1 AMP to existing San Diego International Airport (SDIA) facilities include four elements: Airfield, Terminal, Ground Transportation, Airport Support. Proposed projects focus on incremental improvements to SDIA including construction of 10 new gates to Terminal 2 and a Remain-Over-Night parking structure to commence 2009 and be completed by 2011. The next Phase 2 of the AMP is expected to have a broader scope and focus on complete development that addresses a full integration of all capital improvements to maximize operations at SDIA beyond 2020. AMP Phase 2 implementation is expected to commence 2015 and includes improvements to the Teledyne Ryan property, a northern taxiway (safety concerns), acquisition of adjacent properties, relocation of airside operations, traffic mitigation on congested streets, adding roads and intersections serving SDIA, construction of an inter-modal transportation center at the north side of SDIA, relocation of landside operations to the north, consolidated rental car facility, and funding for a Regional Transportation Plan. Phase 1 of the AMP projects are expected to relieve projected pressures on daily operations beyond 2010 including: project delays at commercial gates and projected pressures on existing taxiways	This comment is a duplicate of one provided by Suhail Khalil in the Peninsula Community Planning Board letter. Please see Response to Comment #32 in the Peninsula Community Planning Comments.”

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					from commercial, cargo and general aviation flights. The total number of operations (departures & arrivals) projected to increase 50% from current levels, nearing 302, 652 total operations annually by 2030. Increased traffic congestion on Harbor Drive and increased CO2 emissions (pollution) is expected to increase significantly due to increased operations projected.	
77	Suhail Khalil	January 30, 2008	Letter		It's my understanding that you intend to adopt a <b>Draft Memorandum of Understanding</b> between SANDGAG and the City of San Diego to ensure all CEQA and NEPA guidelines are met. Also, that you will work to seek Federal Aviation Administration approvals for funding "Off-Airport Improvements" including: freeway ramps serving proposed inter-modal transportation center, mitigation of traffic congestion on North Harbor Drive and improvements of vehicular airport access from Washington, Grape, Hawthorne and Laurel Streets. It remains clear that SDIA hours of operation will not change, relocation alternatives for SDIA may be available by the year 2015 and that existing curfew violations rules and regulations are to remain the same. Public safety must never be compromised. Pollution, noise and traffic impacts must be mitigated to ensure our quality of life. I appreciate your leadership to ensure these processes are kept open and transparent for additional government agencies and public input.	This comment is a duplicate of one provided by Suhail Khalil in the Peninsula Community Planning Board letter. Please see Response to Comment #32 in the Peninsula Community Planning Comments."
78	Lynn Wade, Michael BuFalry & Dustin	February 1, 2008	Email	Traffic	We are very worried about airport expansion. We have terrible noise levels in Ocean Beach. My husband and I have lived in various parts of Ocean Beach for over 20 years and own a home here. We believe that there are other spaces to put more flights south and east of	The commenter's concerns are appreciated. The SDCRAA does not control operational increases at the Airport, airlines determine their flight schedules. Implementation of the proposed project will not increase the

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					San Diego. I have also worked under the flight path downtown and know its bone shaking and mind rattling. We must stop adding flights to this area and spread them to more viable areas. Other cities do it, I'm sure we can too.	<p>number of flights. Prior to 2020, the increase in flights is likely to occur regardless of project implementation. See Response to General Comment #33.</p> <p>The SDCRAA acknowledges that noise levels will grow as operations increase with or without implementation of the Proposed Project. However, any pre 2020 increase would not be the result of the project. See Section 5.1.</p>
79	Jason Feldman	February 1, 2008	Email	Airport/Trolley expansion	<p>Unlike many residents I am not opposed to the proposed expansion of the Lindbergh Field Airport. From what I gather an additional 10 gates at terminal 2 our planned as well as a parking structure.</p> <p>Sure there will be more noise, but as long as the flights don't depart after midnight as they do currently this should not be a problem. San Diego is a popular and growing city, and will see more and more traffic in the form of people, cars, as well as planes.</p> <p>The most pressing issue in my opinion as well as many of my colleagues at the University of San Diego School of Law, will be the increased automobile traffic. The way to best approach this problem in our opinion is to expand the trolley system. San Diego is fortunate that there is already a good trolley system in place, but so many more people will utilize it if it went more places. As you may or may not already be aware, the most critical addition would be line connecting the downtown to the airport. (Another line to Ocean, Pacific, Mission Beach, and/or La Jolla would also be very beneficial)</p>	<p>The SDCRAA does not intend to change the night time curfew on night time departures that is enforced between 11:30 PM and 6:30 for Stage 3 aircraft.</p> <p>Comment noted. The Airport Authority supports improvements to transit service to bring passengers to the facility and is developing policies and programs to encourage and increase transit use by airport users comprised of passengers and employees. The Authority is committed to increasing transit ridership to SDIA and has led a multi-agency Airport Transit/Roadway Committee which developed a Draft Airport Transit</p>

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					<p>Many of our travelers coming into our city, come here for business and to visit conventions. A lot of their need to rent a car or to take a taxi would be eliminated with a line connecting the short distance to the downtown area.</p> <p>With the framework for this line established it could then be extended to continue through Point Loma and then to Ocean Beach.</p> <p>It is inevitable that San Diego will expand, and no one wants to see our traffic and smog situation continue in its current path becoming more and more like L.A. Therefore it is essential we plan now to expand the trolley system to cope with the destined future growth of our city. I urge you to raise the bar and do your part to help San Diego become a model city by expanding the trolley system and showing that public transportation can work in Southern California.</p>	<p>Plan for SDIA identifying opportunities to improve transit access (see EIR Section 2.4.1 for summary). See Response to Public Comments #46.</p> <p>The extension of the Trolley or other fixed guideway is not part of this EIR but is the subject of future planning for the Airport in conjunction with MTS who owns and operates the Trolley.</p>
80	Gidon Singer	February 1, 2008	Email	Long-term Planning	<p>Stop wasting taxpayers dollars on a doomed airport. For once think LONG term!! While certainly convenient in its proximity to downtown and the beach areas, the sensitive tidelands would make an ideal public park with cultural uses as well. Tourism would expand exponentially in this area, creating a more liveable city all along the san diego bay. Yes we should of moved the airport decades ago, however it is never too late. Hmmm 10 gates, parking structure &amp; intermodal transport, sounds to me, like good old short sighted san diego! Let's build the infrastructure, under the guise of relieving current congestion, and then down the road declare a second runway the only responsible choice after spending all the money on infrastructure. For crying out loud create a legacy and a name for yourself, so</p>	<p>The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR. See General Response to Comment #1.</p>

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					that you can live forever. and make some long sighted responsible choices.	
81	Ardetta Steiner	February 1, 2008	Email	Noise	Appendix B, "Noise and Its Effect on People" includes nothing about the known auditory non-auditory health effects of noise.	<p>Appendix B is a general guide to noise and its effects and is a summary of recent research. Hearing loss is typically found where people have been subjected to 85 decibels habitually (more than eight hours a day). Many experts agree that continual exposure to more than 85 decibels is dangerous. In light of this information there should be no hearing loss in the communities surrounding SDIA.</p> <p>To put this in perspective, a lawnmower in operation or truck traffic is typically measured at 90 decibels while a jet engine is measured at about 140 decibels if the exposure is within 100 feet of the engine. While single event noise may reach levels above 85 decibels in areas in proximity to the runways this level of noise is not currently experienced for extended timeframes nor is it forecast to occur. The analysis indicates that the increases to noise levels due to continued growth due to demand at the Airport will not have significant health affects on the surrounding communities.</p> <p>The potential non-auditory effects of noise are potential physiological impacts, sleep interruption, speech interference, effects on learning, and the most common impact annoyance. There is still much research to be completed to apply standards of impact for these more subjective impacts of aviation noise. Such agencies as is the Federal</p>

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						Interagency Committee on Aviation Noise the World Health Organization continue to develop research to these effects, however at this time there is no conclusive study that provides specifics to assess impact for non-auditory effects of noise.
82	Ardetta Steiner	February 1, 2008	Email	Noise	Finally I get to Appendix H “Human Health Risk Assessment”, a mere FIVE PAGES that does not even address the most serious health risk to humans, that of the effects of noise on the human body! In section 5.21.5 “Schools”, a seven line paragraph, all we learn is that the project will not have a significant impact on school enrollment. This DEIR must be over 10,000 pages and is supposed to address serious environment impact. This omission of the health effect of noise on children is unconscionable.	The supplemental analysis in Section 5.1.2 of the Draft EIR concludes that there will be no significant impacts from noise. Noise levels experienced now or in the future in communities surrounding SDIA is not expected to have a health effect. [AND – noise increase is not due to the project]
83	Ardetta Steiner	February 1, 2008	Email	Noise	There exists voluminous scientific data from around the world that addresses jet noise as a public health problem. The research goes back nearly 40 years and can easily be found on the internet. This DEIR addresses noise as primarily an annoyance. See Appendix B, page 13—D.2.1 “The primary potential effect of aircraft noise on exposed communities is one of annoyance.” This comment is erroneous. Clearly the evidence is unequivocal that the human body and mind are harmed by excessive daily noise at the levels produced by jet aircraft. Section 5.1.2.3 of your EIR under schools states that “none of the research has resulted in accepted methodology or threshold of significance”. Where is the evidence for such a conclusion?	<p>Research on noise impact does include extensive research on annoyance the actual health effect of noise is still being investigated in the U.S. and abroad. One such reference for noise studies is the Federal Interagency Committee on Aviation Noise found at <a href="http://www.fican.org">www.fican.org</a>. Studies abroad include those published by the World Health Organization.</p> <p>There is no unequivocal evidence on the impact of noise on health. The most understood health affect of noise is hearing loss. Hearing loss is typically found where people have been subjected to 85 decibels habitually (more than eight hours a day). Many experts agree that continual exposure to more than 85 decibels is dangerous. In light of this information there should be not hearing</p>

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						<p>loss in the communities surrounding SDIA. However there are other potential physiological impacts, sleep interruption, speech interference, effects on learning, and the most common impact annoyance. There is still much research to be completed to apply standards of impact for these more subjective impacts of aviation noise.</p> <p>See response to comment #81 for comparative of noise levels.</p>
84	Ardetta Steiner	February 1, 2008	Email	Noise	<p>FICAN (Federal Interagency Committee on Aviation Noise) in a July 2007 report states: "Research on the effects of aircraft noise on children's learning suggests that aircraft noise can interfere with learning in the following areas: reading, motivation, language and speech acquisitions, and memory."</p> <p>A Cornell University study in 1998 concluded: "Airport noise is harmful to the health and well-being of children and may cause lifelong problems." The report goes on to report that the health problems resulting from chronic airport noise include higher blood pressure and boosted levels of stress hormones. A research team in London looked at data on more than 2,800 children living near Heathrow and other airports in Spain and the Netherlands. Their conclusion: "Aircraft noise affects learning and translates to a delay of up to eight months in a child's expected reading age." A Yale University professor said this latest research backed up previous analyses. The long-term effects on these aircraft noise impacted children is unknown at this time. <u>The 9<sup>th</sup> International Congress on Noise as a Public Health Problem</u> is set for July 2008 in</p>	<p>The study the commenter cites includes important caveats in that the airports and schools represented in the study are not meant to be representative and should not be used nationally without subsequent studies at many additional airports and schools. Relationship Between Aircraft Noise Reduction in Schools and Standardized Test Scores, FICAN, March 2004. The tables in Appendix B provide total time above (in minutes) specific noise levels with the lowest level (65 dB) including the most time above. As described in Section 5.1.2.4 of the EIR time above levels (in minutes) are shown for noise levels ranging from 65 to 95 dB. Note that typical school construction would be expected to provide for exterior to indoor attenuation of 25 to 30 dB, resulting in interior noise levels of between 35 and 70 dB.</p> <p>As the data includes all daytime flights (between 7 a.m. and 7 p.m.), the results are conservative as most school days are somewhat shorter. However, that data</p>

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					<p>the U.S. Proceedings of the previous meetings and other scholarly articles on noise is easily available.</p> <p>Table B-9 lists about 20 schools that have serious exterior noise levels. (Omitted from the list is Explorer Elementary School, High Tech Media Schools, and Rock Church Academy, all near High Tech High Middle School which has 80.5 minutes of noise levels over 65 dB.) Having been a teacher and counselor at Point Loma High I am acutely aware of the noise problem. Students spend much time outside during peak times of jet operations from SDIA, such as before and after school, lunch hour, and P.E. classes. Even inside classrooms that have been "sound attenuated" the installed air conditioners make so much noise that students must move their desks up closer to the teacher to be able to hear the instruction. This is very disrupting, as you can imagine with up to 37 students in our classes. Remember this all goes on every single day, all year long, and affects thousands of children. There are about 2000 students at Point Loma High alone. Have you calculated just how many people, students, teachers, and staff there are in these noise impacted schools?</p>	<p>does provide a comprehensive evaluation of the time period when many school activities occur, including after-school functions.</p> <p>The data shows that most schools in the vicinity of SDIA do not experience substantial periods of time with exterior noise levels above 80 dB, which equates to a typical interior noise level of about 55 dB. According to Figure B-8 in Appendix B, a steady 55 dB sound level is the threshold above which sentence intelligibility would begin to degrade. The values referenced in the comment are not included specifically in Appendix B and therefore direct response can not be provided.</p> <p>The SANDAG database was used for determination of schools; the database did not include the schools the commenter lists. The analysis determined that there would not be a significant impact to any school analyzed. It is reasonable to conclude that the schools listed, which the commenter asserts are near High Tech Middle and High (schools that were included), would have no significant impact</p> <p>The analysis includes residential population counts but not population of schools. Schools for analyzed in Section 5.1.2.5 of the EIR, see Section 5.1.2.1 for the approach and methodology used to assess impact.</p>

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85	Ardetta Steiner	February 1, 2008	Email	Noise	In this DEIR I could find no mention of possible mitigation measures for this impact on children. The problem is not new, and this project will only make it worse. You have spend \$300,000.00 to lure ZOOM Airlines to come here (according to the Union Tribune). The primary goal of this airport expansion is to make thing easier and more efficient for the airlines and the passengers. Have you come up with any noise mitigation ideas?	<p>The Draft EIR indicates that are no significant impacts on schools due to the Proposed Project, see Section 5.1.2 and Appendix B for results and detailed information on school exposure to noise.</p> <p>Federal regulations provide for a manner in which airport operators prepare noise studies. 14 C.F.R. § 150. This then becomes the basis for implementing noise mitigation measures. This process is called "Part 150." The Part 150 for SDIA is currently being updated. The Part 150 will consider noise abatement and land use measures to reduce non-compatible land uses.</p>
86	Ardetta Steiner	February 1, 2008	Email	Noise	<p>Since you have no current plans to locate SDIA elsewhere, perhaps you should relocate all the impacted schools! Maybe you could outfit all the students and school personnel with noise suppression headphones. How about building sound proof astro domes over all the school grounds? At the very least you could install quieter air conditioning units in the many classrooms that need them because the windows much be closed.</p> <p>Technology will not solve the problems of SDIA, in spite of what some of the SCDRAA Board and their staff expounds. When runway capacity is reached in the next few years, giant air buses won't help because they cannot take off fully loaded, so airlines won't schedule them here. The demand for private jet travel is growing, and the FAA predicts that Low Cost and Regionals/ Commuters will be more cause</p>	<p>The Draft EIR indicates that are no significant impacts on schools due to the Proposed Project, see Section 5.1.2 and Appendix B for results and detailed information on school exposure to noise.</p>

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					traffic jams and daily delays. SDIA is a huge money maker and the SDCRAA has an obligation to the citizens of this county to use a large portion of that profit to help solve all the problems it is causing, especially the damage its operations is doing to our children.	
87	L. Winslet	February 4, 2008	Email	Future plans	SD Airport should consider banding with other regional airports including John Wayne, Long Beach, Ontario, and Burbank to pressure airlines and jet manufactures to adopt engine innovations such as electric engines to make planes quieter and more fuel efficient. Rather than spending billions on new runway capacity, the same money could be invested in making the engines quieter so that more airports could be run 24/7 with less opposition from the impacted neighborhoods.	<p>The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.</p> <p>The proposed project will not alter in any manner the existing runway.</p> <p>The U.S. Environmental Protection Agency has exclusive legal jurisdiction over the regulation of aircraft engine emissions.</p>
88	Harris Steiner	February 4, 2008	Letter	Previous Comments and Flight Operations	As I viewed the 14 lbs of EIR paper on my desk to analyze during the holiday season, I didn't see any reasonable justification for the expansion. This boiler plate document contains much old data based upon 2002/2004 projections with little new information on operations, along with partially answered questions from the various comments by reviewers.	<p>The SDIA EIR is not a boilerplate document; analysis was completed specifically for each impact category.</p> <p>This Draft EIR is an update from the may 2006 Draft EIR. We updated the Draft EIR to consider (1) additional years (2015 to 2030) and (2) the Proposed Project without a parking structure. Because this Draft EIR replaces the previous Draft EIR, CEQA does not require responses to comments submitted for the May 2006 Draft EIR Responses to comments on October 2007 Draft EIR are responded to individually.</p>
89	Harris Steiner	February 4, 2008	Letter	Congestion	I read the previously submitted comment for the May 2006 DEIR, in particular the questions posed by San Diego Unified Port District's law firm of Fox and Sohagi LLP on understated operations. I then plotted the EIR data on	The SH&E report indicates that SDIA becomes severely congested when operations approach 300,000 annual operations. Annual operations in 2006 were 209,491; in order to meet 300,000

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					flight operations and found that the one runway becomes severely congested by about 2011, not 2015. My projection is shown on the SH&E chart enclosed. FAA's minimum annual projected increase of 5% correlates favorably.	annual operations by 2011 operations would have to grow by approximately 7.5% each year. This level of growth is not projected even in the high forecast scenario investigated by SH&E.
90	Harris Steiner	February 4, 2008	Letter	Congestion	Also impacting the rapid growth in operations are new airlines coming in i.e., ATA, Zoom, Virgin, and Express Jet, along with the introduction of first class fractional ownership jets of 7 to 10 passengers. Also, the FAA forecasts that the regional jet fleet, consisting of aircraft ranging in size from 35 to 70 seats will expand dramatically. Is this why a new north terminal is being built for general aviation? No where in this EIR is a description of the details of this new north terminal. More smaller jets handling more people adds up to much greater operations than are projected in this EIR, besides clogging up the single runway by crossovers.	As described in the Chapter 4.1.2.8 of the Draft EIR, Construct New General Aviation Facilities Including Access, Terminal/Hangars and Apron to Improve Airport Safety for Airport Customers/Users, "new general aviation facilities would be constructed on 12.4 acres to accommodate forecast general aviation operation through 2015." The proposed general aviation facility would not be utilized for scheduled commercial airline service.
91	Harris Steiner	February 4, 2008	Letter	Comments	I found no response to the various comments submitted to the 2006 DEIR expect a sentence on pg. 1-25: "the comments that were received have been addressed throughout the text of the EIR". I guess they are embedded somewhere – good luck finding them.	See response to Public Comment #89.
92	Harris Steiner	February 4, 2008	Letter	Congestion, Good Neighbor Policy, and Gate Assignment	We must not forget that the airport as a neighbor is situated in one of the most pristine areas of the beautiful City of San Diego in the midst of highly functional and vibrant neighborhoods, i.e., Downtown, Golden Hills, Ocean Beach, Loma Portal, Point Loma, South Mission Beach, Middle Town, Little Italy. With the increase of flight operations approaching severe congestion by 2011, the airport should institute a goal of a "GOOD NEIGHBOR POLICY" to mitigate the environmental impacts on these neighboring communities. It is the intent of the City of San Diego, as well	Comment noted. The proposed project does not increase capacity. The Airport's capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.  The Draft EIR indicates that traffic can be accommodated with the existing terminal but at a reduced level of service resulting from insufficient curbside space and parking facilities (see Section 5.3.8). The SDCRAA seeks to improve the level of

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					as the nation, to increase the population density in such well functioning neighborhoods to utilize existing facilities thereby reducing environmental pollution, costs, and adverse effects of urban sprawl. Also, as the flights increase and more fan out (see enclosed map), additional neighborhoods will be adversely effected, i.e., Mission Beach, Sunset Cliffs, Wooded Area, Fleetridge, Bird Rock, La Jolla, and recently reported Kate Sessions Park area on Mt. Soledad. Remember this is happening now, and is occurring before any extra gates are to be completed by 2012. The EIR says that the existing gates can handle the traffic through 2015, ergo, no need for this project. If necessary, for the near future a lottery system for gate assignment, as in place at other major airport, can be used.	service by providing sufficient facilities, for example there will be an airport wide deficiency of 610 linear feet of curbside in 2015 and 1,650 in 2030 without the project. Because the FAA controls access to the Airport's runway at SDIA, the SDCRAA would have to work with FAA to implement a slot/lottery system. Because of deregulation the FAA is reticent to restrict aviation in any form.  The Airport is a public airport and access to the Airport is not able to be restricted according to federal law.
93	Harris Steiner	February 4. 2008	Letter	Mitigation	Rather than starting creative financing with market derivatives, emulating Orange County, the SDCRAA should start expanding some of the \$45 millions of profits a year to mitigate these impacts on our neighborhoods from increased operations. All one finds in the goals is to increase level of service to accommodate passengers. There is no serious attempt to address the impact on your neighbors. At least when the Port Authority was managing the airport, profits were used to improve tidelands recreation areas in all the Port member cities. Don't forget that SDIA is a destination airport, not a hub or transit site.	Four statutes govern the use of airport revenue: the Airport and Airway Improvement Act of 1982; the Airport and Airway Safety and Capacity Expansion Act of 1987; the FAA Authorization Act of 1994; and the FAA Reauthorization Act of 1996. These statutes are codified at 49 USC 47101, <i>et seq.</i>  Unlawful revenue diversion is the use of airport revenue for purposes other than the capital or operating costs of the airport, the local airport system, or other local facilities owned or operated by the airport owner or operator and directly and substantially related to the air transportation of passengers or property. SDIA's Quiet Home Program serves to mitigate aviation noise impacts.

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94	Harris Steiner	February 4. 2008	Letter	Sound Proofing	<p>The following is recommended as possible goals of this Good Neighbor Policy, and the Final EIR must address these goals:</p> <ol style="list-style-type: none"> <li>1. Expand the policy of sound proofing impacted homes in the 65 CNEL and above areas. Use LA's stipulated settlement of 2005 as a guide. We understand that 80% of these monies available are Federal grants, and the Airport Authority has been very slow in their "quiet home" implementation program. The 2008 SDCRAA budge shows \$15 million is available.</li> </ol>	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments. See response to comment 85.
95	Harris Steiner	February 4. 2008	Letter	Precision Departure System	<ol style="list-style-type: none"> <li>2. Insist on the installation of necessary equipment to implement the "Precision Departure System" in order to keep planes on their required headings of 275 and 290 thereby not widening the noise and safety hazard footprint</li> </ol>	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments.
96	Harris Steiner	February 4. 2008	Letter		<ol style="list-style-type: none"> <li>3. Keep constant pressure on the FAA for restriction of aircraft not meeting toxic and noise emission standards. Remembering there are over 70 schools adversely affected</li> </ol>	Comment noted concerning the FAA. The Draft EIR did not find any significant impact to schools. See Section 5.1.2.5 of the EIR.
97	Harris Steiner	February 4. 2008	Letter		<ol style="list-style-type: none"> <li>4. Insist on no early southward turns on the take offs, i.e, early turns over the Point Loma peninsula before the established 1.5 miles past shoreline (except for safety reasons), and establish stiff penalties for aircraft that</li> </ol>	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments. Stricter control over flight paths must be addressed with the

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					do not comply. Equipment should be installed to accurately monitor and identify these turns that are impacting whole new areas of the Point Loma peninsula	FAA as the SDCRAA does not control aircraft in flight.
98	Harris Steiner	February 4, 2008	Letter		5. Establish higher effective cost penalties on flights that break the curfew requirements, which is not uncommon at some airports.	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments.
99	Harris Steiner	February 4, 2008	Letter		6. Upgrade the noise monitoring equipment and add more monitor sites to reflect the actual noise footprints. A lawsuit had to be filed in an attempt to achieve this (Britt vs. SDCRAA).	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments.
100	Harris Steiner	February 4, 2008	Letter		7. Stop forcing homeowners to sign noise easements when they want to build or remodel. Such easements without compensation is not only unacceptable, it is probably illegal. It <u>does</u> reduce the amount of land area that is incompatible with California Noise Standards, but it <u>does not</u> reduce the noise impact on people, which is, of course, the intended purpose of all noise laws.	The commenter's proposals are appreciated, but there is no direct comment on the Draft EIR. The update to the SDIA Part 150 is the correct forum for these comments.
101	William Gibson	February 4, 2008	Email	Airport Terminal Access to Adjacent Trolley and I-5 long overdue	I have been surprised that the airport has been allowed to complete incremental development and expansion of the new terminals without a condition to make connections to either the trolley train or interstate 5 immediately	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR. See Response to General Comment #9.

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					<p>adjacent to the airport. Instead, the airport relies on available capacity in City right-of-ways that are overwhelmed and have had to install photo enforcement due to their history of traffic violations due to airport associated congestion. The continual stream of incremental expansion needs to be halted and this project should be conditioned with a transportation hub encompassing a dedicated I-5 off ramp and a trolley track station. The airport and Port Authority both about I-5 and the trolley tracks on the East side of the airfield that currently has a large parking dirt lot with a port owned pedestrian bridge no more than a block away and access to the trolley tracks no more than two blocks away. Although the connection to the West side of the airfield may not be immediately evident, there are a host of similar solutions at other airports (tunnels, monorails, ground transportation etc.). This project and any other proposed expansion of the commuter air operations should include fundamental infrastructure expansion connecting to major adjacent public transportation systems. It is ridiculous that this has not been a condition of the many previous development permits and should not be allowed to continue with this one.</p> <p>Additionally, the conditions should be constructed prior to any further airport expansions and not after as is so often the case.</p>	
102	Margaret Valentine	February 4, 2008	Letter	Safety	<p>I have recently seen a copy of this EIR report which states that expansion "is needed because of forecasted growth" and my answer is you cannot increase growth at this airport until you can ensure <u>safety</u>. This airport has been stated by the airline pilots to be the "most dangerous airport in the world" for years. Your own traffic compares with airports doing</p>	<p>The SDCRAA is concerned with safety and would not promote a project that reduced safety. The FAA is also concerned primarily with safety and handles aircraft appropriately into and out of SDIA.</p>

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					comparable business shows you all operating on 600 acres, forcing it to accommodate as many flights as those with 3-500,000 acres. Lindberg cannot continue to expand without serious consequences when you have 80-150 missed approaches a month, which includes near misses. This is unacceptable! Besides the lack of land you have only one runway which is short and has a gas station at one end and a power plant at the other. This airport could not be built today and operates only on waivers. It's a crime to expand and ask more of it than we already have. I am a native of San Diego and for 60 years we have known the need of a new location in order to have a first class airport. The last foolish attempt to move to Miramar was ill-conceived and doomed to failure from the start. Admiral Bolend who sits on the Airport Authority headed the "no" on Prop. A to defeat the measure. One of the main components of the EIR is the addition of 10 new gates to terminal 2 and construction of a new parking structure. This document also states that airlines will reduce their flight offering if these changes are not made. I say Hooray! These changes will not correct the main problems, will cause more danger to the passengers and surrounding communities. Projections show they will be obsolete before they are completed in 2015.	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.
103	Margaret Valentine	February 4, 2008	Letter	Traffic	The EIR's approach to assessing <u>traffic</u> impacts fails to correctly assign responsibility for cumulative traffic impacts. It falsely assumes that implementation of the master plan will have no significant traffic impacts since airport traffic is expected to increase anyway. Ongoing growth and airport related traffic cannot be separated for planning or mitigation purposes from improvement projects designed to increase the airport capacity. You	Cumulative Traffic Impacts are discussed in EIR Section 5.3.7. The Airport Land Use Plan describes the maximum development scenario accommodating regional growth at SDIA in 2030.  The Proposed Project will not increase airport capacity prior to 2020. The proposed project does not increase

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					must identify mitigation measure that will offset the airport's full cumulative impact on area-wide traffic.	<p>capacity. The Airport's capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.</p> <p>To the extent that the Proposed Project will have an effect on traffic after 2020, those effects are reduced to a below significant level by the proposed mitigation measures identified in Section 5.3.8.</p> <p>See Response to General Comment #4.</p>
104	Margaret Valentine	February 4, 2008	Letter	Air Quality	Also you must pay attention to the problems of air contaminant increase which adversely affect the health of workers and the surrounding community.	The Health Risk Assessment (Section 5.16) and Air Quality analysis (Section 5.5) included an analysis of sensitive receptors within the area surrounding the Airport. These sensitive receptors included residences, schools, workers, and recreational locations. The analysis found no significant or adverse health impact on these sensitive receptors.
105	Margaret Valentine	February 4, 2008	Letter	CEQA	The California Environmental Quality Act when the EIR compares the expected impacts of the proposed expansion versus the impacts of a "no project" alternative which no expansion would happen. For this case the EIR states, "no project alternative does not provide for adequate level of services to accommodate growth forecast through 2015. The Draft points out areas of deficiency under the No Project alternatives are expected to include ticketing, security screening, passenger hold rooms, baggage claims, airport access roads and parking areas and airport support facilities.	Comment noted.
106	Margaret Valentine	February 4, 2008	Letter	Noise	Noise impact with added flights will increase. There are only two flight paths 275 and 290 for take off to the west that are approved by the FAA and 250 for emergency only. Yet with the	Comment noted. The tracks modeled for noise impact are those tracks that were flown in 2005. Traffic at SDIA will increase with or without the Proposed

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					volume of traffic now these planes from out over all of Pt Loma and Pacific Beach now in order to take off as scheduled. More gates, more capacity, more danger, more flight more problems. The noise is getting worse not better. I live here, I know! I moved south from Loma Portal 18 years ago and now they fly over my house again all the time.	<p>Project.</p> <p>The Proposed Project is will not increase airport capacity prior to 2020. The proposed project does not increase capacity. The Airport's capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.</p> <p>To the extent that the Proposed Project will have an effect on traffic after 2020, those effects are reduced to a below significant level by the proposed mitigation measures identified in Section 5.3.8.</p> <p>See Response to General Comment #4.</p>
107	Margaret Valentine	February 4, 2008	Letter	Future plans	This is not what San Diego needs. What it needs is a new airport at East Elliot where there are thousand of acres to expand, money available for a rapid transit system, where safety issues are met, no community is in danger and we can fly cargo instead of trucking it to L. G. The money for this expansion to Lindberg can better be spent giving us a new 1 <sup>st</sup> class airport.	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR. See Response to General Comment #1.
108	Julia Quinn	February 4, 2008	Fax	Master Plan as Appendix	The omission of the actual Airport Master Plan as an appendix to the Draft EIR made a comprehensive review of this document difficult. The Draft EIR should include the Airport Master Plan as an appendix so that the public can adequately evaluate the analysis in the Draft EIR.	The Airport Master Plan is incorporated by reference and therefore does not need to be included as an appendix. The Airport Master Plan can be found online at <a href="http://www.sanplan.com">www.sanplan.com</a> or at the San Diego County Regional Airport Authority offices on Harbor Drive.
109	Julia Quinn	February 4, 2008	Fax	Increased flights and Noise	As discussed in the Draft EIR, the potential environmental effects of the proposed project are based on aviation activity forecasts prepared and published by the San Diego	The projected growth rate in operations is approximately 2.3 percent from 2002 through 2015, when the airfield begins to be constrained due to aircraft delay,

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					<p>County Regional Airport Authority in June 2004. Aviation activity affects such environmental issues as traffic, noise, air quality, and hazards.</p> <p>The forecasts are presented in Table 2-1 (Forecast Annual Aircraft Operations) and Table 2-2 (Forecast Annual Passengers) of the Draft EIR.</p> <p>The Draft EIR notes that the actual aviation activity at San Diego International Airport exceeds the aviation activity forecasts developed for purposes of determining the types and timing of uses identified in the Airport Master Plan and the specific facilities that may be required in the short, medium, and long-term.</p> <p>In an article published in the 1/25/08 edition of the North County Times, according to the San Diego County Regional Airport Authority, a record 18.3 million airline passengers flew in and out of Lindberg Field (San Diego International Airport) last year representing a 5% increase over the year before. In 2006, the passenger total reached 17.5 million. Last year (2007) marked the fourth year in a row when records were set for Lindberg Field. According to the North County Times article, and also reported by other local media, the number of takeoffs and landings also reached a new all-time high in 2007, in exceeding 227,000. That represented a 3 percent increase over the nearly 221,000 flights in 2006.</p>	<p>higher than the 1-1.5 percent that was asserted As of 2006, actual airport operations (excluding overflights) were 209,491 slightly less than the 211,875 operations that had been forecast. The commenter provides no basis for the conclusion that long-term operations and capacity projections are inaccurate. Actual operations fluctuate from year to year that is the reason that the SDCRAA uses multiple years to analyze potential impact.</p> <p>The information published in the North County Times supports the findings of the SH&amp;E forecast that both passengers and operations will continue to grow at San Diego International Airport. The passenger and aircraft operation activity levels projected for 2015 and beyond are significantly higher than those experienced in 2007; therefore records will continue to be set at Lindberg Field in the future. Note that, as in the past, the growth rate will vary from year to year. During periods of strong economic growth, passenger and operation growth rates will exceed the long term average, whereas in periods of slow economic growth or recession, passenger and operation growth rates will trail the long</p>

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					<p>The actual usage (aircraft operations and passengers) at San Diego International Airport County has exceeded projections developed by the San Diego County Regional Airport Authority for the purposes of evaluating the specific facilities required to meet projected future demand. This calls into question forecast utilized by the San Diego County Regional Airport Authority for the purposes of identifying projects and evaluating impacts related to the Master Plan, and the level of projects impacts associated with the implementation of the Master Plan evaluated in the Draft EIR. The analysis in the draft EIR should be revised with updated forecast of aircraft operations and passengers to account for the actual usage and projections for future use.</p> <p>As a resident of the Point Loma for over 26 years, I can attest to the increased use of the Airport has resulted in more planes flying over my home (which is south of the FAA required heading of 275). This has resulted in increased noise impacts to the Sunset Cliffs area which was not addressed in the Draft EIR. The draft EIR should be revised to analyze actual noise levels and projected noise increases based on actual noise measurements taken at the 4 headings now currently utilized by aircraft.</p>	<p>term average, or even decline at times.</p> <p>The flight tracks used to model the Proposed Project and No Project Alternatives do not change between the alternatives.</p> <p>The FAA developed and approved Integrated Noise Model is based on tested aircraft noise although not specifically at SDIA. Noise measurements are not incorporated into the Integrated Noise Model but used to compare existing noise with model output. Table 5-1.1 in the EIR makes this comparison. The determination of impact is comparative in that the difference in noise between the Proposed Project and the No Project Alternative is used to assess impact therefore the other than for purposes for setting the environmental setting noise monitors are inconsequential to the assessment of impact.</p>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
110	Julia Quinn	February 4, 2008	Fax	Traffic	The draft EIR also does not adequately address increased traffic along major egress and ingress routes to the Airport in the Point Loma area including Harbor Drive between Rosecrans and Nimitz Boulevard, Rosecrans Street, Nimitz Boulevard, and Pacific Highway. As traffic congestion increases along the road segments evaluated in the Draft EIR, use of the above named road segments in the Point Loma area will no doubt increase as alternative routes to the Airport.	See Section 5.3 and Response to Public Comment #19.
111	Teresa Brownyard	February 4, 2008	Email	Relocation	Above all, the highest priority must be to find a new site to relocate the airport. We should not spend any more money on an unfeasible option.	See Response to General Comment #1..
112	Teresa Brownyard	February 4, 2008	Email	Noise	<p>The fact of the matter is that current noise from airplanes is too loud and incessant. Right now from 6:30am-11:30 pm we hear one plane take off after the next, often with less than a minute between them! <b>Any increased noise should not be allowed!</b> There are already too many airplanes taking off nonstop with unhealthy noise to residents.</p> <p>This section [referring to Appendix B – Noise and Its Effect on People] of the EIR was very disturbing to me. The report down played noise effects and patronized the reader and residents with simple statements and definitions. There are over 220,000 documented takeoffs and landings each year, which equates to over 600 per day with a plane a minute over neighborhoods. This is more than an annoyance and a nuisance. It already disrupts classroom activities in schools and sanity and sleep.</p> <p>I am further outraged by previous comments made by Chairman Alan D. Bersin, and his</p>	<p>The SDCRAA appreciates the commenter’s concerns about aviation noise in general however the SDCRAA is not in the position to reduce operations at SDIA.</p> <p>The Proposed Project is will not increase airport capacity prior to 2020. The proposed project does not increase capacity. The Airport’s capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.</p> <p>To the extent that the Proposed Project will have an effect on noise after 2020, those effects are not at a significant level. See EIR Section 5.1.</p> <p>Appendix B is a general guide to noise and its effects and considers numerous</p>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>lack of respect for residents and process, and for his bullish attitude and untrue statements. There is a long history of citizen complained about airport noise. I have reported them online, my neighbors have reported them. For Mr. Bersin to say that there are "very few noise complaints" is simply not true. I have reported noise complaints online and received no confirmation – this doesn't mean it didn't happen! One of my neighbors had an air monitor in his yard and he routinely got readings over 90 dB. Unfortunately he passed away about 8 years ago and we lost our neighborhood watch dog. I have emailed the noise public complaint email address and volunteered to put a noise meter in my yard – again I got no confirmation or receipt.</p> <p>Again, increased noise must not be allowed. The Airport Authority should instead focus on current curfew violations, off-course departures, and missed approach flights to mitigate the now exasperating present day noise problems. As an aside, I am a firm believer that any penalties paid for violations should be spent on improvements to the affected neighborhoods that are under the flight path.</p>	<p>studies that studied the affect of noise on the population near the source of noise.</p> <p>The comment does not address the Draft EIR under review.</p>
113	Teresa Brownyard	February 4, 2008	Email	Human Health Risk Assessment	<p>This section [referring to Appendix H – Human Health Risk Assessment] was very alarming to me! To say that at best, breathing low levels of common pollutants emitted from airport-related sources (1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter and formaldehyde) may cause irritation and burning of nose, throat and skin, inflammation and watering of the eyes, coughing, and a decreased breathing rate IS A BIG PUBLIC HEALTH PROBLEM. And at worst, breathing</p>	<p>See response to comments #46 and #104 regarding the outcome and interpretation of the Health Risk Assessment.</p>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>these pollutants may cause central nervous system damage, blurred vision, nausea, fatigue, headache, decreased blood pressure and pulse rate, and unconsciousness IS FLABBERGASTING. <b>Any increased exposure to pollutants must not be allowed!</b></p> <p>To dismiss it all by saying that these conditions are "typically" not found in the outdoor environment is not good enough! This EIR must not be approved! Not only are we forced to breathe this polluted air but it also deposits on water, soil, and vegetation and further contaminate us!!! Eating or drinking foods containing these pollutants can cause vomiting, irritation of the stomach, dizziness, sleepiness, convulsions, and rapid heart rate! This is a common potential contamination mode - our vegetable gardens, BBQ grills and patio furniture consistently have a coat of black soot on them!</p> <p>To state that "some epidemiological studies found an increased incidence of nose and throat cancer in exposed individuals" without fully confirming is not good enough! These pollutants are "known" human carcinogen. It is irresponsible to disregard the health of residents living under the flight path. An epidemiology study should be conducted now for the populated area already subjected to these ill health effects! Both my son and I have asthma. How many people living under the flight path have asthma? This blatant disregard for our health is not okay!</p> <p>In summary, I have significant concerns with the environmental impacts to neighboring</p>	

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>communities (noise, pollution, traffic), as well as safety for passenger &amp; neighborhoods. As a taxpayer, I do not support spending more money on the ill-fated idea of expanding San Diego Airport/Lindbergh Field. Instead, funding must go to find a suitable replacement site.</p> <p>The airport expansion must not be approved! Lack of options for a new site does not equate to an okay to proceed with expansion! The Airport Authority must go back to their original charge and seek out an alternative site for our regional airport.</p>	
114	Roger Britt	February 4, 2008	Email	Noise Contours	1. The parameter modeled is not Community Noise Equivalent Level as defined in Title 21, Subchapter 6. Noise Standards	The commenter is correct; an additional 2 decibel penalty has been applied to the evening operations at SDIA. See Section 5.1.1 of the Final EIR for updated results. This information does not represent significant new information and does not affect the significance determinations presented in the Draft EIR.
115	Roger Britt	February 4, 2008	Email	Noise Contours	<p>2. The models that generate the noise contours have never been evaluated with actual CNEL data but, rather, with manipulated measurements.</p> <p>a. The noise measurement thresholds until mid-2005 were always set 10 to 20 decibels higher than permitted by regulations.</p> <p>b. The current noise measurement thresholds are now changed arbitrarily nearly every quarter and still fail to comply with regulations</p> <p>c. Even the manipulated measurements</p>	The noise analysis within the EIR used the latest version of Integrated Noise Model (INM version 7) available for noise analysis. The INM has been peer reviewed and is the model accepted by the Federal Aviation Administration to conduct noise analyses. The EIR cites results of noise monitoring sites in Table 5-1.1 for comparative purposes; the monitoring measures do not inform the model itself.

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

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					through much of 2003-2004 are known by the monitoring office to be in error, e.g. readings for one day were reported as month aver and reported readings	
116	Roger Britt	February 4, 2008	Email	Noise Contours	3. The current noise monitoring system, i.e.: the hardware, has never been approved for use at San Diego International Airport	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.
117	Roger Britt	February 4, 2008	Email	Noise Contours	4. The manner of operating the noise monitoring system, i.e. the noise monitoring plan, has never been submitted to nor approved by Caltrns, as a matter of fact, the installation of a filtering chip at the remote monitoring units was never disclosed to Caltrans or the Airport Noise Advisory Committee, much less to the public.	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.
118	Roger Britt	February 4, 2008	Email	Noise Contours	5. The operation of the current noise monitoring system is incapable of being audited and, in fact, is not audited by the county as required by regulation; interim data, i.e. pre-manipulation, are specifically withheld from public scrutiny.	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.
119	Miguel Romero (and family)	February 4, 2008	Email	Noise and future location	<p>I would like to express my disagreement and opposition to the San Diego County Regional Airport Authority's plan to expand Lindbergh field (SAN Airport). The new expansion plan will create more air traffic noise pollution and severe hazards to surrounding residents.</p> <p>It is extremely disappointing that the Airport Authority has abandoned all together the idea of relocating the airport in the near future. Voter's opposition in using the Miramar facility (a 'military' facility) as a future commercial airport location is NO indication that the idea of relocation should be left behind. We should learn from cities like Hong Kong that successfully relocated airports that were</p>	<p>The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR. The Proposed Project is will not increase airport capacity prior to 2020. The proposed project does not increase capacity. The Airport's capacity is limited by its runway. Instead, the proposed project will improve the experiences of those who use the facilities.</p> <p>To the extent that the Proposed Project will have any effect after 2020, those effects are reduced to a below significant level by the proposed mitigation</p>

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>posing similar hazards to its residents as SAN airport does.</p> <p>We continue to see more and more aircraft curfew violations and aircraft/tower disobeying the allowed flight path once take-offs occur. This has created new noise pollution to additional areas within Point Loma that need to be addressed and resolved.</p> <p>I urge the community and county officials to re-open the debate of relocating the airport and finding solutions that will not result in an expansion of the San Diego Airport.</p>	<p>measures identified in Chapter 5.</p> <p>See Response to General Comment #1.</p>
120	Bill Ingram	February 4, 2008	Email	Safety	<p>Lindbergh Field is the busiest single-runway in the world and it is only a matter of time before an unforeseen circumstance will create a crash of an airplane at Lindbergh. (Like the recent Boeing 777) and the recent runway incursion between the Hawker Jet still on the runway while the Southwest Airline jet took off.</p> <p>Flight schedule increasing from 600 current flights to 818 projected flights will jam up the runway and not provide proper spacing between flights landing and taking off. <b>EIR – Appendices. A</b></p> <p>What is the airport authority going to do to prevent these dangers?</p>	See Response to Peninsula Community Planning Board in Planning Group Comments letters (Bill Ingram) Comment #27.
121	Bill Ingram	February 4, 2008	Email	Noise	<p>Children in schools, residents, and customers in local businesses cannot talk because of the noise of the airplanes. Schools have 164.5 min/day = 496 hours per year of potential loss of education. The FAA says that the airport is</p>	See Response to Peninsula Community Planning Board in Planning Group Comments letters (Bill Ingram) Comment #28.

Table 1-8  
**Responses to Public Comments**  
(In order of the date received)

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					in violation of increasing the number of schools next to the airport. <b>Appendices B-40</b>	
122	Bill Ingram	February 4, 2008	Email	Air Quality, Pollution, and Traffic	<p>Along with increased flights the EIR indicates there will be significant increases over CEQA thresholds of Nitrogen oxides, sulfur oxides, and particulate matter falling from aircraft. Over 400 tons are being dumped on people.</p> <p>Traffic will increase from 87,000 to 135,000 and the overflow into Point Loma will be an increase of 100% because of the overflow from the airport. This does not include traffic derived from all other development in the area, such as Marriott – Sponge Bob, Liberty Station, and Harbor Island Hotels etc.</p>	See Response Public comment #46.
123	Bill Ingram	February 4, 2008	Email	Relocation	Thinking down the road further than 2015, 2030, or 2050 is imperative. <b>Put our major airport in East Elliot where it belongs.</b> It will provide two runways and cargo handling capability.	<p>The commenter's proposals and opinions are appreciated, but here is no direct comment on the Draft EIR.</p> <p>See General Response to Comment #1</p>
124	Matthew Naiman	February 4, 2008	Email	Flight paths violations, enforcement, and property value	As a homeowner who purchased my present residence back in 2003, I am writing to express my deep concern over the increased tendency for departing flights to stray south of the 275 degree legally mandated flight path. The lack of enforcement of this rule has resulted in ever increasing noise and unsafe conditions for my family, schools and hundreds of other peninsula residents who otherwise should not have to be subjected to these flights departing over their homes and property (which are often well south of the legally designated flight path). Furthermore, I am also very concerned about the future value and salability of my home should this pattern continue, or worse yet, increase with the new planned airport expansion.	<p>The EIR modeled aircraft using the current tracks with more use. The discussion on traffic flying south of the 275 heading is not a feature of the Proposed Project. No mitigation for noise impacts is included in the EIR as implementation of the Proposed Project will not have a significant impacts regarding noise. The SDCRAA has initiated an update to the Part 150 Study for SDIA. This study will consider noise abatement techniques to reduce non-compatible land uses. The Part 150 also considers enforcement of noise abatement techniques.</p> <p>The property value impacts of aviation noise have been studied on multiple</p>

Table 1-8  
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(In order of the date received)

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					<p>While I realize that the current planned expansion is probably necessary, the Airport Authority should not feel it has been granted an open license to continue to further erode and poorly enforce the established rules designed to protect the safety and quality of life in the neighboring communities. As such, in your new Environmental Impact Report, I am requesting to see language addressing the establishment of a tighter departure route and hours, as well as a plan for better enforcement and stiffer penalties for violators.</p>	<p>occasions with publication of study results beginning in the mid 1970s, to-date there is still no definitive answer. For individuals who might work at (or near) the airport or who use the airport for travel, the benefits of proximity can be reflected in residential property values. Because it is possible for an airport to have both negative and positive effects on property values, the net effect can be negative or positive. Separation of aviation noise from other noise emitters has always been at issue for determining a specific property value impact due to aviation noise. Some studies have found that impact due to aviation noise is negligible while others have found the impact to be upwards of 10 percent. A 2003 study by J. Nelson, Department of Economics, Pennsylvania State University entitled "Meta-Analysis of Airport Noise and Hedonic Property Values: Problems and Prospects" found that the "cumulative noise discount in the U. S. is about 0.5% to 0.6% per decibel at noise exposure levels of 75 dB or less". Hedonic means of or relating to utility. A hedonic property value model is one where the independent variables are related to quality; e.g. the quality of a property that one might buy.</p> <p>For this study 20 hedonic property value studies are analyzed, covering 33 estimates of the noise discount for 23 airports in Canada and the United States (Nelson, Jon P: Aircraft Noise and the Market for Residential Housing: 50/78/24, Sept. 1978 (Available from NTIS as PB</p>

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**Responses to Public Comments**  
(In order of the date received)

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						<p>297 681). Specifically, at Day Night Sound Levels (DNL) above 65 dB, the effect is about 1% per additional dB; at DNL between 60 and 65 dB, the effect is about 0.5% per additional dB; below 55 dB DNL, no effect has been measured (Nelson, Jon P., "Hedonic Property Value Studies of Transportation Noise: Aircraft and Road Traffic", Proceedings of the International Symposium on Hedonic Methods in Real Estate, Geneva, Switzerland, June 2007.). DNL is the cumulative noise metric used by Federal agencies to assess impact of aviation noise. From this status of current research is it expected that the Proposed Project will have an insignificant affect on property tax values in San Diego.</p> <p>Stricter control over flight paths must be addressed with the FAA as the SDCRAA does not control aircraft in flight. The Part 150 process is the correct forum for these comments.</p>
125	Gregory Giselman	February 4, 2008	Email	Future Plans	As a former Pacific Southwest Airlines and subsequently U.S. Airways maintenance technicians (mechanic), countless times I have live taxied or towed commercial aircraft on the filed to and from the parking on the North side. Particularly in the morning at 6:30 "rush hours", moving an aircraft across the runway to the South Taxiway and taxiing or towing it in a direction opposing all the departures was the next thing to frustrating. Sometimes we had to use the runway to go west however with all the departure takeoffs this couldn't always be done. In the airlines interest and having on-	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.

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(In order of the date received)

	Name	Date received	Method of Receipt	Subject	Comment	Response
					<p>time departures it was imperative to get these over night aircraft stored in North Parking to the gate for their loading and departure, hopefully on time. I continue to be amazed that there is not a full length taxiway on the North side.</p> <p>In addition I vision major terminals primarily along the Pacific Coast Highway area and cannot understand why this is not in the present longer term plan. I vision Jimsair relocated, a branch from nearby light rail coming to the terminal(s) right to the “front door” where passengers anywhere served by light rail can easily come direct to the airport with baggage and disembark the light rail on a same level platform. There is nearby freeway I-5 access and ample space for terminals where Convair and Jimsair used to be.</p> <p>I vision high frequency commuter <i>jets</i> such as Southwest being directed to turn right and taxi to their gates at this wonderful added commuter friendly location and the “trunk” airlines continuing to turn left and using gates some of which are in the present planning stage off Harbor Drive. After going to the Airport Authority and viewing the master Plan as it looked a year ago, I have the impression not enough will be done with the airfield in the present long term proposal.</p>	<p>The SDCRAA has initiated the Vision Plan for SDIA, this plan will consider in extensive detail the future of the Airport beyond the conceptual analysis that was completed for the AMP. The Vision Plan will consider incorporation of transit facilities. Also see Response to General Comment #9.</p>
126	Paul Grimes	February 5, 2008	Email	Safety	<p>The proposed Terminal 2 expansion provides enough total gates and RON positions to accommodate SAN’s ultimate operational capacity of the single runway.</p> <p>However, the Master Plan does not maximize operations capacity of RW 9/27 under the</p>	<p>The commenter’s proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.</p>

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(In order of the date received)

	<b>Name</b>	<b>Date received</b>	<b>Method of Receipt</b>	<b>Subject</b>	<b>Comment</b>	<b>Response</b>
					safest conditions. The departure staging areas would take aircraft across the active runway at risk of runway incursions and added stress on airport controllers.	
127	Paul Grimes	February 5, 2008	Email	Teledyne Ryan	None of the development proposed on the north side of the runway is tied to Terminal 2 expansion and decisions cannot be made until the Teledyne Ryan issue is resolved. A real Master Plan would address all properties at the facility, especially if an area (Teledyne Ryan) can provide a standard taxiway and a staging area that does not force aircraft to cross the active runway. The Master Plan makes unnecessary changes to the General Aviation facility, adds a huge ramp and precludes a possible Southwest Airlines terminal.	<p>The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.</p> <p>The SDCRAA has initiated the Vision Plan for SDIA, this plan will consider in extensive detail the future of the Airport beyond the conceptual analysis that was completed for the AMP. The AMP developed proposed improvements to meet near term needs (i.e. through 2015) including updating the layout of the general aviation facilities.</p>
128	Paul Grimes	February 5, 2008	Email	Traffic, future plans	<p>Instead of building a large multi-level parking structure and further overloading Harbor Drive, the Master Plan should build a dedicated roadway for buses and shuttles starting at Laurel and Pacific Highway, run through the Solar parking lot, Teledyne Ryan property, go aerial before providing stops at the Commuter Terminal, Terminals 1 and 2. MTDB must start operating buses from Old Town and Downtown on the dedicated roadway; also to be utilized by rent-a-car shuttles. Instead of an expanded General Aviation terminal and problematic departure staging area, some or all rent-a-car facilities should be relocated to the former General Dynamics site, freeing prime property along Harbor Drive and reducing traffic demands on the overloaded street.</p> <p>If the Terminal 2 parking structure is built, a bridge to serve arrivals is needed at the center of the baggage claim area.</p>	<p>The Airport Land Use Plan analyzed at a programmatic level includes a transit corridor along Pacific Highway and North harbor Drive connecting development in the north with the terminals. In addition, the Airport Land Use Plan contemplates a Consolidated Rental Car Facility in the north (former General Dynamics site).</p> <p>The terminal 2 parking structure includes pedestrian bridges to connect the structure to the terminal.</p>

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**Responses to Public Comments**  
(In order of the date received)

	<b>Name</b>	<b>Date received</b>	<b>Method of Receipt</b>	<b>Subject</b>	<b>Comment</b>	<b>Response</b>
129	Paul Grimes	February 5, 2008	Email	Gate Utilization	<p>The proposed clockwise taxiway loop may work, realizing that departing aircraft must require clearance to proceed eastbound on the single taxiway to RW 27. Gate assignment must minimize towing to/from gates other than the west side of Terminal 2 with possible mandated gate assignments to maximize gate utilization.</p> <p>To maximize SAN's runway, the Commuter Terminal must remain to utilize the quick turnoffs of smaller aircraft. Mainline aircraft must exit the Runway 27 at the first available high speed taxiway instead of rolling on the runway toward the expanded Terminal 2.</p>	The commenter's proposals and opinions are appreciated, but there is no direct comment on the Draft EIR.

**Laura Schaefer**

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**From:** Anasis Theodore [anasis@san.org](mailto:anasis@san.org) behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:47 PM  
**To:** Kim Hughes  
**Subject:** FW: Second runway

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**From:** Darrell Roberson  
**Sent:** Wednesday, November 14, 2007 10:26 AM  
**To:** Airport Planning  
**Subject:** Second runway

Why not fill in around Harbor Island, relocate the marinas, Sheriton Hotel etc and build a runway there?  
Connecting taxiways can cross over Harbor Drive at each end of the runway. Since the approach path  
would be over downtown, use that runway only for takeoffs.

1

Sincerely

D. J.  
former San Diegan

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**Laura Schaefer**

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**From:** Anasis Theodore | on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:46 PM  
**To:** Kim Hughes  
**Subject:** FW: San Diego Airport Realignment/Reconfiguration Proposal

-----Original Message-----

From: info@sanplan.com [mailto:info@sanplan.com]  
Sent: Tuesday, October 09, 2007 8:16 AM  
To: info@sanplan.com  
Subject: San Diego Airport Realignment/Reconfiguration Proposal

Subject: San Diego Airport Realignment/Reconfiguration Proposal

Message: For years the realignment/reconfiguration of the San Diego Airport (Lindbergh Field) has been an ongoing problem. Instead of continuing to obtain MCAS Miramar, which will never happen, my ongoing concern and question is this: "Why has the MCRD adjacent to the airport ever been discussed or considered, publically?" My proposal is move the MCRD to Camp Pendleton where it should be and should have been years ago where most of the Marine training is done during and immediately after recruit training. With the MCRD relocated, Lindbergh Field can then be expanded thereby providing all the required area for the necessary infrastructure needed now and for many future generation. The bottom line is: The MCRD location is and has been the most logical for expansion/realignment/reconfiguration of the current airport Lindbergh Field. reconfiguration.

2

First Name: Wayne

Last Name: Smith

Address:

City:

State:

Zip:

Email:

Airfield Tour:

Periodic Updates: yes

Means of Contact: Email

**Laura Schaefer**

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**From:** Anasis Theodore on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:46 PM  
**To:** Kim Hughes  
**Subject:** FW: Future plans

-----Original Message-----

From: info@sanplan.com [mailto:info@sanplan.com]  
Sent: Wednesday, October 10, 2007 1:54 PM  
To: info@sanplan.com  
Subject: Future plans

Subject: Future plans

Message: Please plan on a direct link to I-5 to avoid the current congestion on local roads and the convoluted route to I-5. Thank you. } 3

First Name: Chantal

Last Name: Saipe

Address: .

City:

State: .

Zip:

Email:

Airfield Tour:

Periodic Updates: yes

Means of Contact: Email

**From:** Lance Murphy  
**Sent:** Wednesday, October 17, 2007 9:30 AM  
**To:** Airport Planning; Anasis Theodore  
**Cc:** Shafer-Payne Angela; Russell Tony; Cynthia Conger; Geoff Page; Matt Awbrey (City of SD - Dist. 2)  
**Subject:** Airport Master Plan Draft EIR

Ted,

As we discussed at last Thursday's Airport Advisory Committee, I have two issues regarding the Airport Master Plan - Draft EIR that I believe should be addressed immediately:

1. The current Environmental Page for the Draft EIR has only the link to the primary volume, and excludes the figures and appendices.  
 -- This has been a problem for several persons in my community that have requested internet access to this important and lengthy document. Although many items are hyperlinked to the Figures in this document's on-line version - the time delays in accessing these links are un-workable.

2. The 'Archives' section of the Airport website has now deleted the links to the prior 2006 Draft EIR and other documents which people have requested for comparing the two Draft EIR documents. In fact, the Airport Master Plan section of the "Archives" has only 2 citations - can there be any less information?

-- This is unacceptable if the term "Archive" is to be understood as to the common English definition:

Archive: per Merriam-Webster:

1: a place in which public records or historical documents are preserved; *also* : the material preserved —often used in plural

2: a repository or collection especially of information

cc/

Cynthia Conger - Airport Committee - PCPB  
 Geoff Page - PCPB Acting Chairman  
 Kevin Faulconer - City Council #2  
 Matt Awbrey - Asst. to Mr. Faulconer

RECEIVED

OCT 17 2007

PLANNING DEPT. #44

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**Laura Schaefer**

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**From:** Anasis Theodore | behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:46 PM  
**To:** Kim Hughes  
**Subject:** FW: No info

-----Original Message-----

From: Joe Varley  
Sent: Friday, October 19, 2007 10:53 AM  
To: Airport Planning  
Subject: No info

"Draft Environmental Impact Report. View meeting schedule. The VIEW meeting schedule does not show any meetings scheduled.

6

JOE VARLEY

**From:** Zettel Charlene  
**Sent:** Sunday, October 21, 2007 5:33 PM  
**To:**  
**Cc:** Shafer-Payne Angela  
**Subject:** RE: Multiple Project impacts and Report-time extension request

Mr. Richards:  
Thank you for your statement of concerns. I have noted them and have referred them to our planning staff.  
Best regards,  
Charlene Zettel

October 19, 2007

Mr. Kevin Faulconer  
City of San Diego  
202 'C' Street  
San Diego CA 92101

RE: SDIA Airport (20+ Yr.) Master Plan's Environmental Impact Report (EIR)  
The Port Authority's Plan to narrow part of Harbor Drive  
The plan to place the Nicklodian "Spongebob" resort hotel between the airport and Harbor drive immediately to the SE of the channel.

Kevin,

We have no evidence that these three projects are being looked at in concert with one another. This is a disaster in the making if allowed to proceed as is.

The Airport Authority has released their Draft EIR for the Master Plan expansion. It includes an immediate 10 gates and other improvements. They have also been discussing additional phases with 10 more gates to fully utilize the runway's maximum capacity, but that is not in the current Draft EIR. This new document is about 550 pages without the Addendum/Appendix. The public, both lay persons and professionals need more time to evaluate this document.

There is no way that any traffic studies have taken these three projects as one with their total impacts.

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10/26/2007

All three projects must be brought to the table together for public input plus an evaluation of the impacts of the Navy base (personnel) that is being moved from Texas to Point Loma. There is also the planned relocation of the Von's supermarket to Liberty Station.

Meanwhile please address a letter to Mr. Ted Anasis requesting the original 120 day review period as was first promised by Mr. Boland at the September 12th meeting at the Nazarene University. Ted is the Planning Manager for the Draft EIR and his email is:  
Anasis Theodore

10

Sincerely yours,

Jarvis Ross  
Point Loma

10/26/2007

*Jamie Rose*  
10-22-07

SDIA AIRPORT AUTHORITY MEETING OCT. 22, 2007

Chairman Bersin and Board Members

The visual presentations of the Airport Master Plan by staff at the Airport Advisory Committee meeting and at the Peninsula Community Planning Board meeting last Thursday were badly lacking in several aspects.

**First.** The FAA has guidelines and SDIA has an ALUCP that provides for displaying RPZs in the Airport Influence Area and the restrictions therein. The Master Plan projects increased activity and with that comes increased risks on the ground in the RPZ's. It is the ground level counterpart of the Sunroad debacle.

11

The FAA is quite clear that even though SDIA does not own the land in the RPZ that they have specific obligations concerning it. The Master Plan slide presentations do not portray the RPZs nor do they indicate the restrictions there in.

There already exists a direct violation in the Liberty Station RPZ and several proposed ones. This authority abdicated its responsibility in addressing this when the Shoreline Plaza project was brought before the city council.

The existing direct violation is a prohibited parking lot in direct alignment with the runway within the Western RPZ. The projected violations are places of assembly within existing buildings within the Western RPZ.

The city's Development Services claims that the Airport Authority did not respond to the project within the allotted timeframe therefore this would signify approval and leave the Airport Authority Liable in the event of a crash in the RPZ.

Both of these also come under the state utility codes with regard to airports and public safety.

**Secondly** is the failure of three public agencies to coordinate their projects that will all impact Harbor Drive traffic.

12

SDIA's Airport Master Plan and its EIR do not address the following.

The Port Authority's Plan to narrow part of Harbor Drive

The plan to place the Nicklodian "Spongebob" resort hotel between the airport and Harbor drive immediately to the SE of the channel.

Add to this the Navy closing a base in Texas and moving those personnel to Point Loma and the Von's grocery store that will be relocating to Liberty Station.

Initially a construction nightmare and a long term traffic mess on Harbor Drive. Please act Prudently move the E.I.R to 120 days, correct the Master Plan Slide presentation to show the RPZ violations and notify the city of same.

13

JOE VARLEY - E-MAIL #1 - 1 PG

**From:** Joe Varley  
**Sent:** Monday, October 22, 2007 9:46 AM E-MAIL #1  
**To:** Airport Planning  
**Cc:**  
  
**Subject:** EIR draft 2007

I wish to object to the Draft 2007 EIR submitted by the Airport Authority.

The report does not consider the impact on traffic and air quality by the addition of 10 gates at terminal 2. The traffic plan alone is flawed and does not mitigate the increased impact of entry and exit traffic from 10 additional gates onto Harbor Drive BOTH westbound and eastbound.

The report does not consider the increased traffic impact on westbound Harbor Drive to Rosecrans caused by the Airport Expansion, the Port District development in the ACH Plan as well as the impact from the Spongebob Hotel project.

15

The report does not include the cumulative impact on noise, traffic and air quality caused by the Airport Expansion and other development nearby but attempts to portray the Airport expansion as the only project in the area.

Why is the Port development and the City plans not considered in the overall results of traffic, noise and air pollution?

16

Joe Varley  
San Diego, California 92106  
619 895-2223 cell  
619 224-0355 fax  
619 222-0555 office  
teamvarley@cox.net  
All incoming and outgoing messages  
are protected by Norton Antivirus

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OCT 22 2007

PLANNING DEPT. #44

**From:** Joe Varley  
**Sent:** Monday, October 22, 2007 10:22 AM  
**To:** Airport Planning; info@sanplan.com  
**Cc:**

**Subject:** Airport Expansion 2007 EIR

My objections to the 2007 EIR:

The report fails to consider or include any other projects in the area.

The report failed to contact the Port District and the City and NTC to become aware of the many currently planned projects that will impact the Airport plan and attempts to put out a report as a stand alone project which it is not.

As a result of that failure important environmental impacts were not identified and no mitigation plan is mentioned.

The noise, traffic and air quality are all severely impacted by the Airport Plan when it is realistically considered with the current Port and City development plans.

The westbound traffic, noise, air quality and parking on Harbor drive will be impacted by the Airport Plan and when put in proper context with NTC, Spongebob Hotel, Port District narrowing of N. Harbor Drive, Port district plan for PLN Marina Green, Port District plan for Driscoll's Wharf, these impacts must be mitigated if the Airport Authority EIR is to be considered a realistic report based on all the information available.

The report appears to be aware of the impact the plan has on eastbound Harbor Drive traffic. The report fails to identify the increased bottleneck on eastbound traffic will severely increase west bound traffic searching for Rosecrans and Nimitz to escape the traffic jam and get to I-5 and I-8.

Point Loma, Roseville, the Midway district will all be impacted but none of this is considered in this flawed report.

I urge the EIR be rejected.

JOE VARLEY  
San Diego, California 92106

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OCT 22 2007

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are protected by Norton Antivirus

**Laura Schaefer**

---

**From:** Anasis Theodore on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:47 PM  
**To:** Kim Hughes  
**Subject:** FW: Lindbergh Expansion

-----Original Message-----

From: info@sanplan.com [mailto:info@sanplan.com]  
Sent: Tuesday, October 30, 2007 1:06 PM  
To: info@sanplan.com  
Subject: Lindbergh Expansion

Subject: Lindbergh Expansion

Message: I have drawn a 100 gate/two runway scaled map of how Lindbergh could be expanded without any land aquired from MCRD. If interested please contact me at my home address. 20

First Name: John

Last Name: Karpinski

Address:

City:

State:

Zip:

Email:

Airfield Tour: yes

Periodic Updates: yes

Means of Contact: Regular Mail

**Laura Schaefer**

---

**From:** Anasis Theodore on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:47 PM  
**To:** Kim Hughes  
**Subject:** FW: Trolley/Coaster

-----Original Message-----

From: info@sanplan.com [mailto:info@sanplan.com]  
Sent: Thursday, November 01, 2007 11:38 AM  
To: info@sanplan.com  
Subject: Trolley/Coaster

Subject: Trolley/Coaster

Message: I would like to see the trolley connection to the terminals given a higher priority. I think that the trains should get people to the terminals within the first phase of the project. 21

First Name: Paul

Last Name: Zablotny

Address:

City:

State:

Zip:

Email:

Airfield Tour:

Periodic Updates:

Means of Contact: Email

**From:** Karen Voigt [  
**Sent:** Monday, November 05, 2007 9:44 AM  
**To:** info@sanplan.com  
**Subject:** Lindbergh Field

I read the article in Sunday's Union Tribune (I-4) regarding proposed expansion of the airport terminal.

22

I'd say we're putting some nice icing on a bad cake! Until we get more than one runway, we should make do with the terminals as they now exist.

Karen Voigt

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NOV 05 2007  
PLANNING DEPT. #44

**From:** David Elmore  
**Sent:** Monday, November 05, 2007 9:15 AM  
**To:** Airport Planning  
**Subject:** San Diego Airport planning

I respectfully propose that a thoughtful, unbiased review of the San Diego Airport Planning program be undertaken. I have previously lived in Oxnard, N.Y., and Houston, and when moving to San Diego 4 years ago, found the city management approach to be ineffectual, emotional, and unable to focus and organize it's problems. San Diego lacks a strong city manager, relying instead on city council, mayor, and commissions such as the airport planning group. For this reason, airport planners need to be particularly careful, strong, and do their homework in a scientific manner.

I travel domestically and abroad, over 70,000 miles annually. I see a lot of innovative improvements in airport design, traveler management, and overall traffic flow. I am amazed by the lack of foresight by the airport planners in San Diego. The need for a safe, easy access, multiple runway airport is critical here. The current location, where the original airport existed for over half a century is not an adequate site for the type of facility that will soon be needed; and needed to grow over the next 50 years.

While currently stressed with air traffic, San Diego International seeks to lure more intercontinental carriers to their airport, with attractive financial incentives (while the city deficit is burdensome). Likewise, closing our eyes, and hoping Tijuana or some other local area will step up to the plate with an adequate airport – is embarrassing. The idea of adding gates to the current single runway airport, located near a large portion of the cities residents – shuttling travelers from terminal to these additional airports... is such a horrible idea that I can't imagine who would support it, unless they received some form of kick back. What a frustrating, demeaning way to treat air travelers, and city residents.

It is really time to decide to do things in a quality, correct fashion. Find a local site where a new airport of adequate size can be built, with future growth anticipated. There are already several areas with fairly good transportation access, and not too far from the city – and package this deal, and get started.

David Elmore  
D.V.M., M.P.V.M.

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23

114



3461 TRUMBULL STREET  
SAN DIEGO CA USA 92106  
TEL 1 619 223-5762  
FAX 1 619 223-2536

**G** James Gilhooly  
3461 Trumbull St.  
San Diego, CA 92106



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NOV 06 2007

### Facsimile Cover Sheet

PLANNING DEPT. #44

Date: 11-6-2007 Time:       

To: AIRPORT PLANNING

Company: SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Fax Number:       

From: JAMES GILHOOLY  
at **WESCO**

SUBJECT: LINDBERGH FIELD EXPANSION  
Number of copies being transmitted:  
(including this sheet) 2 + ENCL.

REF: DRAFT ENVIRONMENTAL IMPACT REPORT.  
Our Fax number is

Comments or special instructions:

COMMENTS

THE REFERENCED E.I.R. FOR THE  
SUBJECT EXPANSION HAS TO BE CURRENT  
NOT PREDICATED ON VINTAGE PROJECTS.  
THE REPORT IS VERY SIMILAR TO THE  
AMERICA'S CUP E.I.R. MADE IN 2000.

FOR EXAMPLE

THERE ARE SEVEN (7) LARGE CITY  
MAINTENANCE - NAVY AND PRIVATE  
DEVELOPMENT PROJECTS SCHEDULED  
1. 2... THROUGH 2010

42

IN THE POINT LOMA AREA.

(SCOTT STREET - HARBOR DR. NORTH - ROSECRANS - SHELTER ISLAND, ETC., ETC.) (SEE ENCLURE)

THESE PROJECTS WITH THEIR HEAVY CONSTRUCTION TRUCKS & EQUIPMENT WILL CAUSE DISASTROUS CONGESTION ON THE CORRIDOR SERVING ROADS TO HWYS. 805 & 5, & THE AIRPORT.

TO COMPLETE THE GRIDLOCK SCENARIO THE REGIONAL PORT AUTHORITY ARE NOW PLANNING THE AIRPORT EXPANSION.

I TOOK THE TIME TO PERUSE THE DRAFT E.I.R. FOR THE AIRPORT.

" ALL OF THE PROTECTION DEVELOPMENT IN THE HARBOR DR. - SCOTT ST. ROSECRANS AREAS HAS BEEN IGNORED. "

AN ENVIRONMENTAL IMPACT REPORT HAS TO REFLECT THE POTENTIAL NEGATIVE/POSITIVE EFFECTS ON THE RESIDENTIAL/BUSINESS, TRAFFIC, HOUSING IN THE AREA SURROUNDING THE PROJECT, WITH A VIEW TO PROTECTING THE SOCIAL, CULTURAL, ENVIRONMENTAL, HISTORIC RESOURCES OF THE AREA TO THE GREATEST EXTENT POSSIBLE.

THE PORT SHOULD RECOGNIZE THE IMPORTANCE OF MAINTAINING FAVORABLE RELATIONS WITH THE COMMUNITY; BY IGNORING THE HEAVY PROJECT DEVELOPMENT IN THE AREA, THE PORT CLEARLY SHOWS AN INDIFFERENT ATTITUDE TO THE COMMUNITY.

24 cont

Construction Developments in Point Loma

1. Waste Water Treatment Plant - Methane Gas Tankers  
Catalina Blvd.
2. Nickelodeon Hotel & WaterPark - Construction equipment & Vehicles  
Harbor Drive
3. Navy replacing Storage Oil Tanks - equipment trucks from  
Harbor Dr. to Base Rosecrans St.
4. 47 Townhomes Shelter Island - construction equipment & vehicles  
Rosecrans/Scott Street
5. Wharf Waterfront Development - construction equipment & vehicle.  
Harbor Dr./Scott St./Rosecrans
6. Lindberg Field Expansion - Relocation of Rental Car Facilities for  
overnight Aircraft parking - Harbor Drive
7. Replacing Sewers and Water Mains on Rosecrans from Talbot St to  
Kellogg Street. Estimated start date from October 2007 to May 2008.

**Laura Schaefer**

---

**From:** Anasis Theodore on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:47 PM  
**To:** Kim Hughes  
**Subject:** FW: Drop-off passanger improvement

-----Original Message-----

From: info@sanplan.com [mailto:info@sanplan.com]  
Sent: Thursday, November 08, 2007 11:57 AM  
To: info@sanplan.com  
Subject: Drop-off passanger improvement

Subject: Drop-off passanger improvement

Message: I would like to suggest the possibility of providing diagonal parking with exit lane in front of vehicle in the passenger drop-off areas rather than current parallel parking--more efficient and much less frustrating (similar to St. Louis Lambert Airport). 25

First Name: Catherine

Last Name: Kurland

Address:

City:

State:

Zip:

Email:

Airfield Tour:

Periodic Updates:

Means of Contact:

**Laura Schaefer**

---

**From:** Anasis Theodore | on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:47 PM  
**To:** Kim Hughes  
**Subject:** FW: Second runway

---

**From:** Darrell Roberson  
**Sent:** Wednesday, November 14, 2007 10:26 AM  
**To:** Airport Planning  
**Subject:** Second runway

Why not fill in around Harbor Island, relocate the marinas, Sheriton Hotel etc and build a runway there?  
Connecting taxiways can cross over Harbor Drive at each end of the runway. Since the approach path  
would be over downtown, use that runway only for takeoffs.

26

Sincerely

D. J.  
former San Diegan

---

**From:** Stewart, Tom  
**Sent:** Monday, November 26, 2007 4:44 PM  
**To:** Airport Planning  
**Subject:** SDIA Master Plan DEIR - Missing Appendix E Tables

Hello:

We have noticed that 'Section 5.19 Greenhouse Gas Emissions' of the October 2007 DEIR, in the first paragraph on page 5.19-3 refers to Tables E-64 through E-83 in Appendix E...' However, in the Appendix E posted on the website, tables for 'Part I Air Quality' end at Table E-52 (hardcopy page E-45 or PDF page 52 of 207) and then it goes into 'Part II Construction Emissions'. Apparently Tables E-53 through at least Table E-83 were inadvertently left out of the posted Appendix E.

27

If you could locate the missing pages/tables and email them to us as soon as you can we would appreciate it.

Thank you very much.

Tom Stewart  
Malcolm Pirnie, Inc.

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NOV 26 2007

PLANNING DEPT. #44

**From:** Bill Ingram  
**Sent:** Saturday, November 24, 2007 9:27 AM  
**To:** Airport Planning  
**Cc:** Lance Murphy  
**Subject:** EIR

Airport planning commission:

Due to the 2000 pages of the EIR, I beleive it is in the est interest of the community and the planning groups to have the full 120 days to examin and make comment on the content of the EIR. It is appreciated that it was extended to 90 days. 28

Regards

Bill Ingram  
Point Loma resident.

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NOV 26 2007

PLANNING DEPT. #44

**From:** Marylou LoPreste  
**Sent:** Sunday, December 02, 2007 3:05 PM  
**To:** Airport Planning  
**Subject:** Comments on EIR Airport expansion

As a long time resident of Point Loma, over 30 years, and business owner, Fisherman's Landing, Sun Harbor Marina, I feel I am very qualified to comment on the EIR for the airport expansion. I am the first to admit that I love the convenience of the airport as I live in La Playa and have only a 10 minute commute to the airport. However, I am also seeing many other indicators of over-growth that really detracts from the convenience of the airport. My neighborhood used to be a peaceful and quiet neighborhood. However in recent years, the sound of aircraft starts at 7 AM and goes into the night. The dust and grit from the exhausts of the planes goes everywhere. The air quality is not the best for one living on the water. An airport does NOT belong in residential areas! The traffic on Harbor Drive today is awful, with the cruise ships and the airports combined. Why is there no talk of the growth factor? Why do we continue to build and build thereby detracting the quality of life?

29

I strongly oppose any kind of expansion of the airport and really think it is time to get off the stick and find another area, away from homes and schools to build an airport for the future.

Most sincerely,  
 Mary Lou LoPreste

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DEC 03 2007

PLANNING DEPT. #44

Respecting Mother Earth  
 Mary Lou

San Diego, California

December 3, 2007

San Diego County Regional Airport Authority  
ATTN: Airport Planning  
P.O. Box 82776  
San Diego, CA 92138-2776

RE: Phase 1 Airport Master Plan

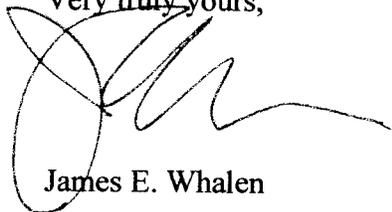
To Whom It May Concern:

This letter is regarding the San Diego International Airport Phase 1 Airport Master Plan Draft Environmental Impact Report of October, 2007. The Master Plan calls for the building of 10 additional airline gates at the western end of Terminal 2, and a new terminal for private planes on the east side of the airfield. However, the EIR fails to adequately address the increased number of flights the airport will have once these renovations are made.

30

Please provide information on why there are no planned mitigation measures for these additional flights.

Very truly yours,



James E. Whalen

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DEC 18 2007

PLANNING DEPT. #44

JARVIS ROSS - 9 PG.

1/4/08

Attention: Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Dear Planners and SDCRAA board Members:

Herewith my comments (attached) upon the Draft Environmental impact Report on the Airport Master Plan dated October 2007. It is based upon state legislation, FAA, California State, the 2004 ALUCP, documents produced by SDCRAA prior to and including 2007, and letters to SDCRAA staff by government agencies.

As the subject EIR exceeded state CEQA guidelines of 150-300 pages by over 275 pages for a total more than 575 pages it presented a hurdle for public response.

Sincerely Yours,



R. Jarvis Ross  
3115 Loma Riviera Drive  
San Diego, CA 92110

Point Loma Resident  
Board Member of a 263 unit HOA  
6 year former board member of PCPB.

# CHAPTER ONE: EXECUTIVE SUMMARY

This Environmental Impact Report was developed in accordance with the California Environmental Quality Act, Public Resources Code §§ 21000 et. seq. and the Guidelines for Implementation of the California Environmental Quality Act (California Code Regulations Title 14., §§ 15000-15387). The

**Comment:** The subject Environmental Impact Report *was not developed* in accordance with the California Environmental Quality Act Public Resources Code et. seq. Section 21003 (b), (c) and (f); Section 21083 (1), (2) and (3); Section 21100 (2) (A) & (B), and (4).

Furthermore under California code Regulations Title 14 15000-15387 Article 3 Section 15042 the Airport Authority board has the authority and therefore the legal responsibility to disapprove the subject project based upon, “significant effects upon the environment that would occur if the project were approved as proposed.”

Based upon the subject EIR’s own Executive Summary Tables 1-1 and 1-2 they project increased passengers and a need for a parking garage which means increased flights and increased vehicular ground transportation. Both of the foregoing will unequivocally result in environmentally detrimental increased air and noise pollution. They both have already been clinically identified as contributing to or causing health problems in school children.

Under Title 14 Article 10 Section 15141 the voluminous hard copy subject draft E.I.R is in gross violation of the spirit of this declaration. Section 15142 under the requirements of interdisciplinary approach the subject EIR fails to responsibly place adequate weight upon the qualitative factors and places too much emphasis on quantitative, economic and technical factors. Section 15143 reinforces that the emphasis of the EIR should be upon, “the significant effects on the environment.”

California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an objective, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT

**Comment:** The preceding statement indicates that the Airport Master Plan under CEQA required an EIR due to potential (may have), “significant environmental impacts.” [ CEQA Section 15064 (a)(1)]

By virtue of the fact that the Airport Authority did not exercise CEQA Art. 1 section 15002 (f) (2) it moves to the level of affirming that the subject Airport Master Plan proposal *does have significant environmental impacts.*

The Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County Regional Airport Authority.

(continued)

**Comment:** The preceding text is convoluted. On one hand it implies that sequential phases of development at Lindbergh field will take place if the initial one is approved and the environmental analysis anticipates this. It then implies that the cumulative environmental impacts would have to be evaluated in the future. It infers that the long range phase impacts have not been evaluated. Typically this would give weight to the future argument that phase one, if approved, has already compromised the environment. Therefore the then monetary investment in the Phase One terminal expansion should not be compromised by not proceeding with the remaining phases despite their cumulatively increased impacts upon the environment.

33  
cont.

## 1.1 Introduction and Background

San Diego International Airport is located in the northwest portion of the downtown area within the City of San Diego. The existing Airport site is severely constrained by its location. San Diego International Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east. Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport's proximity within two miles from Downtown San Diego.

34

**Comment:** The last sentence in the above paragraph presents but one of the strongest arguments *for not proceeding* with the proposed subject airport expansion at Lindbergh Field from both environmental and economic standpoints. Surrounding area density represents an increased threat environmentally to residents from increased air pollution, noise pollution, and safety. The last of these across the nation and as pointed out more recently here in San Diego on January 16<sup>th</sup> at Lindbergh Field (Source: Union-Tribune January 23, 2008) as a consequence of overworked air traffic controllers and the resulting incidents.

San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has a single, 9,401-foot-long 200-foot-wide east-west runway, making it the busiest single-runway commercial airport in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project.

35

**Comment:** This second paragraph under 1.1 makes an irrefutable case for *not pursuing* the proposed project. It is already the busiest single-runway commercial airport in the world. Not mentioned but its approach and departure, RPZ's also make it among the most dangerous both to the aircraft and those upon the ground. Most recently (January 3, 2008) the S.D. Airport Authority approved human occupancy uses in the Shoreline Plaza area of liberty Station in direct violation of Federal, State and their own ALUCP guidelines. Prior military use and their occupancy and the right of municipalities to over rule Airport Authorities land use decisions does not extend the legal right for the Airport Authority to compromise it's responsibilities under the Federal, State and it's own ALUCP guidelines. As a consequence the proposed project elevates the level of environmental impacts of which most important are health and safety hazards.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

36

**Comment:** According to the trust wording stated above the trust lands (original? subsequently acquired? or both?) are to serve, "a statewide public purpose." That could be a park, golf course or in this city it could be condemned as blighted and hotels built there. Furthermore the FAA is empowered to shut an airport down for various reasons which would void the airport usage.

Page 2 of 8

### 1.1.1 San Diego County Regional Airport Authority

San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of Supervisors. The Port District's purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

**Comment:** Paragraph one indicates that the current Airport Authority has failed to fulfill its legal obligation under S.D.C.R.A.A. Act of 2002 regarding the requirement to conduct an airport site *selection program to identify a long term regional airport solution.*

### 1.1.2 Airport Master Plan

An airport master plan is a concept for future development of an airport. The goal of the San Diego International Airport Master Plan is to provide a financially and environmentally responsible guideline for future Airport development that will accommodate forecast aviation demand and remain adaptable to either a short-term or long-term future for the existing Airport site.

In order to meet this goal of the Airport Master Plan, the following overall objectives were set to guide future development at San Diego International Airport:

1. Improve levels of service for Airport customers/users
2. Improve Airport safety and security for Airport customers/users
3. Utilize property and facilities efficiently
  - a. Maintain balance of passenger volumes and operations among the Airport's facilities.
  - b. Improve tenant facilities
4. Enhance Airport access as part of the region's transportation system
5. Enhance regional economy by serving demand for air service
6. Prepare measured, incremental improvements that are cost effective and respond to the region's forecast for air service for passengers and cargo
7. Involve stakeholder and community input
8. Consider compatibility with surrounding land uses and Airport Authority policies.

**Comments:** Items 1-6 in 1.1.2, primarily are economic arguments for continued development of Lindbergh Field. As such under CEQA EIR guidelines they are not valid for consideration except as to their adverse environmental impacts upon the broader areas of airport influence. Item 7, with regard to public input as indicated in 1.8 table 1-6 there were only 21 responses to the May 2006 Draft EIR. None of these are indicated to have been from private citizens and only two were from community planning groups. The limited response brings into question the level of public outreach. The public meeting held at Portuguese Hall in Point Loma in 2006 met with resounding opposition to the Lindbergh Field Airport Master Plan yet there is no mention of it.

*(continued)*

Item 8. in 1.1.2 needs little consideration. Anyone with common sense would acknowledge from their own observations and countless documents published by the S.D. Airport Authority in 2006 and preceding years that Lindbergh Field has been and is incompatible with surrounding land uses primarily for the reasons indicated in Executive Summary 1.8 Figure 1-1 (The following represent approximately 3/4ths of the volume of concerns.)

(1) Human Health Risk, (2) Noise (3) Traffic (4) Air Quality

In addition to the preceding are the terrain and obstructions (Briefing paper SDCRAA May 16, 2006 page 6.)

### 1.1.3 Airport Site Selection Program

From 2003 to November, 2006, the Airport Authority conducted a comprehensive study of relocating the region's primary commercial airport or enhancing San Diego International Airport's capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Site Selection Program process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The voters of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego's long-term transportation needs.

The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process.

**Comment:** The then Airport Authority did authorize an exhaustive study of relocating the regions primary commercial airport. Exhaustive in that the study encompassed the absurd (proposal 6) to the ridiculous i.e. desert sites requiring unaffordable high speed transit and a declining customer base. At the SDCRAA March 27, 2006 Strategic Planning Committee Meeting, the East Miramar (camp Elliot) was eliminated by staff based upon the erroneous assumption that joint use would be in effect at West Miramar fifteen years in the future (2021) That is the estimated time it would take to even build out Camp Elliot as the new airport. Unfortunately what the voters turned down in 2006 was not the potential use of Camp Elliot but an ill conceived joint use proposal of MCAS (West) Miramar which was associated with the ballot. This ballot defeat has been misconstrued as authorizing the discontinuance of seeking relocation for long term needs and pouring money into an environmentally unsound expansion of SDIA for relatively short term use. In 2007 an airport authority board member is reported to have stated at a public meeting at the Point Loma Nazarene University that State Senator Chris Kehoe's bill banned the continued site selection process. At a subsequent Peninsula Community Planning Board meeting a representative of Senator Kehoe flatly denied that accusation. The last paragraph indicates an incremental improvement program of improvements (expansion) of the present SDIA. To the public impacted by the airport this equates to a stealth approach.

The SDCRAA needs to get back on course and look into relocating the International Airport. More than ten years ago the postal service relocated their mail processing center to North County in anticipation that a new airport would be located near there. The Navy vacated Miramar and in like manner the Marines could also. To argue that Miramar is essential to national defense may be likened to the French depending upon the Maginot Line in WWII. When the Marines were displaced from El Toro they wanted to go to March Airforce Base. The Navy facing economic cutbacks hit upon trading their land rights for other benefits as exemplified by the Navy/Manchester deal at downtown San Diego. Developers want East Miramar. When it goes there goes the best location for San Diego's new International airport. The major pluses are it is largely open space, already has public transit (rail) nearby and the Marines would have almost 15 years to relocate.

### 1.1.4 Activity Forecast and Planning Horizon Used for Environmental Analysis

The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030.

The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration's 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first three full years after the forecast was completed. Because the trend at San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in Table 1-1.

**Comment:** Just as September 11, 2001 had a negative impact upon air travel so will the current economic fallout impact air travel projections based upon 2004 data. The major difference is that the current crisis will very likely have a much longer duration due to the combination of inflationary impacts of fuel across the spectrum of the economy and the subprime mortgage collapse impact also upon a broad range of the economy. The SH&E Aviation Activity Forecast of 2004 and the use of, "tracking above the high growth scenario" as indicated above coupled with the recent economic events make the data in 1.1.4 Table 1-1 questionable at best and more than likely invalid.

be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack

**Comment:** The preceding statement of accommodation until 2020 in 1.1.4 would appear to compromise much of the argument for any expansion at Lindbergh Field especially in terms of long term demand and it's overriding need for relocation. The additional delays resulting from high congestion are speculative over the short term (2015) due to economic factors mentioned.

## 1.2 Summary of Proposed Project (Preferred Alternative)

The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:

1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.
2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.
3. Provide for future public transit options in airport land use planning.

**Comment:** Under 1.2 (1.) above air service demand as stated in earlier comments (1.1.4) is based upon outdated and optimistic data (2004-2006) and does not reflect current adverse events (2007-2008) The elements touted are largely ones of economic benefit and per CEQA not relevant to an EIR excepting their negative environmental impacts. (2.) The current facilities are incompatible with surrounding land use i.e. densely populated with large commercial areas and the city plan to increase population density in the urban areas. (3.) Providing for future public transit options in ALUP at Lindbergh Field is full of sound and theory but signifies nothing in terms of reality.(as exemplified by MTS's light rail proposal from Old Town to University City)

(continued)

Furthermore Ms. Rosa Munoz, PE Utilities Engineer, Public Utilities Commission letter to SDCRAA Staff member Ted Anasis of February 16, 2006 raised serious issues regarding the transit proposals. As a transit center is being used as leverage for approval of phase one it should be reviewed and be subject to approval by the Public Utilities commission *prior to approval of the subject EIR.*

42  
cont.

### 1.2.1 Proposed Airport Land Use Plan

The San Diego County Regional Airport Authority proposes to adopt an Airport Land Use Plan that:

- Depicts the boundaries of San Diego International Airport; and
- Designates the land uses on the Airport.

The Proposed Airport Land Use Plan is a policy document only. The Proposed Airport Land Use Plan is a figure that depicts the properties and boundaries under the planning jurisdiction of San Diego County Regional Airport Authority.

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The preceding statements may be interpreted as in direct violation of the intent of an Airport Land Use Plan under State and Federal guidelines. An ALUP is subordinated and subject to the provisions in its ALUCP. Due to the small amount of available acreage and its site location observance of the 2004 ALUCP is critical yet it is not mentioned in the Executive Summary. The maps used in the EIR depicting the airport are grossly negligent in failing to include the RPZs. The Airport Master Plan will have direct and escalated safety concerns in these areas

The Proposed Airport Land Use Plan is a program level planning guide to ensure that Airport facilities are planned with thought and foresight to serve the greatest number of Airport users. With limited physical space available for Airport purposes, the Proposed Airport Land Use Plan guides and groups similar Airport uses to insure compatible, shared, and orderly development of Airport facilities. The adoption of the Proposed Airport Land Use Plan may incorporate mitigation measures that would be requirements and conditions for future projects to reduce environmental impacts. In addition, the Proposed Airport Land Use Plan may be modified or amended in the future to respond to changes in the demand for Airport facilities as identified in future passenger, operations, and cargo forecasts.

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The first sentence in the above paragraph highlights the overriding consideration given to the economic impacts as opposed to the environmental impacts in this EIR. The current airport authority has already compromised the FAA, the State and its own ALUCP guidelines in its sanctioning occupancy (safety) violations in the RPZ of adjoining Liberty Station. Increased activity (flights) will incur unmitigatable adverse safety, air quality and noise impacts upon the communities surrounding Lindbergh Field. The speculative reduction in noise from planes is subject to the economic conditions of the individual airlines which has generally been unfavorable to the majors in recent years.

There is escalating concerns about safety around airports due to concerns about air traffic controllers being in short supply and their resulting fatigue. (Union-Tribune 2/4/2008)

The Proposed Airport Land Use Plan designates properties that are contemplated by the San Diego County Regional Airport Authority to be used for future Airport purposes. The former Teledyne Ryan property generally located between the Airport and North Harbor Drive, south of Taxiway B and east of the Commuter Terminal, is depicted for use as airfield, ground transportation, and airport support. Until such time as the area is remediated and determined available for development the land use can not be specifically determined. Once the remediation is complete, the San Diego County Regional Airport Authority will develop specific project improvements consistent with the Proposed Airport Land Use Plan and conduct an environmental analysis at a PROJECT level for any airport facilities proposed to be constructed and operated.

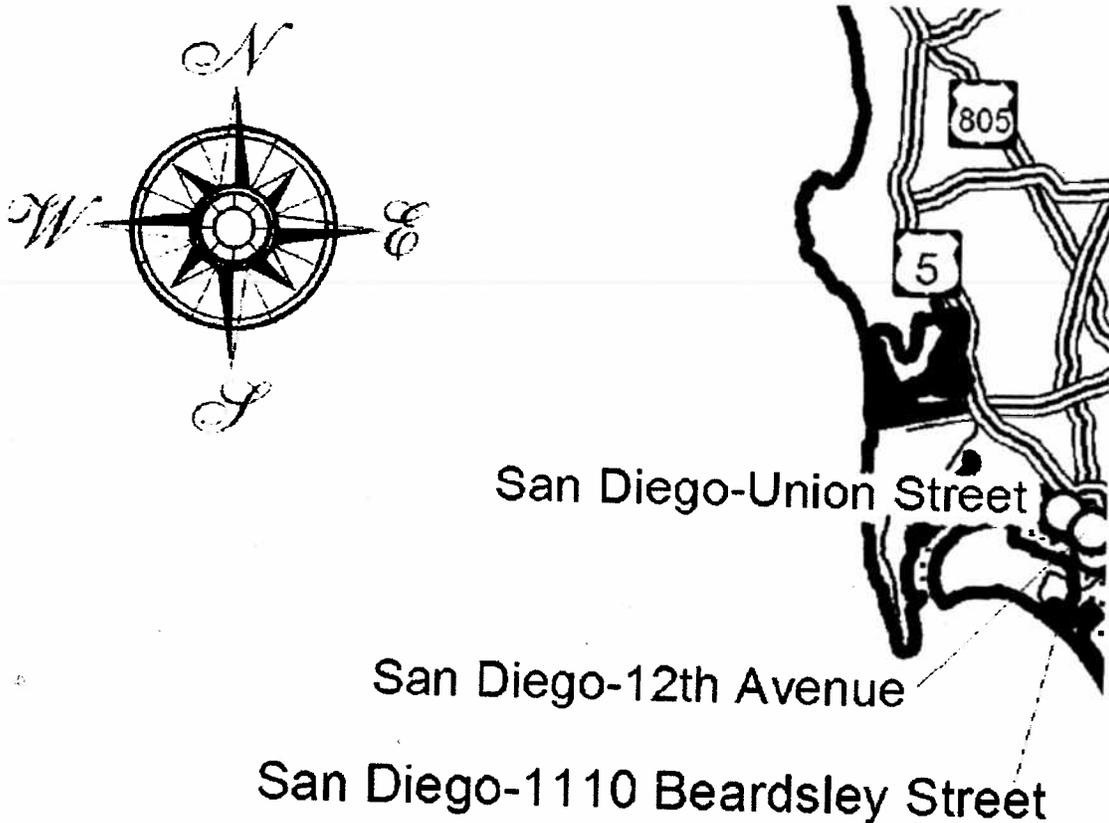
45

The above paragraph further supports the airport impacted public in surrounding communities concerns of a stealth approach in the future Lindbergh Field expansion rather than the timely initiation of relocation.

1.2.2 Proposed Airport Implementation Plan (with Parking Structure)

The Airport Implementation Plan (with Parking Structure) would include PROJECT-level approvals for those elements that are to be designed and constructed through 2012 and operate through 2015 and The basic premise of an onsite parking structure defeats alternate transit and environmental air quality control.

Figure 12. San Diego Air Basin  
Monitoring Stations  
(2005-2007)



As indicated above there are no air quality monitoring stations in the proximity of Lindbergh Field. The subject map is furnished by the state Air Resources Board may be found online at:

<http://www.arb.ca.gov/aqd/netrpt/sd.pdf>

Note that the monitors to the South all lie to the windward side of the freeway and thereby do not reflect the worst vehicular emissions.

Out of 25 cities with the worst air pollution in the U.S.A. Forbes ranks San Diego number 8. Ultra-fine particulate matter has been linked with premature death, cardiovascular disease and respiratory illness, according to the California Air Resources Board. Though it takes Americans an average of 25 minutes to drive to work (or an airport), according to 2005 U.S. Census Bureau figures, the board estimates that over 50% of a person's daily exposure to ultra-fine particles can occur during a commute. Likewise, a 2005 study by researchers at the University of Southern California's Keck School of Medicine showed that long-term exposure to ambient particulate matter may contribute to atherosclerosis, the hardening and narrowing of the arteries. This contradicts the conclusions of "less than significant" drawn in the Summary of Environmental Effects in 1.6 Table 1-4.

## 1.4.1 Summary of Alternatives Considered and Rejected

Table 1-3 provides a brief comparison of all the alternatives considered but rejected for further analysis.

Table 1-3  
Comparison of Alternatives Considered and Rejected

Alternative	Meets Project Objectives	Reasons for Meeting or Not Meeting Project Objectives
Airport Relocation	No	Can not be developed within project timeline (available by the year 2015).

The above is a classical case of creating a false premise (that relocation would have to be completed by 2015) to justify an end result. There is no environmental prerequisite for this time line. It is purely conjecture and based upon theoretical economics..

There is ample Airport Authority documentation that supported looking at alternate sites in 2006 on the assumption that construction would not be completed for approximately 15 years (2021). One or two years later to claim it is unfeasible, is ludicrous. Furthermore it is an abdication of the responsibility of the SDCRAA to continue to look for a new location.

## 1.5 Environmental Areas of Concern

- Noise;
- Land Use Planning;
- Traffic and Circulation;
- Air Quality;
- Historic, Architectural, Archaeological, Paleontological, and Cultural Resources;
- Biological Communities/Endangered and Threatened Species;
- Coastal Resources;
- Utilities and Service Systems;
- Aesthetics;
- Hazardous and Hazardous Materials;
- Human Health Risk Assessment; and
- Cumulative Effects

These impact categories as well as population and housing; hydrology and water quality; wetlands; light emissions; geology and soils; public services; and recreation are analyzed in detail in Chapter 5, *Environmental Setting, Consequences and Mitigation Measures*. The remaining California Environmental Quality Act environmental categories required for potential environmental effect determination are identified and addressed in Section 5-20, *Effects Found Not to be Significant*.

The summation of Noise, Land use planning, Traffic and Circulation Air Quality, Human Health Risk Assessment and Cumulative effects as being "Effects Found Not to be Significant" is both ludicrous and irresponsible.

To attempt to justify them in 1.7 by stating that they would occur anyways is again overlooking the necessity for relocating the airport.

Submitted at SDCRA By:  
R. Jarvis Ross  
February 4, 2004

**From:** John French  
**Sent:** Wednesday, January 09, 2008 6:14 PM  
**To:** Airport Planning  
**Subject:** Comment on draft EIR

Dear San.Org,

As a resident of the Hillcrest community I am acutely aware of the near round the clock congestion on Laurel, Kettner and other streets leading to the Harbor Drive approach to the Airport. A reasonably diligent review of the EIR revealed no mention of this airport related congestion. I trust that you are attending to this issue and will implement some actions to mitigate the current and future impacts.

John R. French  
CEO | Carttronics, LLC

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JAN 09 2008

PLANNING DEPT. #44

**James T. Frost, Airport Planner-Architect**

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IAN 09 2008

VICE PRESIDENT  
STRATEGIC PLANNING DIV.

7 January 2008  
Ms. A. Shafer-Payne, V.P., Planning and Operations  
San Diego Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Subject: Comments on San Diego International Airport Master Plan Draft EIR, October 2007

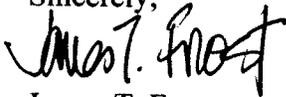
Dear Ms. Shafer-Payne:

Thank you for your letter of 19 November 2008 describing the opportunities for involvement in planning and operation of the airport.

As a result, I attended the Airport Land Use Committee meeting on 3 January and was pleased to have the chance to meet you. I plan to attend the Airport Advisory Committee meeting on 17 January to continue my participation on items related to airport development.

I would appreciate your formally submitting my comments as part of the Draft EIR review process.

Sincerely,



James T. Frost

Enclosure: SDIA Draft EIR Comments by J.T. Frost, 7 pages

## **James T. Frost, Airport Planner-Architect**

7 January 2007

These comments are submitted in response to the issuance of the “Draft Environmental Impact Report” (EIR) using the same numbering and Chapter headings. The lack of comment on specific sections of the EIR should not be construed as a complete concurrence with their findings.

### **2.0 INTRODUCTION, BACKGROUND, AND PROJECT DESCRIPTION**

#### **2.2.2 Aviation Forecast Update**

It is not clear why the traffic forecast and EIR are projected to 2030 while facilities are projected to fulfill needs only to 2015. If the EIR is meant to cover the period to 2030, the impact of expanding and operating facilities must likewise be considered to 2030.

The EIR states that airport capacity is constrained by runway capacity. While this may be true for aircraft operations, the use of larger aircraft over time to serve increasing passenger demand will generate an ever growing number of passengers which will require increased terminal facilities to serve both passengers and aircraft. The proposed expansion covers only operation and passenger growth until 2015 while the EIR implies that the airport will continue operations at least until 2030. The EIR should be amended to cover the effects of necessary facility expansion for the period from 2015 to 2030.

The ultimate “capacity” of the airport must be defined to include both maximum runway operations and maximum passengers that can be accommodated in the largest possible aircraft mix.

The Summary of Annual Forecasts indicates that design peak hour passenger projections were not determined or included. It is difficult to understand how facilities can be properly sized without the use of this critical number.

### **3.0 PROJECT OBJECTIVES**

While the EIR states that its objective is to “assess the environmental impact of the proposed Master Plan projects with significant effects”, there is no analysis of whether the proposed projects themselves are the most desirable solutions for current and future airport expansion programs.

Initially, the Airport Authority must clearly establish what levels of service are desired and economically feasible for current and future timeframes for both landside and airside services. In order to make an intelligent analysis, the costs, economic impacts and acceptable levels of inconvenience must be documented for various scenarios. In the EIR there is no indication that this has been done other than vague statements that some delays and inconvenience may be associated with various proposals.

There are only two principal proposals presented for airport development in the EIR: essentially all or nothing. The possibility of a North Terminal is dismissed out of hand as unworkable. The “All” proposal, and its derivatives, envision the airside built out to maximum runway operational capacity combined with landside terminal development on the south to match (expanded terminals, aircraft parking/gates, parking garages, and two level curbs). The “Nothing” proposal is exactly that: retaining the existing facilities and nothing in the way of additional development. Both options as presented are unrealistic.

The “All” proposal, while it maximizes airport capacity, passenger convenience and minimizes operational delays, comes at a significant cost, perhaps in the range of \$600 million or more depending on what road works are included. No economic analysis is presented to justify this expenditure. The “Nothing” proposal likewise has no economic analysis of the very real costs of delay, inconvenience and the mandatory replacement of critical airport elements simply because they wear out over time.

In summary, to make an intelligent evaluation of the proposed airport development proposals, a complete evaluation of each proposal must be made including: the physical (airport land use plan), landside facilities, the airside operational aspects, and the economic costs. Only then can a comprehensive, meaningful and comparative EIR be prepared. History has shown in airport development planning that there is usually a better way than “All” or “Nothing” proposals. It consists of examining the “Middle Ground” between the two extremes. There is no evidence that this has been done.

#### **4.0 PROPOSED PROJECT AND ALTERNATIVES**

The following are suggestions of issues and alternatives for examination to create a “Middle Ground” solution. Commonly accepted airport planning principles indicate that an airport should operate in a slightly “congested” condition with some delays and inconvenience at ultimate peak hours in order to achieve a higher rate of utilization and economic efficiency during periods of lesser activity. Application of this design principle could result in a more balanced proposal that optimizes airport development, costs less, and minimizes environmental impact.

##### **Level of Airfield Operational Service**

Determine what are acceptable levels of delay.

Propose options, such as auctioning landing slots, to spread peak hour operations.

Investigate impact of peak hour spreading related to increased total overall operations capacity.

Determine effect of limiting/diverting general aviation traffic to other airports.

Develop multiple scenarios for both directions of runway use (RW27 and RW9).

**Level of Passenger Service**

Determine what are acceptable levels of delay/inconvenience and their impact on landside facilities (parking, curb lengths, ticketing, public areas, security, support services, circulation, gate lounges).

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Establish maximum vs. optimal criteria for walking distances between critical elements.

Examine passenger and operational inconvenience and cost when comparing single vs. two level curb solutions.

Explore cost and inconvenience of terminal modifications resulting from construction of two level curb.

**Parking**

Define passenger and visitor demand for short, medium and long term.

Analyze various pricing structures for parking services and their effect on demand.

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Determine combined parking capacities on and off site.

Analyze possibility of remote check-in at a parking lot curbside.

Examine impact of promoting remote parking to spread peak hour demand and reduce curbside lengths.

Investigate using no or minimal parking structures and providing increased parking at Teledyne-Ryan site and in north SANpark to meet demand.

**Public Transit**

Verify goal to increase public transit use to only 5 to 6 percent of passengers. Coastal corridor communities (served by existing transit lines) generate approximately 20 percent of airport passengers. Existing Trolley service covers large portions of Mission Valley, East County and South Bay. Given this coverage, there is the possibility of much higher public transit use.

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Investigate alternatives to significantly increase use of public transit by close integration with Coaster, Amtrak, Trolley and bus services.

Explore high capacity, high frequency, dedicated shuttle loop from airport to cruise ship terminal to Santa Fe Station and back to airport.

Determine impact of increasing public transit to reduce: roadway requirements and congestion, curbside lengths, pollution, rental car areas, and on and offsite parking.

Compare investment required to improve public transit with costs of providing increased automobile infrastructure (on and off site) including parking.

**Airport Support Services**

**Air Cargo**

Study relocation/consolidation of air cargo to north side of airport to improve land utilization, access and reduce traffic on Harbor drive.

**Rental Car**

Investigate moving rental car operations to Teledyne Ryan site to allow for development of existing harbor side location.

Investigate moving rental car operations to north side to reduce Harbor Drive congestion.

**Aircraft Catering**

Investigate adequacy and appropriateness of existing location. Consider relocation to increase apron area, reduce service traffic and increase efficiency.

**Utilities, Waste Water, Water Supply**

Investigate adequacy of supply and waste water processing related to proposed expansion. Verify effect of increased storm drain runoff from paved areas.

**Airport Development Phasing**

Show development and associated costs by phase since all construction cannot be executed simultaneously.

Determine associated delays/inconvenience for each phase.

Determine environmental impacts by phase.

Coordinate phasing with Life Cycle Analysis.

**Airport Life Cycle Analysis**

Determine life expectancies of critical airport elements.

Prepare coordinated phased construction/replacement of elements.

Maximize critical element lifespan while maintaining operational efficiency.

Perform life cycle analysis for each proposed project scenario.

Relate life cycle analysis to Airport Development Phasing program.

**North Unit Terminal**

Provide detailed reasons for rejection of possible North Unit Terminal. Separate unit terminals function well at many airports especially when used by a dedicated carrier such as Southwest which has a large market share and few off-line passenger transfers.

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Examine effect on South Terminal landside requirements when approximately 30 percent of passengers are removed to North Unit Terminal. May result in no significant land/airside expansion at South Terminal.

Compare construction inconvenience/delays associated with North Terminal development vs. South Terminal.

Create an initial unit terminal design that could be the “anchor” for moving all passenger terminal operations to north side in future.

62 cont.

**Future (Post 2030) North Terminal Complex Development**

Investigate development of north terminal complex to replace existing terminal facilities which may become obsolete physically and lack capacity around 2030.

Investigate and seek commitment to occupy Marine Corps Recruit Training base.

Develop plan for landside access (freeway and transit) to site.

Prepare integrated plan to shift facilities to north side on phased basis.

Analyze and compare costs (construction and ongoing operational) of balanced, new North Terminal complex with expanding and maintaining existing South Terminal complex.

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**5.0 ENVIRONMENTAL SETTING, CONSEQUENCES AND MITIGATION MEASURES**

**Introduction**

Justify how the EIR can be formulated for the year 2030 when all impacts are related to airport development plans for the year 2015. This anomaly implies that all potential impacts beyond 2015 are suspect and unverifiable.

64

Explain exactly how “the proposed project does not *induce* (italics added) operations”. This claim is a splitting of definitional hairs to imply that larger, more convenient, accessible, operationally efficient airside and landside facilities will not encourage, permit, facilitate, and allow etc. additional use. The supposition that only passenger need (demand) will produce additional usage demeans the credibility of the entire EIR.

**5.2 Land Use Planning**

**Section 30252 Development**

Consider the relocation the rental car facility to “on site” to allow for public use of the waterfront area.

65

Develop plans for the promotion of public transit for high intensity use. Current EIR envisions no changes other than a general desire to increase the use of public transit to 5 percent of passengers from the current 1.2 percent.

**5.3 Traffic and Circulation**

Explore specific improvements, modifications and additions to the public transit system to increase use.

Examine the impact of increased use of public transit use to reduce: roadway capacities; parking; curbside lengths; rental car areas; road and freeway congestion.

Investigate alternatives to second level roadway as the means to increase curb length such as additional areas at grade in parking areas, and remote check-in locations.

See 5.3.8.1 Street Segments to gain an appreciation of proposed off site road works necessary to accommodate vehicle traffic. Provide responsible parties and cost allocation for these road works.

**5.3.8.3 Freeway Segments**

Explain how EIR covers the requirement and impacts of widening I-5 by one lane in each direction “which is more than necessary” (i.e. imperative) to accommodate additional airport traffic.

Delineate construction timeframe, parties responsible and how the costs will be allocated.

**5.5 Air Quality**

Explain how cited air quality data is valid when it is collected on a monitoring site “Downtown” and 2 miles away from the airport. Data collected in highly urbanized sites can radically differ from an open airport site.

Account for pollutant drift and dispersal over areas immediately east of the airport site.

Examine impacts of how significantly increased use of public transit can improve air quality.

Explain how increases in various emissions are “considered significant but unavoidable” when it is theoretically possible to limit or spread out the number of aircraft operations (5.5.10) and make them “avoidable”.

Explain justification for increasing aircraft and vehicle activity which leads to increased pollution given that facility is non-compliant and will be non-compliant in 4 of 5 categories (5.5.29) in 2030.

**5.6 Hydrology and Water Quality**

Describe means of storm water runoff treatment and subsequent water re-use to meet objectives of 5.6.3.1 and 5.6.4.6

Show area devoted to water reclamation on Airport Land Use plan to comply with 5.11.2.

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**5.13 Recreation**

**5.18.1 General Approach and Methodology**

Explain how there “would not be indirect noise impacts at parks or recreation areas located under SDIA flight paths (such as Balboa Park and Ocean Beach), given increased aircraft operations.

Justify how, given increased levels of passenger traffic, “the Proposed Project would not generate increased levels of residents or *visitors* (italics added) to San Diego, (therefore) it would not result in increased demand for or use of, parks or other recreational areas”.

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**CONCLUSION**

The above comments are offered in the spirit of a professional, constructive evaluation in an effort to produce a more thorough and analytically solid EIR.

The formulation of the EIR up to the timeframe of the year 2030 must be reconciled with the airport development plan which shows facility development only to 2015. Unknown additional development in the years 2016 to 2030 could have significant impacts on the findings of this EIR.

The airport land use plan and proposed projects should be further investigated to develop viable alternatives to the “All” or “Nothing” proposals currently presented.

The EIR should be modified, amended and corrected to reflect and evaluate alternative solutions. Once a proposed project is fully justified and selected, the EIR should be updated to reflect the chosen proposal.

**Laura Schaefer**

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**From:** Anasis Theodore | on behalf of Airport Planning [planning@san.org]  
**Sent:** Wednesday, January 30, 2008 9:48 PM  
**To:** Kim Hughes  
**Subject:** FW: Just my opion

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**From:** Cash, James  
**Sent:** Sunday, January 13, 2008 10:03 AM  
**To:** Airport Planning  
**Subject:** Just my opion

As a Capt for a major airline, these are my thoughts

1. build an elevated high speed train from San to LAX, you can go any where in the world from LAX.
- 2 .move all general aviation to nearby gilespe field
3. move all cargo carriers (FED-EX/UPS/ECT)to brown field. They do-not need to fly into Lindberg
4. with the price of fuel for jets getting ever higher the days of the 50 seat RJs are going away, limit 100 seat jets for Lindberg field,

Now there will be no congestion at SAN...

5 the tourist now have a close in airport that everybody likes

6 move the terminal over to the northeast side to take advantage of the trolley and train, also I-5 is right there for easy on and off. You could have water access for the hotels in the bay as well...

Just my thoughts as a person who fly's in and out of SAN for a major airline

Thanks  
 Capt. JetBlue Airways  
 Jim cash

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# MICHAEL HUFF, A. S. I. D.

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1/23/2008

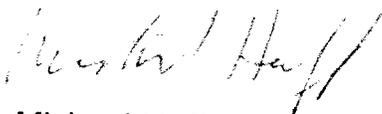
Airport Authority,

How is it possible that you could even consider expanding the capacity of Lindberg International Airport. The current situation is intolerable! I do not see anything in the expansion plan that is going to reduce the environmental impact on those of us that live near the airport. I find it interesting that you would stop a project that would effect the life style of a Lease Tern but not give the same consideration to Human Beings.

If you were reviewing the airport as a new use for the land, there is no way that you allow it to be built in it's current location. How then can you make a disastrous condition even worse???

Why am I not mailing this to the organization that is actually conducting the EIR instead of the Airport Authority?

Sincerely,



Michael Huff

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RECEIVED

January 29, 2008

Mr. Alan Bersin  
Executive Committee Chair  
Ms. Thella Bowens  
President / CEO  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

CONFIDENTIAL

RE: comment to AIRPORT MASTER PLAN (AMP) DRAFT ENVIRONMENTAL IMPACT REPORT dated October, 2007

Dear Mr. Bersin & Ms. Bowens:

Please find my understanding and comments regarding Draft EIR document mentioned above as follows:

SDCRAA completed its DEIR on a "No Project Alternative" development baseline. Unfortunately, this approach does not allow the public or decision makers to analyze existing environmental settings as it compares to development impacts when determining if a proposed project impact may be "significant", pursuant to California Environmental Quality Act (CEQA) and National Environment Protection Act (NEPA) guidelines. As you are aware, labels of "significant" impact require additional studies to mitigate impact, if feasible, whereas "insignificant" impact labels do not require any further study or mitigation.

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Capital improvements proposed in Phase 1 AMP to existing San Diego International Airport (SDIA) facilities include four elements: **Airfield, Terminal, Ground Transportation, Airport Support**. Proposed projects focus on incremental improvements to SDIA including construction of 10 new gates to Terminal 2 and a Remain-Over-Night parking structure to commence 2009 and be completed by 2011. The next Phase 2 of the AMP is expected to have a broader scope and focus on complete development that addresses a full integration of all capital improvements to maximize operations at SDIA beyond 2020. AMP Phase 2 implementation is expected to commence 2015 and includes improvements to the Teledyne Ryan property, a northern taxiway (safety concerns), acquisition of adjacent properties, relocation of airside operations, traffic mitigation on congested streets, adding roads and intersections serving SDIA, construction of an inter-modal transportation center at the north side of SDIA, relocation of landside operations to the north, consolidated rental car facility, and funding for a Regional Transportation Plan. Phase 1 of the AMP projects are expected to relieve projected pressures on daily operations beyond 2010 including: projected delays at commercial gates and projected pressures on existing taxiways from commercial, cargo and general aviation flights. The total number of operations (departure & arrivals) projected to increase 50% from current levels, nearing 302,652 total operations annually by 2030. Increased traffic congestion on Harbor Drive and increased CO2 emissions (pollution) is expected to increase significantly due to increased operations projected.

76

It's my understanding that you intend to adopt a **DEIR Memorandum of Understanding** between SANDAG and the City of San Diego to ensure all CEQA and NEPA guidelines are met. Also, that you will work to seek Federal Aviation Administration approvals for funding "Off-Airport Improvements" including: freeway ramps serving proposed inter-modal transportation center, mitigation of traffic congestion on North Harbor Drive and improvements of vehicular airport access from Washington, Grape, Hawthorne and Laurel Streets. It remains clear that SDIA hours of operation will not change, relocation alternatives for SDIA may be available by the year 2015 and that existing curfew violation rules and regulations are to remain the same. Public safety must never be compromised. Pollution, noise and traffic impacts must be mitigated to ensure our quality of life. I appreciate your leadership to ensure these processes are kept open and transparent for additional government agencies and public input.

77

Sincerely,



Suhail Khalil  
Point Loma Resident

**From:** Michael BuFalry & Lynn Wade  
**Sent:** Friday, February 01, 2008 5:50 PM  
**To:** Airport Planning  
**Subject:** Please Stop Airport Expansion

To whom it may concern,

We are very worried about airport expansion. We have terrible noise levels in Ocean Beach. My husband and I have lived in various parts of Ocean Beach for over 20 years and own a home here. We believe that there are other spaces to put more flights south and east of San Diego. I have also worked under the flight path downtown and know it's bone shaking and mind rattling. We must stop adding flights to this area and spread them to more viable areas. Other cities do it, I'm sure we can too.

Sincerely,

Lynn Wade, Michael BuFalry & Dustin

78

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FEB 01 2008

PLANNING DEPT. #44

**From:** Jason Feldman  
**Sent:** Friday, February 01, 2008 11:17 AM  
**To:** Airport Planning  
**Subject:** Airport/trolley expansion

Hello,

Unlike many residents I am not opposed to the proposed expansion of the Lindbergh Field Airport. From what I gather an additional 10 gates at terminal 2 our planned as well as a parking structure.

Sure there will be more noise, but as long as the flights don't depart after midnight as they do currently this should not be a problem. San Diego is a popular and growing city, and will see more and more traffic in the form of people, cars, as well as planes.

The most pressing issue in my opinion as well as many of my colleagues at the University of San Diego School of Law, will be the increased automobile traffic. The way to best approach this problem in our opinion is to expand the trolley system. San Diego is fortunate that there is already a good trolley system in place, but so many more people will utilize it if it went more places. As you may or may not already be aware, the most critical addition would be line connecting the downtown to the airport. (Another line to Ocean, Pacific, Mission Beach, and/or La Jolla would also be very beneficial)

79

Many of our travelers coming into our city, come here for business and to visit conventions. A lot of their need to rent a car or to take a taxi would be eliminated with a line connecting the short distance to the downtown area.

With the framework for this line established it could then be extended to continue through Point Loma and then to Ocean Beach.

It is inevitable that San Diego will expand, and no one wants to see our traffic and smog situation continue in its current path becoming more and more like L.A. Therefore it is essential we plan now to expand the trolley system to cope with the destined future growth of our city. I urge you to raise the bar and do your part to help San Diego become a model city by expanding the trolley system and showing that public transportation can work in Southern California.

Thank you for your time and consideration,

Jason Feldman

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FEB 01 2008

PLANNING DEPT. #44

**From:** gidon singer [gidonsinger@gmail.com]  
**Sent:** Friday, February 01, 2008 12:07 AM  
**To:** Airport Planning  
**Subject:** airport

Stop wasting taxpayers dollars on a doomed airport. For once think LONG term!! While certainly convenient in its proximity to downtown and the beach areas, the sensitive tidelands would make an ideal public park with cultural uses as well. Tourism would expand exponentially in this area, creating a more liveable city all along the san diego bay. Yes we should of moved the airport decades ago, however it is never too late. Hmmm 10 gates, parking structure & intermodal transport, sounds to me, like good old short sighted san diego! Let's build the infrastructure, under the guise of relieving current congestion, and then down the road declare a second runway the only responsible choice after spending all the money on infrastructure. For crying out loud create a legacy and a name for yourself, so that you can live forever. and make some long sighted responsible choices.

80

regards gidon singer

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FEB 01 2008

PLANNING DEPT. #44

February 1, 2008

Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

RE: Comments on Draft Environmental Impact Report  
Airport Master Plan, San Diego International Airport

From: Ardetta Steiner

Dear Airport Planning Manager, Staff, Consultants, and Airport Authority Members,

Although there are many parts of this massive document about which I have questions, I will keep my comments to my primary concern which is the impact of aircraft noise on humans, specifically children. As a teacher, guidance counselor, and parent of students in the jet noise impacted schools I have studied and experienced the problem.

Appendix B, "**Noise and Its Effects on People**" includes nothing about the known auditory and non auditory health effects of noise. Finally I get to Appendix H "**Human Health Risk Assessment**", a mere **FIVE PAGES** that does not even address the most serious health risk to humans, that of the effects of noise on the human body! In section 5.21.5 "**Schools**", a seven line paragraph, all we learn is that the project will not have a significant impact on school enrollment. This DEIR must be over 10,000 pages and is supposed to address serious environment impacts. This omission of the health effect of noise on children is unconscionable.

There exists voluminous scientific data from around the world that addresses jet noise as a public health problem. The research goes back nearly 40 years and can easily be found on the internet. This DEIR addresses noise as primarily an annoyance. See Appendix B, page 13-B.2.1: "**The primary potential effect of aircraft noise on exposed communities is one of annoyance.**" This comment is erroneous. Clearly the evidence is unequivocal that the human body and mind are harmed by excessive daily noise at the levels produced by jet aircraft. Section 5.1.2.3 of your EIR under schools states that "none of the research has resulted in accepted methodology or threshold of significance". Where is the evidence for such a conclusion?

FICAN (Federal Interagency Committee on Aviation Noise) in a July 2007 report states: "**Research on the effects of aircraft noise on children's learning suggests that aircraft noise can interfere with learning in the following areas: reading, motivation, language and speech acquisition, and memory.**"

A Cornell University study in 1998 concluded: "**Airport noise is harmful to the health and well-being of children and may cause lifelong problems.**" The report goes on to report that the health problems resulting from chronic airport noise, include higher blood pressure and boosted levels of stress hormones. A research team in London looked at data on more than 2,800 children living near Heathrow and other airports in Spain and the Netherlands. Their conclusion: "**Aircraft noise affects learning and translates to a delay of up to eight months in a child's expected reading age.**" A Yale University professor said this latest research backed up previous analyses. The long-term effects on these aircraft noise impacted children is unknown at this time. The "9<sup>th</sup> International Congress on Noise as a Public Health Problem" is set for July 2008 in the U.S. Proceedings of previous meetings and other scholarly articles on noise is easily available.

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Table B-9 lists about 20 schools that have serious exterior noise levels. (Omitted from the list is Explorer Elementary School, High Tech Media Schools, and Rock Church Academy, all near High Tech High Middle School which has 80.5 minutes of noise levels over 65db.) Having been a teacher and counselor at Point Loma High I am acutely aware of the noise problem. Students spend much time outside during peak times of jet operations from SDIA, such as before and after school, lunch hour, and P.E. classes. Even inside classrooms that have been "sound attenuated" the installed air conditioners make so much noise that students must move their desks up closer to the teacher to be able to hear the instruction. This is very disrupting, as you can imagine with up to 37 students in our classes. Remember this all goes on every single day, all year long, and affects thousands of children. There are about 2000 students at Point Loma High alone. Have you calculated just how many people, students, teachers, and staff there are in these noise impacted schools?

84 cont.

In this DEIR I could find no mention of possible mitigation measures for this impact on children. The problem is not new, and this project will only make it worse. You have spent \$300,000.00 to lure ZOOM Airlines to come here (according to the Union Tribune). The primary goal of this airport expansion is to make things easier and more efficient for the airlines and the passengers. Have you come up with any noise mitigation ideas?

85

Since you have no current plans to locate SDIA elsewhere, perhaps you should relocate all the impacted schools! Maybe you could outfit all the students and school personnel with noise suppression head phones. How about building sound proof astro domes over all the school grounds. At the very least you could install quieter air conditioning units in the many classrooms that need them because the windows must be closed.

86

Technology will not solve the problems of SDIA, in spite of what some of the SDCRAA Board and their staff expounds. When runway capacity is reached in the next few years, giant air buses won't help because they cannot take off fully loaded, so airlines won't schedule them here. The demand for private jet travel is growing, and the FAA predicts that Low Cost and Regionals/Commuters will be more than half the passenger market share by 2016. The growth of vehicle traffic on roads that service SDIA will cause traffic jams and daily delays. SDIA is a huge money maker and the SDCRAA has an obligation to the citizens of this county to use a large portion of that profit to help solve all the problems it is causing, especially the damage its operations is doing to our children.

Respectfully submitted,

*Ardetta Steiner*  
Ardetta Steiner

**From:** lwinslet@  
**Sent:** Monday, February 04, 2008 6:21 AM  
**To:** Airport Planning  
**Subject:** San Diego Airport

SD Airport should consider banding with other regional airports including John Wayne, Long Beach, Ontario, and Burbank to pressure airlines and jet manufactures to adopt engine innovations such as electric engines to make planes quieter and more fuel efficient. Rather than spending billions on new runway capacity, the same money could be invested in making the engines quieter so that more airports could be run 24/7 with less opposition from the impacted neighborhoods.

87

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FEB 04 2008

PLANNING DEPT. #44

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JAN 27 2008

PLANNING DEPT 344

January 25, 2008

Airport Planning  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138-2776

Re: Comments on October 2007 Draft EIR Master Plan, SDIA

Dear Neighbor,

As I viewed the 14 lbs. of EIR paper on my desk to analyze during the holiday season, I didn't see any reasonable justification for the expansion. This boiler plate document contains much old data based upon 2002/2004 projections with little new information on operations, along with partially answered questions from the various comments by reviewers

88

I read the previously submitted comments for the May 2006 DEIR, in particular the questions posed by San Diego Unified Port District's law firm of Fox and Sohagi LLP on understated operations. I then plotted the EIR data on flight operations and found that the one runway becomes severely congested by about 2011, not 2015. My projection is shown on the SH&E chart enclosed. FAA's minimum annual projected increase of 5% correlates favorably.

89

Also impacting the rapid growth in operations are new airlines coming in i.e., ATA, Zoom, Virgin, and Express Jet, along with the introduction of first class fractional ownership jets of 7 to 10 passengers. Also, the FAA forecasts that the regional jet fleet, consisting of aircraft ranging in size from 35 to 70 seats will expand dramatically. Is this why a new north terminal is being built for general aviation? No where in this EIR is a description of the details of this new north terminal. More smaller jets handling more people adds up to much greater operations than are projected in this EIR, besides clogging up the single runway by crossovers..

90

I found no responses to the various comments submitted to the 2006 DEIR except a sentence on pg. 1-25: "the comments that were received have been addressed throughout the text of the EIR". I guess they are embedded somewhere - good luck in finding them.

91

We must not forget that the airport as a neighbor is situated in one of the most pristine areas of the beautiful City of San Diego in the midst of highly functional and vibrant neighborhoods, i.e., Downtown, Golden Hills, Ocean Beach, Loma Portal, Point Loma,

92

South Mission Beach, Middle Town, Little Italy. With the increase of flight operations approaching severe congestion by 2011, the airport should institute a goal of a "GOOD NEIGHBOR POLICY" to mitigate the environmental impacts on these neighboring communities. It is the intent of the City of San Diego, as well as the nation, to increase the population density in such well functioning neighborhoods to utilize existing facilities thereby reducing environmental pollution, costs, and adverse effects of urban sprawl. Also, as the flights increase and more fan out (see enclosed map), additional neighborhoods will be adversely effected, i.e., Mission Beach, Sunset Cliffs, Wooded Area, Fleetridge, Bird Rock, La Jolla, and recently reported Kate Sessions Park area on Mt. Soledad. Remember this is happening now, and is occurring before any extra gates are to be completed by 2012. The EIR says that the existing gates can handle the traffic through 2015, ergo, no need for this project. If necessary, for the near future a lottery system for gate assignments, as is in place at other major airports, can be used.

92 cont.

Rather than starting creative financing with market derivatives, emulating Orange County, the SDCRAA should start expending some of the \$45 millions of profits a year to mitigate these impacts on our neighborhoods from increased operations. All one finds in the goals is to increase level of service to accommodate passengers. There is no serious attempt to address the impact on your neighbors. At least when the Port Authority was managing the airport, profits were used to improve tidelands recreation areas in all the Port member cities. Don't forget that SDIA is a destination airport, not a hub or transit site.

93

The following is recommended as possible goals of this Good Neighbor Policy, and the final EIR must address these goals:

94

1. Expand the policy of sound proofing impacted homes in the 65 CNEL and above areas. Use LA's stipulated settlement of 2005 as a guide. We understand that 80% of these monies available are Federal grants, and the Airport Authority has been very slow in their "quiet home" implementation program. The 2008 SDCRAA budget shows \$15 million is available.

2. Insist on the installation of necessary equipment to implement the "Precision Departure System" in order to keep planes on their required headings of 275 and 290 thereby not widening the noise and safety hazard footprint.

95

3. Keep constant pressure on the FAA for restriction of aircraft not meeting toxic and noise emission standards. Remember there are over 70 schools adversely affected.

96

4. Insist on no early southward turns on the take offs, i.e., early turns over the Point Loma peninsula before the established 1.5 miles past shoreline (except for safety reasons), and establish stiff penalties for aircraft that do not comply.

97

Pg. 3

Equipment should be installed to accurately monitor and identify these turns that are impacting whole new areas of the Point Loma peninsula.

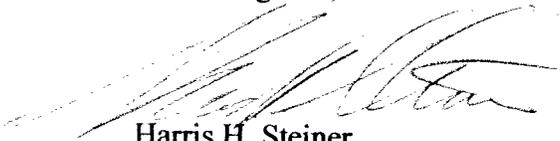
5. Establish higher effective cost penalties on flights that break the curfew requirements, which is not uncommon at some airports.

6. Upgrade the noise monitoring equipment and add more monitor sites to reflect the actual noise footprints. A lawsuit had to be filed in an attempt to achieve this (Britt vs. SDCRAA).

7. Stop forcing homeowners to sign noise easements when they want to build or remodel. Such easements without compensation is not only unacceptable, it is probably illegal. It does reduce the amount of land area that is incompatible with California Noise Standards, but it does not reduce the noise impact on people, which is, of course, the intended purpose of all noise laws.

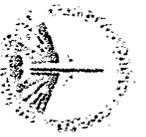
Please let us be realistic. Passenger convenience is not going to attract more tourists; San Diego is unique and beautiful. Let us not destroy it.

Your Neighbor,



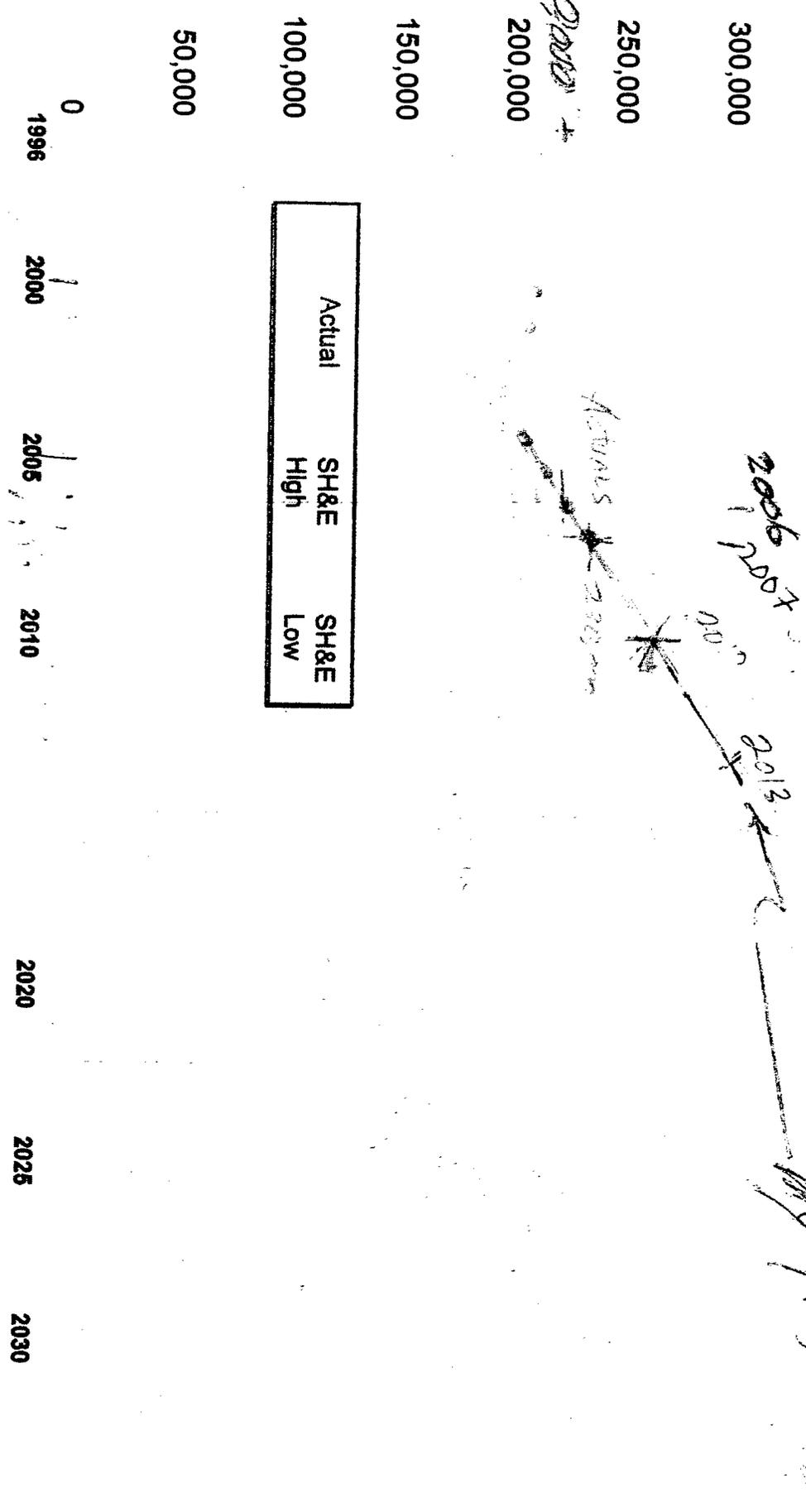
Harris H. Steiner  
561 San Fernando Street  
San Diego, CA 92106

**P.S. We still need a long-range solution for our air and ground traffic congestion at SDIA. Come up with a plan for the future, before embarking on this short-sighted fix.**



# AIRPORT OPERATIONS FORECASTS

## Comparison of Operations Forecasts for SDIA



Actual	SH&E High	SH&E Low
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Note: Operating Thresholds Based on SH&E Capacity/Delay Analysis and FAA Guidelines. Source: SH&E Analysis; SDIA Airport Operations Dept; FAA Statistics.



**Span of FAA approved departure headings**

San Diego International Airport

**From:** Gibson  
**Sent:** Sunday, February 03, 2008 8:17 AM  
**To:** Airport Planning  
**Cc:** comments@sannoise.org; kevinfaulconer@sandiego.gov  
**Subject:** Airport Terminal Access to Adjacent Trolley and I-5 Long Overdue

I have been surprised that the airport has been allowed to complete incremental development and expansion of the new terminals without a condition to make connections to either the trolley train or interstate 5 immediately adjacent to the airport. Instead, the airport relies on available capacity in City right-of-ways that are overwhelmed and have had to install photo enforcement due to their history of traffic violations due to airport associated congestion. The continual stream of incremental expansion needs to be halted and this project should be conditioned with a transportation hub encompassing a dedicated I-5 off ramp and a trolley track station. The airport and Port Authority both abut I-5 and the trolley tracks on the East side of the airfield that currently has a large parking dirt lot with a port owned pedestrian bridge no more than a block away and access to the trolley tracks no more than two blocks away. Although the connection to the West side of the airfield may not be immediately evident, there are a host of similar solutions at other airports (tunnels, monorails, ground transportation etc.). This project and any other proposed expansion of the commuter air operations should include fundamental infrastructure expansion connecting to major adjacent public transportation systems. It is ridiculous that this has not been a condition of the many previous development permits and should not be allowed to continue with this one. Additionally, the conditions should be constructed prior to any further airport expansions and not after as is so often the case.  
 William Gibson

101

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FEB 04 2008

PLANNING DEPT. #44

Feb. 1, 2008

San Diego County Regional Airport Authority  
Attn. Airport Planning  
P.O. Box 82138-2776

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FEB 04 2008

PLANNING DEPT. #44

Re: Comments on current Draft Environmental  
Impact Report for San Diego International Airport

I have recently seen a copy of this EIR report which states that expansion "is needed because of forecasted growth" and my answer is you cannot increase growth at this airport until you can insure safety. This airport has been listed by the airline pilots to be the "most dangerous airport in the world" for years. Your own traffic comparison with airports doing comparable business shows you are operating on 600 acres, forcing it to accommodate as many flights as those with 3-500,000 acres. Lindbergh cannot continue to expand without serious consequences when you have 80-150 missed approaches a month, which includes near misses. This is unacceptable! Besides the lack of land you have only one runway which is short and has a gas station at one end and a power plant at the other. This airport could not be built today and operates only on waivers. It's a crime to expand and ask more of it than we already have. I am a native of San Diego and for 60 years we have known we need a new location in order to have a first class airport. The last foolish attempt to move to Mira Mar was ill conceived and doomed to failure from the start. Admiral Boland who sits on the Airport Authority headed the "no" on Prop A. To defeat the measure, one of the main components of the EIR is

the addition of 10 new gates to Terminal 2 and construction of a new parking structure. This document also states that airlines will reduce their flight offerings if these changes are not made. I say Hooray! These changes will not correct the main problems, will cause more danger to the passengers and surrounding communities. Projections show they will be obsolete before they are completed in 2015.

The EIR's approach to assessing traffic impacts fails to correctly assign responsibility for cumulative traffic impacts. It falsely assumes that implementation of the master plan will have no significant traffic impacts since airport traffic is expected to increase anyway. Ongoing growth and airport-related traffic cannot be separated for planning or mitigation purposes from improvement projects designed to increase the airport's capacity. You must identify mitigation measures that will offset the airport's full cumulative impacts on area-wide traffic. Also you must pay attention to the problem of air contaminant increases which adversely affect the health of workers and the surrounding community. 103

The California Environmental Quality Act which the EIR compares the expected impacts of the proposed expansion versus the impacts of a "No Project" alternative which no expansion would happen. In this case the EIR states "no Project alternative does not provide for adequate level of service to accommodate growth forecast through 2015. The Draft points out areas of inadequacy under the No Project 105

alternatives are expected to include ticketing, security screening, passenger hold rooms, baggage claims, airport access roads and parking areas, and airport support facilities.

Noise impact with added flights will increase. There are only two flight paths 275° and 290° for take off to the west that are approved by the FAA and 250° for emergency only. Yet with the volume of traffic now these planes fan out over all of Pt. Loma and Pacific Beach now in order to take off as scheduled. More gates, more capacity, more danger, more flight more problems. The noise is getting worse not better I live here, I know! I moved south from Loma Portal 18 years ago and now they fly over my house again all the time.

106

This is not what San Diego needs. What is needed is a new Airport at East Elliot where there are thousands of acres to expand, money available for a rapid transit system, where safety issues are met no community is in danger and we can fly cargo instead of trucking it to L.A. The money for this expansion to Lindburg can better be spent giving us a new 1st Class Airport!

107

Margaret B. Valentine

February 4, 2008

RECEIVED

Sent via FAX

PLANNING DEPT 444

San Diego County Regional Airport Authority  
Attn: Airport Planning  
P.O. Box 82776  
San Diego, CA 92138-2776

**DRAFT ENVIRONMENTAL IMPACT REPORT -AIRPORT MASTER PLAN PHASE I  
STATE CLEARINGHOUSE NO. 2005091105**

To whom it may concern:

I have reviewed the above referenced Draft Environmental Impact Report (EIR), dated October 2007, and provide the following comments.

The omission of the actual Airport Master Plan as an appendix to the Draft EIR made a comprehensive review of this document difficult. The Draft EIR should include the Airport Master Plan as an appendix so that the public can adequately evaluate the analysis in the Draft EIR.

108

As discussed in Draft EIR, the potential environmental effects of the proposed project are based on aviation activity forecasts prepared and published by the San Diego County Regional Airport Authority in June 2004. Aviation activity affects such environmental issues as traffic, noise, air quality, and hazards.

109

The forecasts are presented in Table 2-1 (Forecast Annual Aircraft Operations) and Table 2-2 (Forecast Annual Passengers) of the Draft EIR.

The Draft EIR notes that the actual aviation activity at San Diego International Airport exceeds the aviation activity forecasts developed for purposes of determining the types and timing of uses identified in the Airport Master Plan and the specific facilities that may be required in the short, medium, and long-term.

In an article published in the 1/25/08 edition of the North County Times, according to the San Diego County Regional Airport Authority, a record 18.3 million airline passengers flew in and out of Lindberg Field (San Diego International Airport) last year representing a 5 percent increase over the year before. In 2006, the passenger total reached 17.5 million. Last year (2007) marked the fourth year in a row when records were set for Lindberg Field. According to the North County Times article, and also reported by other local media, the number of takeoffs and landings also reached a new all-time high in 2007, in exceeding 227,000. That represented a 3 percent increase over the nearly 221,000 flights in 2006.

San Diego County Regional Airport Authority  
Attn: Airport Planning  
February 4, 2008  
Page 2 of 2

The actual usage (aircraft operations and passengers) at San Diego International Airport County has exceeded projections developed by the San Diego County Regional Airport Authority for the purposes of evaluating the specific facilities required to meet projected future demand. This calls into question forecast utilized by the San Diego County Regional Airport Authority for the purposes of identifying projects and evaluating impacts related to the Master Plan, and the level of projects impacts associated with the implementation of the Master Plan evaluated in the Draft EIR. The analysis in the draft EIR should be revised with updated forecast of aircraft operations and passengers to account for the actual usage and projections for future use.

109 cont.

As a resident of the Point Loma for over 26 years, I can attest to the increased use of the Airport has resulted in more planes flying over my home (which is south of the FAA required heading of 275). This has resulted in increased noise impacts to the Sunset Cliffs area which was not addressed in the Draft EIR. The draft EIR should be revised to analyze actual noise levels and projected noise increases based on actual noise measurements taken at the 4 headings now currently utilized by aircraft.

The draft EIR also does not adequately address increased traffic along major egress and ingress routes to the Airport in the Point Loma area including Harbor Drive between Rosecrans and Nimitz Boulevard, Rosecrans Street, Nimitz Boulevard, and Pacific Highway. As traffic congestion increases along the road segments evaluated in the Draft EIR, use of the above named road segments in the Point Loma area will no doubt increase as alternative routes to the Airport.

110

In conclusion, the Draft EIR needs to be revised to accurately address environmental impacts associated with current actual aircraft operations and passenger use, not the level of impacts associated with forecasts that have been determined to consistently exceed projections, even by the admission of the San Diego County Regional Airport Authority.

Thank you in advance for your anticipated responses and revisions to the Draft EIR.

Sincerely,



JULIA M. QUINN  
4557 Bermuda Avenue  
San Diego, CA 92107

CC: Peninsula Community Planning Board

RECEIVED

**From:** Teresa Brownyard  
**Sent:** Monday, February 04, 2008 3:44 PM  
**To:** Airport Planning  
**Subject:** comments to draft EIR for airport

FEB 04 2008

PLANNING DEPT. #44

My comments on The San Diego County Regional Airport Authority's Draft Environmental Impact Report (EIR) for the Airport Master Plan are below.

Above all, the highest priority must be to find a new site to relocate the airport. We should not spend any more money on an unfeasible option. Now regarding the EIR, I am most concerned with issues of safety, and the lack of ability to mitigate noise, pollution and traffic impacts with regard to the planned improvements. As such my comments are summarized under the two following main topics of the report.

111

**Appendix B - Noise and Its Effect on People**

The fact of the matter is that current noise from airplanes is too loud and incessant. Right now from 6:30am - 11:30 pm we hear one plane take off after the next, often with less than a minute between them! **Any increased noise should not be allowed!** There are already too many airplanes taking off nonstop with unhealthy noise to residents.

This section of the EIR was very disturbing to me. The report down played noise effects and patronized the reader and residents with simple statements and definitions. There are over 220,000 documented takeoffs and landings each year, which equates to over 600 per day with a plane a minute over neighborhoods. This is more than an annoyance and a nuisance. It already disrupts classroom activities in schools and sanity and sleep.

112

I am further outraged by previous comments made by Chairman Alan D. Bersin, and his lack of respect for residents and process, and for his bullish attitude and untrue statements. There is a long history of citizen complained about airport noise. I have reported them online, my neighbors have reported them. For Mr. Bersin to say that there are "very few noise complaints" is simply not true. I have reported noise complaints online and received no confirmation – this doesn't mean it didn't happen! One of my neighbors had an air monitor in his yard and he routinely got readings over 90 dB. Unfortunately he passed away about 8 years ago and we lost our neighborhood watch dog. I have emailed the noise public complaint email address and volunteered to put a noise meter in my yard – again I got no confirmation or receipt.

Again, increased noise must not be allowed. The Airport Authority should instead focus on current curfew violations, off-course departures, and missed approach flights to mitigate the now exasperating present day noise problems. As an aside, I am a firm believer that any penalties paid for violations should be spent on improvements to the affected neighborhoods that are under the flight path.

**Appendix H - Human Health Risk Assessment**

This section was very alarming to me! To say that at best, breathing low levels of common pollutants emitted from airport-related sources (1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter and formaldehyde) may cause irritation and burning of nose, throat and skin, inflammation and watering of the eyes, coughing, and a decreased breathing rate IS A BIG PUBLIC HEALTH PROBLEM. And at worst, breathing these pollutants may cause central nervous system damage, blurred vision, nausea, fatigue, headache, decreased blood pressure and pulse rate, and unconsciousness IS FLABBERGASTING. **Any increased exposure to pollutants must not be allowed!**

113

To dismiss it all by saying that these conditions are "typically" not found in the outdoor environment is not good enough! This EIR must not be approved! Not only are we forced to breathe this polluted air but it also deposits on water, soil, and vegetation and further contaminate us!!! Eating or drinking foods containing these pollutants can cause vomiting, irritation of the stomach, dizziness, sleepiness,

convulsions, and rapid heart rate! This is a common potential contamination mode - our vegetable gardens, BBQ grills and patio furniture consistently have a coat of black soot on them!

To state that "some epidemiological studies found an increased incidence of nose and throat cancer in exposed individuals" without fully confirming is not good enough! These pollutants are "known" human carcinogen. It is irresponsible to disregard the health of residents living under the flight path. An epidemiology study should be conducted now for the populated area already subjected to these ill health effects! Both my son and I have asthma. How many people living under the flight path have asthma? This blatant disregard for our health is not okay!

113  
cont.

In summary, I have significant concerns with the environmental impacts to neighboring communities (noise, pollution, traffic), as well as safety for passenger & neighborhoods. As a taxpayer, I do not support spending more money on the ill-fated idea of expanding San Diego Airport/Lindbergh Field. Instead, funding must go to find a suitable replacement site.

The airport expansion must not be approved! Lack of options for a new site does not equate to an okay to proceed with expansion! The Airport Authority must go back to their original charge and seek out an alternative site for our regional airport.

Teresa Brownyard,  
A mother and a concerned resident of Ocean Beach!

**From:** Roger Britt  
**Sent:** Monday, February 04, 2008 4:39 PM  
**To:** Airport Planning  
**Subject:** Comments re: Long Range Plan  
**Attachments:** Noise Contours.doc

Please address these issues. Thank you.

Roger A. Britt  
3346 Goldsmith St.  
San Diego, CA 92108-1423  
619-223-8265

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## NOISE CONTOURS

The noise contours presented in the long-range plan are fictions.

1. The parameter modeled is not Community Noise Equivalent Level as defined in Title 21, Subchapter 6. Noise Standards.
2. The models that generate the noise contours have never been evaluated with actual CNEL data but, rather, with manipulated measurements.
  - a. The noise measurement thresholds until mid-2005 were always set 10 to 20 decibels higher than permitted by regulations.
  - b. The current noise measurement thresholds are now changed arbitrarily nearly every quarter and still fail to comply with regulations.
  - c. Even the manipulated measurements through much of 2003-2004 are known by the monitoring office to be in error, e.g. readings for one day were reported as month averages and reported readings were arbitrarily set at "zero", no corrections have ever been issued nor have summary statistics been recalculated. Measurements after mid -2004 are no longer available.
3. The current noise monitoring system, i.e.: the hardware, has never been approved for use at San Diego International Airport.
4. The manner of operating the noise monitoring system, i.e. the noise monitoring plan, has never been submitted to nor approved by Caltrans, as a matter of fact, the installation of a filtering chip at the remote monitoring units was never disclosed to Caltrans or the Airport Noise Advisory Committee, much less to the public.
5. The operation of the current noise monitoring system is incapable of being audited and, in fact, is not audited by the county as required by regulation; interim data, i.e. pre-manipulation, are specifically withheld from public scrutiny.

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**From:** Miguel Romero  
**Sent:** Monday, February 04, 2008 3:23 PM  
**To:** Airport Planning  
**Cc:** comments@sannoise.org  
**Subject:** Public Comments - Airport Planning (SAN)

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February 4, 2008

SAN DIEGO REGIONAL AIRPORT AUTHORITY

REF: Public Comments

To Airport Planning:

I would like to express my disagreement and opposition to the San Diego County Regional Airport Authority's plan to expand Lindbergh field (SAN Airport). The new expansion plan will create more air traffic noise pollution and severe hazards to surrounding residents.

It is extremely disappointing that the Airport Authority has abandoned all together the idea of relocating the airport in the near future. Voter's opposition in using the Miramar facility (a 'military' facility) as a future commercial airport location is NO indication that the idea of relocation should be left behind. We should learn from cities like Hong Kong that successfully relocated airports that were posing similar hazards to its residents as SAN airport does.

We continue to see more and more aircraft curfew violations and aircraft/tower disobeying the allowed flight path once take-offs occur. This has created new noise pollution to additional areas within Point Loma that need to be addressed and resolved.

I urge the community and county officials to re-open the debate of relocating the airport and finding solutions that will not result in an expansion of the San Diego Airport.

Sincerely,

Miguel Romero (and family)

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**From:** Bill Ingram  
**Sent:** Sunday, February 03, 2008 1:18 PM  
**To:** Airport Planning; Ben Hueso; Donna Frye; Kevin Faulconer; Brian Maienschein; Jim Madaffer; Matt Awbrey; Scott Peters; Steve Francis; Toni Atkins; Tony Young  
**Subject:** Response to Airport EIR

**San Diego Airport Authority**

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Re: EIR for airport master plan

Response to EIR:

There are three major issues that have to be addressed from the information in the EIR.

**Safety:** Lindbergh Field is the busiest single-runway in the world and it is only a matter of time before an unforeseen circumstance will create a crash of an airplane at Lindbergh. (Like the recent Boeing 777) and the recent runway incursion between the Hawker Jet still on the runway while the Southwest Airline jet took off.

120

Flight schedule increasing from 600 current flights to 818 projected flights will jam up the runway and not provide proper spacing between flights landing and taking off. **EIR – Appendices. A**

What is the airport authority going to do to prevent these dangers?

**Noise and Environment:** Children in schools, residents, and customers in local businesses cannot talk because of the noise of the airplanes. Schools have 164.5 min/day =496 hours per year of potential loss of education. The FAA says that the airport is in violation of increasing the number of schools next to the airport. **Appendices. B-40**

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Along with increased flights the EIR indicates there will be significant increases over CEQA thresholds of Nitrogen oxides, sulfur oxides and particulate matter falling from aircraft. Over 400 tons are being dumped on people.

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Traffic will increase from 87, 000 to 135,000 and the overflow into Point Loma will be an increase of 100% because of the overflow from the airport. This does not include traffic derived from all other development in the area, such as Marriot – Sponge Bob, Liberty Station, and Harbor Island Hotels etc.

Thinking down the road further than 2015, 2030 or 2050 is imperative. **Put our major airport in East Elliot where it belongs.** It will provide two runways and cargo handling capability.

123

Bill Ingram

**From:**  
**Sent:** Monday, February 04, 2008 12:46 PM  
**To:** Airport Planning  
**Subject:** Pending Environmental Impact Report Comments

Dear San Diego County Regional Airport Authority,

As a homeowner who purchased my present residence back in 2003, I am writing to express my deep concern over the increased tendency for departing flights to stray south of the 275 degree legally mandated flight path. The lack of enforcement of this rule has resulted in ever increasing noise and unsafe conditions for my family, schools and hundreds of other peninsula residents who otherwise should not have to be subjected to these flights departing over their homes and property (which are often well south of the legally designated flight path). Furthermore, I am also very concerned about the future value and salability of my home should this pattern continue, or worse yet, increase with the new planned airport expansion.

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While I realize that the current planned expansion is probably necessary, the Airport Authority should not feel it has been granted an open license to continue to further erode and poorly enforce the established rules designed to protect the safety and quality of life in the neighboring communities. As such, in your new Environmental Impact Report, I am requesting to see language addressing the establishment of a tighter departure route and hours, as well as a plan for better enforcement and stiffer penalties for violators.

Thank You.

Matthew Naiman

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Gregory Gieselman

San Diego County Regional Airport Authority,  
Comments on Draft E.I.R. report,

As a former Pacific Southwest Airlines and subsequently U.S. Airways maintenance technician (mechanic), countless times I have live taxied or towed commercial aircraft on the field to and from the parking on the North side. Particularly in the morning at 6:30 "rush hour", moving an aircraft across the runway to the South Taxiway and taxiing or towing it in a direction opposing all the departures was the next thing to frustrating. Sometimes we had to use the runway to go west however with all the departure takeoffs this couldn't always be done. In the airlines interest and having on-time departures it was imperative to get these over night aircraft stored in North Parking to the gate for their loading and departure, hopefully on time. I continue to be amazed that there is not a full length taxiway on the North side.

In addition I vision major terminals primarily along the Pacific Coast Highway area and cannot understand why this is not in the present long term plan. I vision Jimsair relocated, a branch from nearby light rail coming to the terminal(s) right to the "front door" where passengers anywhere served by light rail can easily come direct to the airport with baggage and disembark the light rail on a same level platform. There is nearby freeway I-5 access and ample space for terminals where Convair and Jimsair used to be.

I vision high frequency commuter *jets* such as Southwest being directed to turn right and taxi to their gates at this wonderful added commuter friendly location and the "trunk" airlines continuing to turn left and using gates some of which are in the present planning stage off Harbor Drive. After going to the Airport Authority and viewing the Master Plan as it looked a year ago, I have the impression not enough will be done with the airfield in the present long term proposal.

Sincerely, Greg Gieselman

e-mailed to [planning@san.org](mailto:planning@san.org)

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**From:** Paul Grimes  
**Sent:** Tuesday, February 05, 2008 9:34 PM  
**To:** Airport Planning  
**Subject:** Comments on SAN Master Plan

I'm sorry this is a day late. I hope you can include it.

The proposed Terminal 2 expansion provides enough total gates and RON positions to accommodate SAN's ultimate operational capacity of the single runway.

126

However, the Master Plan does not maximize operational capacity of RW 9/27 under the safest conditions. The departure staging area would take aircraft across the active runway at risk of runway incursions and added stress on airport controllers.

None of the development proposed on the north side of the runway is tied to Terminal 2 expansion and decisions cannot be made until the Teledyne Ryan issue is resolved. A real Master Plan would address all properties at the facility, especially if an area (Teledyne Ryan) can provide a standard taxiway and a staging area that does not force aircraft to cross the active runway. The Master Plan makes unnecessary changes to the General Aviation facility, adds a huge ramp and precludes a possible Southwest Airlines terminal.

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Instead of building a large multi-level parking structure and further overloading Harbor Drive, the Master Plan should build a dedicated roadway for buses and shuttles starting at Laurel and Pacific Highway, run through the Solar parking lot, Teledyne Ryan property, go aerial before providing stops at the Commuter Terminal, Terminals 1 and 2. MTDB must start operating buses from Old Town and Downtown on the dedicated roadway; also to be utilized by rent-a-car shuttles. Instead of an expanded General Aviation terminal and problematic departure staging area, some or all rent-a car facilities should be relocated to the former General Dynamics site, freeing prime property along Harbor Drive and reducing traffic demands on the overloaded street.

128

If the Terminal 2 parking structure is built, a bridge to serve arrivals is needed at the center of the baggage claim area.

The proposed clockwise taxiway loop may work, realizing that departing aircraft must require clearance to proceed eastbound on the single taxiway to RW 27. Gate assignment must minimize towing to/from gates other than the west side of Terminal 2 with possible mandated gate assignments to maximize gate utilization.

129

To maximize SAN's runway, the Commuter Terminal must remain to utilize the quick turnoffs of smaller aircraft. Mainline aircraft must exit the Runway 27 at the first available high speed taxiway instead of rolling on the runway toward the expanded Terminal 2.

Paul Grimes

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