Final
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
SDCRAA # EIR-10-01
State Clearinghouse No. 2005091105

AIRPORT MASTER PLAN
SAN DIEGO INTERNATIONAL AIRPORT

Lead Agency:
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY
P.O. Box 82776
San Diego, CA 92138-2776
www.san.org

August 2011
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CHAPTER 1: EXECUTIVE SUMMARY

This Supplemental Environmental Impact Report (EIR) 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).

As part of the evaluation of the comments received on the Draft Supplemental EIR (see Section 1.5 below), revisions were made to the Draft Supplemental EIR to reflect refinements to the Proposed Project and minor corrections and additions to the text of that earlier document. In revising that document to produce this Final Supplemental EIR, text to be deleted is shown in strike-out (i.e., strike-out text), and text that has been inserted is shown in underline.

1.1 Project Background

This document is a Supplemental Environmental Impact Report (EIR) for the Airport Master Plan (AMP) for San Diego International Airport (SDIA).

SDIA 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. The Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, U.S. Marine Corps Recruit Depot (MCRD) San Diego to the north, and Pacific Highway and Interstate 5 to the east. SDIA is the smallest major airport site in the United States, consisting of 661 acres. The Airport has a single, 9,401-foot-long by 200-foot-wide east-west runway, making it the busiest single-runway commercial airport in the nation.

In May 2006, the Draft EIR for the SDIA proposed AMP was published. The AMP Draft EIR addressed the land uses and improvements contemplated in the proposed Airport Land Use Plan at a program-level of analysis, and the specific improvements of the proposed Airport Implementation Plan at a project-level of analysis, based on information available at the time. The AMP Draft EIR addressed a full range of environmental issues in detail, including: noise; land use planning; traffic and circulation; population and housing; air quality; hydrology and water quality; historic, architectural, archaeological, paleontological, and cultural resources; biotic communities/endangered and threatened species; wetlands; coastal resources; utilities and service systems; light emissions; aesthetics; geology and soils; hazards and hazardous materials; human health risk assessment; public services; recreation; and, greenhouse gas (GHG) emissions. The AMP Draft EIR considered five alternatives, including the "No Project" alternative. The AMP Draft EIR addressed potential environmental impacts anticipated to occur from the construction and operation of the AMP improvements to the year 2015. As a result of comments received on the AMP Draft EIR, the AMP Final EIR considered potential environmental impacts through the year 2030.

In May 2008, the San Diego County Regional Airport Authority (SDCRAA) certified the Final EIR for the SDIA AMP for the future development of the Airport.

Over the past two years, additional planning and coordination with Airport tenants and stakeholders has occurred regarding airport use areas identified in the Airport Land Use Plan that now enables them to be added to the Airport Implementation Plan. The subject improvements are described below under Project Overview.

The proposed Northside Improvements, described in Section 1.2 below, provide the basis for proposed amendments to the adopted AMP Airport Land Use Plan and Airport Implementation Plan. These amendments represent the discretionary actions that constitute the Proposed Project for review under the California Environmental Quality Act (CEQA). As noted below and more fully described in Chapter 2, the uses in the Northside Improvements were previously contemplated and addressed in the AMP Final EIR; however, certain aspects of those uses, such as the configuration of the public parking area, the size of
the Consolidated Rental Car (CONRAC) facility, the alignment of the Terminal Link Roadway, and various other design and implementation details, have since been refined. Those proposed amendments to the Airport Land Use Plan and Airport Implementation Plan account for such refinements. The purpose of this Supplemental EIR is to satisfy CEQA requirements by fully disclosing any material changes in impacts that may occur as a result of the Proposed Project in light of new information regarding the proposed Northside Improvements that were not known at the time the AMP Final EIR was prepared.

As discussed more fully below, the Northside Improvements, as originally proposed, were addressed in the AMP Final EIR. Because the additional analysis required in light of the new information regarding the proposed Northside Improvements does not require major additions or changes to the previously certified AMP Final EIR, a supplemental EIR is the appropriate document for the Proposed Project pursuant to Section 15162 of the CEQA Guidelines. The purpose of a supplemental EIR is to provide the additional information necessary to make the previous EIR adequately apply to the project as revised. As such, a supplemental EIR need contain only the information necessary to address the project changes, changed circumstances, or new information that triggered the need for the additional environmental review under CEQA. A supplemental EIR may be circulated for public review by itself without recirculating the previous EIR.1 (CEQA Guidelines Section 15163(d)) Thus, preparation of a supplemental EIR does not re-open the previously certified EIR for revisions or public review; the focus of the supplemental EIR is whether the project changes, changed circumstances, or new information would result in new or more severe significant effects that were not disclosed in the previous EIR.

1.2 Project Overview

The SDIA AMP describes numerous improvements planned to occur at the Airport, generally delineated within an overall Airport Land Use Plan, and more specifically defined within the Airport Implementation Plan.

As indicated above, the Final EIR for the AMP was certified in May 2008. Since that time, additional coordination with, and receipt of input from, various Airport tenants and key stakeholders has occurred, and further planning of certain conceptual improvements identified in the Airport Land Use Plan has been completed. Proposed revisions to the Airport Land Use Plan has been drafted that would amend the currently adopted AMP Airport Land Use Plan based upon additional planning and minor refinements to the designated land use areas in the northern portion of the Airport. A proposed revision to the Airport Implementation Plan - Northside Improvements has been prepared that describes the development projects proposed for the northern portion of the Airport based upon the facility requirements derived from the SDIA Master Plan forecast and coordination with the Airport tenants and stakeholders. The Proposed Project is to amend the adopted AMP Airport Land Use Plan and Airport Implementation Plan. The improvements associated with the proposed revisions to the Airport Land Use Plan, as related to the Northside area and the proposed Airport Implementation Plan - Northside Improvements include the following:

- CONRAC Facility and reconfiguration of the adjacent approved public parking facility
- Air Cargo Warehouse Facilities and Associated Improvements
- Terminal Link Roadway (along the eastern perimeter of the Airport connecting the proposed northside facilities to the southside of the Airport) and related Northside roadway system
- On-site utilities improvements to serve the proposed development

1 As discussed in Section 2.4 of this Supplemental EIR, the AMP Final EIR is available for review at the SDCRAA administrative offices located on the third floor of the Commuter Terminal, 3225 North Harbor Drive, San Diego, California 92101 from 8 AM to 5 PM, and is also available on the SDCRAA website (www.san.org) at http://san.org/sdcraa/airport_initiatives/master_plan/eir.aspx.
As discussed in Chapter 4 of this Final Supplemental EIR, the Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. Based on comments received on the Draft Supplemental EIR expressing concern about the elimination of such parking (see Section 1.5 below), the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.

1.3 Environmental Areas of Concern

The environmental process for this Supplemental EIR was initiated in May 2010 with the completion of an Initial Study and subsequent issuance of a Notice of Preparation (NOP). In addition, on June 8, 2010, a scoping meeting was held by the SDCRAA at the Commuter Terminal at SDIA to provide an opportunity for public and agency comment concerning the potential environmental effects of the Northside Improvements to be evaluated in this Supplemental EIR. Comments received on the NOP and at the scoping meeting for this Supplemental EIR (see Appendix A) identified the following environmental areas of concern: hazardous materials; transportation/traffic; GHG emissions; aesthetics; solid waste disposal capacity; and, archaeological resources. Table 5.1-1 in Chapter 5 of this Supplemental EIR provides a summary of the comments received on the NOP and during the scoping meeting and identifies where and how each of the issues raised in the scoping/NOP comments was either previously addressed in the AMP Final EIR, as described in the Initial Study, and/or is further addressed in this Supplemental EIR, or is not relevant to the scope of the Proposed Project. As further described in Section 5.1.1 of this Supplemental EIR, based on preliminary review of the proposed Northside Improvements, the SDCRAA determined that one environmental resource, aesthetics, could be potentially affected by implementation of the Northside Improvements and require additional analysis that was not otherwise provided in the AMP Final EIR. As further discussed in Section 5.1.2 of this Supplemental EIR, based on refinements to the proposed Northside Improvements and comments received on the NOP for the Draft EIR and during the scoping meeting, this Supplemental EIR also provides supplemental evaluation/clarification of potential impacts of the Proposed Project with respect to traffic/circulation, utilities, and GHG emissions. The supplemental analysis for the topics of aesthetics, traffic and circulation (parking only), utilities, and GHG emissions are provided in Sections 5.2, 5.3, 5.4, and 5.5 of this Supplemental EIR, respectively. Clarification that traffic/circulation impacts associated with the proposed Northside Improvements were adequately addressed as part of the AMP Final EIR is provided in Section 5.3.

1.4 Environmental Effects and Mitigation Measures

The following summarizes the results of the supplemental environmental analyses for the proposed Northside Improvements.

Aesthetics

Construction and operation of the proposed Northside Improvements would result in aesthetic impacts related to community character, visual resources, and consistency with adjacent land use plans; however, such impacts would be less than significant and no mitigation measures are warranted. This conclusion is consistent with the conclusions regarding impacts to aesthetics and visual resources contained in the AMP Final EIR.

Traffic and Circulation (as related to parking displacement)

The proposed site for replacement of the Solar Turbines Parking Area would not result in any new significant impacts to traffic and circulation movements other than what was identified in the AMP Final EIR. The significant impact to the North Harbor Drive street segment (between Rental Car Road and
Laurel Street), the Laurel Street segment (between North Harbor Drive and Pacific Highway), and the Laurel Street/Pacific Highway intersection was previously identified in the AMP Final EIR as well as in this Supplemental EIR. Because the mitigation measures for the North Harbor Drive street segment, the Laurel Street segment, and the Laurel Street/Pacific Highway intersection have already been identified in the AMP Final EIR, no additional mitigation measures resulting from the Supplemental EIR are warranted.

**Utilities**

The proposed Northside Improvements would not result in any significant impacts to utilities and no mitigation measures are warranted. This conclusion is consistent with the conclusions regarding utilities and related construction impacts (i.e., air quality, noise, and traffic) contained in the AMP Final EIR.

**Greenhouse Gas Emissions**

The AMP Final EIR evaluation of greenhouse gas (GHG) emissions is inclusive of those associated with the proposed Northside Improvements. However, with subsequent completion of a Memorandum of Understanding between SDCRAA and the State Attorney General and the preparation of an Air Quality Management Plan for SDIA, there are now numerous measures incorporated into the AMP to control and reduce GHG emissions at SDIA, including emissions associated with the construction and operation of AMP improvements such as the proposed Northside Improvements. As such, the GHG impacts associated with the Northside Improvements, as well as for the Airport overall, would be less than those indicated in the AMP Final EIR.

1.5 **Comments Received on the Draft Supplemental EIR**

The Draft Supplemental EIR for the SDIA AMP was distributed for review by agencies, organizations, and the public on November 1, 2010. Comments were received through email, fax, and standard U.S. mail. The initial 65-day comment period was from November 1, 2010 through January 4, 2011. After two extensions, to enhance the opportunity for agency and public review and input on the Draft Supplemental EIR, the 82-day comment period concluded on January 21, 2011.

A total of 12 federal/state/local agencies, organizations, and community planning groups submitted comments on the Draft Supplemental EIR, all of which have been considered and responded to in the preparation of this Final Supplemental EIR. **Table 1-1** contains a complete list of commenters and the date their comments were received.
Table 1-1

List of Contributing Commenters

<table>
<thead>
<tr>
<th>Name</th>
<th>Agency</th>
<th>Date received</th>
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<tbody>
<tr>
<td>Scott Morgan, Director</td>
<td>State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit</td>
<td>January 7, 2011</td>
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<tr>
<td>Bill Figge, Deputy District Director of Planning</td>
<td>State of California Department of Transportation, Planning Division</td>
<td>January 13, 2011</td>
</tr>
<tr>
<td>Myra Herrmann, Senior Environmental Planner</td>
<td>City of San Diego Development Services Department</td>
<td>January 14, 2011</td>
</tr>
<tr>
<td>Leonard L. Wilson, P.E., Senior Civil Engineer</td>
<td>City of San Diego Public Utilities Department, Engineering and Program Management Division</td>
<td>January 3, 2011</td>
</tr>
<tr>
<td>Mehdi Rastakhiz</td>
<td>City of San Diego Public Utilities Department, Water and Sewer Development Section</td>
<td>January 4, 2011</td>
</tr>
<tr>
<td>Susan Baldwin, Senior Planner</td>
<td>SANDAG</td>
<td>January 4, 2011</td>
</tr>
<tr>
<td>Darlene Nicandro, Director Environmental &amp; Land Use Management</td>
<td>San Diego Unified Port District</td>
<td>January 21, 2011</td>
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<tr>
<td>James W. Royle, Jr., Chairperson</td>
<td>San Diego County Archaeological Society, Inc. Environmental Review Committee</td>
<td>November 15, 2011</td>
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<tr>
<td>James H. McCollum, Manager, Principal Projects</td>
<td>Solar Turbines Incorporated</td>
<td>December 20, 2011</td>
</tr>
<tr>
<td>Charles Mellor, PCPB Chair</td>
<td>Peninsula Community Planning Board</td>
<td>January 21, 2011</td>
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</table>

A number of the comments received were related to impacts associated with the proposed Terminal Link Roadway on existing Solar Turbines employee parking. As discussed in Chapter 4 of this Final Supplemental EIR, the Terminal Link Roadway, as originally proposed and analyzed in the Draft Supplemental EIR, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. Based on comments received on the Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.

The following provides copies of all written comments received on the AMP Draft Supplemental EIR and the SDCRAA's written responses to all comments received.
Fax Cover Sheet
USCG Sector San Diego
Logistics Department
Facilities Support Division
2710 N. Harbor Drive
San Diego, CA 92101-1028

To: Mr. Ted Anasis
From: LT Josh Nelson
Subject: Coast Guard Comments on Airport Master Plan
POC: LT Josh Nelson
Phone: 619-278-7201
Fax: 619-278-7215
Email: Joshua.E.Nelson@USCG.mil

Page: 1 of 2
Mr. Ted Anasis  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138

Dear Mr. Anasis:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Airport Master Plan – North Side Improvements for San Diego International Airport.

Coast Guard Sector San Diego, as noted in the report, is located just south of San Diego International Airport across North Harbor Drive. Sector San Diego is home to several Coast Guard units prosecuting a wide variety of Coast Guard missions in San Diego and the Southwest region.

Coast Guard Air Station San Diego is responsible for Search and Rescue and Law Enforcement missions, often taking off in low visibility to carry out these missions. In order to take advantage of the runway environment at San Diego International Airport, an easement across North Harbor Drive has been in place for many years to facilitate the launch and recovery of both fixed wing and rotary wing aircraft.

In an examination of the Notice of Preparation for the Airport Master Plan it is unclear how the easement will be affected by the proposed improvements to the airport. Our ability to use San Diego International Airport is important and I respectfully request clarification and comment on this issue.

If you have any questions or concerns, please contact my Facility Engineer, CWO4 Carter Owens (619-278-7202) or my Engineering Support Officer, LT Josh Nelson (619-278-7201).

Sincerely,

[Signature]

T. H. FARRIS  
Captain  
Commander, Sector San Diego  
U.S. Coast Guard
| United States Coast Guard | |
| **Subject:** | **Comment on the Notice of Preparation (NOP) for the Airport Master Plan - North Side Improvements for San Diego International Airport.** |
| **Comment:** | **Response** |
| - Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Airport Master Plan - North Side Improvements for San Diego International Airport. | The proposed Terminal Link Roadway (along the eastern perimeter of the Airport connecting the proposed northside facilities to the southside of the Airport) would not affect the U.S. Coast Guard's easement across North Harbor Drive. The U.S. Coast Guard crossing will be maintained across the Terminal Link Roadway. A yield sign or crossing sign will be posted at the intersection of the Terminal Link Roadway and Coast Guard Crossing to inform drivers on the Terminal Link Roadway that an aircraft crossing may occur. The San Diego County Regional Airport Authority (SDCRAA) will coordinate with the U.S. Coast Guard during the design, construction, and operational phases of the Terminal Link Roadway to ensure that U.S. Coast Guard Access at this location is maintained. |
| - Coast Guard Sector San Diego, as noted in the report, is located just south of San Diego International Airport across North Harbor Drive. Sector San Diego is home to several Coast Guard units prosecuting a wide variety of Coast Guard missions in San Diego and the Southwest region. | |
| - Coast Guard Air Station San Diego is responsible for Search and Rescue and Law Enforcement missions, often taking off in low visibility to carry out these missions. In order to take advantage of the runway environment at San Diego International Airport, an easement across North Harbor Drive has been in place for many years to facilitate the launch and recovery of both fixed wing and rotary wing aircraft. | |
| In an examination of the Notice of Preparation for the Airport Master Plan it is unclear how the easement will be affected by the proposed improvements to the airport. Our ability to use San Diego International Airport is important and I respectfully request clarification and comment on this issue. | |
January 5, 2011

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

Subject: San Diego International Airport Master Plan - Northside Improvements
SCH#: 2005091105

Dear Ted Anasis:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 4, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
JAN 07 2011

PLANNING DEPT. #44
**Project Title**  San Diego International Airport Master Plan - Northside Improvements  
**Lead Agency**  San Diego County Regional Airport Authority  

**Type**  EIR  Draft EIR  
**Description**  NOTE: Review Per Lead  

The proposed Northside improvements project consists of amendments to the Airport Land Use Plan and Airport Implementation Plan for the currently adopted San Diego International Airport Master Plan to include the following projects: 1) consolidated rental car facility; 2) air cargo warehouse facilities; 3) terminal link roadway; and 4) on-site utilities improvements.

**Lead Agency Contact**  
**Name**  Ted Anasis  
**Agency**  San Diego County Regional Airport Authority  
**Phone**  (619) 400-2478  
**Email**  
**Address**  P.O. Box 82776  
**City**  San Diego  
**State**  CA  
**Zip**  92138-2776

**Project Location**  
**County**  San Diego  
**City**  San Diego  
**Region**  
**Lat / Long**  
**Cross Streets**  North Harbor Drive; Pacific Highway and Sassafrass Street  
**Parcel No.**  
**Township**  

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<th>Range</th>
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**Proximity to:**  
**Highways**  I-5  
**Airports**  San Diego International  
**Railways**  BN&SF  
**Waterways**  San Diego Bay  
**Schools**  
**Land Use**  International Airport/International Airport

**Project Issues**  
Other Issues; Aesthetic/Visual; Drainage/Absorption; Public Services; Sewer Capacity; Traffic/Circulation; Water Supply

**Reviewing Agencies**  
Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Airport Projects; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received**  10/29/2010  
**Start of Review**  10/29/2010  
**End of Review**  01/04/2011

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Note: Blanks in data fields result from insufficient information provided by lead agency.
State of California  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit  

<table>
<thead>
<tr>
<th>Subject: San Diego International Airport Master Plan - Northside Improvements SCH# 2005091105</th>
<th>Signed by: Scott Morgan, Director</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment: 1</td>
<td>Response</td>
</tr>
<tr>
<td>The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 4, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.</td>
<td>Comment noted. It should be noted that comment letters on the AMP Draft Supplemental EIR from the State of California, Public Utilities Commission (Commission) and State of California, Department of Transportation (Caltrans) were sent directly to the San Diego County Regional Airport Authority. Responses to the Commission’s and Caltrans’ comment letters are provided on the following pages.</td>
</tr>
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January 4, 2011

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

Dear Mr. Anasis

Re: SCH# 2005091105; Draft Supplemental Environmental Impact Report (SEIR) for the San Diego International Airport Master Plan

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commissioner approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. The Commission's Rail Crossings Engineering Section (RCES) staff is in receipt of the San Diego County Regional Airport Authority’s Draft Supplemental Environmental Impact Report (SEIR) for the Airport Master Plan-North Side Improvements for the San Diego Airport and has reviewed the document for impacts to highway-rail crossings in the area.

The project is adjacent to the San Diego Metropolitan Transit System (MTS) and the BNSF Railway Company (BNSF) tracks. In addition to MTS San Diego Trolley trains and BNSF freight trains, the North County Transit District (NCTD) and the National Passenger Railroad Corporation (Amtrak) operate passenger trains over this line. The proposed project impacts the highway-rail crossings from Washington Street to Sassafras Street. The comments below summarize staff’s concerns and provide recommendations for crossings on the corridor that will be impacted by the project.

**Washington Street (CPUC Crossing No 002-265.60)**

- Due to the roadway profile and width of the crossing, it is difficult for a driver headed westbound to determine the amount of storage space that is available between the intersection of Frontage Road and the tracks.
- RCES staff recommends that R8-8 ‘DO NOT STOP ON TRACKS’ signs are installed on the westbound approach to the crossing.
- Staff recommends that the existing preemption timing be evaluated and a queuing analysis be performed at the crossing to determine if a westbound pre-signal is necessary to mitigate the issue of vehicles queuing on the tracks.

**Sassafras Street (CPUC Crossing No 002-266.10)**

- The SEIR states that an additional traffic lane will be provided on Sassafras Street between Pacific Coast Highway and Ketner Boulevard.
- A General Order (GO) GO-88B is required for any modifications to an existing highway-rail crossing. Roadway widening over the crossing is within the scope of GO 88-B.
Proposed grade separated crossing

- Reviewing the SEIR it appears that a new crossing is proposed to be installed between Washington Street and Sassafras Street.
- Any new crossing is subject to Public Utilities Code Sections 1201-1205 and requires a formal application to be submitted to the Commission.

Overall, staff is concerned with additional vehicles resulting from the project impacting safety of crossings on the corridor. Diagnostic meetings should be arranged with staff to discuss the project’s impact to crossings on the corridor and discuss mitigation measures to reduce impacts. The diagnostic meeting represents the first step in the GO 88-B process, more information can be found at the link below.

http://www.cpuc.ca.gov/PUC/transportation/crossings/Filing+Procedures/go88b.htm

If you have any questions or if you would like to discuss these recommendations further, you may contact me at (213) 576-7076 or ldi@cpuc.ca.gov

Sincerely,

Laurence Michael, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division
<table>
<thead>
<tr>
<th><strong>Subject:</strong></th>
<th>SCH# 2005091105; Draft Supplemental Environmental Impact Report (SEIR) for the San Diego International Airport Master Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comment:</strong></td>
<td>1</td>
</tr>
</tbody>
</table>

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. The Commission's Rail Crossings Engineering Section (RCES) staff is in receipt of the San Diego County Regional Airport Authority's Draft Supplemental Environmental Impact Report (SEIR) for the Airport Master Plan-North Side Improvements for the San Diego Airport and has reviewed the document for impacts to highway-rail crossings in the area.

The project is adjacent to the San Diego Metropolitan Transit System (MTS) and the BNSF Railway Company (BNSF) tracks. In addition to MTS San Diego Trolley trains and BNSF freight trains, the North County Transit District (NCTD) and the National Passenger Railroad Corporation (Amtrak) operate passenger trains over this line. The proposed project impacts the highway-rail crossings from Washington Street to Sassafras Street. The comments below summarize staffs concerns and provide recommendations for crossings on the corridor that will be impacted by the project.

**Washington Street (CPUC Crossing No 002-265.60)**
- Due to the roadway profile and width of the crossing, it is difficult for a driver headed westbound to determine the amount of storage space that is available between the intersection of Frontage Road and the tracks.
- RCES staff recommends that R8-8 'DO NOT STOP ON TRACKS' signs are installed on the westbound approach to the crossing.
- Staff recommends that the existing preemption timing be evaluated and a queuing analysis be performed at the crossing to determine if a westbound pre-signal is necessary to mitigate the issue of vehicles queuing on the tracks.

The Washington Street highway-rail crossing located well north of the Airport is not within the jurisdiction of the San Diego County Regional Airport Authority (SDCRAA) nor is it within the scope of the Northside Improvements. The crossing area described is within a city-dedicated street planned and operated under the jurisdiction of the City of San Diego. Further, as indicated on page 5.3-180 of the AMP Final EIR, under the Airport Land Use Plan, the higher volumes at Washington Street raised the vehicle hours of delay (VHD) threshold, consequently resulting in no impacts at Washington Street in any year. Therefore, the Airport Land Use Plan, for which the Northside Improvements were contemplated, would not result in significant railroad crossing impact and no mitigation measures are required.
<table>
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<tr>
<th>Comment: 2</th>
<th>Response</th>
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</table>
| **Sassafras Street (CPUC Crossing No 002-266.10)**  
- The SEIR states that an additional traffic lane will be provided on Sassafras Street between Pacific Coast Highway and Kettner Boulevard.  
- A General Order (GO) GO-88-B is required for any modifications to an existing highway-rail crossing. Roadway widening over the crossing is within the scope of GO 88-B. | Similar to above, the Sassafras Street highway-rail crossing located well north of the Airport is not within the jurisdiction of the SDCRAA nor is it within the scope of the Northside Improvements. The future provision of an additional travel lane on Sassafras Street between Pacific Highway and Kettner Boulevard is within the jurisdiction of the City of San Diego. It is understood that such development, as may affect the highway-rail crossing, would be subject to the requirements of General Order GO-88B. |

<table>
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<th>Comment: 3</th>
<th>Response</th>
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</table>
| **Proposed grade separated crossing**  
- Reviewing the SEIR it appears that a new crossing is proposed to be installed between Washington Street and Sassafras Street.  
- Any new crossing is subject to Public Utilities Code Sections 1201-1205 and requires a formal application to be submitted to the Commission. | The commenter may be referring to Figure 2-6 in the AMP Draft Supplemental EIR, which is the only reference to a new crossing between Washington Street and Sassafras Street. That figure pertains to a potential development concept for a future intermodal transportation hub located north of the Airport. That transportation facility is separate from the Northside Improvements, as described in Section 2.3.3 of the AMP Draft Supplemental EIR. |

<table>
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<tr>
<th>Comment: 4</th>
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| Overall, staff is concerned with additional vehicles resulting from the project impacting safety of crossings on the corridor. Diagnostic meetings should be arranged with staff to discuss the project’s impact to crossings on the corridor and discuss mitigation measures to reduce impacts. The diagnostic meeting represents the first step in the GO 88-B process, more information can be found at the link below.  
http://www.cpuc.ca.gov/PUC/transportation/crossings/Filing+Procedures/go88b.htm | Comment noted. Please see Responses 1 through 3 above. The comment letter will be provided to the City of San Diego and the San Diego Association of Governments (SANDAG) which conduct the roadway, transit and rail planning in the county of San Diego. |
Hi Ted

Attached is the Caltrans comment letter for the San Diego Airport Master Plan DSEIR for your review and comment. A hard copy follows via U.S. mail.

Thank you in advance,

Anthony Aguirre
California Department of Transportation
District 11
Development Review/International Border Studies Branch
(619) 688-3161
January 13, 2011

PLANNING DEPT. #44

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

Dear Mr. Anasis:

The California Department of Transportation (Caltrans) has reviewed the San Diego County Regional Airport Authority’s (SDCRAA) Draft Supplemental Environmental Impact Report (DSEIR) San Diego International Airport Master Plan (AMP) – North Side Improvements (SCH NO. 2005091105). Caltrans has the following comments:

In our response letter to SDCRAA regarding the Notice of Preparation for this proposed project, as well as other previous correspondence to the SDCRAA, Caltrans noted that the Airport Master Plan (AMP), and now the North Side Improvements project, are growth inducing and consequently will attract more vehicle trips than previously forecasted. The AMP FEIR and the DSEIR do not adequately address the specific project related traffic impacts to State facilities or the implementation of both near and long term mitigation measures.

In the DSEIR the SDCRAA responded to Caltrans concerns by stating that the traffic issues raised in the AMP FEIR and/or addressed in the DSEIR do not need further analysis. Also, the SDCRAA has stated that traffic and circulation impacts caused by the AMP and the North Side Improvements to other agency’s facilities, such as the State’s, are not their responsibility. Additionally, the SDCRAA needs to determine if the Federal Aviation Administration will permit the use of airport revenue for certain off-airport transportation mitigation measures.

It is understood this latest environmental document states that the proposed changes to the Northside Improvements only require that impacts to aesthetics and visual resources be addressed. However, we strongly believe that the DSEIR and the AMP FEIR findings are deficient regarding impacts to both State highway and local roadway facilities. Therefore, we continue to urge the SDCRAA to work with Caltrans, the City of San Diego, and the San Diego Association of Governments to provide mitigation and funding, so as to relieve the transportation impacts caused by the growth of the San Diego International Airport.

Caltrans will maintain working with the SDCRAA in coordinating transportation and land use matters associated with the AMP and the Destination Lindbergh planning efforts, including that future access from State highway facilities to the airport is not impeded.

"Caltrans improves mobility across California"
Ted Anasis
January 13, 2011
Page 2

If you have any questions or require further information, please contact Chris Schmidt, Chief of Public Transportation, at (619) 220-7360 or via email at Chris_Schmidt@dot.ca.gov.

Sincerely,

BILL FIGGE
Deputy District Director of Planning

c: Muggs Stoll, SANDAG
   Dave Schumacher, SANDAG
   Miriam Kirshner, SANDAG
   Mark Thompson, San Diego Metropolitan Transit Service
   Tait Galloway, City of San Diego, Planning Department

"Caltrans improves mobility across California"
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It is understood this latest environmental document states that the proposed changes to the Northside Improvements only require that impacts to aesthetics and visual resources be addressed. However, we strongly believe that the DSEIR and the AMP FEIR findings are deficient regarding impacts to both State highway and local roadway facilities. Therefore, we continue to urge the SDCRAA to work with Caltrans, the City of San Diego, and the San Diego Association of Governments to provide mitigation and funding, so as to relieve the transportation impacts caused by the growth of the San Diego International Airport.

Potential growth-inducing impacts associated with the San Diego International Airport (SDIA) Airport Master Plan (AMP), which includes the Northside Improvements, are addressed in Section 6.3 of the AMP Final Environmental Impact Report (EIR). Relative to the potential for growth inducement, the currently proposed project is not materially different from that assumed in the AMP Final EIR such that there would be greater or substantially different growth-inducing impacts than previously addressed. Further, the vehicle trips forecast in the previously adopted AMP evaluated a high-growth scenario and assumed a larger Consolidated Rental Car (CONRAC) facility. No information has been provided that substantiates that the Northside Improvements will attract more vehicle trips than previously forecasted.

As indicated in the AMP Draft Supplemental EIR and elaborated upon in Response 9 to the City of San Diego’s January 14, 2011 comment letter below, the traffic analysis completed for the AMP Final EIR addresses impacts associated with overall development of the AMP, including the Northside Improvements. The AMP Final EIR provides responses to all comments received on the AMP Draft EIR, including all comments received from the California Department of Transportation (Caltrans) - see pages 1-81 through 1-85 in Volume One of the AMP Final EIR.

The San Diego County Regional Airport Authority (SDCRAA) will continue to communicate and coordinate with Caltrans, the San
Caltrans will maintain working with the SDCRAA in coordinating transportation and land use matters associated with the AMP and the Destination Lindbergh planning efforts, including that future access from State highway facilities to the airport is not impeded.

Diego Association of Governments (SANDAG), the San Diego Metropolitan Transit System, the City of San Diego Planning Department, and the Federal Aviation Administration (FAA), as appropriate, in the planning and development of transportation improvements at and near the Airport.
January 14, 2011

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

Submitted via email to: planning@san.org
Hard copy to follow via mail

Subject: CITY OF SAN DIEGO COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN – NORTHSIDE IMPROVEMENTS (SCH# 2005091105 – SDCRAA # EIR-10-01)

The City of San Diego ("City") has received and reviewed the Notice of Availability for the above project and appreciates this opportunity to provide comments to the San Diego County Regional Airport Authority (SDCRAA). In response to the NOP on this project, the City identified potential environmental issues that may result in a significant impact to the environment. Continued coordinated planning between the City, the SDCRAA, and other local, regional, state, and federal agencies will be essential in order to implement this project.

Staff from the following City departments have reviewed the SEIR and provide the following comments for your consideration:

DEVELOPMENT SERVICES DEPARTMENT:
ENVIRONMENTAL ANALYSIS SECTION:
MYRA HERRMANN, SENIOR PLANNER, mherrmann@sandiego.gov

**Miscellaneous comments:**

Please note that any work proposed within the City’s Public Right-of-Way (PROW) will require permitting in accordance with the Municipal Code. Please refer to the Development Services Department (DSD) website at [http://www.sandiego.gov/development-services/](http://www.sandiego.gov/development-services/) for guidance on submittal requirements. Staff within DSD will be able to assist the SDCRAA with any future permitting and/or discretionary actions associated with the work.

**Section 5.4 - Utilities**

This section makes reference to the City of San Diego Water Department and Metropolitan Wastewater Department; however the department name has changed and should be revised.
throughout this section and anywhere else in the SEIR where it is referenced. Please revise to read “City of San Diego Public Utilities Department.”

Any work within the City’s Public Right-of-Way requires review for conformance with the City’s Storm Water Regulations (within the Land Development Code) and should be referenced in this section of the environmental document.

TRANSPORTATION DEVELOPMENT SECTION:
ANN GONSALVES, SENIOR ENGINEER – TRAFFIC, (619) 446-5294, AGONSALVES@SANDIEGO.GOV

1. The Notice of Preparation for the Draft Supplemental EIR for the SDIA Airport Master Plan-Northside Improvements and the accompanying Initial Study asserted that all transportation/traffic impacts were conservatively addressed in the May 2008 Airport Master Plan EIR and therefore no additional analysis was contemplated in this Draft SEIR. However, the City of San Diego expressed concerns with the adequacy of the May 2008 EIR transportation analysis and reiterates those same concerns as it relates to this project. The City of San Diego letter of comment of February 4, 2008 to the May 2008 Airport Master Plan EIR is therefore incorporated by reference into these comments on this Draft Supplemental EIR for the Northside Improvements.

2. In addition, we repeat the following comment from our letter of June 25, 2010 responding to the Notice of Preparation for this DSEIR, which do not appear to have been addressed in this SDEIR:

a. An updated transportation impact study should compare the impacts of the Northside Improvements project against existing conditions in order to establish significance of impacts and identify project mitigation measures.

b. The proposed “Terminal Link Roadway” should be constructed entirely within the current airport footprint in order to avoid negatively impacting traffic operations on North Harbor Drive.

c. The updated transportation impact study should provide mitigation measures for Northside Improvements project impacts expected along Washington Street, Pacific Highway, Sassafras Street and other locations which will be impacted by the reassignment of existing traffic and generation of additional traffic due to the project facilities. All intersection level of service analysis should also include queuing analysis.
Specific comments regarding the adequacy of the information presented in the DSEIR follow:

3. This transportation impact study should not only analyze the impacts of the relocation of the Solar Turbines employee parking lot, but also discuss and evaluate any traffic pattern changes, access points and circulation, parking, and roadways and intersection impacts due to other components of the Northside Improvements such as Air Cargo Warehouse Facilities and Associated Improvements, and Terminal Link Roadway, etc. The Supplemental Analysis (Section 5.3.2) should be revised and expanded to include the excerpts of such traffic impact analysis that comprehensively discuss all components of the project and evaluate all its impacts and required mitigations.

4. The Supplemental Analysis (Section 5.3.2) should also include trip distribution figures showing how the traffic patterns and volume would be changed due to each and all components of the project. It should also include road segment ADT’s and intersection peak hour volume figures showing the increases, or reductions in trips on each street and intersection surrounding the Airport, instead of the very limited area as presented on the maps in this section.

5. All new access points for each component of the Northside Improvements including the proposed Solar Turbines employee parking lot should be fully discussed, their locations shown, and analysis provided to show whether they would be expected to operate at acceptable level of service. A queue analysis should also be performed for ingress and egress points such as the access point for the new parking lot for the Solar Turbines employees. Location of any proposed gates at such access points should also be identified, and they should be located and operated in a manner not to cause any queuing or stacking of vehicles into City streets and intersections.

6. The report should discuss the employees’ walking distances and routes between the proposed Solar Turbines employee parking lot and the Solar Turbines facility. The increase in distance from the current parking lot to the proposed lot should also be identified. If the increase in walking distance appears unreasonably large then some of the employees may choose to park on nearby City streets which in turn could result in parking impacts. This should be fully discussed and evaluated in the report. Also, if the Airport Authority or Solar Turbines plans any type of shuttle service from the proposed parking lot to the Solar Turbines facility, its provision, hours of operation, and frequency should be identified.

ENVIRONMENTAL SERVICES DEPARTMENT
LISA WOOD, SENIOR PLANNER (858)-573-1236, lwood@sandiego.gov

Section 5.4.1.3 Utilities on page 5-92: This section of the document details construction impacts explains that BMPs or Best Management Practices would be determined during the detailed design stages or in conjunction with other construction occurring during the Proposed Project. This does not provide sufficient information to assess the project’s ability to minimize solid waste...
impacts. Development of a Waste Management Plan would be the best way to provide sufficient analysis and consideration of this issue.

CITY PLANNING & COMMUNITY INVESTMENT DEPARTMENT
Tait Galloway, Senior Planner, Long Range Planning Division
tgalloway@sandiego.gov

1. The US Marine Corps have proposed to modify the West Washington entrance into the Marine Recruit Depot. This project needs to be included in cumulative impacts analysis.

2. In response to the City’s NOP comment addressing the need to consider an alternative alignment for the Terminal Link Roadway to provide direct access to the terminals and help to reduce potential impacts to North Harbor Drive, the Draft SEIR states that “The combination of replacing the individual rental car facilities that are currently distributed along the southern edge of the Airport with the new CONRAC and institutional consolidated shuttle system to replace the individual rental car company shuttles would help reduce airport-related traffic on North Harbor Drive and other local roadways.”
   a. The City could not find any direct analysis or documentation in the SEIR to support the above response to the City’s issue raised in the NOP.
   b. The SEIR identifies additional traffic lanes on North Harbor Drive as mitigation. It is unclear if this full mitigation would still be needed if vehicles using the Terminal Link Road had direct access to the Terminals.
   c. Please analyze the traffic related to vehicles leaving the airport property that would use the Terminal Link Roadway:
      i. This analysis should address potential specific impacts to North Harbor Drive from vehicles using the Terminal Link Roadway.
      ii. This analysis should address if the potential impacts to North Harbor Drive in the EIR and related mitigation measures would be reduced if the Terminal Link Roadway remained on airport property

ENGINEERING AND CAPITAL PROJECTS DEPARTMENT
Linda Marabian, Senior Traffic Engineer, lmarabian@sandiego.gov
Farah Mahzari, fmahzari@sandiego.gov

1. In addition to Pacific Hwy/Laurel St and Laurel St/Harbor Dr intersections, potential impacts due to the redistribution of traffic and recirculation of the terminal link roadway may occur at the following intersections. These intersections need to be analyzed for existing and future conditions with current traffic data:
   a. Pacific Highway/ Washington Street
   b. Pacific Highway/ Sassafras Street
   c. Pacific Highway/ W. Palm Street
2. The proposed terminal Link Roadway extends to the intersection of North Harbor Drive and the existing Rental Car Access Road. Due to the new trip distribution, North Harbor Dr. and Rental Car Access Rd. needs to be analyzed for existing and future conditions with current traffic data.

3. Clearly identify location of the proposed intersection of Solar Turbines employee replacement parking lot access road with North Harbor Drive. This new intersection must be analyzed.

4. Please include the redistribution of traffic due to the Solar Turbines employee parking lot and the proposed Terminal Link roadway. Each intersection along North Harbor Dr. should be analyzed from Laurel Street to where the proposed project will add 50 or more peak hour trips in either direction to adjacent street traffic.

5. Table 5.3-2, Pg 5-73:

   a. Street Segment Operations table shows existing traffic data was collected in 2005. Current traffic data (2010) needs to be collected to support traffic analysis calculations.

   Laurel Street from Harbor Drive to Pacific Highway shows a future 2015 ADT of 36.2K and a future 2030 ADT of 35.1K. Please explain why the future volumes are reduced on this segment.

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 FEIR and provide CD copies of the document for distribution to the commenting department(s). If you have any additional questions regarding the City’s review of the DEIR, please contact me at 619-446-5372 or via email at mhermann@sanciego.gov.

Sincerely,

Myra Herrmann
Senior Environmental Planner
Development Services Department

cc: Reviewing Departments (via email)
    Review and Comment online file
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<table>
<thead>
<tr>
<th>City of San Diego Development Services Department</th>
<th>Signed by: Myra Herrmann, Senior Environmental Planner</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Subject:</strong> City of San Diego Comments on the Draft Supplemental Environmental Impact Report (DEIR) for the San Diego International Airport Master Plan - Northside Improvements (SCH# 2005091105 - SDCRAA # EIR-10-01)</td>
<td></td>
</tr>
<tr>
<td><strong>Comment: 1</strong></td>
<td><strong>Response</strong></td>
</tr>
<tr>
<td>The City of San Diego (&quot;City&quot;) has received and reviewed the Notice of Availability for the above project and appreciates this opportunity to provide comments to the San Diego County Regional Airport Authority (SDCRAA). In response to the NOP on this project, the City identified potential environmental issues that may result in a significant impact to the environment. Continued coordinated planning between the City, the SDCRAA, and other local, regional, state, and federal agencies will be essential in order to implement this project.</td>
<td>Comment noted. Please see Responses 2 through 25 below, which address each of the concerns raised by the commenter.</td>
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<tr>
<td><strong>Comment: 2</strong></td>
<td><strong>Response</strong></td>
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<tr>
<td>Miscellaneous comments:</td>
<td></td>
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<td>Please note that any work proposed within the City's Public Right-of-Way (PROW) will require permitting in accordance with the Municipal Code. Please refer to the Development Services Department (DSD) website at <a href="http://www.sandiego.gov/development-services/">http://www.sandiego.gov/development-services/</a> for guidance on submittal requirements. Staff within DSD will be able to assist the SDCRAA with any future permitting and/or discretionary actions associated with the work.</td>
<td>Comment noted. San Diego County Regional Airport Authority (SDCRAA) staff will coordinate with the City of San Diego Development Services Department, as appropriate, and obtain all necessary permits for any development proposed within the City's public right-of-way (PROW).</td>
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<tr>
<td><strong>Comment: 3</strong></td>
<td><strong>Response</strong></td>
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<tr>
<td><strong>Section 5.4 -Utilities</strong></td>
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<tr>
<td>This section makes reference to the City of San Diego Water Department and Metropolitan Wastewater Department; however the department name has changed and should be revised throughout this section and anywhere else in the</td>
<td>Comment noted. The first sentence in the last paragraph on page 5-79 of the AMP Draft Supplemental EIR has been modified to reflect the following change, as incorporated into the AMP Final Supplemental EIR:</td>
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</table>
SEIR where it is referenced. Please revise to read "City of San Diego Public Utilities Department."

"Water service demand was assessed using the water demand factors established by the City of San Diego Water Department Public Utilities Department, which provides water service to SDIA."

The last sentence in the third full paragraph on page 5-81 of the AMP Draft Supplemental EIR has been modified to reflect the following change, as incorporated into the AMP Final Supplemental EIR:

"All residential, commercial, and industrial water customers who receive water from the City of San Diego Water Department Public Utilities Department are affected by this ordinance."

The fifth and sixth full paragraphs on page 5-85 of the AMP Draft Supplemental EIR have been modified to reflect the following changes, as incorporated into the AMP Final Supplemental EIR:

"Approximately 90 percent of the San Diego region's water is imported, while 10 percent is supplied from water produced locally through a system of reservoirs and pipelines. The San Diego County Water Authority (SDCWA) is the main wholesale supplier of water in San Diego County. Imported water is supplied to SDCWA by The Metropolitan Water District of Southern California (Metropolitan), which serves the greater southern California area. The City of San Diego Water Department Public Utilities Department purchases water from SDCWA and delivers it throughout the City.

The City's Water Department Public Utilities Department maintains a complex water treatment and distribution system to support approximately 1.2 million people over a 330 square mile area. The City maintains three water treatment plants with a combined total treated capacity of 294 million gallons per day (MGD). Along with the potable
water supply, the City of San Diego provides recycled water from treated wastewater to a level that is approved for irrigation, manufacturing and other non-drinking/non-potable purposes."

The last paragraph on page 5-85 which continues onto page 5-86 of the AMP Draft Supplemental EIR has been modified to reflect the following changes, as incorporated into the AMP Final Supplemental EIR:

"Wastewater (sewer) service in the SDIA area is provided by the City of San Diego Metropolitan Sewerage System, which is owned by the City of San Diego, and operated by the San Diego Metropolitan Wastewater Department (SDMWWD) City of San Diego Public Utilities Department. The SDMWWD City of San Diego Public Utilities Department serves 2.2 million people from the City of San Diego and 15 other cities and special wastewater/water districts."

The first sentence in the third full paragraph on page 5-87 of the AMP Draft Supplemental EIR has been modified to reflect the following change, as incorporated into the AMP Final Supplemental EIR:

"Based on the preparation of a Water Supply Assessment by the City of San Diego Water Department Public Utilities Department that specifically finds that adequate water supply would be available for the AMP, which would include Northside Improvements, water supply impacts are assessed as less than significant."

The last paragraph on page 5-87 which continues onto page 5-88 of the AMP Draft Supplemental EIR has been modified to reflect the following changes, as incorporated into the AMP Final Supplemental EIR:
"Development of SDIA in accordance with the AMP would result in additional wastewater-generating facilities (e.g., sinks, toilets). Because the number of passengers traveling through SDIA would not be substantively affected by the AMP, the addition of new facilities would not cause a substantive increase in wastewater generation at SDIA. The development of the northern portion of the Airport and/or the reuse of the former Teledyne Ryan property could, however, generate new uses at SDIA with an associated (but unquantified) increase in wastewater generation. This increase in wastewater generation would not be significant, however, because of the wastewater treatment capacity available to SDIA and because of the Airport's location near large SDMWWD City of San Diego Public Utilities Department wastewater collection pipelines and Pump Station No. 2. As a result, little-to-no off-airport infrastructure would be required to convey increased wastewater flows from SDIA to the SDMWWD City of San Diego Public Utilities Department sewer system and the Point Loma Wastewater Treatment Plant. Capacity impacts to SDMWWD City of San Diego Public Utilities Department wastewater treatment facilities would be offset through payment of applicable sewer capacity fees, to the extent required by law."

Comment: 4

Any work within the City's Public Right-of-Way requires review for conformance with the City's Storm Water Regulations (within the Land Development Code) and should be referenced in this section of the environmental document.

Response

Comment noted. Please see Response 2 above. In addition, the following sentence has been added to the end of the paragraph on page 5-92 of the AMP Draft Supplemental EIR under the heading Utilities Demands, and incorporated into the AMP Final Supplemental EIR:

"Any work within the City's public right-of-way (PROW) will be reviewed for conformance with the City's Storm Water Regulations."
<table>
<thead>
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<td>1. The Notice of Preparation for the Draft Supplemental EIR for the SDIA Airport Master Plan-Northside Improvements and the accompanying Initial Study asserted that all transportation/traffic impacts were conservatively addressed in the May 2008 Airport Master Plan EIR and therefore no additional analysis was contemplated in this Draft SEIR. However, the City of San Diego expressed concerns with the adequacy of the May 2008 EIR transportation analysis and reiterates those same concerns as it relates to this project. The City of San Diego letter of comment of February 4, 2008 to the May 2008 Airport Master Plan EIR is therefore incorporated by reference into these comments on this Draft Supplemental EIR for the Northside Improvements.</td>
<td>As indicated in Table 5.1-1, specifically on page 5-8, of the AMP Draft Supplemental EIR, written responses were prepared for all of the comments and concerns expressed in the City of San Diego's comment letter of February 4, 2008. Those comments and responses are presented on pages 1-119 through 1-133 in Volume One of the San Diego International Airport (SDIA) AMP Final EIR. No further response is required.</td>
</tr>
<tr>
<td>2. In addition, we repeat the following comment from our letter of June 25, 2010 responding to the Notice of Preparation for this DSEIR, which do not appear to have been addressed in this SDEIR:</td>
<td>Comment noted. Please see Responses 7 through 9 below.</td>
</tr>
<tr>
<td>a. An updated transportation impact study should compare the impacts of the Northside Improvements project against existing conditions in order to establish significance of impacts and identify project mitigation measures.</td>
<td>The comment indicates that an updated transportation impact study should compare the Northside Improvements project against existing conditions in order to establish significance of impacts and identify project mitigation measures. The traffic analysis contained in the AMP Final EIR provided a delineation of existing conditions based on 2005 activity levels through the planning horizon of 2030 in 5 year increments. The following table provides the annual passenger forecast through 2030 and actual passenger volumes for 2005, 2006, and 2007, as presented in Table 2-2 on page 2-6 of the AMP Final EIR, and also includes actual passenger volumes for 2008, 2009, and 2010.</td>
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</tbody>
</table>
In recent years and subsequent to the completion of the AMP Final EIR, the San Diego area has experienced the effects of a national, and arguably global, recession. This has been evidenced by decreases in airline travel which directly influences traffic within the study area. For example, in 2005 the Airport accommodated 17,372,000 passengers. Activity continued to increase until reaching a peak in 2008 at which point in time demand began to decrease as a result of the recession. As shown in the above table, at the end of 2010, the Airport had accommodated 16,890,000 airline passengers which is approximately 2.8 percent lower than the

<table>
<thead>
<tr>
<th>Year</th>
<th>Actual(^1)</th>
<th>Forecast(^2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>17,372,521</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td>17,481,942</td>
<td></td>
</tr>
<tr>
<td>2007</td>
<td>18,326,761</td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td>18,125,633</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>16,974,172</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>16,889,622</td>
<td>19,500,000</td>
</tr>
<tr>
<td>2015</td>
<td>22,800,000</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>25,100,000</td>
<td></td>
</tr>
<tr>
<td>2025</td>
<td>26,600,000</td>
<td></td>
</tr>
<tr>
<td>2030</td>
<td>28,200,000</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) San Diego International Airport Air Traffic Reports, 2005-2010.
\(^2\) Constrained High Scenario Forecast approved by FAA, 2005.

Source: SDCRAA, 2011.
airline activity in 2005 and 13.4 percent lower than the airline activity forecast for 2010 during preparation of the AMP Final EIR. The effects of the recession and the direct effect on airline passenger activity will tend to produce a correlating decrease in traffic volume using the study area roadway system. Given airline passenger activity levels in 2010 are lower than the airline passenger activity levels in 2005 (for which the existing conditions traffic levels in the AMP Final EIR traffic analysis were based upon), the 2005 baseline traffic conditions would represent a similar, if not slightly higher, level of traffic activity as today. Therefore, existing traffic conditions depicted in the AMP Final EIR represent a similar order of magnitude for the year 2010 traffic conditions.

In addition, the AMP Final EIR has published the existing conditions analyses from which the reader may compare to the future "With Project" traffic conditions. For purposes of establishing the significance of impacts, however, the future "With Project" condition is compared against the future "No Project" condition. This comparison provides a direct isolation of the impacts associated with the Project given that the No Project condition would represent the expected traffic condition if the Project were not constructed (i.e., accounts for the fact that increases in aviation/passenger activity, and associated vehicle traffic generation, would occur in the future irrespective of AMP implementation). Consequently, the comparison in the AMP Final EIR provides a direct assessment of the anticipated impacts of the AMP, which includes the proposed Northside Improvements.

Comment: 8

<table>
<thead>
<tr>
<th>b. The proposed &quot;Terminal Link Roadway&quot; should be constructed entirely within the current airport footprint in order to avoid negatively impacting traffic operations on North Harbor Drive.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response</td>
</tr>
</tbody>
</table>

The proposed Terminal Link Roadway would be constructed within or along the Airport boundary, providing an on-airport dedicated (i.e., non-public) access route between the Northside area and the
intersection where North Harbor Drive crosses the existing intersection with the former Teledyne Ryan access driveway (just east of the intersection with Rent-A-Car Access Road). Shuttle bus activity would continue to remain on the section of North Harbor Drive between the Airport terminal area and the terminus of the Terminal Link Roadway. The combination of replacing the individual rental car facilities that are currently distributed along the southern edge of the Airport with the new CONRAC and instituting a consolidated shuttle system to replace the individual rental car company shuttles would result in an overall reduction in rental car-related traffic on North Harbor Drive because (a) rental car rental and return activity would shift to the north area rather than in the existing south area facilities accessed via North Harbor Drive and (b) the implementation of a consolidated shuttle busing operation would result in an overall reduction in shuttle bus trips compared to the shuttle bus trips generated by the existing individual rental car operations. The effect of these modifications is described on page 5.3-65 of the AMP Final EIR which states: "Terminal trip generation would decrease under the Proposed Airport Land Use Plan compared to the Proposed Airport Implementation Plan and No Project Alternative due to the consolidation of rental car shuttles; however, total trip generation increases due to new trip generating projects and in-fill development in the existing rental car area along North Harbor Drive."

Specifically, the traffic analyses prepared for the AMP Final EIR estimates that, for the horizon year of 2015 with implementation of the AMP, which includes the proposed Northside Improvements, 21 consolidated rental car shuttle round-trips would access the consolidated rental car center during the a.m. peak hour as compared to 53 individual rental car shuttle round-trips that would otherwise access the existing rental car area in the south without the consolidated rental car center. During the p.m. peak hour, 23 consolidated rental car shuttle round-trips would, with development of the CONRAC by 2015, replace the 68 individual rental car shuttle
round-trips from individual operations. During a 24-hour period, it was estimated that 497 consolidated rental car shuttle round-trips per day would replace 1,000 individual rental car shuttle round-trips accessing the individual rental car facilities in the south. Consequently, the presence of the Terminal Link Roadway and associated CONRAC operations would produce a net decrease in traffic activity along North Harbor Drive as compared to maintaining existing rental car operations in the south area resulting in a net positive operational benefit from the project (i.e., with implementation of the proposed Northside Improvements, which include the CONRAC and Terminal Link Roadway), along North Harbor Drive relative to the No Project condition (i.e., without implementation of the Northside Improvements).

In addition, the traffic analysis prepared for the AMP Final EIR was based on the assumption that the Terminal Link Roadway would terminate at the intersection of Winship Lane and North Harbor Drive. Given current planning envisions the Terminal Link Roadway would terminate two intersections east of the Winship Lane intersection, it is anticipated that 21 consolidated rental car shuttle round-trips during the 2015 a.m. peak hour and 23 consolidated rental car shuttle round-trips during the p.m. peak hour would take access to and from North Harbor Drive at either Rent-A-Car Access Road or the access driveway that served the former Teledyne Ryan facility. Given that implementation of the proposed Project would result in a reduction in rental car-related traffic activity at the south end of the Airport, as described above, and there is relatively little existing traffic at the Teledyne Ryan access driveway since closure of that facility, it is not anticipated that such a low level of activity associated with the consolidated rental car shuttle trips would result in a significant impact at either of these intersections or on the roadway segments between these intersections.

Please also see Response 7 above and Response 9 below which discuss that the traffic impact analysis prepared for the AMP Final
EIR is conservative and fully addresses traffic impacts and mitigation measures that would be required as a result of the proposed Northside Improvements.

<table>
<thead>
<tr>
<th>Comment: 9</th>
<th>Response</th>
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<tr>
<td>c. The updated transportation impact study should provide mitigation measures for Northside Improvements project impacts expected along Washington Street, Pacific Highway, Sassafras Street and other locations which will be impacted by the reassignment of existing traffic and generation of additional traffic due to the project facilities. All intersection level of service analysis should also include queuing analysis.</td>
<td>The development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR under the Proposed Airport Land Use Plan development assumptions and scenario described on pages 2-32 to 2-33, 3-2 to 3-5, 4-1 to 4-3 and 5.3-64 of the AMP Final EIR. The Airport Land Use Plan designates four general categories of land use on the Airport: airfield, terminal, ground transportation, and airport support. In order to attain a programmatic level of approval for future development, the following general types of facilities and locations were depicted in the AMP Final EIR to analyze program and cumulative impacts and to develop mitigation measures that would:</td>
</tr>
<tr>
<td></td>
<td>▪ Designate land area for future ground transportation and airport support uses in the North Area and former Teledyne Ryan property;</td>
</tr>
<tr>
<td></td>
<td>▪ Construct new and replacement air cargo facilities in the North Area;</td>
</tr>
<tr>
<td></td>
<td>▪ Construct new and replacement general aviation facilities in the North Area;</td>
</tr>
<tr>
<td></td>
<td>▪ Construct new and relocated ground transportation facilities in the North Area including a potential transit center with an on-site connector linking the North and South Areas;</td>
</tr>
<tr>
<td></td>
<td>▪ Relocate cargo aircraft parking positions in the North Area;  and</td>
</tr>
<tr>
<td></td>
<td>▪ Remove aircraft movement obstructions along the east end of Taxiway C and south of Taxiway B adjacent to and within the former Teledyne Ryan property.</td>
</tr>
</tbody>
</table>
Furthermore, the Airport Land Use Plan development scenario in Section 5.3 of the AMP Final EIR envisioned a higher level of trip activity than currently proposed. Specifically, the Airport Land Use Plan scenario in the AMP Final EIR envisioned a 9,000-space CONRAC facility (which is larger than the 6,500-space facility currently planned), additional development in the former Teledyne Ryan site, and the redevelopment of the vacated rental car facilities with future commercial development (e.g., hotel, convention facilities, and restaurants). Therefore, the trip generation assumptions for the north area used in the AMP Final EIR traffic analysis are similarly higher than for the proposed Northside Improvements as shown in the following table:

<table>
<thead>
<tr>
<th></th>
<th>2015 AMP FEIR</th>
<th>Northside Improvements SEIR</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CONRAC</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Spaces</td>
<td>9,000¹</td>
<td>6,500</td>
<td>(2,500)</td>
</tr>
<tr>
<td>ADT</td>
<td>9,104¹</td>
<td>6,575</td>
<td>(2,529)</td>
</tr>
<tr>
<td>AM Peak Hour</td>
<td>384¹</td>
<td>277²</td>
<td>(107)</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td>409¹</td>
<td>295²</td>
<td>(114)</td>
</tr>
<tr>
<td><strong>Surface Public Parking</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Spaces</td>
<td>2,170¹</td>
<td>3,770</td>
<td>1,600</td>
</tr>
<tr>
<td>ADT</td>
<td>178¹</td>
<td>309²</td>
<td>131</td>
</tr>
<tr>
<td>AM Peak Hour</td>
<td>7¹</td>
<td>12²</td>
<td>5</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td>8¹</td>
<td>14²</td>
<td>6</td>
</tr>
<tr>
<td><strong>General Aviation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ADT</td>
<td>100³</td>
<td>100</td>
<td>-</td>
</tr>
<tr>
<td>AM Peak Hour</td>
<td>12³</td>
<td>12</td>
<td>-</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td>16³</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Air Cargo</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------</td>
<td>-----------------</td>
<td>-----------------</td>
<td>----------------</td>
</tr>
<tr>
<td><strong>ADT</strong></td>
<td>2,044&lt;sup&gt;1&lt;/sup&gt;</td>
<td>2,044</td>
<td>-</td>
</tr>
<tr>
<td><strong>AM Peak Hour</strong></td>
<td>151&lt;sup&gt;2&lt;/sup&gt;</td>
<td>151</td>
<td>-</td>
</tr>
<tr>
<td><strong>PM Peak Hour</strong></td>
<td>112&lt;sup&gt;2&lt;/sup&gt;</td>
<td>112</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total North Area</strong></td>
<td>11,426</td>
<td>9,028&lt;sup&gt;3&lt;/sup&gt;</td>
<td>(2,398)</td>
</tr>
<tr>
<td><strong>ADT</strong></td>
<td>554</td>
<td>452&lt;sup&gt;4&lt;/sup&gt;</td>
<td>(102)</td>
</tr>
<tr>
<td><strong>AM Peak Hour</strong></td>
<td>545</td>
<td>437</td>
<td>(108)</td>
</tr>
</tbody>
</table>

<sup>1</sup> San Diego International Airport Master Plan Final EIR (Table 5-3.44), April 2008.

<sup>2</sup> Assumed proportional change based on change in number of spaces or acreage.

<sup>3</sup> Obtained from AMP EIR traffic analysis model prepared by HNTB.

<sup>4</sup> Numbers in parentheses indicate a decrease.

Source: San Diego International Airport Master Plan Final EIR, April 2008; California Department of Transportation, August 2011; Ricondo & Associates, Inc., August 2011.

As such, the traffic impact analysis prepared for the AMP Final EIR is conservative and fully addresses traffic impacts and mitigation measures that would be required. Consequently, an updated transportation impact study is not warranted.

Furthermore, the traffic study prepared for the AMP Final EIR assessed potential impacts throughout the agreed-upon study area which included Washington Street, Pacific Highway, Sassafras Street and other roadway and intersection locations that would experience potential impacts from the proposed Northside Improvements. Consequently, any impacts and potential mitigation measures that may be required at these locations as a result of implementing the AMP, which includes Northside Improvements, have been sufficiently analyzed and reported in the AMP Final EIR.
As described on page 5.3-4 of the AMP Final EIR, traffic impact analyses followed applicable guidelines for analyzing roadway and intersection impacts that included the City of San Diego, *Traffic Impact Study Manual and Trip Generation Manual*, revised May 2003 and the City of San Diego - Development Services Department, *California Environmental Quality Act (CEQA), Significance Determination Thresholds*, January 2007. The Traffic Impact Study Manual indicates that signalized intersections are to be analyzed using the current Highway Capacity Manual's signalized intersection operational methodology as a basis for estimating intersection delay and determining level of service for purposes of assessing potential project impacts. Intersection queuing analysis is not stipulated in the guidelines as a basis for assessing intersection impacts; therefore, queuing analysis was not prepared for the AMP traffic impact analysis.

The AMP Final EIR traffic impact analysis was conducted in accordance with applicable guidelines and fully addresses the impacts associated with the AMP, which includes Northside Improvements; therefore, an updated traffic impact study is not warranted.

<table>
<thead>
<tr>
<th>Comment: 10</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific comments regarding the adequacy of the information presented in the DSEIR follow:</td>
<td>As described in Response 9 above, the development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR under the Proposed Airport Land Use Plan scenario and are conservative in nature. As such, the traffic analysis provided in the AMP Final EIR evaluates the traffic patterns, access points, parking, and resultant impacts associated with the Northside Improvements such as the CONRAC, air cargo warehouse facilities, and the Terminal Link Roadway, among other features. Consequently, the findings documented in the AMP Final EIR and the supplemental traffic analysis documented in the AMP Draft Supplemental EIR collectively define the anticipated traffic impacts</td>
</tr>
</tbody>
</table>

3. This transportation impact study should not only analyze the impacts of the relocation of the Solar Turbines employee parking lot, but also discuss and evaluate any traffic pattern changes, access points and circulation, parking, and roadways and intersection impacts due to other components of the Northside Improvements such as Air Cargo Warehouse Facilities and Associated Improvements, and Terminal Link Roadway, etc. The Supplemental Analysis (Section 5.3.2) should be revised and expanded to include the excerpts of such traffic impact analysis that comprehensively...
discuss all components of the project and evaluate all its impacts and required mitigations.

associated with the proposed Northside Improvements. Given that no new significant impacts were identified in the AMP Draft Supplemental EIR, all impacts, along with potential mitigation measures that may be required for the proposed Northside Improvements, have been sufficiently analyzed and documented in the AMP Final EIR.

It should be noted that the supplemental traffic analysis documented in the AMP Draft Supplemental EIR provided additional analysis to assess the planned Terminal Link Roadway and the impacts of changes to the Solar Turbines employee parking lot which was not addressed in the AMP Final EIR. However, as discussed in Chapter 4 of this AMP Final Supplemental EIR, refinement of the Terminal Link Roadway plan, subsequent to publication of the AMP Draft Supplemental EIR, has resulted in an alignment that does not require the relocation of the Solar Turbines employee parking lot. Consequently, the analysis that addresses potential traffic impacts associated with changes to the Solar Turbines employee parking lot documented in Section 5.3.2, Supplemental Analysis, of the AMP Draft Supplemental EIR is no longer relevant.

<table>
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<th>Comment: 11</th>
<th>Response</th>
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<tbody>
<tr>
<td>4. The Supplemental Analysis (Section 5.3.2) should also include trip distribution figures showing how the traffic patterns and volume would be changed due to each and all components of the project. It should also include road segment ADT’s and intersection peak hour volume figures showing the increases, or reductions in trips on each street and intersection surrounding the Airport, instead of the very limited area as presented on the maps in this section.</td>
<td>The supplemental traffic analysis in Section 5.3.2 of the AMP Draft Supplemental EIR is no longer relevant given that the alignment of the proposed Terminal Link Roadway would no longer impact the existing Solar Turbines employee parking lot.</td>
</tr>
<tr>
<td>Comment: 12</td>
<td>Response</td>
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<td>-------------</td>
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<tr>
<td>5. All new access points for each component of the Northside Improvements including the proposed Solar Turbines employee parking lot should be fully discussed, their locations shown, and analysis provided to show whether they would be expected to operate at acceptable level of service. A queue analysis should also be performed for ingress and egress points such as the access point for the new parking lot for the Solar Turbines employees. Location of any proposed gates at such access points should also be identified, and they should be located and operated in a manner not to cause any queuing or stacking of vehicles into City streets and intersections.</td>
<td>The access points for each component of the proposed Northside Improvements would be provided via existing intersections that were studied as part of the AMP Final EIR, with primary access provided via the intersections of Sassafras Street with Pacific Highway and Washington Street with Pacific Highway. Please refer to Response 9 above for additional information concerning the validity of the AMP Final EIR traffic analysis. Regarding the portion of this comment that relates to the Solar Turbines employee parking lot, the supplemental traffic analysis in Section 5.3.2 of the AMP Draft Supplemental EIR is no longer relevant. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.</td>
</tr>
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<tr>
<th>Comment: 13</th>
<th>Response</th>
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<tbody>
<tr>
<td>6. The report should discuss the employees' walking distances and routes between the proposed Solar Turbines employee parking lot and the Solar Turbines facility. The increase in distance from the current parking lot to the proposed lot should also be identified. If the increase in walking distance appears unreasonably large then some of the employees may choose to park on nearby City streets which in turn could result in parking impacts. This should be fully discussed and evaluated in the report. Also, if the Airport Authority or Solar Turbines plans any type of shuttle service from the proposed parking lot to the Solar Turbines facility, its provision, hours of operation, and frequency should be identified.</td>
<td>Comment noted. The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.</td>
</tr>
</tbody>
</table>
### Comment: 14

#### Section 5.4.1.3 Utilities on page 5-92: This section of the document details construction impacts explains that BMPs or Best Management Practices would be determined during the detailed design stages or in conjunction with other construction occurring during the Proposed Project. This does not provide sufficient information to assess the project's ability to minimize solid waste impacts. Development of a Waste Management Plan would be the best way to provide sufficient analysis and consideration of this issue.

#### Response

The SDCRAA will prepare a Northside Improvements Waste Management Plan to identify the Best Management Practices to be included in the construction and operation of the Northside Improvements. The Waste Management Plan will be prepared in accordance with the SDCRAA's adopted Sustainability Policy.

### Comment: 15

1. The US Marine Corps have proposed to modify the West Washington entrance into the Marine Recruit Depot. This project needs to be included in cumulative impacts analysis.

#### Response

The proposed redevelopment of the entrance to the Marine Corps Recruit Depot (MCRD) is intended to route in-bound vehicles to an expanded holding area where appropriate security screening can occur without causing a back-up in traffic. The proposed improvements are designed to separate MCRD-bound traffic from Airport-bound traffic and would involve certain improvements and signal adjustments at the intersection of Washington Street and Pacific Highway and restriping/reconfiguring the vehicle route immediately south of the subject intersection, leading to the MCRD base entrance. The overall objective to separate MCRD and Airport traffic south of the intersection, enabling MCRD-bound traffic to be routed to a stop/holding area while allowing Airport-bound traffic to continue moving, would serve to enhance traffic flow in the nearby area and is not expected to have an adverse impact on traffic conditions. As such, no adverse cumulative impact is expected to occur.

As described above, the MCRD entrance project at Washington and Pacific Highway is designed to separate MCRD-bound traffic from Airport-bound traffic by modifying and restriping lanes to direct MCRD-bound traffic to security screening. The entrance project serves to improve traffic circulation and safety for in-bound vehicles.
by clearly designating lanes and segregating vehicles after passing south of the Washington/Pacific Highway intersection. The entrance project does not alter land uses on increase the intensity of land uses on MCRD or the Airport. MCRD has not completed a federal environmental review document that can be specifically referenced as part of the cumulative impacts analysis; however, the project has been coordinated among MCRD, SDCRAA and the City of San Diego.

Comment: 16

<table>
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| 2. In response to the City's NOP comment addressing the need to consider an alternative alignment for the Terminal Link Roadway to provide direct access to the terminals and help to reduce potential impacts to North Harbor Drive, the Draft SEIR states that "The combination of replacing the individual rental car facilities that are currently distributed along the southern edge of the Airport with the new CONRAC and institutional consolidated shuttle system to replace the individual rental car company shuttles would help reduce airport-related traffic on North Harbor Drive and other local roadways."

a. The City could not find any direct analysis or documentation in the SEIR to support the above response to the City's issue raised in the NOP.

Response |
<table>
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<tbody>
<tr>
<td>Please refer to Response 8 above for direct analysis related to the effects of consolidated rental car shuttle bus activity along North Harbor Drive.</td>
</tr>
</tbody>
</table>

Comment: 17

<table>
<thead>
<tr>
<th>Comment: 17</th>
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</thead>
<tbody>
<tr>
<td>b. The SEIR identifies additional traffic lanes on North Harbor Drive as mitigation. It is unclear if this full mitigation would still be needed if vehicles using the Terminal Link Road had direct access to the Terminals.</td>
</tr>
</tbody>
</table>

Response |
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<tbody>
<tr>
<td>The Terminal Link Roadway is anticipated to accommodate shuttle bus activity accessing the rental car and parking facilities proposed with the Northside Improvements. Based on the analysis, it is anticipated that 21 consolidated rental car shuttle round-trips would use the Terminal Link Roadway during the 2015 a.m. peak hour and 23 consolidated rental car shuttle round-trips would use the Terminal Link Roadway during the p.m. peak hour. Given the low volume associated with the rental car shuttle bus activity, the mitigation measures contained within the AMP Final EIR would still apply if vehicles using the Terminal Link Roadway had direct access to the Terminals.</td>
</tr>
</tbody>
</table>
Please refer to Response 8 above for direct analysis related to the effects of consolidated rental car shuttle bus activity along North Harbor Drive. In addition, please refer to Response 9 above, which further describes that the traffic impact analysis for the AMP Final EIR fully addresses the traffic impacts along North Harbor Drive and identifies appropriate mitigation measures.

Comment: 18  Response

c. Please analyze the traffic related to vehicles leaving the airport property that would use the Terminal Link Roadway:
   i. This analysis should address potential specific impacts to North Harbor Drive from vehicles using the Terminal Link Roadway.

   Please refer to Response 8 above for direct analysis related to the effects of consolidated rental car shuttle bus activity along North Harbor Drive. In addition, please refer to Response 17 above, which discusses the relationship of the mitigation measures identified in the AMP Final EIR to the proposed Northside Improvements.

Comment: 19  Response

   ii. This analysis should address if the potential impacts to North Harbor Drive in the EIR and related mitigation measures would be reduced if the Terminal Link Roadway remained on airport property

   Please refer to Response 8 above for direct analysis related to the effects of consolidated rental car shuttle bus activity along North Harbor Drive. In addition, please refer to Response 17 above, which discusses the relationship of the mitigation measures identified in the AMP Final EIR to the proposed Northside Improvements.

Comment: 20  Response

1. In addition to Pacific Hwy/Laurel St and Laurel St/Harbor Dr intersections, potential impacts due to the redistribution of traffic and recirculation of the

   The AMP Draft Supplemental EIR analyzed the intersection of Pacific Highway/Laurel Street and the intersection of Laurel
terminal link roadway may occur at the following intersections. These intersections need to be analyzed for existing and future conditions with current traffic data:

a. Pacific Highway/ Washington Street  
b. Pacific Highway/ Sassafras Street  
c. Pacific Highway/ W. Palm Street

Street/North Harbor Drive because it was anticipated at the time of the preparation of the AMP Draft Supplemental EIR that these two intersections would likely be affected by the relocation of the Solar Turbines employee parking lot. However, as discussed in Chapter 4 of this AMP Final Supplemental EIR, refinement of the Terminal Link Roadway plan, subsequent to publication of the AMP Draft Supplemental EIR, has resulted in an alignment that does not require the relocation of the Solar Turbines employee parking lot. Consequently, the analysis that addresses potential traffic impacts associated with changes to the Solar Turbines employee parking lot documented in Section 5.3.2, Supplemental Analysis, of the AMP Draft Supplemental EIR is no longer relevant.

In addition, the traffic analysis prepared for the AMP Final EIR accounted for the effect of the redistribution of traffic associated with the Terminal Link Roadway. Refer to Response 8 above for information on the effects associated with the Terminal Link Roadway on area roadways. As a result, the intersection level of service conditions at Pacific Highway/Washington Street, Pacific Highway/Sassafras Street, and Pacific Highway/West Palm Street contained in the AMP Final EIR remain valid.

As described in Response 9 above, the development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR under the Proposed Airport Land Use Plan scenario. These assumptions include the operational effects from the redistribution of traffic associated with the proposed Northside Improvements, including the provision of a future Terminal Link Roadway. The potential impacts at the intersection of Pacific Highway/Washington Street and Pacific Highway/Sassafras Street associated with implementation of the AMP are documented in the AMP Final EIR. The intersection of Pacific Highway/West Palm Street was not identified as a key study area intersection during the preparation of the AMP Final EIR; however, the Palm Street
segment was analyzed between Pacific Highway and Kettner Boulevard.

It is anticipated that obtaining current traffic data would not affect the findings and proposed mitigation measures identified in the AMP Final EIR given that current traffic activity levels are anticipated to be of the similar order of magnitude as the activity levels in 2005. Please refer to Response 7 above for additional information pertaining to the validity of the existing conditions traffic data from 2005.

<table>
<thead>
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<tbody>
<tr>
<td>2. The proposed terminal Link Roadway extends to the intersection of North Harbor Drive and the existing Rental Car Access Road. Due to the new trip distribution, North Harbor Dr. and Rental Car Access Rd. needs to be analyzed for existing and future conditions with current traffic data.</td>
</tr>
<tr>
<td>Response</td>
</tr>
<tr>
<td>The analysis contained in the AMP Final EIR accounts for the impacts associated with traffic using the Terminal Link Roadway and the potential effects on North Harbor Drive. Please refer to Response 8 above. Also, please refer to Response 7 above for information pertaining to the relevancy of existing data.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: 22</th>
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<tr>
<td>3. Clearly identify location of the proposed intersection of Solar Turbines employee replacement parking lot access road with North Harbor Drive. This new intersection must be analyzed.</td>
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<td>Response</td>
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<tr>
<td>Comment noted. The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.</td>
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<td>Comment: 23</td>
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<td>4. Please include the redistribution of traffic due to the Solar Turbines employee parking lot and the proposed Terminal Link roadway. Each intersection along North Harbor Dr. should be analyzed from Laurel Street to where the proposed project will add 50 or more peak hour trips in either direction to adjacent street traffic.</td>
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<th>Comment: 24</th>
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<td>5. Table 5.3-2, Pg 5-73:</td>
<td>Please refer to Response 7 above regarding the validity of the existing conditions data documented in the AMP Final EIR.</td>
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<td>a. Street Segment Operations table shows existing traffic data was collected in 2005. Current traffic data (2010) needs to be collected to support traffic analysis calculations.</td>
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<th>Comment: 25</th>
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<td>Laurel Street from Harbor Drive to Pacific Highway shows a future 2015 ADT of 36.2K and a future 2030 ADT of 35.1K. Please explain why the future volumes are reduced on this segment.</td>
<td>As depicted in Table 5.3-2 of the AMP Draft Supplemental EIR, the one-way segment of Laurel Street between Pacific Highway and North Harbor Drive is expected to accommodate an average daily traffic (ADT) volume of 36,200 vehicles per day in 2015 with a decrease to 35,100 vehicles per day by 2030. These volume estimates are based on traffic modeling analysis documented in the AMP Final EIR and depicted in Table 5-3.46 of the AMP Final EIR. The modeling prepared for the AMP Final EIR indicates traffic</td>
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volumes at these locations (prior to the changes in traffic activity related to the modification of Solar Turbines employee parking) would be 35,900 vehicles per day in 2015 and 34,800 vehicles per day in 2030. The Solar Turbines employee parking modification would result in an additional 300 vehicles per day along this roadway link in addition to the Solar Turbines traffic that would have been using this link prior to the parking modification. As a result, the traffic volumes at this location, exclusive of the Solar Turbines employee parking modification, are expected to decrease by approximately 3.6 percent between 2015 and 2030.

The reduction in traffic between 2015 and 2030 can be attributed to multiple causes. As described on Page 5.3-31 of the AMP Final EIR, it is anticipated that background (non-airport) traffic would decrease on several streets and freeway segments from 2010 to 2030 as a result of changes to the existing roadway network that would cause the reallocation of traffic within the network. For example, planned HOV lanes on I-5 in the vicinity of the Airport and widening of I-8 would affect traffic along Pacific Highway. In addition, implementation of the proposed Northside Improvements would also result in changes in traffic patterns that would affect volumes on Laurel Street. A key factor reducing traffic volumes on westbound Laurel Street would be the redirection of rental car traffic formerly destined for the south rental car facilities to the new CONRAC.

As discussed previously, the supplemental traffic analysis in Section 5.3.2 of the AMP Draft Supplemental EIR is no longer relevant. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.
The City of San Diego Public Utilities Department has reviewed the subject Draft Supplemental Environmental Impact Report. Our comments are as follows:

Potable Water:

- Figure 4-6: The only existing public water main south of the junction of West Washington Street and Pacific Highway is the 12-inch diameter water main. The 2-inch, 4-inch, 6-inch, 8-inch, 10-inch, and 16-inch water mains colored dark blue are San Diego International Airport (SDIA) owned water mains (private water mains).

- Figure 4-6 Pursuant to the letter from Bryan Enarson, Vice President, Development, San Diego County Regional Airport Authority to Ann Sasaki, Assistant Director, Wastewater Operations and Jim Fisher, Assistant Director, Water Operations City of San Diego Public Utilities Department dated October 28, 2010 all new on-site water mains are to be designed as “private facilities.” Therefore, the new on-site water mains shown on Figure 4-6 should be shown as proposed “private water mains.” New public water meters need to be called-out at the junction of Pacific Highway and Sassafras Street, and the junction Pacific Highway and West Washington Street to feed the proposed private water mains.

Sewer:

- Section 5.4.1.4 Wastewater/Sanitary Sewer subsection stated “Relative to the Northside area, Pacific Highway houses a 51-inch sewer primary line”. This statement is in error; there is a 39-inch sewer in Pacific Highway. The City is currently in the process of slip-lining this sewer with a 33-inch pipe.

- Section 5.4.1.5 Impact Analysis, Sanitary Sewer Sub-Section concludes that there is no impact to wastewater conveyance system and treatment plant. City’s comment: Because the wastewater flows are not disclosed in this report, the City of San Diego cannot verify this conclusion. The City is concerned that the City’s Pacific Highway Trunk Sewer may or may not have adequate capacity to accommodate the Northside Development. Therefore, the City is requesting that SDIA provide the projected wastewater flow in this report in order for us to complete our review.

We appreciate the opportunity to review the subject document. If you have any questions, please contact me directly.

Thank you,
Leonard
Leonard L. Wilson, P.E.
Senior Civil Engineer
City of San Diego
Public Utilities Department
Engineering and Program Management Division
9192 Topaz Way
San Diego, CA 92123-1119

(858) 654-4112
LLWilson@sandiego.gov
| Subject: Draft Supplemental Environmental Impact Report  
| San Diego International Airport Master Plan - Northside Improvements  
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<th>SCH No. 2005091105 - SDCRAA # EIR -10-01</th>
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<td><strong>Comment: 1</strong></td>
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<td><strong>Potable Water:</strong></td>
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<td><strong>• Figure 4-6:</strong> The only existing public water main south of the junction of West Washington Street and Pacific Highway is the 12-inch diameter water main. The 2-inch, 4-inch, 6-inch, 8-inch, 10-inch, and 16-inch water mains colored dark blue are San Diego International Airport (SDIA) owned water mains (private water mains).</td>
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<td>Comment noted. Figure 4-6 of the AMP Draft Supplemental EIR depicts the existing and proposed water lines but does not specify if the water mains and lines are public or privately owned and maintained. The San Diego County Regional Airport Authority (SDCRAA) is discussing with the City of San Diego the private ownership and maintenance of water mains and lines that serve San Diego International Airport (SDIA) and expects to reach a resolution in late-2011.</td>
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<td><strong>Comment: 2</strong></td>
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<td><strong>• Figure 4-6</strong> Pursuant to the letter from Bryan Enarson, Vice President, Development, San Diego County Regional Airport Authority to Ann Sasaki, Assistant Director, Wastewater Operations and Jim Fisher, Assistant Director, Water Operations City of San Diego Public Utilities Department dated October 28, 2010 all new on-site water mains are to be designed as &quot;private facilities.&quot; Therefore, the new on-site water mains shown on Figure 4-6 should be shown as proposed &quot;private water mains.&quot; New public water meters need to be called-out at the junction of Pacific Highway and Sassafras Street, and the junction Pacific Highway and West Washington Street to feed the proposed private water mains.</td>
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| Comment noted. Figure 4-6 of the AMP Draft Supplemental EIR depicts the existing and proposed water lines but does not specify if the water mains and lines are public or privately owned and maintained. The SDCRAA is discussing with the City of San Diego the private ownership and maintenance of water mains and lines that serve SDIA and expects to reach a resolution in late-2011. 

The SDCRAA acknowledges the comment that two new public water meters will need to be installed at the junction of Pacific Highway and Sassafras Street and the junction of Pacific Highway and West Washington Street to feed the proposed private water mains on SDIA. |
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<td><strong>Sewer:</strong></td>
<td><strong>Comment noted. The second sentence in the second full paragraph on page 5-86 of the AMP Draft Supplemental EIR has been modified to reflect the following change, as incorporated into the AMP Final Supplemental EIR:</strong></td>
</tr>
<tr>
<td>• Section 5.4.1.4 Wastewater/Sanitary Sewer subsection stated &quot;Relative to the Northside area, Pacific Highway houses a 51-inch sewer primary line.&quot; This statement is in error; there is a 39-inch sewer in Pacific Highway. The City is currently in the process of slip-lining this sewer with a 33-inch pipe.</td>
<td>&quot;Relative to the Northside area, Pacific Highway houses a 51-inch sewer primary line, which the City of San Diego is currently in the process of slip-lining with a 33-inch pipe, and a secondary 8-inch sewer line.&quot;</td>
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<td>• Section 5.4.1.5 Impact Analysis, Sanitary Sewer Sub-Section concludes that there is no impact to wastewater conveyance system and treatment plant. City's comment: Because the wastewater flows are not disclosed in this report, the City of San Diego cannot verify this conclusion. The City is concerned that the City's Pacific Highway Trunk Sewer may or may not have adequate capacity to accommodate the Northside Development. Therefore, the City is requesting that SDIA provide the projected wastewater flow in this report in order for us to complete our review.</td>
<td>A wastewater flow analysis was conducted by the SDCRAA. The additional average flow from the proposed Northside Improvements is estimated to be 49,920 gallons per day. Mr. Guann Hwang, Deputy Director of the City of San Diego Public Utilities Department, reportedly has already reviewed the flow rates and has determined that the Pacific Highway Sewer has sufficient capacity for the additional flows.</td>
</tr>
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</table>
The Water and Sewer Development Section of the Public Utilities Department (PUD) reviewed the draft supplemental environmental document referenced above and has the following comments:

Sewer and water mains serving one entity/ownership will be converted to private per the City policy. Please revisit all proposed water and sewer facilities serving the San Diego International Airport (SDIA) and make them private.

SDIA will be required to pay capacity fees associated with this expansion based upon the agreed number of Equivalent Dwelling Units (EDU’s) being added.

Please change all reference to the departments in charge from the Metropolitan Wastewater Department or Water Department to the Public Utilities Department (PUD) since the two departments have been merged (see section 5.4.1.4).

No shrubs exceeding three feet in height at maturity may be located within 10 feet of any sewer main.

All proposed public water and sewer facilities shall be designed and constructed in accordance with established criteria in the current edition of the City of San Diego Water Facility Design Guidelines, Sewer Design Guide and City regulations, standards and practices.

All proposed private sewer facilities located within a single lot are to be designed to meet the requirements of the California Plumbing Code and will be reviewed as part of the building permit plan check.

If you have any questions regarding the Water and Sewer review comments, please contact Mehdi Rastakhiz at (619) 533-5155.
| **City of San Diego**  
<p>| <strong>Public Utilities Department, Water and Sewer Development Section</strong> | <strong>Signed by: Mehdi Rastakhiz</strong> |
| <strong>Subject:</strong> | <strong>Draft Supplemental Environmental EIR for the San Diego International Airport</strong> |
| <strong>Comment: 1</strong> | <strong>Response</strong> |
| Sewer and water mains serving one entity/ownership will be converted to private per the City policy. Please revisit all proposed water and sewer facilities serving the San Diego International Airport (SDIA) and make them private. | The SDCRAA has initiated the review and designation of water and sewer facilities serving San Diego International Airport that will be owned and maintained by the SDCRAA. Discussions are ongoing with the City of San Diego regarding privatization of water and sewer facilities at the Airport and a resolution is anticipated in late-2011. |
| <strong>Comment: 2</strong> | <strong>Response</strong> |
| SDIA will be required to pay capacity fees associated with this expansion based upon the agreed number of Equivalent Dwelling Units (EDU's) being added. | Comment noted. |
| <strong>Comment: 3</strong> | <strong>Response</strong> |
| Please change all reference to the departments in charge from the Metropolitan Wastewater Department or Water Department to the Public Utilities Department (PUD) since the two departments have been merged (see section 5.4.1.4). | Comment noted. All references to City of San Diego Water Department and San Diego Metropolitan Wastewater Department in the AMP Draft Supplement EIR have been changed to the &quot;City of San Diego Public Utilities Department,&quot; as incorporated into the AMP Final Supplemental EIR. Please see Response 3 to the City of San Diego's January 14, 2011 comment letter above. |
| <strong>Comment: 4</strong> | <strong>Response</strong> |
| No shrubs exceeding three feet in height at maturity may be located within 10 feet of any sewer main. | Comment noted. This requirement will be incorporated into the applicable construction plans and specifications. |</p>
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<td>All proposed public water and sewer facilities shall be designed and constructed in accordance with established criteria in the current edition of the City of San Diego Water Facility Design Guidelines, Sewer Design Guide and City regulations, standards and practices.</td>
<td>Comment noted. This requirement will be incorporated into the applicable construction plans and specifications.</td>
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<td>All proposed private sewer facilities located within a single lot are to be designed to meet the requirements of the California Plumbing Code and will be reviewed as part of the building permit plan check.</td>
<td>Comment noted. This requirement will be incorporated into the applicable construction plans and specifications.</td>
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Please find SANDAG’s comment letter on the SDCRAA’s DEIR for the Airport Master Plan - North Side Improvements for San Diego International Airport. Thank you.-Ron
January 4, 2011

Mr. Ted Anasis
SDCRAA
P.O Box 82776
San Diego, CA 92138-2776

Dear Mr. Anasis:

SUBJECT: Draft Supplemental Environmental Impact Report for the Airport
Master Plan - North Side Improvements for San Diego International
Airport

Thank you for the opportunity to comment on the Draft Supplemental
Environmental Impact Report (SEIR) for the Airport Master Plan (AMP) –
North Side Improvements for San Diego International Airport. SANDAG’s
comments are made from a regional perspective, emphasize the need for land
use and transportation coordination, and are based on policies contained in
the Regional Comprehensive Plan (RCP) and the 2030 Regional Transportation
Plan (RTP).

State law gives SANDAG the authority to determine whether a project or plan
will need to be reviewed for regional significance. SANDAG staff has reviewed
this project and determined that it is regionally significant due to the amount
of traffic generated. Therefore, environmental review of this project should
include consideration of applicable policy objectives contained in the RCP and
the RTP. Please note that SANDAG is currently developing the 2050 RTP.

The draft SEIR includes a summary of the Traffic and Circulation section from
the Final Environmental Impact Report (EIR) for the AMP. In terms of
mitigation, the report acknowledges that if the City of San Diego and Caltrans
do not implement the identified mitigation measures, traffic impacts of the
AMP will remain significant after AMP implementation. SANDAG strongly
urges the SDCRAA to continue to work with these agencies to identify and
pursue funding to provide the mitigation improvements.

We request the following issues be addressed in the Draft SEIR for this project:

- SANDAG noted in our July 1, 2010, comment letter for the NOP that new
  parking on the Teledyne Ryan (TDY) site would be inconsistent with
  Destination Lindbergh. At that time, discussions with airport staff
  indicated that no parking was being proposed on the TDY site. The SEIR
  now proposes to relocate the Solar Turbine employee parking from along
  Laurel Street to the TDY site.
There is no discussion on how this location was selected as the preferred location and what other options were considered. Destination Lindbergh does not show any parking in this area and we understand from the Port of San Diego staff that several other off-airport locations already are under consideration for Solar Turbine employees.

Given that other potential parking lots for Solar Turbine employees may not be available when needed so that the Terminal Link Roadway can be constructed, is the TDY site proposed as a temporary parking solution?

Moving Solar Turbine employee traffic to congested North Harbor Drive runs counter to the efforts of Destination Lindbergh to remove traffic from the south side of the airport and off North Harbor Drive.

If implemented, the suggested lot relocation would appear to have major issues with access across the new internal Terminal Link Roadway.

- The SEIR states that long-term plans for the new surface parking lot west of the CONRAC could be integrated into SANDAG’s proposed Intermodal Transportation Center (ITC). To clarify that point, the SEIR should clearly state that the Northside Development does not conflict with Destination Lindbergh, which indicates the area west of the CONRAC for both public parking AND a passenger processing terminal. These uses could share some utility with the future ITC, which is located off airport property.

Consult with Metropolitan Transit System (MTS) and Caltrans

SANDAG advises the project applicant to consult with MTS, the transit service provider within the project area, and also with Caltrans to coordinate planned transit and/or highway improvements.

Conclusion

If you have any questions or would like to discuss SANDAG comments on this project, please contact me at (619) 699-1943 or sba@sandag.org.

Sincerely,

SUSAN BALDWIN
Senior Planner

SBA/RSA/ais
Subject: Draft Supplemental Environmental Impact Report for the Airport Master Plan - North Side Improvements for San Diego International Airport

Comment: 1

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the Airport Master Plan (AMP) - North Side Improvements for San Diego International Airport. SANDAG's comments are made from a regional perspective, emphasize the need for land use and transportation coordination, and are based on policies contained in the Regional Comprehensive Plan (RCP) and the 2030 Regional Transportation Plan (RTP).

State law gives SANDAG the authority to determine whether a project or plan will need to be reviewed for regional significance. SANDAG staff has reviewed this project and determined that it is regionally significant due to the amount of traffic generated. Therefore, environmental review of this project should include consideration of applicable policy objectives contained in the RCP and the RTP. Please note that SANDAG is currently developing the 2050 RTP.

Comment noted. Traffic impacts associated with the Airport Master Plan (AMP), including the proposed Northside Improvements, are addressed in the AMP Final EIR, as discussed in Responses 7 through 10, 20, and 25 to the City of San Diego's January 14, 2011 comment letter below, and Responses 16 through 18 of the San Diego Unified Port District's January 21, 2011 comment letter below.

The proposed Northside Improvements would be consistent with the policy objectives of the 2030 San Diego Regional Transportation Plan (RTP) and 2004 Regional Comprehensive Plan as discussed below.

RTP policy objectives applicable to the proposed Northside Improvements include the following:

- Better Manage Congestion - Better respond to traffic congestion through greater emphasis on the Congestion Management Program (CMP).

As indicated on page 5-54 of the AMP Draft Supplemental EIR, North Harbor Drive, Grape Street, Hawthorn Street and Pacific Highway are designated CMP arterials. The traffic analysis prepared for the AMP Final EIR was based on the assumption that the primary access point for the Northside Improvements would be provided through the intersection of Pacific Highway with Sassafras Street and secondary access provided through
the intersection of Pacific Highway with Washington Street. Current regional access and local roadway traffic distribution assumptions remain consistent with the AMP assumptions; therefore, the future circulation patterns assumed for the AMP Draft Supplemental EIR are assumed to be the same as those assumed for the AMP Final EIR. Furthermore, project-related traffic volumes accessing the Northside in the AMP Final EIR are conservatively high relative to the current Northside Improvements program that has been reduced in size relative to the program analyzed in the AMP Final EIR. Consequently, all potential traffic impacts and associated mitigation measures for the study area intersections and roadways have been appropriately identified.

However, in addition to the mitigation program identified in the AMP Final EIR, the San Diego County Regional Airport Authority (SDCRAA) is conducting ongoing planning exercises to identify the internal circulation and access requirements for the Northside Improvements, as well as detailed analysis of the intersections and access points with roadways forming the perimeter of the Airport property, specifically Pacific Highway, Laurel Street and North Harbor Drive. The proposed Northside improvements are being planned using project-specific assumptions and traffic volume data that have been developed specifically for site planning purposes. Consistent with the AMP Final EIR, these new roadways and intersections would be designed to accommodate 2030 activity during the a.m. and p.m. commuter peak periods analyzed. In addition, these facilities would also be planned to accommodate the peak hour for Airport traffic that does not directly correlate with the a.m. and p.m. commuter peak hours. Consequently, it is anticipated that these facilities would be more robust than would be required to accommodate only the a.m. and p.m. commuter peak hours.
• Protect the Environment - Improve air quality, reduce greenhouse gas emissions, and limit impacts to sensitive habitats.

Potential air quality impacts associated with the proposed Northside Improvements were accounted for in the air quality impacts analysis in the AMP Final EIR. The AMP Final EIR concluded that implementation of the AMP would not: conflict with or obstruct implementation of an applicable air quality plan; expose sensitive receptors to substantial concentrations including hazardous air pollutants such as diesel particulates; create objectionable odors affecting a substantial number of people; generate more than 100 tons/day of PM10 (airborne dust); release substantial quantities of air contaminates beyond the boundaries of the premises upon which a (stationary) source emitting the contaminates is located; or create potential CO "hotspots" associated with motor vehicle exhaust. (see Section 5.5.10 of the AMP Final EIR) As described in greater detail in Section III of the Initial Study for the proposed Northside Improvements, the analysis and conclusions of the AMP Final EIR relative to air quality impacts related to operational emissions are considered to be applicable to, and adequate for, the improvements included in the Proposed Project. Implementation of the Proposed Project would add certain improvements to the Airport Implementation Plan; however, the addition of those improvements is not expected to substantially increase the amounts of construction-related emissions addressed in the AMP Final EIR. This is due to the fact that implementation of the currently proposed improvements in the northern portion of the Airport is anticipated to occur sometime after the peak construction period assumed in the AMP Final EIR.
As indicated in Section 1.4 of the AMP Draft Supplemental EIR, the AMP Final EIR evaluation of greenhouse gas (GHG) emissions is inclusive of those associated with the proposed Northside Improvements. However, with subsequent completion of a Memorandum of Understanding between SDCRAA and the State Attorney General and the preparation of an Air Quality Management Plan for SDIA, there are now numerous measures incorporated into the AMP to control and reduce GHG emissions at SDIA, including emissions associated with the construction and operation of AMP improvements such as the proposed Northside Improvements. As such, the GHG impacts associated with the Northside Improvements, as well as for the Airport overall, would be less than those indicated in the AMP Final EIR.

As indicated in Section IV of the Initial Study for the proposed Northside Improvements, the vast majority of SDIA is developed or highly disturbed and devoid of any sensitive biotic resources. One exception is the California least tern nesting areas ("ovals") at the southeast portion of SDIA. As indicated in Table 5.1-1, specifically pages 5-2 and 5-3, of the AMP Draft Supplemental EIR, the California least tern nesting area at SDIA is bordered on the south by an existing on-airport service road that is used on a regular basis, and to the south of that are Laurel Street and North Harbor Drive, both of which have substantial traffic volumes. The proposed Terminal Link Roadway would be located between the service road and Laurel Street/North Harbor Drive. (Refer to Figures 4-1 and 4-2 of this AMP Final Supplemental EIR) The vehicular activity on the proposed Terminal Link Roadway is not expected to materially alter the existing noise, light, and movement conditions near the nesting area. Moreover, Section 5.8.7 of the AMP Final EIR delineates several mitigation measures specifically designed to address potential impacts to California least tern that may result from the construction and operation of Master Plan improvements.
These mitigation measures would be required of the proposed Northside Improvements and would ensure that impacts to the California least tern would be less than significant.

RCP policy objectives applicable to the proposed Northside Improvements include the following:

- Reduce traffic congestion on freeways and arterials.
  
  See relevant discussion under the RTP policy objectives above.

- Achieve and maintain federal and state clean air standards.
  
  See relevant discussion under the RTP policy objectives above.

- Preserve and maintain natural biological communities and species native to the region.
  
  See relevant discussion under the RTP policy objectives above.

- Restore, protect, and enhance the water quality and the beneficial uses of local coastal waters, inland surface waters, groundwaters, and wetlands.
  
  See relevant discussion under the RTP policy objectives above.

- Reduce or eliminate pollutants at their source before they enter our region's water bodies.

As indicated on page 5-88 of the AMP Draft Supplemental EIR, all future airport-related development is subject to the San Diego Municipal Permit and the SDIA Stormwater Management Plan (SWMP). The SWMP requires that all construction activities at the Airport with the potential to impact stormwater runoff provide for Best Management Practices (BMPs); therefore, impacts
relative to construction and grading and erosion and sedimentation would be less than significant. In addition, both the SDIA SWMP and the Construction General Permit require the development and implementation of a project specific Storm Water Pollution Prevention Plan (SWPPP) to prevent the discharge of pollutants to stormwater from all construction activities associated with future developments that disturb one acre or more of soil.

The San Diego Municipal Permit and the SDIA SWMP (more specifically, the Standard Urban Stormwater Mitigation Plan (SUSMP) contained therein) require the selection, design, and incorporation of post-construction stormwater pollutant source control BMPs and stormwater treatment control BMPs to ensure that future development does not increase stormwater pollutant loads and does not change urban runoff flow rates, velocities, or durations. The San Diego Municipal Permit and the SUSMP process also require that the long-term operation and maintenance of treatment and flow-control facilities are adequately addressed before construction.

In addition, the SANDAG Board of Director's released the Draft 2050 RTP at the April 22, 2011 Board meeting. The Final 2050 RTP is anticipated to be adopted in October 2011.

The Draft 2050 RTP contains policy objectives that would be applicable to the proposed Northside Improvements including:

- Develop transportation improvements that respect and enhance the environment
- Reduce greenhouse gas emissions from vehicles and continue to improve air quality in the region
- Make transportation investments that result in healthy and sustainable communities
The proposed Northside Improvements would be consistent with the policy objectives of the Draft 2050 RTP as discussed above.

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<td>Comment noted. The SDCRAA will continue to communicate and coordinate with the City of San Diego, Caltrans, SANDAG, the Port District, and the Federal Aviation Administration, as appropriate, regarding implementation of transportation-related mitigation measures.</td>
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<td>We request the following issues be addressed in the Draft SEIR for this project.</td>
<td>The Destination Lindbergh Technical Report from March 2009 is a concept study only and is not a definitive development plan. The SDCRAA is now moving towards a more definitive long-term development plan taking into account both the 2008 Airport Master Plan and the 2009 Destination Lindbergh Technical Report. While that planning effort will determine more definitely a development concept that incorporates Destination Lindbergh, the Northside Improvements presented in the AMP Draft Supplemental EIR are generally consistent with the concepts in the 2009 Destination Lindbergh Technical Report that are of interest to SANDAG, including public parking and a consolidated rental car (CONRAC) facility in the northern part of the Airport, and a terminal link roadway between the north and south. The potential use of the former Teledyne-Ryan (TDY) site for Solar Turbines employee parking, as proposed in the AMP Draft Supplemental EIR, would not detract from the use and benefits of those northern facilities. However, as indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the</td>
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- If implemented, the suggested lot relocation would appear to have major issues with access across the new internal Terminal Link Roadway.

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<td><strong>The SEIR states that long-term plans for the new surface parking lot west of the CONRAC could be integrated into SANDAG’s proposed Intermodal Transportation Center (ITC). To clarify that point, the SEIR should clearly state that the Northside Development does not conflict with Destination Lindbergh, which indicates the area west of the CONRAC for both public parking AND a passenger processing terminal. These uses could share some utility with the future ITC, which is located off airport property.</strong></td>
<td>Comment noted. The fact that the Northside Improvements are consistent with the concept for Destination Lindbergh is reflected in the discussion on page 2-18 of the AMP Draft Supplemental EIR.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment: 5</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Consult with Metropolitan Transit System (MTS) and Caltrans</strong>&lt;br&gt; SANDAG advises the project applicant to consult with MTS, the transit service provider within the project area, and also with Caltrans to coordinate planned transit and/or highway improvements.</td>
<td>The SDCRAA will continue to communicate and coordinate with Caltrans, SANDAG, the San Diego Metropolitan Transit System, the City of San Diego Planning Department, and the Federal Aviation Administration, as appropriate, in the planning and development of transportation improvements at and near the airport.</td>
</tr>
</tbody>
</table>
VIA HAND-DELIVERY AND EMAIL

January 21, 2011

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

Re: Comments on the Draft Supplemental Environmental Impact Report for the
San Diego International Airport Master Plan – Northside Improvements
(SCH No. 2005091105 – SDCRAA # EIR-10-01)

Dear Mr. Anasis:

The San Diego Unified Port District ("District") would like to thank the San Diego County Regional Airport Authority (SDCRAA) for the opportunity to comment on the content of the October 2010 Draft Supplemental Environmental Impact Report (SEIR) prepared for the San Diego International Airport Master Plan - Northside Improvements Project ("Proposed Project"). District staff has reviewed the Draft SEIR, and respectfully submits the comments below. Our comments relate to the following issue areas: mitigation measures; project elements; construction impacts; and potential environmental impacts to parking, traffic and circulation, cumulative, and land use. We acknowledge that our respective staffs have discussed many of these potential issues and appreciate that your staff has acknowledged many of these open issues. However, we believe it is important to establish a record to memorialize our concerns about the adequacy of the Draft SEIR and the need for additional environmental analysis prior to SDCRAA proceeding with the Proposed Project.

While we recognize SDCRAA's responsibility to improve facilities and provide improved services for the traveling public, we want to re-emphasize the fact that we are operating side-by-side, virtually on the same land. In doing so, planning our respective properties is going to require consistent, close collaboration on both sides. We look forward to this collaborative process with SDCRAA to seek resolution to our concerns and to provide a more inclusive participation in SDCRAA's planning process. We would like to meet with you and your staff at your earliest convenience to discuss the issues outlined in this letter.
Impacts to Public Access and District Leaseholds from Mitigation Measures
We contend that the Draft SEIR does not adequately address District staff's concerns about mitigation measures that directly or indirectly affect District properties and leaseholds for the following reasons:

- **Proposed Implementation Plan:** The 2008 Airport Master Plan Final EIR ("2008 AMP Final EIR") proposed traffic mitigation measures which included an implementation plan for nineteen roadway improvements. During SDCRAA's Notice of Preparation (NOP) process, District staff commented that the proposed implementation plan for these roadway improvements may adversely affect District tidelands by eliminating or encroaching upon public access and District leaseholds (i.e. park space, landscaping, sidewalks, and parking). The 2008 AMP Final EIR did not disclose these land use impacts and the Draft SEIR does not analyze any implementation plan that expands roadways onto District property. The Draft SEIR also does not disclose how elements of the Proposed Project such as the Terminal Link Roadway would work with the implementation plan for the traffic mitigation.

- **Section 5.3.1.8 of the Draft SEIR [Mitigation Measures]:** This section indicates that the streets and highways impacted by the Airport Master Plan and the Proposed Project are within the jurisdiction of the City of San Diego and/or Caltrans. However, the Draft SEIR does not disclose that some of the recommended mitigation measures would occur on lands within the jurisdiction of the District and cannot be implemented without the consent of the District and/or acquisition of property rights from the District. The Draft SEIR should identify which of the proposed mitigation measures are within the District's jurisdiction and disclose that, absent the District's consent (in some cases a lease or other grant of property rights from the District) the mitigation measures cannot be implemented, would be infeasible, and would result in additional unmitigated significant impacts.

Central Receiving and Distribution Center
We contend that the Draft SEIR does not adequately disclose information relating to the proposed Central Receiving and Distribution Center for the following reasons:

- **Environmental Analysis:** Section 5.1.1 [Description of Notice of Preparation and Initial Study] discusses the NOP for the Draft SEIR, but does not disclose that the Central Receiving and Distribution Center is no longer being included in the Draft SEIR and is being evaluated in a separate Negative Declaration. No justification is provided in the Draft SEIR for segmenting environmental review of this facility.

- **Cumulative Impact(s):** The relocation of the Central Receiving and Distribution Center should have been evaluated in the Cumulative Impacts section of the
Draft SEIR so that the environmental impacts from this facility could be assessed in conjunction with the other proposed facilities in the area.

**Construction Impacts**
We contend that the Draft SEIR does not adequately address potential impacts that may result from construction of the Proposed Project for the following reasons:

- **Construction Details:** Sections 5.3.1.6 and 5.3.2.5 of the Draft SEIR [Construction Impacts] mention several potential construction impacts resulting from the Proposed Project and the steps the SDCRAA will take to mitigate issues, however no details are provided as to when these construction impacts would occur, what equipment would be used, when the various facilities would be constructed, etc. The description of the Proposed Project is incomplete because it does not include anticipated construction timeframes for the various facilities. Without this information, the impact analysis and the analysis of cumulative traffic, air quality and noise impacts related to construction activities are incomplete.

- **Intersections and Freeway On-ramps:** There is no discussion in the Construction impacts sections of potential impacts to intersections and freeway on-ramps, specifically at Sassafras Street/Pacific Highway, Sassafras Street/India Street, and Washington Street/Pacific Highway, which are the most likely routes for construction truck traffic.

- **Conclusion of “Less than Significant”:** The conclusion that construction impacts would be less than significant because they are temporary is not supported by any evidence. The Draft SEIR does not disclose the duration of the construction period for each facility and for all of them cumulatively, although it is likely to last for several years. The Draft SEIR also does not disclose the nature and extent of the construction activities so there is no way of knowing the potential traffic, air quality or noise impacts associated with these activities. Since the required analysis of construction impacts has been deferred, the facts regarding the nature, extent and duration of construction activities are absent and there is no evidence that supports the analysis or conclusions.

**Parking Impacts**
We contend that the Draft SEIR does not adequately address potential parking impacts to District tenants that may result from implementation of the Proposed Project for the following reasons:

- **Terminal Link Roadway:** Implementation of the Proposed Project would include the construction of a new on-airport access road between the northern and southern portions of the San Diego International Airport (SDIA), which the
Draft SEIR refers to as the “Terminal Link Roadway.” The proposed alignment of the Terminal Link Roadway would effectively displace a parking lot along Laurel Street, which is District property currently leased to Solar Turbines (“Solar”). SDCRAA has no legal right to occupy or use this parcel without such rights being conveyed by the District. Section 3.2 of the Draft SEIR [Proposed Federal, State and Local Actions and Required Permits] should identify that a lease from the District (taking into consideration the District’s prerequisite relocation of Solar’s employee parking) is required to allow SDCRAA to use the 3.2-acre parcel needed for the proposed Terminal Link Roadway.

- **Solar Employee Parking Lot:** Section 4.1.3 of the Draft SEIR [Terminal Link Roadway] identifies a portion of the former Teledyne Ryan Industries site as the proposed replacement site for the Solar employee parking lot. The District and Solar were never consulted regarding the proposed replacement site, and the Draft SEIR does not disclose the following:
  - The exact location and size of the proposed replacement parking lot;
  - The distance between the proposed replacement parking lot and the existing Solar parking lot;
  - How long it will take for Solar employees to walk from the proposed replacement parking lot to the Solar facility;
  - The route Solar employees are expected to take to the new facility and the public safety issues related to the proposed route; and
  - How the employees will navigate the new Terminal Link Roadway as pedestrians or with their vehicles.

District staff has been in contact with officials at Solar and they have expressed to us a number of concerns regarding the proposed replacement parking site. District staff proposes that SDCRAA work with the District to determine a mutually beneficial solution to Solar’s employee parking relocation that adequately addresses Solar’s concerns.

- **Public Airplane Viewing Parking Lot:** There is currently an area to the west of the existing Solar parking lot on Laurel Street that is designated as a public airplane viewing parking lot. The Draft SEIR is unclear about how this area would work in conjunction with the proposed Terminal Link Roadway.

- **District Employee Parking Lot:** The Draft SEIR does not indicate whether or not the District’s employee parking lot, located directly across Pacific Highway from the Port Administration Building (subleased to the District by SDCRAA), would be displaced by either the proposed Terminal Link Roadway or new general aviation facilities. This potential parking impact is not analyzed and no mitigation is provided.
• **Fixed Base Operator Facility**: The Draft SEIR does not disclose the plans for the relocated Fixed Base Operator facility that was contemplated in the 2008 AMP Final EIR. The Draft SEIR also does not clarify if the existing general aviation facilities, currently located parallel to Pacific Highway, will be displaced by the Terminal Link Roadway. More discussion and analysis of these facilities should be provided in the Draft SEIR.

**Traffic and Circulation**

We contend that the Draft SEIR does not adequately address potential traffic and circulation impacts that may result from implementation of the Proposed Project for the following reasons:

• **Development Components**: The Proposed Project includes the construction of a 6,500-space consolidated rental car facility ("CONRAC"), a 2,170 space public surface lot, and 225,000 square feet of air cargo facilities. All of these large development components would be located on the north side of SDIA, and would be accessed via a new roadway that would be constructed adjacent to these facilities.

We recognize that the details of these development components were not known during the preparation of the 2008 AMP Final EIR. And as a result, certain assumptions were made and the analysis was conducted at a programmatic level for those components. Now that the project-specific details of the Proposed Project are known, they should have been analyzed in the Draft SEIR and all potential environmental impacts should have been identified. For example, much more detail is now available about how rental car patrons, public vehicles and cargo operators will access the new facilities on the north side.

The Draft SEIR should have supplemented the 2008 AMP Final EIR traffic and circulation analysis by analyzing any project-specific impacts associated with these facilities and should have identified mitigation measures that will offset impacts on area-wide traffic and circulation. Instead, Section 5.3 of the Draft SEIR [Traffic and Circulation] relies heavily on the 2008 AMP Final EIR traffic and circulation analysis by stating that the CONRAC facility is now smaller than assumed and the impacts and mitigation presented in the 2008 AMP Final EIR are still valid and applicable.

• **Traffic Analysis**: The traffic analysis relies on data from 2005 that is now at least five years old. The assumptions used in the 2008 AMP Final EIR traffic and circulation analysis should be updated to reflect the project-specific details of all of the new facilities on the north side, not just the CONRAC, and should include the location of the facilities, the circulation patterns to be utilized by various users, and the impacts to specific intersections and roadways. We
believe the failure to incorporate this new information by updating assumptions in the Draft SEIR has resulted in an incomplete traffic and circulation analysis.

- **Sassafras Street and Pacific Highway:** During the NOP comment period, District staff requested that the Draft SEIR analyze impacts associated with the large influx of additional truck trips in the area that could disrupt District operations at the Port Administration Building located on the corner of Sassafras Street and Pacific Highway. The Draft SEIR should have included an updated study on the traffic impacts at entrances from Sassafras and Washington Streets because these streets would be the primary access points for rental car customers, cargo operators, public vehicles, delivery trucks, passenger shuttle buses, SDCRAA vehicles, employees, maintenance vehicles, fueling vehicles, etc. Reliance on the 2008 AMP Final EIR traffic and impact study for this area means that the Draft SEIR does not analyze new potential impacts that could be caused by the reassignment of existing traffic, generation of additional traffic, or intersection impacts due to the Proposed Project facilities accessed via Sassafras Street and Washington Street.

- **Rail Operations:** The Draft SEIR does not address how vehicle traffic associated with the Proposed Project would affect at-grade rail crossings and all rail operations in the rail corridor from West Washington Street and at Sassafras Street, particularly with respect to stacking issues.

- **North Harbor Drive:** Table 5.1-1 of the Draft SEIR (Notice of Preparation Comment Letters/Scoping Meeting Comments) states that the combination of the CONRAC being proposed in the northern portion of the SDIA and the use of a consolidated shuttle system would reduce airport-related traffic on North Harbor Drive. This street currently includes numerous shuttle trips by individual rental car companies distributed along the southern edge of SDIA. Given that SDCRAA has no current plans to construct the parking garage in front of Terminal 2 on the south side, and all rental car patrons/shuttles, delivery trucks, and a large percentage of public parkers are being shifted to the north side of the SDIA, it appears that the traffic and circulation analysis may overstate and over-mitigate potential traffic impacts on North Harbor Drive and understate and under-mitigate traffic impacts along Pacific Highway. An updated traffic analysis that addresses these issues should have been included in the Draft SEIR. Additionally, the Draft SEIR should have included a supplemental traffic analysis of the area where the Terminal Link Roadway is planned to exit onto North Harbor Drive at Rental Car Road.

**Cumulative Impacts**

We contend that the Draft SEIR does not adequately address potential cumulative impacts that may result from implementation of the Proposed Project for the following reasons:
• Cumulative Project List: Section 5.1.3 of the Draft SEIR [Environmental Issues that Warrant Further Analysis in this Supplemental EIR] states that the analysis and conclusions related to cumulative impacts outlined in the 2008 AMP Final EIR are considered to be valid and applicable to the Proposed Project, and therefore, no additional discussion or analysis of cumulative impacts is warranted or included in the Draft SEIR. However, we understand that there have been a number of new projects that have commenced since the certification of the 2008 AMP Final EIR. The following projects were not addressed in the 2008 AMP Final EIR and should have been considered in the Draft SEIR:
  ▪ Relocation of the Central Receiving and Distribution Center
  ▪ Redevelopment of the entrance to the Marine Corps Recruit Depot at Washington Street and Pacific Highway.
  ▪ The District issued a Notice of Preparation of an Environmental Impact Report (EIR) for its North Embarcadero Port Master Plan Amendment in 2009 and a public scoping meeting was held on October 15, 2009. The Notice of Preparation was revised in 2010 and two additional public scoping meetings were held in October 2010. The scope of the EIR includes a number of Project elements that should have been considered cumulatively with the Proposed Project. These elements include narrowing or potentially closing portions of Harbor Drive, commencement of a bayfront shuttle, and the potential construction of a multi-use parking facility at West Grape and Pacific Highway.

Land Use Impacts
We contend that the Draft SEIR does not adequately address potential land use impacts that may result from implementation of the Proposed Project. The Draft SEIR did not analyze land use impacts to District tidelands. If any proposed roadway or other improvements may conflict with the District’s certified Port Master Plan, the Draft SEIR should have stated that those improvements would be subject to Port Master Plan consistency review, and identified the circumstances under which a Port Master Plan Amendment (PMPA) would be requested of the Board of Port Commissioners for approval. And, as you are aware, the PMPA would ultimately be subject to certification by the California Coastal Commission.

Conclusion
Thank you for this opportunity to comment on the Draft SEIR. The District has recently conducted revised scoping meetings for an EIR on the proposed North Embarcadero PMPA. We are currently forming a Traffic Working Group comprised of City of San Diego, Centre City Development Corporation, and District staff as well as Linscott, Law & Greenspan as traffic consultants. We would like to invite SDCRAA to participate in this cooperative effort, and believe the Traffic Working Group would be
helpful in resolving many of the issues noted above. We anticipate the EIR process for the North Embarcadero PMPA will take approximately 18 months to complete.

District staff looks forward to continuing to working with you and your staff in a meaningful and productive manner towards achieving mutually beneficial solutions. If you have any questions regarding these comments, please contact me at (619) 686-6473 or Candice D. Magnus, Associate Redevelopment Planner, at (619) 686-6583.

Sincerely,

Darlene Nicandro,
Director, Environmental & Land Use Management
San Diego Unified Port District

cc: Wayne Darbeau
    Dirk Mathiasen
    Irene McCormack
    Randa Coniglio
    Candice D. Magnus

DM#: 451469
San Diego Unified Port District | Signed by: Darlene Nicandro, Director
Environmental & Land Use Management

<table>
<thead>
<tr>
<th>Subject: Comments on the Draft Supplemental Environmental Impact Report for the San Diego International Airport Master Plan - Northside Improvements (SCH No. 2005091105 - SDCRAA # EIR-10-01</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment: 1</td>
<td>Response</td>
</tr>
<tr>
<td>The San Diego Unified Port District (&quot;District&quot;) would like to thank the San Diego County Regional Airport Authority (SDCRAA) for the opportunity to comment on the content of the October 2010 Draft Supplemental Environmental Impact Report (SEIR) prepared for the San Diego International Airport Master Plan - Northside Improvements Project (&quot;Proposed Project&quot;). District staff has reviewed the Draft SEIR, and respectfully submits the comments below. Our comments relate to the following issue areas: mitigation measures; project elements; construction impacts; and potential environmental impacts to parking, traffic and circulation, cumulative, and land use. We acknowledge that our respective staffs have discussed many of these potential issues and appreciate that your staff has acknowledged many of these open issues. However, we believe it is important to establish a record to memorialize our concerns about the adequacy of the Draft SEIR and the need for additional environmental analysis prior to SDCRAA proceeding with the Proposed Project.</td>
<td>Comment noted. Please see Responses 2 through 23 below, which address each of the concerns raised by the commenter.</td>
</tr>
<tr>
<td>Comment: 2</td>
<td>Response</td>
</tr>
<tr>
<td>While we recognize SDCRAA's responsibility to improve facilities and provide improved services for the traveling public, we want to re-emphasize the fact that we are operating side-by-side, virtually on the same land. In doing so, planning our respective properties is going to require consistent, close collaboration on both sides. We look forward to this collaborative process with SDCRAA to seek resolution to our concerns and to provide a more</td>
<td>Comment noted. Representatives of the San Diego County Regional Airport Authority (SDCRAA) met with San Diego Unified Port District (Port District) staff from March through August 2011 to discuss planning of respective properties and address concerns.</td>
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</table>
inclusive participation in SDCRAA's planning process. We would like to meet with you and your staff at your earliest convenience to discuss the issues outlined in this letter.

Comment: 3

<table>
<thead>
<tr>
<th>Impacts to Public Access and District Leaseholds from Mitigation Measures</th>
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<tbody>
<tr>
<td>We contend that the Draft SEIR does not adequately address District staff's concerns about mitigation measures that directly or indirectly affect District properties and leaseholds for the following reasons:</td>
</tr>
<tr>
<td></td>
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<tr>
<td>• Proposed Implementation Plan: The 2008 Airport Master Plan Final EIR (&quot;2008 AMP Final EIR&quot;) proposed traffic mitigation measures which included an implementation plan for nineteen roadway improvements. During SDCRAA's Notice of Preparation (NOP) process, District staff commented that the proposed implementation plan for these roadway improvements may adversely affect District tidelands by eliminating or encroaching upon public access and District leaseholds (i.e. park space, landscaping, sidewalks, and parking). The 2008 AMP Final EIR did not disclose these land use impacts and the Draft SEIR does not analyze any implementation plan that expands roadways onto District property. The Draft SEIR also does not disclose how elements of the Proposed Project such as the Terminal Link Roadway would work with the implementation plan for the traffic mitigation.</td>
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</table>

Comment: 4

<table>
<thead>
<tr>
<th>Response</th>
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<tbody>
<tr>
<td>The most notable potential for impacts to Port District tidelands from implementation of the proposed Northside Improvements would have been that associated with development of the Terminal Link Roadway. That Project element, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. Based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has modified the proposed alignment of Terminal Link Roadway to avoid impacts to that Port District property. Implementation of the roadway improvements identified in the AMP is subject to further evaluation as to the ability of the SDCRAA to use Airport funds for those improvements. Construction of the improvements by the SDCRAA, if/as allowed by federal law, would include appropriate coordination with the Port District regarding issues such as park space, landscaping, sidewalks, and parking.</td>
</tr>
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</table>

Comment noted. Section 5.3.1.8 of the AMP Draft Supplemental EIR, specifically the first full paragraph on page 5-66, indicates that the roadway segments, intersection, arterial roadways, and freeway ramps and operations related to the AMP Final EIR traffic mitigation measures are not within the jurisdiction of the SDCRAA. As such, the SDCRAA...
mitigation measures would occur on lands within the jurisdiction of the District and cannot be implemented without the consent of the District and/or acquisition of property rights from the District. The Draft SEIR should identify which of the proposed mitigation measures are within the District's jurisdiction and disclose that, absent the District's consent (in some cases a lease or other grant of property rights from the District) the mitigation measures cannot be implemented, would be infeasible, and would result in additional unmitigated significant impacts.

does not have the authority to ensure that those other agencies implement the recommended mitigation measures, and it is possible that the traffic impacts of the AMP improvements would remain significant after Project implementation. The subject discussion in the AMP Draft Supplemental EIR identifies the City of San Diego and Caltrans as agencies with such jurisdiction. Section 5.3.1.9 of the AMP Draft Supplemental EIR has been revised herein to indicate that the Port District is also an agency with such jurisdiction. This AMP Final Supplemental EIR, which includes comments on the AMP Draft Supplemental EIR and written responses to those comments, hereby acknowledges that the Port District has land use jurisdiction over recommended traffic mitigation measures occurring in areas within the Port District's legal jurisdiction. The following table identifies the locations for traffic mitigation measures associated with the AMP Airport Land Use Plan, included in Section 5.3 of the AMP Final EIR (pages 5.3-145 through 5.3-150 and 5.3-166 through 5.3-170) and restated in Section 5.3.1.8 of this AMP Final Supplemental EIR, and whether those mitigation measures may involve improvements within Port District tidelands.

### Traffic Mitigation for ALUP in AMP Final EIR

<table>
<thead>
<tr>
<th>Year</th>
<th>Mitigation Measures - Street Segment</th>
<th>Within Port Tidelands?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>North Harbor Drive between Rental Car Access Rd and Laurel Street</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>North Harbor Drive between Laurel Street and Hawthorn Street</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Grape Street between North Harbor Drive and Pacific Highway</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Grape Street between Pacific Highway and Kettner Boulevard</td>
<td>Yes</td>
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<td></td>
<td>Grape Street between Kettner Boulevard and I-5</td>
<td>No</td>
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<tr>
<td></td>
<td>Hawthorn Street between North Harbor Drive and Pacific Highway</td>
<td>Yes</td>
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<tr>
<td></td>
<td>Hawthorn Street between Pacific Highway and Kettner Boulevard</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Kettner Boulevard between Kettner Boulevard and I-5</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Kettner Boulevard between Washington Street and Sassafras Street</td>
<td>No</td>
</tr>
<tr>
<td>Mitigation Measures - Intersections</td>
<td>Within Port Tidelands?</td>
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<tr>
<td>Kettner Boulevard between Sassafras Street and Palm Street</td>
<td>No</td>
<td></td>
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<tr>
<td>Laurel Street between North Harbor Drive and Pacific Highway</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Laurel Street between Pacific Highway and Kettner Boulevard</td>
<td>Yes</td>
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<tr>
<td>Sassafras Street between Pacific Highway and Kettner Boulevard</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Sassafras Street between Kettner Boulevard and India Street</td>
<td>No</td>
<td></td>
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<tr>
<td>Washington Street between Kettner Boulevard and San Diego Street</td>
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<td></td>
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<tr>
<td>India Street between Laurel Street and Palm Street</td>
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<td></td>
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<tr>
<td>India Street between Palm Street and Sassafras Street</td>
<td>No</td>
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<tr>
<td>India Street between Sassafras Street and Washington Street</td>
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<tr>
<td>Rosecrans Avenue between Barnett and Sports Arena</td>
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<td></td>
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<tr>
<td>Rosecrans Avenue between Quimby and Barnett</td>
<td>No</td>
<td></td>
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<tr>
<td>Rosecrans between Nimitz and Quimby</td>
<td>No</td>
<td></td>
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<tr>
<td>2015 Hawthorn Street and North Harbor Drive (AM &amp; PM)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>2015 Laurel Street and Pacific Highway (PM)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>2015 Washington Street and Pacific Highway NB Ramps (AM &amp; PM)</td>
<td>No</td>
<td></td>
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<tr>
<td>2030 Hawthorn Street and North Harbor Drive (AM &amp; PM)</td>
<td>Yes</td>
<td></td>
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<tr>
<td>2030 Laurel Street and Pacific Highway (PM)</td>
<td>Yes</td>
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<tr>
<td>2030 Grape Street and Pacific Highway (PM)</td>
<td>Yes</td>
<td></td>
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<tr>
<td>2030 Grape Street and Kettner Boulevard (PM)</td>
<td>No</td>
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<tr>
<td>2030 Sassafras Street and Kettner Boulevard (PM)</td>
<td>No</td>
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<tr>
<td>2030 Grape Street and I-5 Southbound On-Ramp (PM)</td>
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<td></td>
</tr>
<tr>
<td>2030 Washington Street and Pacific Highway NB Ramps (AM &amp; PM)</td>
<td>No</td>
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</table>
As indicated above, 12 of the 24 traffic mitigation measures for street segments may involve improvements within Port District tidelands:

- North Harbor Drive between Rental Car Access Rd and Laurel Street - 2015
- North Harbor Drive between Laurel Street and Hawthorn Street - 2015
- Grape Street between North Harbor Drive and Pacific Highway - 2015
- Grape Street between Pacific Highway and Kettner Boulevard - 2015
- Hawthorn Street between North Harbor Drive and Pacific Highway - 2015
- Hawthorn Street between Pacific Highway and Kettner Boulevard - 2015
- Laurel Street between North Harbor Drive and Pacific Highway - 2015
- Laurel Street between Pacific Highway and Kettner Boulevard - 2015
- Sassafras Street between Pacific Highway and Kettner Boulevard - 2015
- North Harbor Drive between Terminal 1 Access and Winship Lane - 2030
- North Harbor Drive between Winship Lane and Rental Car Access - 2030
- North Harbor Drive between Hawthorn Street and Grape Street - 2030

As indicated above, five of the 10 traffic mitigation measures for intersections may involve improvements within Port District tidelands:
<table>
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<tbody>
<tr>
<td><strong>Central Receiving and Distribution Center</strong>&lt;br&gt;We contend that the Draft SEIR does not adequately disclose information relating to the proposed Central Receiving and Distribution Center for the following reasons:&lt;br&gt;  • <strong>Environmental Analysis:</strong> Section 5.1.1 [Description of Notice of Preparation and Initial Study] discusses the NOP for the Draft SEIR, but does not disclose that the Central Receiving and Distribution Center is no longer being included in the Draft SEIR and is being evaluated in a separate Negative Declaration. No justification is provided in the Draft SEIR for segmenting environmental review of this facility.</td>
<td>The Central Receiving and Distribution Center (CRDC) was initially considered for inclusion in the AMP Draft Supplemental EIR along with the other Northside improvements; however, based on the nature and independent utility of the CRDC, it was determined that a separate project-specific environmental review of the CRDC was more appropriate. A Negative Declaration for the CRDC was adopted by the SDCRAA Board on March 3, 2011 (Final Negative Declaration, SDCRAA #ND-10-01, March 2011). This document is available on the SDCRAA website (<a href="http://www.san.org/sdcraa/airport_initiatives/environmental/ceqa.aspx">http://www.san.org/sdcraa/airport_initiatives/environmental/ceqa.aspx</a>), and at the SDCRAA Clerk’s Office (San Diego International Airport, Commuter Terminal, Third Floor, 3225 North Harbor Drive, San Diego, CA 92101) and is incorporated by reference. See also Responses 6 and 21 below regarding the fact that development of airport support facilities such as the CRDC was previously considered in the AMP Final EIR.</td>
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<th>Comment: 6</th>
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<td>• <strong>Cumulative Impact(s):</strong> The relocation of the Central Receiving and Distribution Center should have been evaluated in the</td>
<td>The AMP Final EIR anticipated and addressed the development of airport support facilities in the northern portion of the Airport - see page</td>
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Cumulative Impacts section of the Draft SEIR so that the environmental impacts from this facility could be assessed in conjunction with the other proposed facilities in the area.

4-2 of the AMP Final EIR. The AMP Final EIR’s evaluation of such uses along with the other uses contemplated in the AMP, including those specific to the Northside area, provides an analysis of cumulative impacts. See also Response 21 below regarding the fact that development of airport support facilities such as the CRDC was previously considered in the AMP Final EIR.

Comment: 7

Response

Construction Impacts

We contend that the Draft SEIR does not adequately address potential impacts that may result from construction of the Proposed Project for the following reasons:

- Construction Details: Sections 5.3.1.6 and 5.3.2.5 of the Draft SEIR [Construction Impacts] mention several potential construction impacts resulting from the Proposed Project and the steps the SDCRAA will take to mitigate issues, however no details are provided as to when these construction impacts would occur, what equipment would be used, when the various facilities would be constructed, etc. The description of the Proposed Project is incomplete because it does not include anticipated construction timeframes for the various facilities. Without this information, the impact analysis and the analysis of cumulative traffic, air quality and noise impacts related to construction activities are incomplete.

Construction details such as exactly when each of the project components would be constructed and what construction equipment would be used are not known at this time. As indicated in the AMP Draft Supplemental EIR, such construction would result in temporary impacts related to air quality, noise, and traffic impacts; however, such impacts would be less than significant. In addition to the fact that construction impacts would be temporary in nature, other considerations contribute to the conclusion that such impacts would be less than significant. The locations of the proposed improvements are within interior portions of the Airport, well removed from any sensitive uses such as residential development, schools, hospitals, etc. Little, if any, construction traffic associated with the project is anticipated to occur during the peak travel/commute hours in the morning or afternoon and none is expected to occur on residential streets.

Construction-related air emissions associated with the proposed Northside Improvements are determined to be less than significant for the following reasons:

- General Aviation Facility - Construction emissions associated with this project component located in the northside area and included in the adopted Airport Implementation Plan were quantified and included in the AMP Final EIR Air Quality Assessment. When considered together with all of the other projects assumed in the adopted Airport Implementation Plan, the construction emissions for the general aviation facility were
determined to be less than significant. These emissions were based on detailed construction methods, equipment types and schedules that were specifically developed for all of the projects included in the adopted Airport Implementation Plan, including the new general aviation facility. (See AMP Final EIR, Chapter 5, Air Quality, Table 5-5.6, Construction-Related Air Emissions Inventory and Technical Appendix E, Part II, Air Quality - Construction Emissions.)

- Consolidated Rental Car Facility (CONRAC), Air Cargo Facility, Terminal Link Roadway and Surface Parking Lots - Construction requirements (i.e., equipment, man-power, schedules) for the Northside Improvements are anticipated to be less than when compared to the projects in the adopted Airport Land Use Plan evaluated in the AMP Final EIR, and thus the construction-related emissions are expected to be less. Therefore, because construction emissions associated with the adopted Airport Land Use Plan were determined to be less than significant, the construction emissions associated with these projects are also determined to be less than significant. Further, the Northside Improvements will be constructed after the adopted Airport Implementation Plan projects are completed, so the total construction emissions from both programs are not considered to be cumulative.

1 Based on the air quality significance criteria defined in Section 5.5.3 of the Final Environmental Impact Report, San Diego International Airport, Airport Master Plan, San Diego County Regional Airport Authority, April 2008 (SCRCRAA #EIR-06-01, State Clearinghouse No. 2005091105).

2 Final Environmental Impact Report, San Diego International Airport, Airport Master Plan, San Diego County Regional Airport Authority, April 2008 (SCRCRAA #EIR-06-01, State Clearinghouse No. 2005091105).
Additionally, as noted in Section 5.4.1.6 of the AMP Draft Supplemental EIR, Table 5-1.16 in the AMP Final EIR delineates the maximum noise level by the equipment types that would be used in construction of the AMP improvements, as well as the resulting noise at various distances from the construction zones. Among the various equipment types, the maximum noise levels would be produced by the pile drivers, with resulting noise levels in the nearest residential areas of 62.8 dB to 48.0 dB at distances of 1,500 to 4,000 from the sources, respectively. Relative to the Northside area, the projected noise level of 62.8 dB would be most applicable, based on the proximity of existing residences located across I-5. Based upon that analysis, the construction noise would not exceed 75 dB in residential areas. The construction noise would be lower than the aircraft and highway noise that occurs in the residential areas near the construction zones. Due to the louder noise levels and more frequent events that occur with aircraft operations and surface vehicle traffic and in consideration of the logarithmic quantities of noise measured in decibels, aircraft and highway noise would continue to be the determinative sources in the noise environment. Thus, the ambient noise levels would not be expected to increase due to the construction activity. Additionally, the construction work would not be expected to result in excessive ground-borne vibration to home sites. Therefore, the construction work would cause less than significant impacts in regard to noise associated with implementation of the AMP.

Future details such as when exactly each component of the project would be constructed and what construction equipment would be used would not alter these basic considerations regarding why the construction impacts are anticipated to be less than significant.

Recognizing the proximity of the Port District offices at the intersection of Pacific Highway and Sassafras Street, after further design and proposed construction schedules are developed for the CONRAC and other Northside Improvements, the SDCRAA will establish a construction coordination office to meet with the Port District to
coordinate construction-related trips and reduce or minimize conflicts with Port District-related operations and events.

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<td>Intersections and Freeway On-ramps: There is no discussion in the Construction Impacts sections of potential impacts to intersections and freeway on-ramps, specifically at Sassafras Street/Pacific Highway, Sassafras Street/India Street, and Washington Street/Pacific Highway, which are the most likely routes for construction truck traffic.</td>
<td>Construction details associated with the proposed Northside Improvements are not known at this time. Although construction scheduling and construction haul routes have not yet been determined, it is anticipated that the vast majority of construction-related trips would occur during non-peak hours based on typical construction work hours (i.e., around 6:30 or 7:00 a.m. to around 3:00 or 3:30 p.m.) and the typical preference of construction companies to schedule materials deliveries and/or truck trips so as to avoid peak/congested traffic periods. As such, temporary construction-related impacts to intersections and roads in the vicinity of the Project site are generally expected to occur during non-peak hours. Additionally, the SDCRAA has committed to implementing measures to help avoid or reduce potential construction-related traffic. Those measures include establishment of a construction coordination office within the Ground Transportation Department and requiring orientation for construction personnel relative to means of reducing traffic impacts. Additional details regarding those measures are provided in Section 5.3.6 of the AMP Final EIR.</td>
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<td>Conclusion of “Less than Significant:” The conclusion that construction impacts would be less than significant because they are temporary is not supported by any evidence. The Draft SEIR does not disclose the duration of the construction period for each facility and for all of them cumulatively, although it is likely to last for several years. The Draft SEIR also does not disclose the nature and extent of the construction activities, so there is no way of knowing the potential traffic, air quality or noise impacts associated with these</td>
<td>Please see Response 7 above.</td>
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activities. Since the required analysis of construction impacts has been deferred, the facts regarding the nature, extent and duration of construction activities are absent and there is no evidence that supports the analysis or conclusions.

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**Parking Impacts**

We contend that the Draft SEIR does not adequately address potential parking impacts to District tenants that may result from implementation of the Proposed Project for the following reasons:

- **Terminal Link Roadway:** Implementation of the Proposed Project would include the construction of a new on-airport access road between the northern and southern portions of the San Diego International Airport (SDIA), which the Draft SEIR refers to as the "Terminal Link Roadway." The proposed alignment of the Terminal Link Roadway would effectively displace a parking lot along Laurel Street, which is District property currently leased to Solar Turbines ("Solar"). SDCRAA has no legal right to occupy or use this parcel without such rights being conveyed by the District. Section 3.2 of the Draft SEIR [Proposed Federal, State and Local Actions and Required Permits] should identify that a lease from the District (taking into consideration the District's prerequisite relocation of Solar Turbine's employee parking) is required to allow SDCRAA to use the 3.2-acre parcel needed for the proposed Terminal Link Roadway.

Comment noted. The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.

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- **Solar Employee Parking Lot:** Section 4.1.3 of the Draft SEIR [Terminal Link Roadway] identifies a portion of the former Teledyne Ryan Industries site as the proposed replacement site for the Solar employee parking lot. The District and Solar were never consulted regarding the proposed replacement site, and the Draft SEIR does not identify that a lease from the District (taking into consideration the District's prerequisite relocation of Solar Turbine's employee parking) is required to allow SDCRAA to use the proposed Terminal Link Roadway.

Comment noted. The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.
not disclose the following:
- The exact location and size of the proposed replacement parking lot;
- The distance between the proposed replacement parking lot and the existing Solar parking lot;
- How long it will take for Solar employees to walk from the proposed replacement parking lot to the Solar facility;
- The route Solar employees are expected to take to the new facility and the public safety issues related to the proposed route; and
- How the employees will navigate the new Terminal Link Roadway as pedestrians or with their vehicles.

concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.

Comment: 12  
Response
District staff has been in contact with officials at Solar and they have expressed to us a number of concerns regarding the proposed replacement parking site. District staff proposes that SDCRAA work with the District to determine a mutually beneficial solution to Solar's employee parking relocation that adequately addresses Solar's concerns.

Please see Response 2 above regarding representatives of the SDCRAA meeting with Port District staff to discuss and address the Port District's concerns on the impact to Solar Turbine's employee parking.

Comment: 13  
Response
• Public Airplane Viewing Parking Lot: There is currently an area to the west of the existing Solar parking lot on Laurel Street that is designated as a public airplane viewing parking lot. The Draft SEIR is unclear about how this area would work in conjunction with the proposed Terminal Link Roadway.

The small parking area to the west of the existing Solar Turbines employee parking lot along Laurel Street would be removed to allow for construction of the Terminal Link Roadway. While sometimes used by the general public for viewing of Airport operations, this small parking area is not "designated" as a public viewing area in neither the Airport Master Plan nor the Port District's Planning District 2 (Lindbergh Field/Harbor Island) Precise Plan. Further, no signage is located at or near this small parking area that indicates it is a public viewing area.
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<td><strong>District Employee Parking Lot:</strong> The Draft SEIR does not indicate whether or not the District's employee parking lot, located directly across Pacific Highway from the Port Administration Building (subleased to the District by SDCRAA), would be displaced by either the proposed Terminal Link Roadway or new general aviation facilities. This potential parking impact is not analyzed and no mitigation is provided.</td>
<td>Figure 4.2, Proposed Airport Implementation Plan, of the AMP Final EIR, and Figure 2-3, Approved Airport Implementation Plan (Northside Area), of the AMP Draft Supplemental EIR both depict the Port District employee parking lot as being located in an area planned for &quot;Ground Transportation&quot; use. As shown in Figure 2-5, Proposed Airport Implementation Plan - Northside Improvements, of the AMP Draft Supplemental EIR, the Port District employee parking lot would not be impacted by development of the Terminal Link Roadway or the relocated general aviation facilities. Port District employees would continue to access the lot via the entrance road from the Sassafras Street and Pacific Highway intersection.</td>
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<td><strong>Fixed Base Operator Facility:</strong> The Draft SEIR does not disclose the plans for the relocated Fixed Base Operator facility that was contemplated in the 2008 AMP Final EIR. The Draft SEIR also does not clarify if the existing general aviation facilities, currently located parallel to Pacific Highway, will be displaced by the Terminal Link Roadway. More discussion and analysis of these facilities should be provided in the Draft SEIR.</td>
<td>As stated in Section 2.3.2 of the AMP Final EIR, &quot;General aviation uses must be relocated to allow for the construction of airfield/taxiway improvements and apron hold pads.&quot; (Note: General aviation uses include Fixed Base Operators [FBOs]). The AMP Final EIR depicts the site for the relocated general aviation facilities in Figure 4.2, Proposed Airport Implementation Plan. As shown, the existing general aviation facilities, which would include FBOs, would be relocated to the northwest, away from Taxiway C and Pacific Highway. The AMP Draft Supplemental EIR also depicts the relocated general aviation facilities in Figure 2-3, Approved Airport Implementation Plan (Northside Area), and Figure 2-5, Proposed Airport Implementation Plan - Northside Improvements. The general aviation facilities are the first project component planned to be constructed and operated in the Northside Improvements area. The general aviation facilities were analyzed as a Project level component of the San Diego International Airport Master Plan in the Final EIR (May 2011).</td>
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2008). The general aviation facility was also analyzed as a project in the Final Environmental Assessment (EA) prepared in compliance with the National Environmental Policy Act (NEPA) for the San Diego International Airport Master Plan (April 2009). The Final EA was evaluated, signed and dated by the Federal Aviation Administration and a Finding of No Significant Impact was published April 20, 2009 in the Federal Register.

As described in the AMP Final EIR and Final EA, the existing general aviation facilities have been expanded in a piece-meal fashion over the years and occupy a haphazardly organized area on 11.4 acres (AMP Final EIR, Section 3.2.4.1 General Aviation Improvements, page 3-13). Overall Airport efficiency and safety would be improved by the relocation and expansion of the general aviation on 12.4 acres in an area better-suited and planned for general aviation aircraft apron, terminals, hangars, vehicle circulation and parking. These general aviation improvements on 12.4 acres would meet the minimum general aviation facility requirements for 2015 as outlined in the adopted Airport Master Plan. Relocating the general aviation facilities further away from Taxiway C and the runway end would also prevent conflicts between taxiing aircraft and the associated jet blast on the general aviation facilities apron. Relocating and expanding the general aviation facilities would allow the Airport to provide improved general aviation facilities for use and access by general aviation aircraft while improving both safety and efficiency (page 3-13).

The proposed relocation of the existing general aviation facilities will increase the separation between the general aviation apron and the airfield in a better suited location as described in the Airport Master Plan. The existing and future general aviation facilities may be operated by one or multiple fixed base operators as determined by the SDCRAA in accordance with federal regulations.
The actual detailed site plans for the relocated general aviation facilities have not been determined and are currently being developed by the SDCRAA. However, the final site plans for the relocated general aviation facilities are being developed within the relocated general aviation area depicted in the AMP Final EIR and the AMP Draft Supplemental EIR.

Comment: 16

Traffic and Circulation
We contend that the Draft SEIR does not adequately address potential traffic and circulation impacts that may result from implementation of the Proposed Project for the following reasons:

• Development Components: The Proposed Project includes the construction of a 6,500-space consolidated rental car facility ("CONRAC"), a 2,170 space public surface lot, and 225,000 square feet of air cargo facilities. All of these large development components would be located on the north side of SDIA, and would be accessed via a new roadway that would be constructed adjacent to these facilities.

We recognize that the details of these development components were not known during the preparation of the 2008 AMP Final EIR. And as a result, certain assumptions were made and the analysis was conducted at a programmatic level for those components. Now that the project-specific details of the Proposed Project are known, they should have been analyzed in the Draft SEIR and all potential environmental impacts should have been identified. For example, much more detail is now available about how rental car patrons, public vehicles and cargo operators will access the new facilities on the north side.

The Draft SEIR should have supplemented the 2008 AMP Final EIR

Response

The traffic analysis prepared for the AMP Final EIR was based on the assumption that the primary access point for the Northside Improvements would be provided through the intersection of Pacific Highway with Sassafras Street and secondary access provided through the intersection of Pacific Highway with Washington Street. Current regional access and local roadway traffic distribution assumptions remain consistent with the AMP assumptions; therefore, the future circulation patterns assumed for the AMP Draft Supplemental EIR are assumed to be the same as those assumed for the AMP Final EIR. Furthermore, project-related traffic volumes accessing the Northside in the AMP Final EIR are conservatively high relative to the current Northside Improvements program that has been reduced in size relative to the program analyzed in the AMP Final EIR. Consequently, all potential traffic impacts and associated mitigation measures for the study area intersections and roadways have been appropriately identified.

However, in addition to the mitigation program identified in the AMP Final EIR, SDCRAA is conducting ongoing planning exercises to identify the internal circulation and access requirements for the Northside Improvements, as well as detailed analysis of the intersections and access points with roadways forming the perimeter of the Airport property, specifically Pacific Highway, Laurel Street and North Harbor Drive. The proposed Northside Improvements are being planned using project-specific assumptions and traffic volume data that
traffic and circulation analysis by analyzing any project-specific impacts associated with these facilities and should have identified mitigation measures that will offset impacts on area-wide traffic and circulation. Instead, Section 5.3 of the Draft SEIR [Traffic and Circulation] relies heavily on the 2008 AMP Final EIR traffic and circulation analysis by stating that the CONRAC facility is now smaller than assumed and the impacts and mitigation presented in the 2008 AMP Final EIR are still valid and applicable.

As indicated in Section 5.3.1 of the AMP Final EIR, the Airport Implementation Plan was analyzed at a project level of detail while the Airport Land Use Plan was analyzed at a program level. The development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR under the Proposed Airport Land Use Plan scenario described on page 5.3-64 of the AMP Final EIR. Furthermore, this development scenario envisioned a higher level of trip activity than currently proposed. Specifically, the Airport Land Use Plan scenario envisioned a 9,000-space CONRAC facility (which is larger than the 6,500-space facility currently planned), additional development in the former Teledyne Ryan site, and the redevelopment of the vacated rental car facilities with future commercial development (e.g., hotel, convention facilities, and restaurants). As such, the traffic impact analysis prepared for the AMP Final EIR is conservative and fully addresses traffic impacts and mitigation measures that would be required.

The Airport Land Use Plan analyzed in the AMP Final EIR contains the projects included in the Northside Improvements project plus the additional trips associated with office and commercial development at the former Teledyne Ryan site and in the south areas to be abandoned by the rental car companies after the opening of the CONRAC. Furthermore, the traffic modeling process using the SANDAG Model and technical procedures for analyzing street segments, intersections,
freeway segments and ramps, and railroad crossings are conducted at the same level of detail for the Airport Land Use Plan as for the Airport Implementation Plan. As such, the program level analysis conducted for the Airport Land Use Plan was done at the same level of detail as the project level analysis for the Airport Implementation Plan using land use assumptions that remain valid and conservative. Therefore, the AMP Final EIR sufficiently identifies any significant impacts and associated mitigation measures associated with the proposed Northside Improvements.

Comment: 17

• Traffic Analysis: The traffic analysis relies on data from 2005 that is now at least five years old. The assumptions used in the 2008 AMP Final EIR traffic and circulation analysis should be updated to reflect the project-specific details of all of the new facilities on the north side, not just the CONRAC, and should include the location of the facilities, the circulation patterns to be utilized by various users, and the impacts to specific intersections and roadways. We believe the failure to incorporate this new information by updating assumptions in the Draft SEIR has resulted in an incomplete traffic and circulation analysis.

Response

The comment implies that the traffic analysis prepared for the AMP Final EIR does not address traffic associated with facilities on the Northside other than the CONRAC. As described on page 5.3-64 of the AMP Final EIR, the traffic analysis assumed the development of a 9,000-space CONRAC, public parking facilities accommodating 2,170 spaces, and new cargo facilities that would allow cargo operators to sort cargo on-site rather than moving cargo off-airport to be sorted. Project-related traffic volumes accessing the Northside in the AMP Final EIR are conservatively high relative to the current Northside Improvements program that has been reduced in size relative to the program analyzed in the AMP Final EIR. Consequently, all potential traffic impacts and associated mitigation measures for the study area have been appropriately identified. In addition, ongoing planning is being conducted to identify the internal circulation and access requirements for the proposed Northside Improvements, including the refinement of intersections and access points with roadways forming the perimeter of the Airport property.

Refer to Response 7 to the City of San Diego's January 14, 2011 comment letter above regarding the validity of the data used for the AMP Final EIR traffic analysis.
Comment: 18

- Sassafras Street and Pacific Highway: During the NOP comment period, District staff requested that the Draft SEIR analyze impacts associated with the large influx of additional truck trips in the area that could disrupt District operations at the Port Administration Building located on the corner of Sassafras Street and Pacific Highway. The Draft SEIR should have included an updated study on the traffic impacts at entrances from Sassafras and Washington Streets because these streets would be the primary access points for rental car customers, cargo operators, public vehicles, delivery trucks, passenger shuttle buses, SDCRAA vehicles, employees, maintenance vehicles, fueling vehicles, etc. Reliance on the 2008 AMP Final EIR traffic and impact study for this area means that the Draft SEIR does not analyze new potential impacts that could be caused by the reassignment of existing traffic, generation of additional traffic, or intersection impacts due to the Proposed Project facilities accessed via Sassafras Street and Washington Street.

Response

The assumptions used for the traffic analysis prepared for the AMP Final EIR are consistent with current assumptions pertaining to the use of the intersection of Sassafras Street and Pacific Highway as an entrance to the Northside project area. Furthermore, the planning assumptions pertaining to the activity levels associated with the Northside developments and the resulting traffic volumes analyzed in the AMP Final EIR at this intersection remain valid. As described in Response 9 to the City of San Diego's January 14, 2011 comment letter above, the development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR under the Proposed Airport Land Use Plan scenario and are conservative in nature. As such, the traffic analysis provided in the AMP Final EIR evaluates the traffic patterns, access points, parking, and resultant impacts associated with the Northside Improvements such as the CONRAC, air cargo warehouse facilities, and the Terminal Link Roadway, among other features. Consequently, the findings documented in the AMP Final EIR fully define the anticipated impacts traffic associated with the proposed Northside Improvements and potential mitigation measures that may be required for the proposed Northside Improvements have been fully analyzed and documented in the AMP Final EIR.

The SDCRAA is conducting ongoing planning exercises to identify the internal circulation and access requirements for the Northside Improvements as well as detailed analysis of the intersections and access points with roadways forming the perimeter of the Airport property, specifically Pacific Highway, Laurel Street and North Harbor Drive. These studies include detailed analysis and refinement of the intersection of Pacific Highway with Sassafras Street using updated and site-specific traffic volumes. As part of these project-specific engineering and design refinements, the intersection will be planned accordingly to address current information pertaining to the traffic
patterns and volumes associated with the anticipated users of the intersection today as well as under future conditions through 2030.

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<td><strong>Rail Operations:</strong> The Draft SEIR does not address how vehicle traffic associated with the Proposed Project would affect at-grade rail crossings and all rail operations in the rail corridor from West Washington Street and at Sassafras Street, particularly with respect to stacking issues.</td>
<td>Potential impacts to highway-rail crossings, including Washington Street and Sassafras Street, resulting from implementation of the AMP, which includes Northside improvements, are addressed in the AMP Final EIR - see Section 5.3.</td>
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| **North Harbor Drive:** Table 5.1-1 of the Draft SEIR (Notice of Preparation Comment Letters/Scoping Meeting Comments) states that the combination of the CONRAC being proposed in the northern portion of the SDIA and the use of a consolidated shuttle system would reduce airport-related traffic on North Harbor Drive. This street currently includes numerous shuttle trips by individual rental car companies distributed along the southern edge of SDIA. Given that SDCRAA has no current plans to construct the parking garage in front of Terminal 2 on the south side, and all rental car patrons/shuttles, delivery trucks, and a large percentage of public parkers are being shifted to the north side of the SDIA, it appears that the traffic and circulation analysis may overstate and over-mitigate potential traffic impacts on North Harbor Drive and understate and under-mitigate traffic impacts along Pacific Highway. An updated traffic analysis that addresses these issues should have been included in the Draft SEIR. Additionally, the Draft SEIR should have included a supplemental traffic analysis of the area where the Terminal Link Roadway is planned to exit onto North Harbor Drive at Rental Car Road. | The traffic analysis prepared for the AMP Final EIR was based on the assumption that the shuttle buses operated by the individual rental car facilities located south of North Harbor Drive would be replaced by a common shuttle bus system serving the CONRAC facility proposed as part of the Northside Improvements. In addition, the traffic analysis assumed that rental car activity would be relocated from the south area to the north area. As such, the traffic analysis does not overstate impacts on North Harbor Drive or understate impacts along Pacific Highway. Consequently, the traffic analysis in the AMP Final EIR remains valid.  

Please refer to Response 8 to the City of San Diego's January 14, 2011 comment letter above for details pertaining to rental car shuttle bus activity analyzed in the AMP Final EIR and the analysis of potential traffic impacts to North Harbor Drive associated with the proposed Terminal Link Roadway. |
Comment: 21

**Cumulative Impacts**

We contend that the Draft SEIR does not adequately address potential cumulative impacts that may result from implementation of the Proposed Project for the following reasons:

- **Cumulative Project List:** Section 5.1.3 of the Draft SEIR (Environmental Issues that Warrant Further Analysis in this Supplemental EIR) states that the analysis and conclusions related to cumulative impacts outlined in the 2008 AMP Final EIR are considered to be valid and applicable to the Proposed Project, and therefore, no additional discussion or analysis of cumulative impacts is warranted or included in the Draft SEIR. However, we understand that there have been a number of new projects that have commenced since the certification of the 2008 AMP Final EIR. The following projects were not addressed in the 2008 AMP Final EIR and should have been considered in the Draft SEIR:
  - Relocation of the Central Receiving and Distribution Center
  - Redevelopment of the entrance to the Marine Corps Recruit Depot at Washington Street and Pacific Highway.
  - The District issued a Notice of Preparation of an Environmental Impact Report (EIR) for its North Embarcadero Port Master Plan Amendment in 2009 and a public scoping meeting was held on October 15, 2009. The Notice of Preparation was revised in 2010 and two additional public scoping meetings were held in October 2010. The scope of the EIR includes a number of Project elements that should have been considered cumulatively with the Proposed Project. These elements include narrowing or potentially closing portions of Harbor Drive, commencement of a bayfront shuttle, and the potential construction of a multi-use parking facility at West Grape and Pacific Highway.

Response

As indicated on page 2-33 of the AMP Final EIR, future land uses anticipated in the northern portion of the Airport include airport support uses. The CRDC provides such airport support services and is considered to have been included in the overall cumulative impacts analysis of the AMP Final EIR. As indicated in Response 5 above, the CRDC was initially considered for inclusion in the AMP Draft Supplemental EIR along with the other Northside improvements; however, based on the nature and independent utility of the CRDC, it was determined that a separate project-specific environmental review of the CRDC was more appropriate. A Negative Declaration for the CRDC was adopted by the SDCRAA Board on March 3, 2011 (Final Negative Declaration, SDCRAA #ND-10-01, March 2011). This document is available on the SDCRAA website (http://www.san.org/sdcraa/airport_initiatives/environmental/ceqa.aspx), and at the SDCRAA Clerk's Office (San Diego International Airport, Commuter Terminal, Third Floor, 3225 North Harbor Drive, San Diego, CA 92101), and is incorporated by reference.

The proposed redevelopment of the entrance to the Marine Corps Recruit Depot (MCRD) is intended to route in-bound vehicles to an expanded holding area where appropriate security screening can occur without causing a back-up in traffic. The proposed improvements are designed to separate MCRD-bound traffic from Airport-bound traffic and would involve certain improvements and signal adjustments at the intersection of Washington Street and Pacific Highway and restriping/reconfiguring the vehicle route immediately south of the subject intersection, leading to the MCRD base entrance. The overall objective to separate MCRD and Airport traffic south of the intersection, enabling MCRD-bound traffic to be routed to a stop/holding area while allowing Airport-bound traffic to continue moving, would serve to enhance traffic flow in the nearby area and is not expected to have an adverse impact on traffic conditions. As such, no adverse cumulative impact is expected to occur.
As described above, the MCRD entrance project at Washington and Pacific Highway is designed to separate MCRD-bound traffic from Airport-bound traffic by modifying and restriping lanes to direct MCRD-bound traffic to security screening. The entrance project serves to improve traffic circulation and safety for in-bound vehicles by clearly designating lanes and segregating vehicles after passing south of the Washington/Pacific Highway intersection. The entrance project does not alter land uses or increase the intensity of land uses on MCRD or the Airport. MCRD has not completed a federal environmental review document that can be specifically referenced as part of the cumulative impacts analysis; however, the project has been coordinated among MCRD, SDCRAA and the City of San Diego.

The North Embarcadero Port Master Plan Amendment project proposes new development south of the Airport, including but not limited to potential construction of a multi-use parking facility at West Grape Street and Pacific Highway, and modifications to the nearby circulation system. While such new development and circulation system modifications may increase and redistribute traffic in areas south of the Airport, it is not anticipated that implementation of the proposed SDIA Northside Improvements would contribute adversely to cumulative impacts. Key elements of the proposed Northside Improvements include construction of a CONRAC, which would relocate and consolidate existing rental car operations that are dispersed to the south and southeast of the Airport and move them to the north end of the Airport, and provide additional airport parking at the north end of the Airport. It should be noted that the existing rental car use sites along North Harbor Drive are assumed to be redeveloped with Port uses, which was accounted for in the future traffic conditions addressed in the AMP Final EIR analysis. The Terminal Link Roadway included in the proposed Northside Improvements would transport passengers and rental car customers to and from the terminals using shuttles that travel primarily within the bounds of the Airport, off of public streets. Implementation of the proposed Northside Improvements would serve to reduce Airport-related traffic in the
general areas where the North Embarcadero Port Master Plan Amendment project is likely to increase and redistribute future traffic. Although it is possible that traffic associated with the North Embarcadero Port Master Plan Amendment development projects would also travel on other roads around the airport, such as Pacific Highway along the eastern and northern sides of the airport, it is anticipated that the volumes of such traffic on other roadways would diminish as it moves northward, being distributed onto the intervening cross-streets. This would reduce the likelihood of cumulative traffic impacts occurring from the combination of North Embarcadero traffic and Airport Northside traffic. Additionally, it is important to note that the analysis of future traffic conditions within the AMP Final EIR assumed a larger CONRAC facility than is currently proposed. As such, implementation of the proposed Northside Improvements is not expected to result in a cumulatively considerable adverse impact when combined with the North Embarcadero Port Master Plan Amendment project.

**Comment: 22**

**Land Use Impacts**

We contend that the Draft SEIR does not adequately address potential land use impacts that may result from implementation of the Proposed Project. The Draft SEIR did not analyze land use impacts to District tidelands. If any proposed roadway or other improvements may conflict with the District's certified Port Master Plan, the Draft SEIR should have stated that those improvements would be subject to Port Master Plan consistency review, and identified the circumstances under which a Port Master Plan Amendment (PMPA) would be requested of the Board of Port Commissioners for approval. And, as you are aware, the PMPA would ultimately be subject to certification by the California Coastal Commission.

**Response**

As indicated in Section IX.b. in the Initial Study for the proposed Northside Improvements, the 2008 AMP Final EIR analyzed the compatibility of the Airport Land Use Plan, which includes the types of uses associated with the proposed Northside Improvements, with numerous land use plans, policies, and regulations. Those plans, policies, and regulations include: the California Tidelands Trust; the California Coastal Act; the SDIA Airport Land Use Compatibility Plan; the San Diego Port Master Plan/California Coastal Act; the City of San Diego Strategic Framework Element; City of San Diego Community Plans including those for the Peninsula, Uptown, Midway-Pacific Highway Corridor, and Downtown Community Plan Areas; North Bay Redevelopment Plan, Naval Training Center (NTC) Redevelopment/Reuse Plan; NTC Precise Plan and Local Coastal Program; San Diego Airport Approach Overlay Zone; and, City of San Diego International Airport
Diego Airport Environ Overlay Zone (AEOZ). The AMP Final EIR evaluation related to each of these land use plans, policies, and regulations found that approval of the then proposed Airport Land Use Plan would not result in any significant conflicts. The AMP Final EIR analysis of the land use plan compatibility of the Airport Implementation Plan also concluded that no significant conflicts would occur, in most cases by virtue of the fact that the improvements proposed in the Airport Implementation Plan were consistent with the Airport Land Use Plan. In other cases, the fact that the proposed uses were airport-related and SDIA has long been an airport accounted for in applicable planning documents, and all new development would be subject to airport-related development standards, were the bases for concluding that no significant land use conflicts would occur. That analytical framework and basis for conclusions would also apply to the improvements associated with the Proposed Project. Thus, as indicated in the Initial Study, potential impacts with respect to land use impacts would be less than significant and no further analysis is warranted in this Supplemental EIR.

Comment: 23

Response

**Conclusion**

Thank you for this opportunity to comment on the Draft SEIR. The District has recently conducted revised scoping meetings for an EIR on the proposed North Embarcadero PMPA. We are currently forming a Traffic Working Group comprised of City of San Diego, Centre City Development Corporation, and District staff as well as Linscott, Law & Greenspan as traffic consultants. We would like to invite SDCRAA to participate in this cooperative effort, and believe the Traffic Working Group would be helpful in resolving many of the issues noted above. We anticipate the EIR process for the North Embarcadero PMPA will take approximately 18 months to complete.

Comment noted. SDCRAA is pleased to join and participate in the Traffic Working Group to identify and resolve potential impacts to traffic circulation in the vicinity of the North Embarcadero. We look forward to continuing to work with the Port District regarding ongoing SDCRAA and Port District planning efforts at and near SDIA.
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San Diego County Archaeological Society, Inc.
Environmental Review Committee

13 November 2010

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

Subject: Draft Supplemental Environmental Impact Report
Airport Land Use Plan – Northside Improvements

Dear Mr. Anasis:

I have reviewed the cultural resources aspects of the subject DSEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DSEIR, we have the following comments:

1. We acknowledge the response to our letter of 1 June 2010, included in Table 5.1-1.

2. The relocated Solar Turbines employee parking lot should be configured so as to not require demolition of historic Ryan Aeronautical Complex structures. Alternatives could include covered (interior) parking.

3. Other than 2, above, we agree that no significant impacts to cultural resources are likely to result from the project.

Thank you for including SDCAS in the public review of this DSEIR.

Sincerely,

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

cc: SDCAS President
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<tr>
<th>San Diego County Archaeological Society, Inc. Environmental Review Committee</th>
<th>Signed by: James W. Royle, Jr., Chairperson</th>
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<tbody>
<tr>
<td>Subject:</td>
<td>Draft Supplemental Environmental Impact Report Airport Land Use Plan - Northside Improvements</td>
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<tr>
<td>Comment: 1</td>
<td>Response</td>
</tr>
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<td>1. We acknowledge the response to our letter of 1 June 2010, included in Table 5.1-1.</td>
<td>Comment noted.</td>
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<tr>
<td>Comment: 2</td>
<td>Response</td>
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<td>2. The relocated Solar Turbines employee parking lot should be configured so as to not require demolition of historic Ryan Aeronautical Complex structures. Alternatives could include covered (interior) parking.</td>
<td>The structures that were formerly within the site previously considered for Solar Turbines replacement parking were analyzed and removed by the San Diego Unified Port District in a project separate and in advance from the proposed Northside Improvements. As indicated in Chapter 4 of this AMP Final Supplemental EIR, the alignment of the proposed Terminal Link Roadway has been refined to avoid removal of the existing Solar Turbines employee parking lot located at the southeast edge of SDIA property. Therefore, replacement parking at the former Teledyne Ryan Industries site would not be required.</td>
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<td>Comment: 3</td>
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December 16, 2010

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

Subject: Draft Supplemental Environmental Impact Report to the Airport Master Plan
(SDCRAA # EIR-10-01)
(State Clearinghouse No. 2005091105)

Solar Turbines and its predecessors have been in business in San Diego since 1927. Their corporate headquarters has been located at their current site for the last 83 years. The parking available for their employees has been provided in Tidelands parcels adjacent to their facility for decades and has been included in a lease with the Port of San Diego. The lease period continues through 2033 with potential extensions through 2043.

Solar is respectfully submitting this response to the Airport Master Plan and the Draft Supplemental Environmental Impact Report Dated October 2010. Although the Airport Authority has not involved Solar, in regards to this study, to date, Solar believes it greatly impacts its position as a Tenant and thus wishes to express its views.

The proposed portion of the Airport Master Plan, Supplemental Environmental Impact Report associated with the Terminal Link Roadway, as noted in Chapter 4, Project Characteristics, Paragraph 4.1.3 has numerous flaws in their planning and present a serious impact to the operations of Solar Turbines and their employees. The proposed replacement parking is especially flawed in its location and in the Airport Authority’s assumption that there would be minimal impact to traffic conditions along North Harbor Drive for this parking lot in the previous Teledyne Ryan site.

The description of the Roadway in Paragraph 4.1.3, referencing figure 4-1, illustrates a roadway adjacent to Solar’s Laurel Street parking area potentially sharing a common pathway with the current bi-directional airport service road. The figure 4-1 concepts would not impact Solar’s Laurel Street lot and the current parking used by our employees. The illustration in Figure 4-2 eliminates all of Solar’s parking in the Laurel Street lot and the additional parking for Solar employees in our Pacific Coast Highway (PCH) lot North of the PCH / Laurel Street intersection. Solar currently has 408 spaces in the Laurel Street lot and 70 Spaces in the Pacific Highway lot. The proposed plan in Figure 4-2 would eliminate all of these spaces for our employees. That volume of displaced local parking is approaching 50% of the total parking currently available for our employees.
The proposed replacement parking lot represents a significant displacement of our employees from the current crosswalk access locations to our facility. The closest marked crosswalk to reach the south side of Laurel Street is at the PCH / Laurel Street intersection. The distance to that location is almost one (1) mile from the replacement lot. To reach the facility from the south sidewalk of North Harbor Drive, the employees would have to walk west, away from the facility to the next traffic light before crossing at a crosswalk to the south side of North Harbor Drive. The employees would then be required to walk to the Laurel Street / North Harbor Drive intersection to be able to cross to the facility on a crosswalk. Neither of the available access routes provides reasonable distances to access the Solar Facility.

Contrary to the draft study findings, the replacement lot is also a significant traffic impediment when compared to the existing patterns with the current parking for Solar employees. The reference to the new lot’s entrance in relation to the existing lot’s entrance is incorrectly defined in Chapter 5, Environmental Setting, Consequences and Mitigation Measures, Paragraph 5.3.2.2. When the entrance to the proposed lot is compared to the closest entrance to the existing lot, the distance is closer to 0.75 miles away rather than 450 feet.

Solar employees currently access the 70 Space PCH lot from a southbound entrance on PCH north of the Laurel Street intersection. If all spaces in the PCH lot are occupied, the Solar employee can continue for additional parking into the Laurel Street lot without returning to the city streets. The remainder of Solar employees, that use the Laurel Street lot, access that lot from the outside, west bound lane of Laurel Street at an entry gate approximately 300 feet west of the PCH / Laurel Street intersection. These arrivals start as early as 05:00 and continue through 09:00. The second shift employees start arriving at the lots by approximately 13:00 and continue until 14:30 as the first shift employees start to walk to their cars to leave work for the day.

The replacement lot location would reposition all of these vehicle entrance and exit movements to impact the North Harbor Drive Airport Terminal traffic, which is rushing to drop off or pickup passengers at the Existing South Terminal access to the Air Carrier Gates. The Solar vehicle volume will be a noticeable impact to the morning and mid afternoon traffic on North Harbor Drive. Airport bound traffic will also be interrupted as employees make their way to Solar’s Facility using crosswalk protected access to the south sidewalk of North Harbor Drive. The Solar Employees will then impact Airport bound traffic a second time as they access the crosswalk protected path to Solar’s facility at the North Harbor Drive / Laurel Street intersection.

The replacement lot is also undefined as to the layout of the spaces to be provided but appears to be too small to replace the full complement of our existing spaces.

The fenced and segregated Terminal Link Roadway will be passing between the proposed replacement lot and North Harbor Drive as it shuttles travelers between the North Airport Facilities and the South Air Carrier Terminals. The current plan is unclear how the Solar vehicles will get into and exit the lot with the fenced Terminal Link Roadway as a
barrier. The path for the Solar employee to walk to their Solar Facility destination around or over the fenced roadway is also unclear in the proposed plan.

This is a synopsis of the factors that may not have been considered in your report. We are always open to discuss alternatives that would be mutually beneficial to Solar and the Airport Authority in coordination with the Port of San Diego.

Respectfully,

James H. McCollum
Manager, Principal Projects
Solar Turbines Incorporated

858-694-1623 (office)
mccollum_jim_h@solarturbines.com

cc: Jacqueline Loaiza

Enclosures
4.1.3 Terminal Link Roadway

The Terminal Link Roadway, identified as a transit corridor in the AMP Final EIR, would be a dedicated, airport-controlled, on-airport property road that connects the northside development area and south terminal area. As depicted in Figure 4-1, the road alignment would run south from the Sassafras Street and Pacific Highway intersection to the eastern end of the runway then turns west and proceeds to the intersection of North Harbor Drive and the existing Rental Car Access Road. This alignment would take the roadway through the existing general aviation area parallel to Pacific Highway, the Runway Safety Area (RSA) for Runway 27, and an employee parking lot on State of California lands operated by the Unified Port District of San Diego and currently leased to Solar Turbines. Related planning considerations for the Terminal Link Roadway include the following:

- Various alignments through the existing general aviation area were evaluated by the SDCRAA and the preferred option includes relocation of the fixed based operator (FBO). As shown in the AMP Final EIR, the development of a new FBO facility for general aviation, which would replace the existing facility, is included in the Airport Implementation Plan.
- The SDCRAA has determined that it would be feasible to construct the Terminal Link Roadway around the end of Runway 27 (i.e., retain the existing airfield service road that extends around Runway 27, place a new airfield security fence along the outside edge of that roadway and construct the Terminal Link Roadway between the new security fence and the existing Airpot boundary fence).
- The SDCRAA has identified the former Teledyne Ryan Industries site as the preferred location for replacement of the Solar Turbines employee parking that would be eliminated by the proposed Terminal Link Roadway (see Figure 4-2).

The Terminal Link Roadway would be dedicated to SDCRAA vehicles, passenger shuttle buses, and other authorized vehicles; no public vehicles would be permitted to use the roadway. The subject 2-lane roadway would provide one twelve-foot wide lane in each direction with a six-foot shoulder on each side for an overall right-of-way dimension of 36 feet.

4.1.4 Utilities Improvements

Development of the new CONRAC facility, the adjacent surface parking lot, and the air cargo warehouse facilities described above would include local utilities improvements to provide water, sewer, natural gas, storm drain, power, and communications infrastructure for each of the planned facilities. The proposed utilities improvements would place new or upgraded utility lines within the Northside Improvements site that would connect with existing utility lines within or adjacent to the site in order to provide service to the proposed new buildings/facilities. The nature and location of new (proposed) and existing utility lines are depicted on each of the utility figures referenced below (Figures 4-3 through 4-9). The main trunk lines, or "backbone system," of the new utilities would generally be located within the new on-site access road proposed to extend west from Sassafras Street at Pacific Highway, with the smaller service lines extending generally north and south from the backbone system. The new utility lines would connect to the existing utility infrastructure located nearby, with the majority of the new connections occurring in the vicinity of Pacific Highway and Sassafras Street. Some utilities such as water lines, natural gas lines, and telecommunication lines would also have connections to existing utilities at both the east side and the west side of the proposed development area. No major improvements to existing off-site utilities are currently anticipated to be necessary for the proposed development. The basic nature and characteristics of the improvements anticipated for each utility type are summarized below.

Electrical (Figure 4-3)

- The main electrical utility connection is anticipated to occur at Sassafras Street with a connection capacity of at least 8.5 megawatts at 12.47 kilovolts. Incoming substation and switchgear would
5.3.2.2 AMP Project (with Replacement of Solar Turbines Employee Parking Lot)

This supplemental analysis relates specifically to the future need to relocate the Solar Turbines Employee Parking Lot for construction of the Terminal Link Roadway which is a component of the Northside Improvements. As shown in Figure 4-2, the Terminal Link Roadway is planned to be constructed through the area currently occupied by the Solar Turbines Employee Parking Lot (which is approximately 3.2 acres in total size). Figure 4-2 also shows the preferred replacement location for the Solar Turbines employee parking lot which is located at the eastern end of the former Teledyne Ryan Industries site. Access to the replacement parking lot would be from North Harbor Drive at the east end of the former Teledyne Ryan Industries site.

It is anticipated that the replacement employee parking lot would generally be of the same size and serve the same purpose as currently used by Solar Turbines Industries. Furthermore, because the entrance to the replacement lot is located approximately 450 feet from the closest entrance to the existing lot on Laurel Street, it is anticipated that the traffic patterns outside of the concentrated sub area studied for this Supplemental EIR would remain unchanged and that changes in traffic flow would be limited to those roadways and intersections in close proximity to the existing and proposed parking lot sites that are depicted in Figure 5.3-2.

5.3.2.3 Traffic Counts Associated with Solar Turbines Parking

All existing and future traffic volume forecasts identified in the AMP Final EIR are still considered valid for this supplemental traffic and circulation analysis. This includes the airport traffic patterns, the street segment average daily traffic volumes, and AM/PM peak turning movements for study area intersections. The relevant AMP Final EIR traffic volumes used for the supplemental traffic and circulation analysis are included below.

Based on information supplied by Solar Turbines Industries, their employee parking lot located on SDIA property contains 550 total spaces. Although the lot is not always full due to rotating shifts, it is considered fully used (at the same level) for all future years for the purpose of this analysis. Of the 550 spaces, 60 percent (or 330 spaces) are used by shift employees that arrive to and depart from the plant during three off-peak hour shifts (6:00 a.m. to 2:30 p.m., 2:30 p.m. to 11:00 p.m., and 11:00 p.m. to 6:00 a.m.). The remaining 40 percent (or 220 spaces) are used by office employees who work from 8:00 a.m. to 5:00 p.m. and are included in this analysis as peak hour activity.

The overall volume of traffic generated by Solar Turbines Industries is included in the Average Daily Traffic (ADT) and Intersection Counts in the AMP Final EIR. Changes in the use of street segments or intersections associated with relocation of existing parking to the Solar Turbines Replacement Parking Lot are identified in the following section.

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15 The distribution of Solar Turbines employee traffic during the day was provided by Solar Turbines Industries, September 2010.
This route does not impact Solar's parking lot on Laurel Street.
**Solar Turbines Incorporated**

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<tr>
<th>Subject: Draft Supplemental Environmental Impact Report to the Airport Master Plan (SDCRAA # EIR-10-01) (State Clearinghouse No. 2005091105)</th>
<th>Signed by: James H. McCollum, Manager, Principal Projects</th>
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**Comment: 1**

Solar Turbines and its predecessors have been in business in San Diego since 1927. Their corporate headquarters has been located at their current site for the last 83 years. The parking available for their employees has been provided in Tidelands parcels adjacent to their facility for decades and has been included in a lease with the Port of San Diego. The lease period continues through 2033 with potential extensions through 2043.

Solar is respectfully submitting this response to the Airport Master Plan and the Draft Supplemental Environmental Impact Report Dated October 2010. Although the Airport Authority has not involved Solar, in regards to this study, to date, Solar believes it greatly impacts its position as a Tenant and thus wishes to express its views.

so

**Response**

Comment noted. The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. San Diego County Regional Airport Authority (SDCRAA) staff met with Solar Turbines staff on March 1, 2011 to discuss and understand the concerns of Solar Turbines.

As indicated in Chapter 4 of this AMP Final Supplemental EIR, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.

**Comment: 2**

The proposed portion of the Airport Master Plan, Supplemental Environmental Impact Report associated with the Terminal Link Roadway, as noted in Chapter 4, Project Characteristics, Paragraph 4.1.3 has numerous flaws in their planning and present a serious impact to the operations of Solar Turbines and their employees. The proposed replacement parking is especially flawed in its location and in the Airport Authority's assumption that there would be minimal impact to traffic conditions along North Harbor Drive for this parking lot in the previous Teledyne Ryan site.

**Response**

Comment noted. Please see Responses 3 through 9 below, which address each of the concerns raised by the commenter.
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<td>Comment noted. Figure 4-1 of the AMP Draft Supplemental EIR presents the conceptual site plan for the Northside Improvements and is intended to illustrate the general locations and interrelationships of the Project's main components, whereas Figure 4-2 provides a closer, more precise look at the alignment of the Terminal Link Roadway in relation to the existing Solar Turbines employee parking. Based on the more precise depiction of the subject roadway, the AMP Draft Supplemental EIR addresses potential impacts to the Solar Turbines existing employee parking facility along Laurel Street and Pacific Highway. However, based on comments received on the AMP Draft Supplemental EIR expressing concern about the elimination of such parking, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot. Please see Chapter 4 of this AMP Final Supplemental EIR for further discussion.</td>
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January 20, 2011

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

Subject: Comments on the Draft Supplemental Environmental Impact Report Airport Master Plan

Dear Mr. Anasis:

The Peninsula Community Planning Board has reviewed the Draft Supplemental Environmental Impact Report for the Airport Master Plan. We have identified the following areas of concern in your analysis, which we would like to see further studied before the adoption of a Final SEIR.

- CEQA requires an EIR to discuss the cumulative effect on the environment of the subject project in conjunction with other closely related past, present and reasonably foreseeable probable future projects. Although still in conceptual form, the Airport Authority has made clear documentation of the potential of the reorganization of the Airport Master Plan to accommodate the concepts addressed in Destination Lindbergh. Although the Introduction to the Draft SEIR discusses Destination Lindbergh, the Draft SEIR fails to complete an alternatives analysis that takes into consideration the concepts within Destination Lindbergh Report\(^1\) by Jacobs Consultancy, specifically Alternative B1 from the Jacobs Report.

- A Supplemental EIR is intended to address potential environmental impacts from proposed projects that were not fully considered in the Airport Master Plan EIR, not to allow the Authority to take a piecemealed approach to the CEQA process in order to produce a desired outcome. The widely available information on Destination Lindbergh as well as the probable redevelopment of Terminal 1 should be considered in conjunction with these proposed improvements under consideration. In addition, any offsite processing facilities that could be required in the future to support the cargo operations of the proposed project need to be included in this analysis, as well environmental impacts from increased cargo flight operations that will likely occur from the availability of proposed cargo processing facilities.

- Finally, the Traffic and Circulation section of the Draft SEIR does not analyze the impact of rental car shuttle vehicles from the terminus of the proposed airport road to the actual terminal entrances. The vehicles will have to use North Harbor Drive between Winship Lane and Airport Terminal Road, and the impacts to these intersections need to be studied in your analysis.

We appreciate the opportunity to comment on the referenced Draft SEIR. Questions regarding this letter and further coordination on these issues should be directed to PCPB Airport Subcommittee Co-Chairs, Robert MacCulloch and Suhail Khalil.

Sincerely,

Charles Mellor, PCPB Chair


Cc: San Diego Regional Airport Authority & Airport Advisory Committee
San Diego Association of Governments
San Diego City Council & Mayor Jerry Sanders
San Diego Community Planners Committee
Senator Christine Kehoe, CA Senate District # 39
### Comments on the Draft Supplemental Environmental Impact Report Airport Master Plan

<table>
<thead>
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<th>Comment: 1</th>
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<td>The Destination Lindbergh Technical Report completed in March 2009 is a concept study only and does not set forth a reasonably foreseeable development plan. The San Diego County Regional Airport Authority (SDCRAA) has recently selected an airport planning consultant team to assist in the formulation of a long-term development plan for the Airport that will take into account the 2008 Airport Master Plan and the 2009 Destination Lindbergh Technical Report. In conjunction with the formulation of potential development concepts related to Destination Lindbergh, that work effort will include the completion of appropriate environmental reviews under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).</td>
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<td>As indicated in several of the introductory sections of the Airport Master Plan (AMP) Draft Supplemental EIR, including but not limited to Sections 1.1, 1.2, 2.1., and 2.2, the proposed Northside Improvements are included in the AMP and were addressed in the AMP Final EIR. With the availability of more detailed information regarding those improvements and the desire to develop those facilities in the near future, the SDCRAA prepared a Supplemental EIR in order to provide additional information and analysis for the subject improvements. That process is not &quot;piecemealing,&quot; but rather just the opposite; it is the continuation and the implementation of elements of the comprehensive plan presented in 2008 as the Airport Master Plan. As indicated in the response to comment</td>
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presented directly above, the SDCRAA is moving ahead with a comprehensive planning effort for the long-term future, through the year 2040, of San Diego International Airport taking into account the 2008 AMP and the 2009 Destination Lindbergh Technical Report. As such, both the role of the Northside Improvements and the potential implications of Destination Lindbergh relative to the long-term future of the Airport will be addressed in a comprehensive integrated manner.

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<td>Comment noted. Please refer to Response 8 to the City of San Diego's January 14, 2011 comment letter above.</td>
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CHAPTER 2: INTRODUCTION, BACKGROUND, AND PROJECT OVERVIEW

This chapter describes the purpose and organization of this document, and provides a background discussion of the San Diego International Airport (SDIA) Master Plan (AMP) Final EIR, as well as an overview of the proposed Northside Improvements that are the subject of this Supplemental EIR. In addition, incorporated references are provided.

2.1 Introduction

The following describes the purpose of this document and its organization.

2.1.1 Document Purpose

In May 2008, the San Diego County Regional Airport Authority (SDCRAA) certified the Final EIR for the SDIA AMP. The AMP Final EIR addresses the land uses and improvements identified in the Airport Land Use Plan at a program-level of analysis, and the specific improvements of the Airport Implementation Plan at a project-level of analysis, based on information available at the time.

Over the past two years, additional planning and coordination with Airport tenants and stakeholders has occurred regarding airport use areas identified in the Airport Land Use Plan that now enables them to be added to the Airport Implementation Plan. Such improvements are planned primarily in the northern portion of the Airport, and are referred herein as the Northside Improvements, and include a CONRAC facility, air cargo warehouse facilities and associated improvements, a terminal link roadway along the eastern perimeter of the Airport connecting the proposed northside facilities to the main terminal area, and on-site utility improvements to serve the proposed development (i.e., placement of new utility lines and/or upgrading of existing utility lines within the Northside Area to provide service to new buildings/facilities).

The proposed Northside Improvements provide the basis for proposed amendments to the adopted AMP Airport Land Use Plan and Airport Implementation Plan. These amendments represent the discretionary actions that constitute the Proposed Project for review under CEQA. The proposed Northside Improvements (Proposed Project) consists of amendments to the Airport Land Use Plan and Airport Implementation Plan of the adopted SDIA AMP to include the following projects: 1) CONRAC facility; 2) air cargo warehouse facilities; 3) terminal link roadway; and 4) on-site utilities improvements. As more fully described in Chapter 2, the uses in the Northside Improvements were previously contemplated and addressed in the AMP Final EIR; however, certain aspects of those uses, such as the configuration of the public parking area, the size of the CONRAC facility, the alignment of the Terminal Link Roadway, and various other design and implementation details, have since been refined. Those proposed amendments to the Airport Land Use Plan and Airport Implementation Plan account for such refinements. The purpose of this Supplemental EIR is to satisfy CEQA requirements by fully disclosing any material changes in impacts that may occur as a result of the Proposed Project in light of new information regarding the proposed Northside Improvements that were not known at the time the AMP Final EIR was prepared.

Per Section 15162 of the CEQA Guidelines, when an EIR has been certified for a project, a subsequent EIR or supplemental EIR is required if one or more of the following occurs:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to
the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
   - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
   - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
   - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
   - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

1. Any of the conditions described above would require the preparation of a subsequent EIR, and
2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

As further described herein, the Northside Improvements, as originally proposed, were addressed in the AMP Final EIR. Because the additional analysis required in light of the new information regarding the proposed Northside Improvements does not require major additions or changes to the previously certified AMP Final EIR, a supplemental EIR is the appropriate document for the Proposed Project. The purpose of a supplemental EIR is to provide the additional information necessary to make the previous EIR adequately apply to the project as revised. As such, a supplemental EIR need contain only the information necessary to address the project changes, changed circumstances, or new information that triggered the need for the additional environmental review under CEQA. A supplemental EIR may be circulated for public review by itself without recirculating the previous EIR. Thus, preparation of a supplemental EIR does not re-open the previously certified EIR for revisions or public review; the focus of the supplemental EIR is whether the project changes, changed circumstances, or new information would result in new or more severe significant effects that were not disclosed in the previous EIR.

2.1.2 Organization of the Report

The organization of this Supplemental EIR is similar to that of the AMP Final EIR, although the focus of this document is limited to only new information relevant to the proposed Northside Improvements. The scope of analysis presented in this Supplemental EIR was determined based on the completion of an Initial Study pursuant to Section 15063 of the CEQA Guidelines, comments received on the Notice of Preparation (NOP) published for the Supplemental EIR, and input received at a scoping meeting held on June 8, 2010.

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2 As discussed in Section 2.4 of this Supplemental EIR, the AMP Final EIR is available for review at the SDCRAA administrative offices located on the third floor of the Commuter Terminal, 3225 North Harbor Drive, San Diego, California 92101 from 8 AM to 5 PM, and is also available on the SDCRAA website (www.san.org) at http://san.org/sdcraa/airport_initiatives/master_plan/eir.aspx.
The first chapter of this Supplemental EIR is the executive summary chapter that provides an overview of the proposed Northside Improvements, and a summary of potential environmental impacts, and copies of comment letters received on the Draft Supplemental EIR and written responses to all comments received. Chapter 2 provides an introduction and briefly describes the Proposed Project. Chapter 3 provides project objectives, and Chapter 4 describes the characteristics of the proposed Northside Improvements. Chapter 5 provides a summary of the relevant environmental analyses contained in the AMP Final EIR and includes supplemental analyses specific to the proposed Northside Improvements for the following environmental topics: aesthetics; traffic and circulation, as related to displaced parking; utilities/service systems; and, GHG emissions. Chapter 6 describes other effects of the Proposed Project and Chapter 7 includes closing sections of this Supplemental EIR.

An appendix is provided at the end of this document. Appendix A includes the NOP for the SDIA AMP Draft Supplemental EIR, responses to the NOP, and scoping meeting information.

Consistent with CEQA, an updated review of federal, state, and local database lists was conducted to determine if other agencies have identified sites within the Proposed Project site as having been contaminated by hazardous materials releases. Review of such lists was conducted by Environmental Data Resources (EDR), Inc. in July, 2010. The product of this review is the EDR report, which is on file with the SDCRAA (Refer to Table 5.1-1 in Section 5.1 of this Supplemental EIR for further discussion).

### 2.2. Background

#### 2.2.1 Airport Master Plan Final EIR

SDIA 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. The Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, U.S. Marine Corps Recruit Depot (MCRD) San Diego to the north, and Pacific Highway and Interstate 5 to the east. Figure 2-1 is a regional location map depicting SDIA.

SDIA is the smallest major airport site in the United States, consisting of 661 acres. The Airport has a single, 9,401-foot-long by 200-foot-wide east-west runway, making it the busiest single-runway commercial airport in the nation.

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 SDIA tripled between 1980 and 2005.

To address increasing demand for air transportation services at the Airport, the San Diego Unified Port District prepared SDIA’s first Draft Master Plan document in 2001. This Draft Master Plan document was not adopted and the associated environmental analysis was not completed prior to the transfer of Airport ownership and operation to the SDCRAA in 2003.

Based on an updated aviation forecast, described in Section 2.2.2 of the AMP Final EIR, the SDCRAA commenced an update to the Airport's Draft Master Plan technical report. Improvements for SDIA required to accommodate regional growth as defined in the previous draft report were not implemented.

In May 2006, the Draft EIR for the SDIA proposed AMP was published. The AMP Draft EIR addressed the land uses and improvements contemplated in the proposed Airport Land Use Plan at a program-level of analysis, and the specific improvements of the proposed Airport Implementation Plan at a project-level of analysis, based on information available at the time. The AMP Draft EIR addressed a full range of environmental issues in detail, including: noise; land use planning; traffic and circulation; population and housing; air quality; hydrology and water quality; historic, architectural, archaeological, paleontological, and cultural resources; biotic communities/endangered and threatened species; wetlands; coastal resources; utilities and service systems; light emissions; aesthetics; geology and soils; hazards and
hazardous materials; human health risk assessment; public services; recreation; and, GHG emissions. The AMP Draft EIR considered five alternatives, including the "No Project" alternative. The AMP Draft EIR addressed potential environmental impacts anticipated to occur from the construction and operation of the AMP improvements to the year 2015. As a result of comments received on the AMP Draft EIR, the AMP Final EIR considered potential environmental impacts through the year 2030.

In May 2008, the SDCRAA certified the AMP Final EIR and adopted the SDIA AMP for the future development of the Airport. The approved AMP Airport Land Use Plan and Airport Implementation Plan are described in the following section.

2.3 Project Overview

2.3.1 Approved AMP Airport Land Use Plan and Airport Implementation Plan

The SDIA AMP describes numerous improvements planned to occur at the Airport, generally delineated within an overall Airport Land Use Plan, and more specifically defined within the Airport Implementation Plan.

Airport Land Use Plan

The approved Airport Land Use Plan (Figure 2-2) for SDIA designates existing and future land uses in areas that are under the SDCRAA's planning and operating jurisdiction. It is important to note that the majority of the lands that comprise SDIA are State tidelands, which are held in trust for the benefit of the citizens of the State of California. The 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 SDCRAA, remain in the public trust and any proposed land uses must be consistent with California Tidelands Trust requirements. As shown in Figure 2-2, the Airport Land Use Plan designates 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.

Airport Implementation Plan

The approved AMP Airport Implementation Plan includes project-level approvals for specifically defined elements that were to be designed and constructed through 2012 and operated through 2015 and beyond. The project elements of the approved Airport Implementation Plan that relate to the Proposed Project (i.e., relate to the Northside area) are identified in Figure 2-3.

2.3.2 Overview of Proposed Project

The Final EIR for the AMP was certified in May 2008. Since that time, additional coordination with, and receipt of input from, various Airport tenants and key stakeholders has occurred, and further planning of certain conceptual improvements identified in the Airport Land Use Plan has been completed. Proposed revisions to the Airport Land Use Plan has been drafted that would amend the currently adopted AMP Airport Land Use Plan based upon additional planning and minor refinements to the designated land use areas in the northern portion of the Airport. A proposed Airport Implementation Plan - Northside Improvements has been prepared that describes the development projects proposed for the northern portion of the Airport based upon the facility requirements derived from the SDIA Master Plan forecast and coordination with the Airport tenants and stakeholders. The Proposed Project is to amend the adopted AMP Airport Land Use Plan and Airport Implementation Plan. As described above, the improvements associated with the revised Airport Land Use Plan, as related to the Northside area (see
Figure 2-4) and the proposed Airport Implementation Plan - Northside Improvements (see Figure 2-5) include the following:

- CONRAC Facility and reconfiguration of the adjacent approved public parking facility
- Air Cargo Warehouse Facilities and Associated Improvements
- Terminal Link Roadway (along the eastern perimeter of the Airport connecting the proposed northside facilities to the southside of the Airport) and related Northside roadway system
- On-site utilities improvements to serve the proposed development

Descriptions for each of the currently proposed Northside Improvements components are provided below.

**Consolidated Rental Car (CONRAC) Facility**

As described in the AMP Airport Land Use Plan and related Final EIR, a CONRAC facility was planned to be constructed in the Airport's north side area consisting of an 11,170 space parking structure with 3.3 million square feet of floor area. The structure originally proposed would have included 9,000 rental car ready/return and storage spaces and 2,170 public parking spaces.

However, since adoption of the AMP and completion of the Final EIR, further coordination with all of the rental car agencies on rental car forecasts and facility requirements has resulted in a determination that there is only a need for a smaller CONRAC facility. The current proposal is to construct a facility up to 1.9 million square feet for rental car ready/return and storage operations for up to 6,500 parking spaces. This is a reduction of approximately 1.4 million square feet from what was originally planned and analyzed in the AMP Final EIR. The smaller CONRAC facility is planned in the same location designated in the Airport Land Use Plan for Ground Transportation land uses (yellow). The smaller CONRAC facility, depicted in Figure 2-5, is located along Pacific Highway oriented closest to the Sassafras Street and Pacific Highway intersection that will serve as the primary access point to the CONRAC.

While the development of a future CONRAC facility is contemplated in the adopted Airport Land Use Plan to occur within the area designated for Ground Transportation at the northern portion of the Airport, and is addressed as such in the AMP Final EIR, it is not specifically identified in the adopted Airport Implementation Plan. An amendment to the Airport Implementation Plan is proposed in order to include the specific location and design of the CONRAC facility.

The smaller CONRAC facility is currently planned to be a four level parking structure that would measure approximately 52 feet in height. The ultimate height for the structure would be determined during final design. The facility would total approximately 1.9 million square feet of space and encompass a footprint of approximately 15 to 27.5 acres. The customer service building would be up to 40,200 square feet and integrated into the front of the parking structure. The facility would operate 24 hours per day, seven days per week. Shuttle service to and from the passenger terminals would be provided in common use CONRAC buses that would utilize a new Terminal Link Roadway (see below) for access between the passenger terminals and the CONRAC facility. Customers would be dropped-off and picked-up at the CONRAC customer service building.

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3 In conjunction with more detailed site planning that occurred subsequent to publication of the Draft Supplemental EIR, the configuration of the CONRAC and adjacent surface parking, as well as the east-west on-airport access road proposed along the south side of those facilities was refined to be that shown in Figures 2-4 and 4-1 of this Final Supplemental EIR. Those refinements do not materially change the basic functions and operations of those facilities as addressed in the Draft Supplemental EIR.

4 This height distance is measured from the surface of the ground floor to the surface of the top floor (44 feet) plus an estimate of eight additional feet for a planned canopy or hard top. The ultimate height for the structure would be determined during final design.
The primary ground access to the CONRAC facility would be located near the intersection of Pacific Highway and Sassafras Street. This intersection would be used by customers for returning rental cars as well as exiting the facility. A service access for the CONRAC facility would be via the Pacific Highway/Washington Street intersection and connecting to a new on-site road between the new CONRAC and air cargo facilities. The service access route would be utilized by employees, maintenance vehicles, semi-truck car carriers, fueling vehicles, etc.

In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Proposed Airport Implementation Plan would occur to the north and be relocated west of the proposed CONRAC facility, in a configuration slightly different from what was reflected in the approved Airport Land Use Plan; hence, an amendment to the Airport Land Use Plan is proposed (i.e., the reconfigured parking area would extend more to the southwest than shown in the approved Airport Land Use Plan - see Figures 2-2 and 2-4). The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure would be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street. The design and operation of this surface parking lot are currently proposed as part of the Northside Improvements relative to existing and future airport operations. As described in Section 2.3.3 below, the San Diego Association of Governments (SANDAG) is contemplating an Intermodal Transportation Center (ITC) to serve as a transportation hub for bus, rail and parking facilities connecting via a pedestrian bridge across Pacific Highway to the Northside Improvements area on the Airport. The long-term plans for the subject parking lot could be integrated into SANDAG's proposed ITC. The nature and timing of such future use would be determined in the more detailed planning and processing of the ITC, which is in the early planning stage.

**Air Cargo Warehouse Facilities and Associated Improvements**

As depicted in Figure 2-5, new air cargo facilities would be located parallel to, and on the north side of, Taxiway C. The currently proposed facilities would include 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine (9) parking positions for cargo aircraft. All current and future air cargo operators would be consolidated into the new cargo facilities. The proposed cargo warehouse facilities would be designed to accommodate future air cargo volumes at SDIA.

Due to the lack of existing warehouse space at SDIA, all air cargo operations (including the sorting and staging of pallets/containers) are currently conducted out in the open on former runway/taxiway and apron areas in the northern portion of the airfield. The new facilities would provide an enclosed area (warehouse) within which incoming and outgoing cargo can be sorted and staged prior to being transferred between trucks and aircrafts. As currently planned, two air cargo warehouse structures would be approximately 116 feet deep, total approximately 1,939 feet in length, and setback 1,113 feet from the runway to provide airspace clearance for the tails of aircraft parked in front of the warehouse. The height of the structures would range from 10 to 20 feet.

The planned air cargo facilities would include the construction of a new aircraft parking apron area. A cross taxilane would be constructed adjacent to the cargo ramp and parallel to Taxiway C.

While the development of a future air cargo warehouse facilities and associated improvements is contemplated in the adopted Airport Land Use Plan to occur within the area designated for Airport Support at the northern portion of the Airport, and is addressed as such in the AMP Final EIR, the details of such development are not specifically identified in the adopted Airport Implementation Plan. An amendment to the Airport Implementation Plan is proposed in order to include a more detailed description of the location and size of the subject improvements, although construction of the proposed improvements is not anticipated to occur for several years (i.e., existing cargo operations would continue at the existing location/facilities in the interim period).
Figure 2-1
Regional Location Map
Supplemental Environmental Impact Report

Source: Ricondo & Associates Inc., October, 2010
Prepared By: CDM, October, 2010
AIRPORT MASTER PLAN
SAN DIEGO INTERNATIONAL AIRPORT

Source: SDIA Master Plan and Final EIR, 2008
Prepared By: CDM, October, 2010
Legend:
- Existing airport property boundary
- Existing structures to be removed
- Future apron pavement
- Future taxiway/taxilane
- Future surface parking (approved in Airport Implementation Plan, but in a different configuration)
- Future General Aviation facilities (approved in Airport Implementation Plan)
- Future Cargo Facilities
- Future CONRAC and Customer Service Building
- Approved Centralized Receiving/Distribution Center
- Future terminal link roadway
- Future northside service road
- Interim road alignment
- Existing airport traffic control tower facilities

Notes:
1/ The Future Taxilane will be constructed as part of the new General Aviation development (approved as part of the Airport Implementation Plan) and the new air cargo facilities.
2/ Taxiway C Realignment (approved as part of the Airport Implementation Plan).
3/ Future surface parking approved in Airport Implementation Plan but in a different configuration.

Source: Ricondo & Associates Inc., August 2011
Prepared By: COM, August 2011

Figure 2-5
Proposed Airport Implementation Plan - Northside Improvements
Supplemental Environmental Impact Report
Terminal Link Roadway

The Terminal Link Roadway, identified as a transit corridor in the AMP Final EIR, would be a dedicated, airport-controlled, on-airport property road that connects the northside development area and south terminal area. As depicted in Figure 2-5, the road alignment would run south from the Sassafras Street and Pacific Highway intersection to the eastern end of the runway then turns west and proceeds to the intersection of North Harbor Drive and the existing Rental Car Access Road former Teledyne Ryan access driveway (just east of the intersection with Rent-A-Car Access Road). This alignment would take the roadway through the existing general aviation area parallel to Pacific Highway, and the Runway Safety Area (RSA) for Runway 27, and an employee parking lot on State of California lands operated by the Unified Port District of San Diego and currently leased to Solar Turbines. Related planning considerations for the Terminal Link Roadway include the following:

- Various alignments through the existing general aviation area were evaluated by the SDCRAA and the preferred option includes relocation of the fixed based operator (FBO). As shown in the AMP Final EIR, the relocation of a future FBO facility for general aviation is included in the Airport Implementation Plan.
- The SDCRAA has determined that it would be feasible to construct the Terminal Link Roadway around the end of Runway 27 (i.e., retain the existing airfield service road that extends around Runway 27, place a new airfield security fence along the outside edge of that roadway and construct the Terminal Link Roadway between the new security fence and the existing Airport boundary fence).
- The SDCRAA has identified a portion of the former Teledyne Ryan Industries site as the preferred location for replacement of the Solar Turbines employee parking that would be eliminated by the proposed Terminal Link Roadway.

The Terminal Link Roadway would be dedicated to SDCRAA vehicles, passenger shuttle buses, and other authorized vehicles; no public vehicles would be permitted to use the roadway. The subject 2-lane roadway would provide one twelve-foot wide lane in each direction with a six-foot shoulder on each side for an overall right-of-way dimension of 36 feet.

The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. Based on comments received on the Draft Supplemental EIR expressing concern about the elimination of such parking (see Section 1.5 above), the SDCRAA has refined the proposed alignment of the Terminal Link Roadway (i.e., shifted alignment inward toward interior of airport, away from perimeter) to avoid impacts to the Solar Turbines employee parking lot, as reflected in Figure 2-5.

While the development of a future Terminal Link Roadway is contemplated in the adopted Airport Land Use Plan to occur as the Proposed Transit Corridor, and is addressed as such in the AMP Final EIR, it is not specifically identified in the adopted Airport Implementation Plan. An amendment to the Airport Implementation Plan is proposed in order to include the location and alignment of the Terminal Link Roadway.

Utilities Improvements

Development of the new CONRAC facility, the adjacent surface parking lot, and the air cargo warehouse facilities described above would include local utilities improvements to provide water, sewer, natural gas, storm drain, power, and communications infrastructure for each of the planned facilities. The main trunk lines, or “backbone system,” of the new utilities would generally be located within the new on-site access road proposed to extend west from Sassafras Street at Pacific Highway, with the smaller service lines extending generally north and south from the backbone system. The new utility lines would connect to the existing utility infrastructure located nearby, with the majority of the new connections occurring in the...
vicinity of Pacific Highway and Sassafras Street. Some utilities such as water lines, natural gas lines, and telecommunication lines would also have connections to existing utilities at both the east side and the west side of the proposed development area. No major improvements to existing off-site utilities are currently anticipated to be necessary for the proposed development. The basic nature and characteristics of the improvements anticipated for each utility type are depicted and summarized in Section 4.1.4 of this Supplemental EIR.

All of the above facilities and improvements were contemplated in the Airport Land Use Plan, as delineated in Section 2.3.1 of the AMP Final EIR, and were largely addressed in the AMP Final EIR, as further discussed in Section 5.1 of this Supplemental EIR.

2.3.3 Relationship to Destination Lindbergh

After the adoption of the SDIA AMP, a multi-agency planning process was conducted to: 1) determine the ultimate build-out configuration of SDIA; 2) evaluate and plan to minimize airport-related traffic impacts to adjacent communities; and 3) improve intermodal access to the Airport, while considering SDIA as a potential location for a regional transportation hub. In order to address these three priorities in a comprehensive manner, the Destination Lindbergh process was conducted as an integrated, regional surface and air transportation planning effort centered on SDIA (Destination Lindbergh, Executive Summary, February 12, 2009).

An alliance was formed between the City of San Diego, SANDAG and the SDCRAA resulting in the creation of the AD Hoc Airport Regional Policy Committee, chaired by San Diego Mayor Sanders. The Ad Hoc Committee also invited other key participants to assist in this effort, including policy makers from the Port of San Diego, County of San Diego, Metropolitan Transit System, North County Transit District and the U.S. Department of Defense. Destination Lindbergh included technical planning to provide a broad overview of existing and forecasted conditions, alternatives considered and a development plan including an ITC to be located immediately north of, and adjacent to, SDIA and developed in a phased manner (Destination Lindbergh, Executive Summary, February 12, 2009).

The first phase of Destination Lindbergh was identified as "Opening Day" when activity levels between 2015 and 2020 are anticipated to reach approximately 20 million annual passengers. The Opening Day facilities included an ITC located on the north side of Pacific Highway that serves the blue and orange trolley lines as well as the Coaster/Amtrak and MTS Bus routes. A passenger walkway would connect the ITC across Pacific Highway to the CONRAC. The Opening Day facilities also assumed the dedicated on-airport road would provide a link for passengers to the terminals on the south side. Parking for both transit and airline passengers would be provided (Destination Lindbergh, Executive Summary, February 12, 2009).

SANDAG as the designated Metropolitan Planning Organization for San Diego County and the region's transportation planning agency is conducting the planning for the ITC. SANDAG is the lead agency for planning for transit facilities and has prepared preliminary concepts for the proposed ITC. The ITC is proposed at the intersection of West Washington, Hancock Streets and Pacific Highway on the north side of the heavy rail and light rail right of ways (Figure 2-6). The contemplated ITC is a transportation hub for bus, rail and parking facilities, with the possibility of expanding to the south at a later phase to provide a High Speed Rail station as proposed by the California High Speed Rail Authority. It is envisioned that the connection would be provided via a pedestrian bridge to the entrance plaza of the CONRAC facility.
Figure 2-6
Destination Lindbergh - Intermodal Transportation Hub
Supplemental Environmental Impact Report

Source: SANDAG, August 2010, as modified by SDCRAA, August 2011
Prepared By: CDM, August 2011
The contemplated ITC is not located within the planning or operation jurisdiction of the SDCRAA. However, consistent with the Destination Lindbergh Opening Day plan, a pedestrian bridge connection to the CONRAC would provide another transit connection opportunity to serve airport passengers and employees that may use a shuttle on the terminal link road to access the ITC. As such, the Proposed Project is consistent with the Destination Lindbergh Opening Day plan. SANDAG's concepts for the ITC are preliminary and no specific plans have been incorporated into the Regional Transportation Plan (RTP) to date, although a new RTP is under preparation to be adopted by SANDAG in 2011. In addition, in April 2011 SANDAG released the Draft 2050 RTP, which includes the development of an Airport ITC; however, the Draft 2050 RTP similarly does not include specific design plans for the ITC. The Final 2050 RTP is anticipated to be adopted in October 2011. SANDAG would need to conduct additional planning for the ITC and complete additional procedural steps (i.e., property acquisition and environmental review). Further, SANDAG will need to coordinate actions with other agencies including the City of San Diego, Metropolitan Transit System (MTS), Caltrans and the North County Transit District (NCTD) to further the ITC.

Future phases of Destination Lindbergh contemplate further improvements and connections to the region's transit system, including high speed rail if developed in California. In addition, future phases of Destination Lindbergh contemplate direct ramp connections from Interstate 5 to an airport passenger processing center along Pacific Highway. These plans are preliminary in nature and no specific projects have been identified or approved. In addition, no land acquisition has been identified. However, the Northside Improvements have been planned to be compatible with future phases of Destination Lindbergh, including an airport passenger processing center. The preliminary design for the Northside Improvements included an estimated 200-foot setback from Pacific Highway to allow for future roadway and direct ramp connections. In addition, the remainder of the Northside Improvements fronting Pacific Highway are surface-level parking facilities that could be used in the future for structures, including a passenger processing center along Pacific Highway. As such, the Proposed Project is compatible with future phases of the Destination Lindbergh plan and does not preclude elements of the Destination Lindbergh plan from being implemented. At this time, future phases or concepts for Destination Lindbergh are preliminary in nature.

2.4 Incorporation by Reference

Pursuant to CEQA Guidelines, §15150, this Supplemental EIR incorporates, by reference, all or portions of other technical documents that are public records. Any referenced documents either relate to the Proposed Project or provide additional information concerning the environmental setting in which the Action will occur.

Copies of the this Draft and Final Supplemental EIR, including the appendix, and cited or referenced studies or reports herein are available for review at the SDCRAA administrative offices located on the third floor of the Commuter Terminal, 3225 North Harbor Drive, San Diego, California 92101 from 8 AM to 5 PM. The This Draft and Final Supplemental EIR and appendix are also available for review on the SDCRAA website (www.san.org) and at local libraries.


Historical Review of Lindbergh Field San Diego International Airport prepared by AMEC Earth & Environmental, Inc., June 14, 2002.

San Diego County Regional Airport Authority Air Quality Management Plan, November 2009.
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CHAPTER 3: PROJECT OBJECTIVES

3.1 Project Objectives

This chapter provides the project objectives for the AMP and a discussion of the relationship of those objectives to the objectives specific to the Proposed Project.

Airport Master Plan Objectives

As delineated in Chapter Three of the AMP Final EIR, the AMP objectives are summarized as follows:

- Improve levels of service for Airport customers/users
- Improve Airport safety and security for Airport customers/users
- Utilize property and facilities efficiently by:
  - Maintaining balance of passenger volumes and operations among the Airport's facilities
  - Improving tenant facilities
- Enhance Airport access as part of the region’s transportation system
- Enhance regional economy by serving demand for air service
- Prepare measured, incremental improvements that are cost effective and respond to the region's forecast for air service for passengers and cargo
- Involve stakeholders and solicit community input
- Consider compatibility with surrounding land uses and Airport Authority policies.

The AMP included adoption of an Airport Land Use Plan and proposed specific improvements to meet constrained high forecast demand through 2015. In keeping with the AMP objectives and focusing on near-term development, the objectives for the Airport Land Use Plan are as follows:

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

As described in Chapter 2 of this Supplemental EIR, the elements of the Proposed Project are included in the approved Airport Land Use Plan and were generally addressed in the AMP Final EIR. The objectives of the Proposed Project are part and parcel of those summarized above. Of particular relevance to the Proposed Project are the three objectives for near-term development improvements at the Airport, as follows:

1. The Northside Improvements are intended and designed to improve the cargo processing capabilities of the Airport, consolidate dispersed rental car facilities into a single location alongside an improved public parking facility, and provide access between the northern and southern portions of the Airport via a secure on-airport terminal link roadway. Together, these improvements would serve to improve levels of service and Airport safety and security, and enhance Airport access, especially in terms of achieving a better north-south balance of vehicle trips.
2. The proposed Northside Improvements are complementary to the existing uses and setting of the northern portion of the Airport, which currently include open apron areas for air cargo operations,
a public surface parking lot, and large open areas used for vehicle and other storage. The proposed air cargo warehouses, CONRAC, reconfigured/improved public parking facility, and roadway improvements including the terminal link roadway would substantially improve the operations and efficiency of those uses, and would occur within an area surrounded by compatible airport, industrial, and military uses.

3. The Proposed Project is intended to support future public transit by developing the land use and transportation infrastructure that would better link the northern and southern portions of the Airport in a location near the regional ITC proposed by SANDAG.

In summary, the objectives of the AMP presented in the AMP Final EIR encompass those of the Proposed Project including as related to the need for near-term improvements at SDIA.

3.2 Proposed Federal, State and Local Actions and Required Permits

In addition to the SDCRAA’s approval of the amendments to the AMP Airport Land Use Plan and Airport Implementation Plan, the anticipated State and local actions required for approval of the Proposed Project include the following:

- California Coastal Development Permit
- General NPDES Permit for Storm Water Discharges Associated with Construction Activities
- City of San Diego Building Permits or Certificates of Occupancy
CHAPTER 4: PROJECT CHARACTERISTICS

This chapter provides a description of the Proposed Project, including descriptions for each of the currently proposed Northside Improvements facilities.

4.1 Proposed Project

The Proposed Project is to amend the adopted AMP Airport Land Use Plan and Airport Implementation Plan. The improvements associated with the proposed Airport Land Use Plan, as amended (see Figure 2-4) and the proposed Airport Implementation Plan, as amended (see Figure 2-5) are represented in the Northside Improvements Conceptual Site Plan (Figure 4-1) and include the following:

- CONRAC Facility and reconfiguration of the adjacent approved parking facility
- Air Cargo Warehouse Facilities and Associated Improvements
- Terminal Link Roadway (along the eastern perimeter of the Airport connecting the proposed northside facilities to the southside of the Airport)
- On-site utilities improvements to serve the proposed development

Descriptions for each of the currently proposed Northside Improvements components are provided below.

4.1.1 Consolidated Rental Car (CONRAC) Facility

As described in the AMP Airport Land Use Plan and related Final EIR, a CONRAC facility was planned to be constructed in the Airport's north side area consisting of an 11,170 space parking structure with 3.3 million square feet. The structure would include 9,000 rental car ready/return and storage spaces and 2,170 public parking spaces.

However, since adoption of the AMP and completion of the Final EIR, further coordination with all of the rental car agencies on rental car forecasts and facility requirements has resulted in the need for a smaller CONRAC facility. The current proposal is to construct a facility up to 1.9 million square feet for rental car ready/return, and storage operations with up to 6,500 parking spaces. This is a reduction of approximately 1.4 million square feet from what was originally planned and analyzed in the AMP Final EIR. The smaller CONRAC facility is planned in the same location designated in the Airport Land Use Plan for Ground Transportation land uses (yellow). The smaller CONRAC facility is located along Pacific Highway oriented closest to the Sassafras Street and Pacific Highway intersection that will serve as the primary access point to the CONRAC.

The smaller CONRAC facility is currently planned to be a four level parking structure that would measure approximately 52 feet in height. The ultimate height for the structure would be determined during final design. The facility would total approximately 1.9 million square feet of space and encompass a footprint of approximately 15 to 27.5 acres. The customer service building would be up to 40,200 square feet and integrated into the front of the parking structure. The facility would operate 24 hours per day, seven days per week. Shuttle service to and from the passenger terminals would be provided in common use CONRAC buses that would utilize a new Terminal Link Roadway (see below) for access between the passenger terminals and the CONRAC facility. Customers would be dropped-off and picked-up at the CONRAC customer service building.

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5 This height distance is measured from the surface of the ground floor to the surface of the top floor (44 feet) plus an estimate of eight additional feet for a planned canopy or hard top. The ultimate height for the structure would be determined during final design.
The primary ground access to the CONRAC facility would be located near the intersection of Pacific Highway and Sassafras Street. This intersection would be used by customers for returning rental cars as well as exiting the facility. A service access for the CONRAC facility would be via the Pacific Highway/Washington Street intersection and connecting to a new on-site road between the new CONRAC and air cargo facilities. The service access route would be utilized by employees, maintenance vehicles, semi-truck car carriers, fueling vehicles, etc.

In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Proposed Airport Implementation Plan would occur to the north and be relocated west of the proposed CONRAC facility, in a configuration slightly different from what was reflected in the approved Airport Land Use Plan (i.e., the reconfigured parking area would extend more to the southwest than shown in the approved Airport Land Use Plan - see Figures 2-2 and 2-4). The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure would be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street. The design and operation of this surface parking lot are currently proposed as part of the Northside Improvements relative to existing and future airport operations; however, long-term plans for the subject parking lot could be integrated into SANDAG’s proposed ITC. The nature and timing of such future use would be determined in the more detailed planning and processing of the ITC, which is in the early planning stage.

4.1.2 **Air Cargo Warehouse Facilities and Associated Improvements**

As depicted in Figure 4-1, new air cargo facilities would be located parallel to, and on the north side of, Taxiway C. The currently proposed facilities would include 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine (9) parking positions for cargo aircraft. All current and future air cargo operators would be consolidated into the new cargo facilities. The proposed cargo warehouse facilities would be designed to accommodate future air cargo volumes at SDIA.

Due to the lack of existing warehouse space at SDIA, all air cargo operations (including the sorting and staging of pallets/containers) are currently conducted out in the open on former runway/taxiway and apron areas in the northern portion of the airfield. The new facilities would provide an enclosed area (warehouse) within which incoming and outgoing cargo can be sorted and staged prior to being transferred between trucks and aircrafts. As currently planned, two air cargo warehouse structures would be approximately 116 feet deep, total approximately 1,939 feet in length, and setback 1,113 feet from the runway to provide airspace clearance for the tails of aircraft parked in front of the warehouse. The height of the structures would range from 10 to 20 feet.

The planned air cargo facilities would include the construction of a new aircraft parking apron area. A cross taxilane would be constructed adjacent to the cargo ramp and parallel to Taxiway C.

4.1.3 **Terminal Link Roadway**

The Terminal Link Roadway, identified as a transit corridor in the AMP Final EIR, would be a dedicated, airport-controlled, on-airport property road that connects the northside development area and south terminal area.

The Terminal Link Roadway, as originally proposed, would have eliminated the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport. Based on comments received on the Draft Supplemental EIR expressing concern about the elimination of such parking (see Section 1.5 above), the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.
Legend:
- Existing airport property boundary
- Existing structures to be removed
- Future apron pavement
- Future taxiway/taxilane
- Future surface parking (approved in Airport Implementation Plan, but in a different configuration)
- Future General Aviation facilities (approved in Airport Implementation Plan)
- Future Cargo Facilities
- Future CONRAC and Customer Service Building
- Approved Centralized Receiving/Distribution Center
- Future terminal link roadway
- Future northside service road
- Interim road alignment
- Existing airport traffic control tower facilities

Notes:
1/ The Future Taxilane will be constructed as part of the new General Aviation development (approved as part of the Airport Implementation Plan) and the new air cargo facilities.
2/ Taxiway C Realignment (approved as part of the Airport Implementation Plan).
3/ Future surface parking approved in Airport Implementation Plan but in a different configuration.
As depicted in Figure 4-1, the road alignment would run south from the Sassafras Street and Pacific Highway intersection to the eastern end of the runway then turns west and proceeds to the intersection of North Harbor Drive and the existing Rental Car Access Road (just east of the intersection with Rent-A-Car Access Road). This alignment would take the roadway through the existing general aviation area parallel to Pacific Highway, and the Runway Safety Area (RSA) for Runway 27, and an employee parking lot on State of California lands operated by the Unified Port District of San Diego and currently leased to Solar Turbines. Related planning considerations for the Terminal Link Roadway include the following:

- Various alignments through the existing general aviation area were evaluated by the SDCRAA and the preferred option includes relocation of the fixed based operator (FBO). As shown in the AMP Final EIR, the development of a new FBO facility for general aviation, which would replace the existing facility, is included in the Airport Implementation Plan.

- The SDCRAA has determined that it would be feasible to construct the Terminal Link Roadway around the end of Runway 27 (i.e., retain the existing airfield service road that extends around Runway 27, place a new airfield security fence along the outside edge of that roadway and construct the Terminal Link Roadway between the new security fence and the existing Airport boundary fence).

- The SDCRAA has identified the former Teledyne Ryan Industries site as the preferred location for replacement of the Solar Turbines employee parking that would be eliminated by the proposed Terminal Link Roadway (see Figure 4-2).

The Terminal Link Roadway would be dedicated to SDCRAA vehicles, passenger shuttle buses, and other authorized vehicles; no public vehicles would be permitted to use the roadway. The subject 2-lane roadway would provide one twelve-foot wide lane in each direction with a six-foot shoulder on each side for an overall right-of-way dimension of 36 feet.

The alignment of the Terminal Link Roadway in the vicinity of the closest California least tern nesting areas ("ovals") on SDIA is shown in Figure 4-2. The California least tern nesting area at SDIA is bordered on the south by an existing on-airport service road that is used on a regular basis, and to the south of that are Laurel Street and North Harbor Drive, both of which have substantial traffic volumes. The proposed on-airport access road would be located between the service road and Laurel Street/North Harbor Drive. The vehicular activity on the proposed on-airport access road is not expected to materially alter the existing noise, light, and movement conditions near the nesting area. Moreover, Section 5.8.7 of the AMP Final EIR delineates several mitigation measures specifically designed to address potential impacts to California least tern that may result from the construction and operation of Master Plan improvements.

4.1.4 Utilities Improvements

Development of the new CONRAC facility, the adjacent surface parking lot, and the air cargo warehouse facilities described above would include local utilities improvements to provide water, sewer, natural gas, storm drain, power, and communications infrastructure for each of the planned facilities. The proposed utilities improvements would place new or upgraded utility lines within the Northside Improvements site that would connect with existing utility lines within or adjacent to the site in order to provide service to the proposed new buildings/facilities. The nature and location of new (proposed) and existing utility lines are depicted on each of the utility figures referenced below (Figures 4-3 through 4-9). The main trunk lines,
or "backbone system," of the new utilities would generally be located within the new on-site access road proposed to extend west from Sassafras Street at Pacific Highway, with the smaller service lines extending generally north and south from the backbone system. The new utility lines would connect to the existing utility infrastructure located nearby, with the majority of the new connections occurring in the vicinity of Pacific Highway and Sassafras Street. Some utilities such as water lines, natural gas lines, and telecommunication lines would also have connections to existing utilities at both the east side and the west side of the proposed development area. No major improvements to existing off-site utilities are currently anticipated to be necessary for the proposed development. The basic nature and characteristics of the improvements anticipated for each utility type are summarized below.

**Electrical (Figure 4-3)**

- The main electrical utility connection is anticipated to occur at Sassafras Street with a connection capacity of at least 8.5 megawatts at 12.47 kilovolts. Incoming substation and switchgear would be located at the east end of the site and would be provided with 4,160-volt feeder breakers for distribution to each of the major site components.
- Relative to the improvements included in the Proposed Project, electrical system feeders (i.e., the outgoing lines from a substation) would be provided to the future cargo apron and aircraft hangars, and to the CONRAC facility.
- A feeder would also be provided to the surface parking area for overhead lighting and revenue control system.
- A new electrical duct bank would be provided along the access road proposed to extend west from the intersection of Pacific Highway and Sassafras Street to distribute new 4160-volt feeders from the new substation and switchgear to the new loads. The duct bank would be arranged to provide two 4- to 5-inch conduits to each of the site components, depending on the final connected load.
- The projected electrical load for the site is estimated to be 10 mega volt-amperes.

**Natural Gas (Figure 4-4)**

- A "looped system" would be constructed within the Northside area, which would connect to an existing 2-inch gas main in the existing access road at the west end of the site and to an existing 4-inch gas main in Sassafras Street at the east end of the site.
- The service line connections extending from the duct bank backbone to individual facilities within the site would generally be two inches in diameter.

**Hydrant Fueling**

- Aircraft hydrant fueling system components may be included for the cargo ramp, subject to further evaluation and design. No specific design is proposed at this time.

**Telecommunication (Figure 4-5)**

- Relative to the improvements included in the Proposed Project, telecommunication service would be provided to the future cargo apron and aircraft hangars, and to the CONRAC facility.
- Service would also be provided to the surface parking area for passenger ticketing kiosks.
Figure 4-2
Proposed Security Gate and Roadway in Proximity of Protected Least Tern Nesting Area

Legend
- --- Existing airport property boundary
- Blue Proposed roadways
- Green Least tern protected nesting area
- Beige Former TDY site
- Red Proposed airport security fence
- Gray Existing service road to be closed

Prepared By: CDM, August 2011
Figure 4-4: Conceptual Natural Gas System Layout

Airport Master Plan
San Diego International Airport

Source: HNTB 2009, as modified by CDM 2010
Prepared By: CDM, September, 2010
Confidential for Deliberative Purposes Only
Supplemental Environmental Impact Report

Conceptual Water System Layout

Figure 4-6

AIRPORT MASTER PLAN
SAN DIEGO INTERNATIONAL AIRPORT

Source: HNTB 2009, as modified by CDM, October 2010
Prepared By: CDM, October, 2010

LEGEND
- SCR - STEEL CYLINDER ROD WRAPPED
- CI - CAST IRON
- AC - ASBESTOS CEMENT
- PVC - POLY VINYL CHLORIDE
- MH - MANHOLE
- FH - FIRE HYDRANT
- FS - FIRE SERVICE
- FP - FIRE PROTECTION
- DI - DUCTILE IRON
- STL - STEEL
- CSP - CONCRETE STEEL CASING

* UNVERIFIED FACILITIES IDENTIFIED ON FIELD WALK.

LEGEND
PROPOSED WATER LINE
EXISTING WATER LINE

* DEPICTS APPROXIMATE SIZE AND LOCATION FOR PLANNING PURPOSES ONLY. NOT FOR CONSTRUCTION PURPOSES.
An internal Airport communications trunk line may be provided between the Northside facilities, specifically the CONRAC, and the central hub in the south Airport area.

A new duct bank would be provided along the main access road in the Northside area to support communications conduit extending to each of the new site components.

**Water (Figure 4-6)**

- A "looped system" is planned to connect one end of the system to an existing 8-inch water line in the existing access road at the west end of the site and the other end to an existing 12-inch water line in Pacific Highway at the east end of the site.
- The water service lines extending from the "backbone" of the system loop to each facility would generally range in diameter from 8-inch to 12-inch, with the exception of a 6-inch line to the surface parking area.
- This layout provides domestic water service and fire service to the future facilities as a combined system.
- The proposed water system layout includes extension of water service to the surface parking area, which would provide for a fire protection system.
- As part of more detailed system design, the anticipated residual water pressure in the existing water system would be evaluated to determine whether a booster pump is needed to provide for adequate fire flow. Such a pump could be easily accommodated within Northside area.

**Sanitary Sewer (Figure 4-7)**

- The proposed sanitary sewer layout includes a backbone ranging in diameter from 12 inches at the west end to 15 inches at the east end where it connects to an existing 18-inch sewer main on Pacific Highway.
- The sewer lines extending from the backbone to individual facilities within the site would generally be four inches in diameter.

**Storm Drain (Figures 4-8 and 4-9)**

- Storm drain lines are proposed to extend throughout the Northside area to intercept runoff from the parking lot, aircraft apron areas, and the roofs of buildings.
- The storm drain lines proposed for the surface parking facility and most of the building areas would generally range in diameter from 18 to 36 inches.
- A 12- to 18-inch trench drain system is proposed for draining the aircraft apron area. This drain would be located along the ends of the aircraft parking positions as shown in Figure 4-8.
- Stormwater within the proposed drainage system would be routed, via gravity flow, to a collection point near the existing airport traffic control tower complex in the western portion of the Project site. Figure 4-9 delineates the proposed pipeline route.
- The outlet structure at the west end of the force main would include a 10-foot long baffle/energy dissipator that reduces the flow velocity, beyond which the flow would descend along a concrete channel that is sloped between the mean higher water level and the mean lower water level within the Navy Boat Channel (i.e., the storm water discharge would maintain contact with the...
concrete slope and meet the water level within the Boat Channel during any normal tide condition) see Figure 4-9 for a profile drawing of the outlet structure.

- As part of the proposed storm drain system design and operation, a number of water quality control measures, also referred to as water quality "Best Management Practices" (BMPs), would be provided upstream of the proposed pump station. Such BMPs may include, but not be limited to, the following:
  - Flow/Volume Reduction:
    - Porous pavement and rock infiltration basins
    - Underground storage containment tanks may also be utilized to reduce flow to the pump station
    - Rock filled drainage channels to lengthen time of concentration and allow for infiltration
    - Pump station holding cell to regulate outflow to the channel
  - Cleaning:
    - Maintain surface flow
    - Maintain surface overland sheet flowing where possible
    - Filtration structures (i.e., CONTECH type structures) where feasible
    - Rock filled drainage channels to slow flows and provide primary filtration
    - Vegetated flow areas up stream of collection point
  - Other:
    - Underground storage conduits
    - Use of existing unused storm drain conduits for storage. These conduits would be lined prior to use.
    - Irrigation of off-site vegetated areas (i.e., MCRD San Diego)
    - Green Roofs
    - Incorporation of aboveground storage into new structures to contain building runoff and reuse for grey water, fire protection, or irrigation
AIRPORT MASTER PLAN
SAN DIEGO INTERNATIONAL AIRPORT

LEGEND

- VCP - VITRIFIED CLAY PIPE
- RCP - REINFORCED CONCRETE PIPE
- CB - CATCH BASIN
- E1 - DRAIN INLET
- MH - MANHOLE

Proposed Storm Drain Force Main

Source: HNTB 2010, as modified by COM, October, 2010
Prepared by: COM, October, 2010
Revised by: FDD May, 2011

Conceptual Storm Drain System Layout
Supplemental Environmental Impact Report

* UNVERIFIED FACILITIES IDENTIFIED ON FIELD WALK.
* DEPicts approximate size and location for planning purposes only, not for construction purposes.
Figure 4-9
Storm Drain Force Main Design
Supplemental Environmental Impact Report
5.1 Scope of Environmental Analysis Within this Supplemental EIR

5.1.1 Description of Notice of Preparation and Initial Study (NOP/IS)

On May 20, 2010, the Notice of Preparation (NOP) for the AMP Draft Supplemental EIR was published to request input from interested governmental and quasi-governmental agencies, other organizations, and private citizens regarding the scope and content of environmental information to be included in this Supplemental EIR. The NOP provided a description of the Proposed Project and an initial study that evaluated the degree to which the impacts associated with the proposed Northside Improvements have already been addressed in the AMP Final EIR and what additional analysis is warranted in the Supplemental EIR. Based on the results of the initial study, the SDCRAA determined that one environmental resource, aesthetics, could be potentially affected by implementation of the Northside Improvements and requires additional analysis that was not otherwise provided in the AMP Final EIR.

5.1.2 Scoping Meeting and NOP Comments

On June 8, 2010, a scoping meeting was held by the SDCRAA at the Commuter Terminal at SDIA to provide an opportunity for public and agency comment concerning the potential environmental effects of the Northside Improvements to be evaluated in this Supplemental EIR. One organization/individual, Suhail Khalil with the Peninsula Community Planning Board, provided oral and written comments at the scoping meeting. No other comments were received during the scoping meeting.

Comments on the NOP were received from four state agencies, four local agencies, one organization, and one community planning group. No federal agencies submitted comments on the NOP.

Comments received on the NOP and at the scoping meeting for this Supplemental EIR are included in Appendix A. Table 5.1-1 provides a summary of the comments received on the NOP and during the scoping meeting and identifies where and how each of the issues raised in the scoping/NOP comments was either previously address in the AMP Final EIR, and/or is further addressed in this Supplemental EIR, or is not relevant to the scope of the Proposed Project.
### Table 5.1-1

<table>
<thead>
<tr>
<th>Commenter/Date of Letter</th>
<th>Issue Raised</th>
<th>SDIA AMP Final EIR Relevant Section</th>
<th>Northside Improvements Supplemental EIR clarification/evaluation</th>
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<tbody>
<tr>
<td><strong>State Agencies</strong></td>
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<tr>
<td>Governor's Office of Planning and Research</td>
<td>None (Notice of Preparation sent to Reviewing Agencies)</td>
<td>Not applicable</td>
<td>Not applicable</td>
</tr>
<tr>
<td>State Clearinghouse and Planning Unit May 24 and May 26, 2010</td>
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<tr>
<td>Department of Toxic Substances Control Southern California Region June 16, 2010</td>
<td>Hazardous Materials: Potential for an unauthorized release of hazardous materials into the environment during Project construction and operation.</td>
<td>Section 5.15, Hazardous Materials</td>
<td>Section VII, Hazards and Hazardous Materials, of the AMP Supplemental EIR NOP/Initial Study (Appendix A). A review of the lists of sites enumerated under Section 65962.5 of the Government Code, relative to hazardous materials, was completed for the Project site. The findings of the list review, which are presented in a report by EDR on file with the SDCRAA, are generally consistent with the information presented in the AMP Final EIR. No further analysis is required.</td>
</tr>
<tr>
<td>Department of Fish and Game South Coast Region June 22, 2010</td>
<td>Biological Resources: Potential impacts of traffic on the proposed on-airport access road and the associated increases in noise, light, and movement of passing cars, etc., on nesting least terns.</td>
<td>Section 5.8, Biotic Communities/ Endangered and Threatened Species</td>
<td>The alignment of the Terminal Link Roadway in the vicinity of the closest California least tern nesting areas (&quot;ovals&quot;) on SDIA is shown in Figure 4-2. The California least tern nesting area at SDIA is bordered on the south by an existing on-airport service road that is used on a regular basis, and to the south of that are Laurel Street and North Harbor Drive, both of which have substantial traffic volumes. The proposed</td>
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<td>on-airport access road would be located between the service road and Laurel Street/North Harbor Drive in an area outside of the airfield security fence and currently used for vehicle parking. (Refer to Figure 4-2) The vehicular activity on the proposed on-airport access road is not expected to materially alter the existing noise, light, and movement conditions near the nesting area. Moreover, Section 5.8.7 of the AMP Final EIR delineates several mitigation measures specifically designed to address potential impacts to California least tern that may result from the construction and operation of Master Plan improvements. These mitigation measures would be required of the Proposed Project and would ensure that impacts are less than significant. No further analysis is required.</td>
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<tr>
<td></td>
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<td>Potential impacts to sensitive plants, animals and habitat.</td>
<td>With regards to potential impacts to sensitive plants, animals, and habitat, such impacts were previously addressed in the SDIA AMP Final EIR, as described in Section IV, Biological Resources, of the AMP Supplemental EIR NOP/Initial Study (Appendix A). The Proposed Project does not</td>
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<tbody>
<tr>
<td><strong>Department of Transportation</strong>&lt;br&gt;District 11&lt;br&gt;June 28, 2010</td>
<td>Transportation/Traffic:&lt;br&gt;Further traffic analysis to determine redistribution of traffic and corresponding roadway mitigation.&lt;br&gt;Short-term surface transportation improvements needed due to proposed Northside Improvements.&lt;br&gt;Clarification of Project-related traffic impacts to surface transportation facilities, the implementation of mitigation measures to address those impacts in the near term, and how they would be coordinated with longer range mitigation associated with other AMP improvements over time.</td>
<td>Section 5.3, Traffic and Circulation</td>
<td>include changes that would alter this analysis. As a result, no further analysis is required.&lt;br&gt;Section XV, Transportation/Traffic, of the AMP Supplemental EIR NOP/Initial Study (Appendix A).&lt;br&gt;Supplemental analysis in Section 5.3, Traffic and Circulation, of this Supplemental EIR.&lt;br&gt;The currently proposed development plan for the Northside area is comparable to that assumed in the SDIA AMP Final EIR, with the most notable exception being that the currently proposed CONRAC is smaller than originally anticipated. The vehicle trip generation, distribution characteristics, potential impacts, and mitigation measures (i.e., transportation improvements) delineated in the AMP Final EIR are considered to still be valid and applicable to the current proposal. In addition to not changing the basic traffic impact and mitigation characteristics that are presented in the AMP Final EIR, the development plans currently proposed for the Northside area do not materially change how or when traffic-related mitigation measures would...</td>
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<tr>
<td></td>
<td>Discuss how the Proposed Project would not preclude future roadway improvements, including the placement of I-5 connector ramps, as contemplated in the 2030 Regional Plan.</td>
<td>Not applicable</td>
<td>The Proposed Project would be developed on Airport property and would not extend into the I-5 right-of-way. Additionally, the location of the CONRAC would be set back from Pacific Highway by approximately at least 200 feet. While some improvements may be made to the intersections of Pacific Highway/Sassafras Street and Pacific Highway/Washington Street, those improvements would not preclude future I-5 and I-8 connector ramp improvements as contemplated in SANDAG's 2030 Regional Transportation Plan.</td>
</tr>
<tr>
<td></td>
<td>Discuss the relationship of Project to potential future Airport ITC.</td>
<td>Not applicable</td>
<td>Regarding the relationship of the currently Proposed Project to potential future Airport ITC, the Northside development plan is compatible with, and supportive of, the ITC concept which is in the early planning stage. The SDCRAA will continue to coordinate with SANDAG in the further planning and processing of the ITC, including with regard to specific design features, as appropriate. At this point,</td>
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<td>Local Agencies</td>
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<tr>
<td>San Diego County</td>
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<tr>
<td>Office of the County Clerk</td>
<td>May 26, 2010</td>
<td>None (Filing Notice)</td>
<td>Not applicable</td>
</tr>
<tr>
<td>San Diego Unified Port District</td>
<td>June 25, 2010</td>
<td>Transportation/Traffic: Clarification of points of ingress and egress and associated potential increased traffic at Pacific Highway/Sassafras Street.</td>
<td>Section 5.3, Traffic and Circulation of the AMP Supplemental EIR NOP/Initial Study (Appendix A). Supplemental analysis in Section 5.3, Traffic and Circulation of the Supplemental EIR.</td>
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<tr>
<td></td>
<td></td>
<td>Clarification of Project-specific traffic impacts.</td>
<td>The AMP Final EIR included construction of a new access road within the northern portion of the Airport, connecting at Pacific Highway/Washington Street and Pacific Highway/Sassafras Street, which would serve existing and proposed uses within the subject area. The most notable new information available regarding such future uses pertains to the CONRAC, which is now smaller than assumed in the AMP Final EIR. The traffic and circulation impacts and mitigation discussions presented in the AMP Final EIR are still valid for, and applicable to, the current...</td>
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<tr>
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<td></td>
<td>Potential impacts to the existing I-5 ramp systems.</td>
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<td></td>
<td>Impacts associated with displacement of parking lot on Laurel Street leased to Solar Turbines and Port District’s employee parking lot across from Port Administration Building. Terminal Link Roadway traffic and circulation impacts on North Harbor Drive, Pacific Highway, and adjoining properties.</td>
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<td></td>
<td>Potential impacts associated with removal of parking due to development of the on-airport Terminal Link Roadway are addressed in Section 5.3 of this Supplemental EIR. Operation of the Terminal Link Roadway is not expected to adversely impact North Harbor Drive, Pacific Highway, or adjacent properties because it would be used only for on-airport controlled access between the northern and southern portions of the Airport and would not be accessible to the public. Also, the combination of the CONRAC being in the northern portion of the Airport and the use of a consolidated shuttle system would reduce airport-related traffic on North Harbor Drive that currently includes numerous shuttle trips by individual rental car companies distributed.</td>
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<tr>
<td><strong>City of San Diego</strong></td>
<td>Potential impacts to District tidelands and consistency with Port Master Plan.</td>
<td>Section 5.3, <strong>Traffic and Circulation</strong></td>
<td>Chapter 1 of the AMP Final EIR provides a written response to each and every issue raised in the February 4, 2008 letter. This Supplemental EIR only addresses new information associated with the Northside Improvements and, as discussed in Sections 1.1 and 2.1 above, it is not appropriate to re-open the AMP Final EIR for revisions or public review.</td>
</tr>
<tr>
<td>June 25, 2010</td>
<td>An updated transportation impact study should</td>
<td></td>
<td>Section XV, <strong>Transportation/Traffic</strong>, of</td>
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</table>

According to the 2009 Port Master Plan (PMP), the land use designations for the Project area include "International Airport" and "Airport Related Commercial," with the PMP Precise Plans for Planning District 2 specifying "International Airport" and "Aviation-Related Industrial." The currently proposed uses are compatible with the PMP designations.

State tidelands are addressed in the AMP Final EIR, including but not limited to Sections 4.1.1 and 5.10.

City of San Diego
Development Services Department
Concerns regarding the adequacy of the May 2008 (AMP) EIR transportation analysis, as identified in City of San Diego letter dated February 4, 2008.
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<td></td>
<td>compare the impacts of the Northside Improvements against existing conditions to establish significance of impacts and identify mitigation measures, including as related to Washington Street, Pacific Highway, Sassafras Street, and other nearby locations.</td>
<td>the AMP Supplemental EIR NOP/Initial Study (Appendix A). As described above, the development uses currently proposed for the Northside area were previously contemplated in the AMP Final EIR; hence, the associated traffic impacts and mitigation measures have already been addressed. Washington Street, Pacific Highway, Sassafras Street and other nearby locations were specifically addressed in the analysis.</td>
<td>The proposed Terminal Link Roadway would be constructed within or along the Airport boundary, providing an on-airport dedicated (i.e., non-public) access route between the Northside area and the intersection where North Harbor Drive crosses the existing Rent A Car Access Road, the former Teledyne Ryan access driveway (just east of the intersection with Rent-A-Car Access Road). The combination of replacing the individual rental car facilities that are currently distributed along the southern edge of the Airport with the new CONRAC and instituting a consolidated shuttle system to replace the individual rental car company shuttles would help reduce airport-related</td>
</tr>
<tr>
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<td><strong>Potential cumulative impacts on GHGs.</strong></td>
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<td>Supplemental analysis in Section 5.5, <em>Greenhouse Gas Emissions,</em> of this Supplemental EIR.</td>
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<td><strong>City Planning &amp; Community Investment, Community Planning Division</strong></td>
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<td><strong>Potential view impacts from adjacent residential areas.</strong></td>
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<td>Section 5.13, <em>Aesthetics</em></td>
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<td>Section I, <em>Aesthetics,</em> of the AMP Supplemental EIR NOP/Initial Study (Appendix A). Supplemental analysis in Section 5.2, <em>Aesthetics,</em> of this Supplemental EIR.</td>
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<td><strong>Address options that would keep the Terminal Link Roadway within Airport property.</strong></td>
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<td></td>
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<td><strong>Not applicable</strong></td>
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<td>As indicated above in the response to a similar comment from the City Development Services Department, the proposed Terminal Link Roadway would be constructed within or along the Airport boundary, providing an on-airport dedicated (i.e., non-public) access route between the Northside area and the intersection where North Harbor Drive crosses the existing Rent A Car Access Road the former Teledyne Ryan access driveway (just east of the intersection with Rent-A-Car Access Road).</td>
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<td><strong>Address whether shuttles from the CONRAC would be consolidated or individual companies.</strong></td>
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<td></td>
<td><strong>Not applicable</strong></td>
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<td>As noted above, a consolidated shuttle system would be used.</td>
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<td></td>
<td>Address how the project would affect ability to implement Destination Lindbergh.</td>
<td>Not applicable</td>
<td>The Project is compatible with the Draft Concept for Destination Lindbergh - see Section 2.3.3 of this Supplemental EIR for additional discussion.</td>
</tr>
<tr>
<td></td>
<td>Address potential traffic impacts on at-grade rail crossing and all rail operations in the rail corridor from West Washington Street to Laurel Street for both existing and forecasted 2030 vehicle and rail traffic conditions.</td>
<td>Section 5.3, Traffic and Circulation</td>
<td>Potential rail impacts are addressed in the AMP Final EIR. No further analysis is warranted.</td>
</tr>
<tr>
<td></td>
<td>Address the traffic impacts of the Proposed Project, as well as mitigation measures and freeway improvements.</td>
<td>Section 5.3, Traffic and Circulation</td>
<td>As discussed above in the response to a similar comment from the City’s Development Services Department, traffic impacts and mitigation measures associated with the Proposed Project have been adequately addressed in the AMP Final EIR.</td>
</tr>
<tr>
<td></td>
<td>Address transit improvements to increase transit ridership and reduce traffic impacts.</td>
<td>Not applicable</td>
<td>The design of the Northside improvements includes accommodation of a walkway over Pacific Highway to link the planned Intermodal Transportation Center with the Northside area.</td>
</tr>
<tr>
<td></td>
<td>Would any proposed mitigation measure result in the need for the City to amend the Circulation Element?</td>
<td>Section 5.3, Traffic and Circulation</td>
<td>As indicated above, the impacts analysis and mitigation measures identified in the AMP Final EIR are still valid for, and applicable to the Proposed Project. Potential changes in roadway designations resulting from mitigation</td>
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<td></td>
<td>Address transportation demand management strategies including means to increase transit ridership.</td>
<td>Not applicable</td>
<td>measure improvements are identified in 5.3.8 of the AMP Final EIR.</td>
</tr>
<tr>
<td></td>
<td>Provide a Transportation Phasing Plan for the required transportation mitigation measures.</td>
<td>Section 5.3, Traffic and Circulation</td>
<td>The CONRAC would provide a central collection for all rental car traffic and the shuttle would consolidate and reduce Airport passenger trips. A potential connection with SANDAG’s proposed ITC would enhance transit connections for Airport passengers and employees.</td>
</tr>
<tr>
<td>Environmental Services Division</td>
<td>Potential impacts to solid waste disposal capacity.</td>
<td>Section 5.11, Utilities and Service Systems</td>
<td>The AMP Final EIR identifies the transportation mitigation measures associated with the AMP. Implementation of the Proposed Project may include improvements at the intersection of Sassafras Street and Pacific Highway. Such improvements would be coordinated with the appropriate department of the City of San Diego and would be consistent with applicable City standards and regulations.</td>
</tr>
</tbody>
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San Diego International Airport

Scope of Environmental Analysis within SEIR

Airport Master Plan

Final Draft-SEIR

August 2011 October 2010
most notable uses are the CONRAC and the cargo facility, each of which would be a new facility to consolidate and replace existing facilities dispersed outside the Airport. The combination of improved waste management efficiencies in having new consolidated facilities and the extension of the Airport's highly successful recycling/waste reduction program is expected to reduce potential impacts to landfill capacity well beyond the reduction associated with ordinance compliance. It is recognized that the processing of the proposed Sycamore Landfill expansion is currently being reconsidered in light of a recent Superior Court ruling, the Campo Landfill proposal is no longer being pursued, and the Gregory Landfill project is facing substantial opposition. It is speculative at this time, however, to say what the final outcome of those projects will be and/or what alternative proposals may be introduced in lieu of one or more of those projects. In any event, due to the beneficial effects of consolidation of existing facilities and implementation of the SDCRAA recycling policies, the particular improvements under
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<tr>
<td>SANDAG July 1, 2010</td>
<td><strong>Transportation/Traffic:</strong> Consider recent amendments to the checklist contained in Appendix G of the CEQA Guidelines for determining potential transportation impacts.</td>
<td>Not applicable.</td>
<td>Section XV, Transportation/Traffic, of the AMP Supplemental EIR NOP/Initial Study (Appendix A). Supplemental analysis in Section 5.3, Traffic and Circulation, of this Supplemental EIR. The 2010 amendments to the Appendix G environmental checklist do not substantially alter the nature and scope of the transportation analysis completed for the AMP Final EIR. Further, use of the 2010 amendments to the Appendix G environmental checklist would not change the conclusions relative to the impacts of the proposed Northside Improvements identified in Section XV, Transportation/Traffic, of the AMP Supplemental EIR NOP/Initial Study (Appendix A). Section 5.3, Traffic and Circulation, of this Supplemental EIR. As indicated above, the improvements planned for the Northside area are</td>
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<td></td>
<td><strong>Other:</strong> Clarify how the Proposed Project, including additional rental car parking, relates to the Destination Lindbergh Plan and the future planned California</td>
<td>Not applicable.</td>
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review would not increase materially the off-site disposal requirements of these functions at SDIA. Regarding GHG generation, please see above.
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<td>Organizations</td>
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<tr>
<td>San Diego County Archaeological Society June 1, 2010</td>
<td>Archaeological Resources: Source of 1920s fill in Project area.</td>
<td>Section 5.7, Historic, Architectural, Archaeological, Paleontological, and Cultural Resources</td>
<td>Section V, Cultural Resources, of the AMP Supplemental EIR NOP/Initial Study (Appendix A). Based on Historical Review of Lindbergh Field San Diego International Airport prepared by AMEC Earth &amp; Environmental, Inc. (June 14, 2002), a review of historical photographs from 1926 suggests that the area was hydraulically filled with materials dredged from San Diego Bay.</td>
</tr>
<tr>
<td>Community Planning Groups</td>
<td></td>
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<tr>
<td>Peninsula Community Planning Board June 8, 2010 (Scoping Meeting Comment Card)/June 17, 2010</td>
<td>Project may eliminate future opportunity to relocate Terminal 1 to the northside/ may conflict with Destination Lindbergh.</td>
<td>Not applicable.</td>
<td>Section 2.3.3, Relationship to Destination Lindbergh, of this Supplemental EIR.</td>
</tr>
</tbody>
</table>
5.1.3 Environmental Issues That Warrant Further Analysis in this Supplemental EIR

As described in Section 5.1.1 above, based on preliminary review of the proposed Northside Improvements, the SDCRAA determined that one environmental resource, aesthetics, could be potentially affected by implementation of the Northside Improvements and require additional analysis that was not otherwise provided in the AMP Final EIR. As discussed above in Section 5.1.2, based on refinements to the proposed Northside Improvements and comments received on the NOP for the Draft EIR and during the scoping meeting, this Supplemental EIR also provides supplemental evaluation/clarification of potential impacts of the Proposed Project with respect to traffic/circulation, utilities, and GHG emissions. The supplemental analysis for the topics of aesthetics, traffic and circulation (parking only), utilities, and GHG emissions are provided in Sections 5.2, 5.3, 5.4, and 5.5 below, respectively. Clarification that traffic/circulation impacts associated with the proposed Northside Improvements were adequately addressed as part of the AMP Final EIR is provided in Section 5.3. Further, as described in Section XVII. b of the AMP Supplemental EIR NOP/Initial Study (Appendix A), the analysis and conclusions related to cumulative impacts in the AMP Final EIR are considered to be valid and applicable to the proposed Northside Improvements; therefore, no additional discussion or analysis of cumulative impacts is warranted or included in the following analyses.
5.2 Aesthetics

This section addresses the potential impacts to aesthetic resources from implementation of the proposed Northside Improvements. The following provides a summary of the aesthetics analysis in the AMP Final EIR that relates to the proposed Northside Improvements, a supplemental analysis specific to potential aesthetic impacts associated with the Proposed Project based on more detailed descriptions of the subject Northside Improvements, and conclusions regarding whether the proposed Northside Improvements would result in any significant visual impacts and whether any new or modified mitigation measures are warranted.

The discussion below focuses on aesthetic impacts related to community character, visual resources and consistency with adjacent land use plans. As discussed in Section I, Aesthetics, of the AMP Draft Supplemental EIR NOP Initial Study (see Appendix A of this Supplemental EIR), the analysis of impacts and conclusions of less than significant impact related to light emissions, glare, and landform alteration contained in the AMP Final EIR is fully applicable to the proposed Northside Improvements, and adequately addressed potential impacts for these issues. As such, no additional discussion or analysis related to light emissions, glare, or landform alteration is warranted or included in the discussions below. In addition, as described in Section 5.1 of this Supplemental EIR, the analysis and conclusions related to cumulative impacts in the AMP Final EIR are considered to be valid and applicable to the proposed Northside Improvements; therefore, no additional discussion or analysis of cumulative impacts with respect to aesthetic resources is warranted or included in the following discussion of aesthetics.

5.2.1 Summary of Relevant Analysis in Airport Master Plan Final EIR

Section 5.13, Aesthetics, of the AMP Final EIR addresses potential impacts to aesthetic resources from implementation of the AMP. The following provides a summary of Section 5.13 of the AMP Final EIR as related to the currently proposed Northside Improvements.

5.2.1.1 General Approach and Methodology

The purpose of the aesthetics section is to describe the existing aesthetic conditions of the project area and analyze the potential project impacts on its aesthetic character and the aesthetic character of the surrounding areas as a result of the implementation of the AMP. The approach to analyzing potential impacts to aesthetic resources for the AMP includes: first, a review of the regulatory documents that govern the project area in regards to aesthetic resources; second, a review of the significance criteria that was used to evaluate potential impacts; third, a description of the environmental setting, both on-site, as well as the surrounding area; fourth a description of the AMP in terms of potential aesthetic impacts and the relevant plans and policies that regulate land use, both on-site and in the surrounding areas; fifth, potential construction impacts that could occur during construction of the alternatives; and lastly a discussion of mitigation measures and the level of significance of the potential impacts after mitigation measures for the AMP.

This analysis is based on a review of the regulatory documents governing the project area and the areas adjacent to it. Additionally, the analysis included: 1) site reconnaissance of the project area and the surrounding communities, 2) review of aerial photographs, 3) identification and documentation of key views, and 4) review of the preliminary designs and project descriptions of the AMP. More specifically, in regards to views, consideration and assessment were given to defining public scenic resources, identifying major viewer groups, and selecting key views.
5.2.1.2 Regulatory Framework

There are several planning areas located near or adjacent to SDIA that set policies within their own areas specific to aesthetic views of San Diego Bay, the Pacific Ocean, the Point Loma peninsula, and the downtown area. Policies and guidelines related to urban design and view corridor preservation in the community plans and other planning documents that were discussed as part of the AMP aesthetics analysis and that are most relevant to proposed Northside Improvements are described below.

Port Master Plan

The Port Master Plan is the land use document governing the land and water development within the Port District's jurisdiction. However, in January 2003, the San Diego Regional Airport Authority Act (SDCRAA Act) became effective. The SDCRAA Act grants to the SDCRAA all land use and design related authority and jurisdiction over lands within the original SDIA leasehold, along with any other lands that might be acquired adjacent to the existing Airport property and necessary to operate the Airport. Although the Airport property, including the more recently acquired General Dynamics and Teledyne Ryan parcels, are still depicted in the certified Port Master Plan, the Port Master Plan and its associated design guidelines are no longer applicable to property now under the planning and design auspices of the SDCRAA.

The Unified Port of San Diego's Port Master Plan (as amended) still guides the land use designation and policies for lands adjacent to or adjoining SDIA. The Port Master Plan establishes precise plans for each of the planning districts located within the project area. The planning district most affected by the Proposed Project is Planning District 2 (Harbor Island/Lindbergh Field). This planning district identifies two scenic vistas that include:

- Views from Spanish Landing out toward the Bay, and
- Views from West and East Harbor Island to the Bay.

Both of these designated view areas are generally located to the south of SDIA and would not be affected by the AMP, including the proposed Northside Improvements.

Section II Planning Goals of the Port Master Plan identifies general goals that are to be attained by implementing the policies set forth in the Precise Plans. These goals apply to the entire district and address the design and treatment of new development in the area under the District's jurisdiction. The most relevant goals that address aesthetic issues include the following:

- Goal VIII: The Port District will enhance and maintain the bay and tidelands as an attractive physical and biological entity.
- Views should be enhanced through view corridors, the preservation of panoramas, accentuation of vistas, and shielding of the incongruous and inconsistent.
- Establish guidelines and standards facilitating the retention and development of an aesthetically pleasing tideland environment free of noxious odors, excessive noise, and hazards to the health and welfare of the people of California.
- Goal IX: The Port District will insure physical access to the bay except as necessary to provide for the safety and security, or to avoid interference with waterfront activities.
- Provide 'windows to the water' at frequent and convenient locations around the entire periphery of the bay with public right-of-way, automobile parking and other appropriate facilities.

It should be noted that these planning goals of the Port Master Plan apply only to the lands under the District's jurisdiction and do not apply to SDCRAA or SDIA.
California Coastal Act
Under the provisions of the California Coastal Act, development projects located in the coastal zone must receive an additional level of review for potential impacts to coastal resources.

Section 30251 of the California Coastal Act is the section that is applicable for assessing aesthetic impacts of the AMP. Section 30251 states:

- The scenic and visual qualities of the coastal areas should be protected as a public resource.
- Proposed projects in the Coastal Zone shall be sited and designed to protect views to and along the ocean, scenic coastal areas, to minimize the alteration of natural landforms, to be visually in character of the surrounding area and, wherever possible to restore and enhance the visual quality in visually degraded areas.

City of San Diego Community Plans and Policies
Midway/Pacific Highway Corridor Community Plan
Urban Design Guidelines
The Midway/Pacific Highway Corridor Community Planning Area contains areas that are within the State Coastal Zone as defined by the California Coastal Act of 1976. As such, as part of the Midway/Pacific Highway Corridor Community Plan development process, it was required that a Local Coastal Program be developed and approved by the California Coastal Commission. Under the Local Coastal Program for the Midway/Pacific Highway Corridor Community Planning Area, the area within the Coastal Zone is subject to special coastal guidelines. Those that apply to this project include:

- Assure continuity and compatibility between the City and the Port District through the coordination of planning efforts.
- Improve the quality of architectural styles and site design in and around the Coastal Zone Area.
- Preserve and emphasize public views west and south to the waterfront.
- Prevent the expansion or development of unsightly land use activities in the coastal strip.

View Corridor Preservation
In regards to visual resources, the Midway/Pacific Highway Corridor Community Plan states the following policies:

- Commercial redevelopment projects located along Pacific Highway should not obstruct scenic vistas and/or should provide and maintain view corridors from all public right-of-ways.
- Provide coastal and bayward view corridors through the community.
- Application of the CPIOZ (Community Plan Implementation Overlay Zone) in conjunction with the (Commercial) C-1 zone will ensure maintenance of view corridors to the waterfront, incorporation of pedestrian-oriented features and landscaping of visible parking structures, while promoting airport-related uses.

Uptown Community Plan
Urban Design Guidelines
In regards to urban design and aesthetics, the Uptown Community Plan contains policies that comply with the existing land uses and built conditions at SDIA.
**View Corridor Preservation**

In regard to visual resources, the Uptown Community Plan provides for the protection of public views of open space and water areas, particularly along the "western slopes" of the community.

### 5.2.1.3 Significance Criteria

For the purposes of the AMP aesthetics analysis, potential significant aesthetics impacts were evaluated based on the CEQA State Guidelines and the City of San Diego Environmental Analysis Section Significant Determination Guidelines for public policies regarding aesthetic/urban design guidelines and visual resources, and the SANDAG “Impacts of Unconstrained Air Transportation Capacity on the San Diego Regional Economy” Report were considered. Drawn from these documents are the evaluation criteria for the AMP in regards to potential aesthetic and visual impacts and are as follows:

1. **Substantially alter aesthetics in the area by:**
   - Altering the natural or naturalized landform
   - Conflicting with adopted urban design and view preservation policies within the District
   - Conflicting with related community plans
   - Altering lighting so as to create substantial glare at sensitive receptors

2. **Severely contrast with the character of the surrounding neighborhood**

3. **Substantially block public views from designated open space, roads, or parks to visual landmarks or scenic vistas (Pacific Ocean, San Diego Bay, mountains or waterways) for a majority of viewers**

In evaluating the potential impact of the AMP on the quality of aesthetic and visual resources, the analysis process begins with an evaluation of the potential for the AMP to impact key views. The degree of potential impact at each key view is assessed by assigning low-, medium-, or high-value weighting factors to the three aesthetic impact categories: views, neighborhood character, and aesthetics. This approach is similar to the system used for many years by the Federal Highway Administration. The characteristics of each weighting factor are described below.

- **Low (1):** Minor adverse change in views to scenic or visual resources, neighborhood character, or aesthetics resulting in a minor effect on the visual resource that would not generally be noted by the viewer because of the minor aspect of the change or distance from the site. Visual impacts would be considered less than significant and mitigation measures are not required.
- **Medium (2):** Moderate adverse change in the views to scenic or visual resources, neighborhood character, or aesthetics resulting in an effect that some viewers would consider to be significant while others might not. Mitigation measures might be necessary to improve the visual quality of the area and create a setting where the visual impact would be considered less than significant.
- **High (3):** Major adverse change to the views to scenic or visual resources, neighborhood character, or aesthetics resulting in an effect that the majority of the viewers would consider to be

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7 As noted on in the introduction to the aesthetics section, the analysis of impacts and conclusions (less than significant impact) related to light emissions, glare, and landform alteration contained in the AMP Final EIR is fully applicable to the proposed Northside Improvements, and adequately addressed potential impacts for these issues. As such, no additional discussion or analysis related to light emissions, glare, or landform alteration is warranted or included in the discussions of aesthetic impacts for the AMP or proposed Northside Improvements in this Supplemental EIR.


significant. Mitigation measures are needed to alleviate the problem. Without mitigation, visual impact is considered significant.

### 5.2.1.4 Environmental Setting

SDIA is located in a fully urbanized area that is surrounded by existing commercial uses, industrial uses, military uses, a park, and San Diego Bay. This section describes both the environmental setting on-site at SDIA and in the surrounding area.

On-site, the SDIA project area is relatively flat and sits within the landforms of the Point Loma peninsula on the west and the hillsides of Uptown and Middletown on the east. The average elevation of SDIA is between 10 to 15 feet above mean sea level (msl). The topography at the site slopes gradually to the south and west towards San Diego Bay. Most of the structures associated with SDIA are low-scale development (approximately 50 feet at the highest point). SDIA has its primary aviation terminals on the south side of the facility facing North Harbor Drive. The principal uses between these terminals and North Harbor Drive are the landside parking facilities, transit plazas, and associated access routes. The runway, taxiways, and other airside support facilities are north of the terminals and are not easily viewed from North Harbor Drive. All of these facilities can be seen from the elevated Pacific Highway on-ramp to I-5 and from I-5 itself.

Existing visual resources within the SDIA project area consist of natural and human-made features. Natural visual features include San Diego Bay, the Pacific Ocean and distant views of the Point Loma peninsula. The human-made features include the downtown skyline and various historic structures located on the east side of U.S. MCRD San Diego.

Immediately surrounding SDIA are residential neighborhoods to the west, military uses to the north, tourist-recreational uses to the south, and industrial and airport-related uses to the east. The following provides a more detailed description of the environmental setting on each side of SDIA.

**Environmental Setting: West of SDIA**

Immediately adjacent to the west side of SDIA is Liberty Station (formerly the Naval Training Center). Redevelopment of this property with multiple uses including residential, commercial, office, open space, and tourist-oriented commercial development has largely been completed.

Nearby to SDIA there are east-facing residences in the Peninsula Community Plan Area that have distant views to San Diego Bay, the downtown skyline, the Pacific Ocean, and SDIA.

**Environmental Setting: North of SDIA**

U.S. MCRD San Diego is located to the north of SDIA and includes historic buildings that are used to house and train Marine recruits. Outdoor-use areas on MCRD San Diego adjacent to SDIA include the outdoor combat skills training areas. There are views to the downtown skyline from Belleau Avenue looking south and to the water from the north end of the San Diego Bay Navy Boat Channel.

**Environmental Setting: East of SDIA**

Immediately east of SDIA is a panhandle shaped area within the Midway Community Plan Area that is bounded by I-5 on its west side. This area includes a variety of commercial uses such as light industrial businesses, office uses, gas stations, and long- and short-term parking. Additionally, the area includes the Port of San Diego administrative building (headquarters) and the Palm Avenue Trolley Station.

Nearby to SDIA and east of the Midway Community Plan area is I-5, a major transportation corridor that leads south to the border of Mexico and north to Los Angeles. Currently, the motorist has views from the southbound lane of I-5, which is elevated above SDIA, and includes San Diego Bay, the Pacific Ocean, the Point Loma peninsula, and the downtown skyline. These views are partially obstructed by freeway railings, and by buildings and private fences near the freeway. East of I-5 are the residential communities.
within the City of San Diego's Uptown Planning area. These communities are located on hillsides rising up from I-5 and they have distant views of the San Diego Bay, the Pacific Ocean, SDIA, and the Point Loma peninsula. These communities also have nighttime views of the same area including views of the SDIA runway lights.

**Environmental Setting: South of SDIA**

Immediately to the south of SDIA is North Harbor Drive. Along the south side of North Harbor Drive is the City of San Diego Metropolitan Sewer Pump Station #2, the U.S. Coast Guard Station, a rental car center, the Harbor Police Station, and Spanish Landing Park.

Nearby SDIA are hotels, restaurants, and marinas that are located on Harbor Island, an island that is south of North Harbor Drive.

All of these facilities have uninterrupted views of San Diego Bay and of downtown San Diego.

### 5.2.1.5 Impact Analysis

The aesthetics impact analysis in the AMP Final EIR evaluates the potential aesthetic and visual changes, as well as potentially significant environmental impacts associated with the implementation of the AMP.

The aesthetic impact analysis includes a review of neighborhood character. Also considered are surrounding area's land use plans and policies related to visual resources/aesthetics.

In regards to visual resources, 23 long and short-range views were considered for the AMP aesthetics analysis. These viewpoints are located at residential neighborhoods, recreational facilities, and public roadways including I-5 and Pacific Highway. Figure 5.13-1 of the AMP Final EIR identifies the location of these key views. Six of these key view locations (Key Views 12 through 17) are located around the northern portion of the Airport.

The following steps were conducted for the AMP visual resources assessment.

1) Define the existing conditions of the visual environment of the Proposed Project area.
2) Identify major viewer groups that would view the project area.
3) Select key views for the visual assessment based on representative viewer groups, public viewing locations, and public policies.
4) Document the type and degree of visual changes to the key views based on the significance criteria.
5) Select significant key views requiring further analysis and representation.
6) Assess visual impacts and determine level of significance.
7) Assess visual impacts during the course of construction.
8) Generate design recommendations to mitigate significant visual impacts.

The weighting factor system used to rate the significance of the potential impacts to key views is described in Section 5.2.1.3 above.

The following provides a summary of the results of the aesthetic impacts analysis for the Airport Land Use Plan component of the AMP, which includes consideration of improvements in the northern portion of the Airport at a program-level.

**Surrounding Area: Aesthetic Resources (Neighborhood Character)**

The current character of SDIA is represented by runways, taxiways, aircraft parking aprons, an airport traffic control tower, passenger terminals, and public parking. The proposed Airport Land Use Plan would
not conflict with the current character of the airport area, because proposed improvements are consistent with the existing character of the SDIA project area. Further, proposed buildings are planned to be similar to existing buildings in terms of height, mass, scale, materials, and architectural style. Therefore, implementation of the Airport Land Use Plan would not have a significant impact on the character of the neighborhood.

**Surrounding Areas: Visual Resources**

The results of the analysis of potential impacts to visual resources as contained in the AMP Final EIR determined that no significant impacts from any of the 23 key view locations around the Airport would occur with implementation of Airport Land Use Plan. However, for the six key views around the northern portion of the Airport (i.e., Key View 12: Pacific Highway Southbound I-5 On-ramp, Key View 13: Washington Street and Pacific Highway, and Key Views 14 through 17: Uptown Community) it was noted that as more site-specific projects are proposed, further analysis may be needed to address potential visual impacts from these locations.

In addition, elevated portions of any future specific project resulting from the Airport Land Use Plan may be visible from U.S. MCRD San Diego and might obstruct view resources looking to the southeast to San Diego Bay and the downtown skyline. Since views from U.S. MCRD San Diego are not public views, potential impacts related to views from U.S. MCRD San Diego as a result of implementation of the Airport Land Use Plan are not identified as being significant.

**Surrounding Area’s Land Use Plans and Policies**

**Port Master Plan**

The Port Master Plan outlines general goals addressing the design of new development. The goals relevant to this project deal with view preservation. The above section about visual resources and key views demonstrates that the Airport Land Use Plan would not have a significant impact on existing views of the Bay or the downtown area. Therefore, the Airport Land Use Plan would not have a significant impact on the adjacent land governed by the Port Master Plan.

**City of San Diego Community Plans**

In regards to aesthetic impacts, the Airport Land Use Plan would comply with the City of San Diego Uptown Community Plan and Midway/Pacific Highway Corridor Community Plan policies and guidelines related to neighborhood character as the proposed land uses are of the same nature as those that currently exist at SDIA. Therefore, implementation of the Airport Land Use Plan would not result in significant neighborhood character impacts.

In regards to visual resources, the key views from the Uptown Community and Midway/Pacific Highway Corridor Community plan areas could potentially be impacted by the Airport Land Use Plan. As discussed above, analysis of the views from these planning areas determined that the Airport Land Use Plan would not result in significant impact to views of visual resources identified in these plans.

**5.2.1.6 Construction Impacts**

The proposed Airport Land Use Plan would not result in any construction related aesthetics impacts because specific projects are not being proposed and would not be under construction.

**5.2.1.7 Mitigation Measures/Other Improvements**

Mitigation measures are not required since impacts to aesthetics and visual quality caused by the AMP would be less than significant.
5.2.1.8 Level of Significance after Mitigation Measures

Impacts to aesthetic and visual resources from implementation of the AMP would be less than significant.

5.2.2 Supplemental Analysis

The following provides a supplemental analysis specific to potential aesthetic impacts associated with the Proposed Project based on more detailed descriptions of the subject Northside Improvements, and conclusions regarding whether the proposed Northside Improvements would result in any significant visual impacts and whether any new or modified mitigation measures are warranted.

The general approach and methodology used in this supplemental aesthetics analysis is the same as that used in the AMP Final, summarized in Section 5.2.1.1 above. In addition, given that proposed Northside Improvements, including the CONRAC and air cargo improvements, envisioned in the Northside Development area now have more project definition and specificity than at the time the AMP Final EIR was completed, visual simulations of the proposed improvements were developed for use in this supplemental aesthetics analysis.

In regards to visual resources, several long and short-range views were considered for the supplemental analysis for the proposed Northside Improvements. Public off-airport views of the proposed Northside Improvements site are predominantly located along roadways to the east and south of the Project site, although some streets within residential areas along the Point Loma peninsula also have limited long-range views of the Project site. The nine key view locations chosen for this supplemental analysis represent typical public viewpoints of the proposed Northside Improvements, with a focus on those locations with views of the visual resources in the Project area, including San Diego Bay, the Point Loma peninsula, the Pacific Ocean, and the downtown skyline. These viewpoints are located at residential neighborhoods and public roadways located to the east and south of the proposed Northside Improvements site. Figure 5.2-1 identifies the location of these key views. Each of these views is depicted in Figures 5.2-2 through 5.2-3, 5.2-4, 5.2-5, 5.2-6, 5.2-7, 5.2-8, 5.2-9, and 5.2-10.
Supplemental Environmental Impact Report

Figure 5.2-1: Key View Location Map

Legend
- Key View Photo Location
- General Direction of View

1. California Street and Henry Street
2. Guy Street and Andrews Street
3. Sassafras Street Near State Street
4. Columbia Street and Redwood Street
5. I-5 Pedestrian Overpass off Palm Street
6. Harbor Drive and Coast Guard Crossing
7. Sassafras Street and Pacific Highway
8. Pacific Highway Pedestrian Overpass North of Sassafras Street
9. Washington Street and Pacific Highway

Source: SDCRAA
Prepared By: CDM, September, 2010
**Before**

Location: California Street and Henry Street

Viewer Group: Local residents and users of public streets

View Description: This view is looking south towards the proposed CONRAC and cargo facilities sites in the northern portion of the airport. Existing scenic resources include relatively unobstructed views of the downtown skyline, San Diego Bay, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, billboards, commercial buildings, and airport operations/facilities, most notably surface parking and airfield facilities (runway/taxiways).

**After**

Location: California Street and Henry Street

View Description: This view is looking south towards the proposed CONRAC and cargo facilities sites in the northern portion of the airport. Existing scenic resources include relatively unobstructed views of the downtown skyline, San Diego Bay, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, billboards, commercial buildings, and airport operations/facilities, most notably surface parking and airfield facilities (runway/taxiways).
Location: Guy Street and Andrews Street

Viewer Group: Local residents and users of public streets

View Description: This view is looking south towards the airport. Existing scenic resources include relatively unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, commercial buildings, and airport operations/facilities.
Location: Sassafras Street near State Street

Viewer Group: Local residents and users of public streets

View Description: This view is looking southwest towards the northern and eastern portions of the airport. Existing scenic resources include relatively unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, and airport operations/facilities.
Location: Columbia Street and Redwood Street

Viewer Group: Local residents and users of public streets

View Description: This view is looking west towards the airport. Existing scenic resources include unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility lines, I-5 and connector ramps, the Port of San Diego administrative building, and airport operations/facilities.
Location: Interstate 5 Pedestrian Overpass at Palm Street

Viewer Group: Pedestrians and users of public streets

View Description: This view is looking west/southwest towards the airport. Existing scenic resources include relatively unobstructed views of the downtown skyline, San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility facilities/lines, commercial buildings, the Port of San Diego administrative building, and airport operations/facilities.
Before

Location: Harbor Drive and Coast Guard Crossing
Viewer Group: Users of North Harbor Drive
View Description: This view is looking north towards the airport at the location of the proposed terminal link roadway. There are no existing scenic resources included in the view. Features within view from this location are airport operations/facilities, including surface parking, airfield facilities (runway/taxiways, access road, California least tern nesting areas), and the easternmost building of the former Teledyne Ryan facility. The Port of San Diego administrative building and residential areas to the northeast of the airport are visible in the background.

After

Location: Harbor Drive and Coast Guard Crossing
Viewer Group: Users of North Harbor Drive
View Description: This view is looking north towards the airport at the location of the proposed terminal link roadway. There are no existing scenic resources included in the view. Features within view from this location are airport operations/facilities, including surface parking, airfield facilities (runway/taxiways, access road, California least tern nesting areas), and the easternmost building of the former Teledyne Ryan facility. The Port of San Diego administrative building and residential areas to the northeast of the airport are visible in the background.
Location: Sassafras Street and Pacific Highway

Viewer Group: Users of public streets

View Description: This view is looking south/southwest towards the airport. Existing scenic resources include distant, partially obstructed views of the Point Loma peninsula. Other features within view from this location are utility lines, on- and off-airport surface parking lots, the Port of San Diego administrative building, and airport operations/facilities.
Location: Pacific Highway Pedestrian Overpass north of Sassafras Street

Viewer Group: Pedestrians and users of public streets

View Description: This view is looking south towards the airport. Existing scenic resources include partially obstructed views of the downtown skyline and San Diego Bay. Other features within view from this location are transportation facilities, the Port of San Diego administrative building, and airport operations/facilities, most notably on-airport surface parking.
Location: Washington Street and Pacific Highway of Sassafras Street

Viewer Group: Pedestrians and users of public streets

View Description: This view is looking south/southeast towards the airport. Existing scenic resources include partially obstructed views of the downtown skyline. Other features within view from this location are on-airport surface parking and the Port of San Diego administrative building.
The weighting factor system used to rate the significance of the potential impacts to key views, previously described in Section 5.2.1.3, Significance Criteria, is described again here:

- **Low (1):** Minor adverse change in views to scenic or visual resources, neighborhood character, or aesthetics resulting in a minor effect on the visual resource that would not generally be noted by the viewer because of the minor aspect of the change or distance from the site. Visual impacts would be considered less than significant and mitigation measures are not required.

- **Medium (2):** Moderate adverse change in the views to scenic or visual resources, neighborhood character, or aesthetics resulting in an effect that some viewers would consider to be significant while others might not. Mitigation measures might be necessary to improve the visual quality of the area and create a setting where the visual impact would be considered less than significant.

- **High (3):** Major adverse change to the views to scenic or visual resources, neighborhood character, or aesthetics resulting in an effect that the majority of the viewers would consider to be significant. Mitigation measures are needed to alleviate the problem. Without mitigation, visual impact is considered significant.

Table 5.2-1 lists the key views used in the supplemental aesthetics analysis for the proposed Northside Improvements and the weighting valuation for each using the system above.

**Table 5.2-1**

<table>
<thead>
<tr>
<th>Key Views</th>
<th>Potential Visual Change</th>
<th>Weighting Valuation</th>
<th>Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2 Views</td>
<td>1 Neighborhood Character</td>
<td>1 Aesthetics</td>
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<td>2</td>
<td>1 Views</td>
<td>1 Neighborhood Character</td>
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<td>3</td>
<td>1 Views</td>
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<td>1 Aesthetics</td>
</tr>
<tr>
<td>9</td>
<td>2 Views</td>
<td>1 Neighborhood Character</td>
<td>1 Aesthetics</td>
</tr>
</tbody>
</table>

Low: 1 to 3 = "Low Impact" and not considered significant
Medium: 4 to 6 = "Medium Impact" and not considered significant
High: 7 to 9 = "High Impact" and considered significant

This following includes an analysis of the potential impacts related to aesthetic and visual resources associated with implementation of the proposed Northside Improvements, as well as how this Proposed Project conforms to adjacent land use plans and policies related to aesthetics.

**Surrounding Area: Aesthetic Resources (Neighborhood Character)**

The current character of the proposed Northside Improvements site is represented by aircraft parking aprons, cargo facilities, and surface parking. Areas surrounding the Project site are characterized by
airport operations and facilities (SDIA) to the south and west and commercial/light industrial and transportation (I-5, Pacific Highway, connector ramps, and the Palm Avenue Trolley Station) facilities to the north and east. One of the most notable structures in the area is the six-story Port of San Diego administrative building (see Figures 5.2-5, 5.2-6, 5.2-8, and 5.2-9) which is highly visible from I-5, roadways, and commercial and residential uses to the north and east. Further east beyond I-5 are the residential communities of Middletown and Mission Hills.

As indicated in Chapter 4, Project Characteristics, the proposed Northside Improvements include a CONRAC facility, air cargo warehouse facilities and associated improvements, a terminal link roadway along the eastern perimeter of the Airport connecting the proposed northside facilities to the southside of the Airport, and on-airport utilities improvements. Conceptual visual simulations of the proposed CONRAC and cargo facilities, the most visible of the proposed Northside Improvements, from key views of the Project site are provided in Figures 5.2-2, 5.2-3, 5.2-4, 5.2-5, 5.2-6, 5.2-7, 5.2-8, 5.2-9, and 5.2-10.

As described in Chapter 4, the proposed CONRAC facility is currently planned to be a four level parking structure that would measure approximately 52 feet\(^{10}\) in height. The ultimate height for the structure would be determined during final design. The facility would total approximately 1.9 million square feet of space and encompass a footprint of approximately 15 to 27.5 acres. To reduce energy consumption and meet the environmental sustainability goals of the SDCRAA, solar panels or canopies may be incorporated into the top level of the CONRAC facility. Any solar panels or canopies would be designed from materials that avoid or reduce glare. Depending upon the location of the solar panels and canopies, the FAA may require a glare analysis be conducted as part of the final design to avoid or reduce glare to arriving aircraft. Any restriction on materials or locations in the glare analysis would be incorporated into the final design and would eliminate any potential effects from lighting or glare.

The proposed cargo facilities would include 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine parking positions for cargo aircraft. As currently planned, two air cargo warehouse structures would be approximately 116 feet deep, total approximately 1,939 feet in length. The height of the structures would range from 10 to 20 feet.

The proposed Northside Improvements would not conflict with the current character of the Project area, because proposed improvements, including the CONRAC and cargo facilities, would be consistent and compatible with the existing surrounding transportation and commercial/light industrial uses.

Additionally, the proposed Northside Improvements would not have a significant impact on the character of the surrounding neighborhoods, as they would not encroach onto adjacent communities and, although the CONRAC would be of a somewhat greater overall scale relative to existing surrounding structures and uses, the facility would be substantially shorter than the existing Port of San Diego administrative building and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site.

Therefore, the proposed Northside Improvements would not result in a significant impact on neighborhood character.

**Surrounding Areas: Visual Resources**

Using the evaluation process described above, nine key views were identified for evaluation in terms of the visual impact based on conceptual visual simulations of the features of the proposed Northside Improvements, as described in Chapter 4, Project Characteristics, of this EIR. The results of the evaluation are presented in Table 5.2-1. As indicated in Table 5.2-1, impacts on most views were determined to have a "Low" rating, while four view impacts were determined to have a rating of "Medium,"

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\(^{10}\) This height distance is measured from the surface of the ground floor to the surface of the top floor (44 feet) plus an estimate of eight additional feet for a planned canopy or hard top. The ultimate height for the structure would be determined during final design.
and none of the view impacts received a "High" rating. The following provides further discussion and analysis of the nine key views considered in this supplemental analysis.

**Key View 1: California Street and Henry Street**

This view is looking south towards the proposed CONRAC and cargo facilities sites in the northern portion of the Airport. As shown in Figure 5.2-2, existing scenic resources include relatively unobstructed views of the downtown skyline, San Diego Bay, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, billboards, commercial buildings, and airport operations/facilities, most notably surface parking and airfield facilities (runway/taxiways). As illustrated in Figure 5.2-2, based on conceptual visual simulations of the proposed CONRAC and cargo facilities, existing views of the downtown skyline, San Diego Bay, and the Pacific Ocean would not be altered or blocked as a result of the Proposed Project. Although the CONRAC would be of a somewhat greater height and scale relative to existing surrounding structures and uses within this view, the facility would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. Nonetheless, as indicated in Table 5.2-1, it was determined that the Proposed Project would have a "medium" or moderate adverse change to views from this location as the CONRAC would be highly visible and may result in a view impact that some viewers would consider significant while others might not. Overall, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

**Key View 2: Guy Street and Andrews Street**

This view is looking south towards the Airport. As shown in Figure 5.2-3, existing scenic resources include relatively unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility lines, I-5, commercial buildings, and airport operations/facilities. As illustrated in Figure 5.2-3, based on conceptual visual simulations of the Proposed Project, existing views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean would not be altered or blocked as a result of the Proposed Project. The proposed cargo facilities and a small portion of the proposed CONRAC would be visible from this location, and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. As indicated in Table 5.2-1, it was determined that the Proposed Project would have a "low" adverse change to views from this location based on the weighting factors described above. As such, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

**Key View 3: Sassafras Street near State Street**

This view is looking southwest towards the northern and eastern portions of the Airport. As shown in Figure 5.2-4, existing scenic resources include relatively unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. As illustrated in Figure 5.2-4, based on conceptual visual simulations of the Proposed Project, existing views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean would not be altered or blocked as a result of the Proposed Project. The proposed cargo facilities and a portion of the proposed CONRAC would be visible from this location, and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. As indicated in Table 5.2-1, it was determined that the Proposed Project would have a "low" adverse change to views from this location based on the weighting factors described above. As such, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

**Key View 4: Columbia Street and Redwood Street**

This view is looking west towards the Airport. As shown in Figure 5.2-5, existing scenic resources include unobstructed views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other
features within view from this location are utility lines, I-5 and connector ramps, the Port of San Diego administrative building, and airport operations/facilities. As illustrated in Figure 5.2-5, based on conceptual visual simulations of the Proposed Project, existing views of San Diego Bay, the Point Loma peninsula, and the Pacific Ocean would not be altered or blocked as a result of the Proposed Project. The proposed cargo facilities and the proposed CONRAC would be visible from this location. Although the CONRAC would be of a somewhat greater overall scale relative to existing surrounding structures and uses within this view, the facility would be substantially shorter than the existing Port of San Diego administrative building and similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. Nonetheless, as indicated in Table 5.2-1, it was determined that the Proposed Project would have a "medium" or moderate adverse change to views from this location as the CONRAC would be highly visible and may result in a view impact that some viewers would consider significant while others might not. Overall, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

Key View 5: I-5 Pedestrian Overpass off Palm Street

This view is looking west/southwest towards the Airport. As shown in Figure 5.2-6, existing scenic resources include relatively unobstructed views of the downtown skyline, San Diego Bay, the Point Loma peninsula, and the Pacific Ocean. Other features within view from this location are utility facilities/lines, commercial buildings, the Port of San Diego administrative building, and airport operations/facilities. As illustrated in Figure 5.2-6, based on conceptual visual simulations of the Proposed Project, existing views of the downtown skyline, San Diego Bay, the Point Loma peninsula, and the Pacific Ocean would not be altered or blocked as a result of the Proposed Project. The proposed cargo facilities and CONRAC would be visible from this location, and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. As indicated in Table 5.2-1, it was determined that the Proposed Project would have a "low" adverse change to views from this location based on the weighting factors described above. As such, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

Key View 6: Harbor Drive and Coast Guard Crossing11

This view is looking north towards the Airport at the location of the proposed terminal link roadway. There are no existing scenic resources included in the view. As shown in Figure 5.2-7, features within view from this location are airport operations/facilities, including surface parking, airfield facilities (runway/taxiways, access road, and California least tern nesting areas), and the easternmost building of the former Teledyne Ryan facility. The Port of San Diego administrative building and residential areas to the northeast of the Airport are visible in the background. As illustrated in Figure 5.2-7, the proposed CONRAC and cargo facilities would not be readily visible from this location; however, the segment of the proposed Terminal Link Roadway that passes through this portion of the Airport would be very apparent from areas that are immediately adjacent. Although visible, the appearance of the road and periodic passing of shuttles and other vehicles on the road would be generally consistent with the current surroundings, which include vehicle parking in the area where the roadway is proposed and vehicle travel on Laurel Street and North Harbor Drive. As such, as indicated in Table 5.2-1, it was determined that the Proposed Project would have a "low" adverse change to views from this location and impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

11 The Visual Simulation for Key View 6 in Figure 5.2-7 depicts the alignment of the Terminal Link Roadway as originally proposed and analyzed in the Draft Supplemental EIR. The subsequent refinement of the alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot, as proposed in this Final Supplemental EIR, does not change the conclusion that the Proposed Project would have a "low" adverse change to views from this location and impacts to aesthetics and visual resources associated with views from this location would be less than significant.
Key View 7: Sassafras Street and Pacific Highway

This view is looking south/southwest towards the Airport. As shown in Figure 5.2-8, existing scenic resources include distant, partially obstructed views of the Point Loma peninsula. Other features within view from this location are utility lines, on- and off-airport surface parking lots, the Port of San Diego administrative building, and airport operations/facilities. As illustrated in Figure 5.2-8, although the proposed CONRAC and cargo facilities would further obstruct distant views of the Point Loma peninsula, impacts to the distant views of the peninsula would be "low" since views of this visual resource are currently highly obscured by existing vegetation, power lines, and roadway signage. The proposed CONRAC and cargo facilities would be visible from this location, and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. As indicated in Table 5.2-1, it was determined that the Proposed Project would have a "low" adverse change to views from this location based on the weighting factors described above. As such, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

Key View 8: Pacific Highway Pedestrian Overpass North of Sassafras Street

This view is looking south towards the Airport. As shown in Figure 5.2-9, existing scenic resources include partially obstructed views of the downtown skyline and San Diego Bay. Other features within view from this location are transportation facilities, the Port of San Diego administrative building, and airport operations/facilities, most notably on-airport surface parking. As illustrated in Figure 5.2-9, based on conceptual visual simulations of the Proposed Project, existing views of the downtown skyline and San Diego Bay would not be altered or blocked as a result of the Proposed Project. The proposed CONRAC would be visible from this location. Although the CONRAC would be of a somewhat greater overall scale relative to existing surrounding structures and uses within this view, the facility would be substantially shorter than the existing Port of San Diego administrative building and similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. Nonetheless, as indicated in Table 5.2-1, it was determined that the Proposed Project would have a "medium" or moderate adverse change to views from this location as the CONRAC would be highly visible and may result in a view impact that some viewers would consider significant while others might not. Overall, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.

Key View 9: Washington Street and Pacific Highway

This view is looking south/southeast towards the Airport. As shown in Figure 5.2-10, existing scenic resources include partially obstructed views of the downtown skyline. Other features within view from this location are on-airport surface parking and the Port of San Diego administrative building. As illustrated in Figure 5.2-10, although the proposed CONRAC would further obstruct and block views of the downtown skyline, impacts to the distant views of the downtown skyline would be "medium" since views of this visual resource are currently highly obscured by existing vegetation, power lines, and roadway signage. Although the CONRAC would be of a somewhat greater overall scale relative to existing surrounding structures and uses within this view, the facility would be substantially shorter than the existing Port of San Diego administrative building and similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. Nonetheless, as indicated in Table 5.2-1, it was determined that the Proposed Project would have a "medium" or moderate adverse change to views from this location as the CONRAC would be highly visible and may result in a view impact that some viewers would consider significant while others might not. Overall, impacts to aesthetics and visual resources associated with views from this location were determined to be less than significant.
Surrounding Area’s Land Use Plans and Policies

Port Master Plan

The Port Master Plan outlines general goals addressing the design of new development. The goals relevant to the project deal with view preservation. The above section regarding visual resources and key views demonstrates that the proposed Northside Improvements would not have a significant impact on existing views of San Diego Bay or the downtown skyline.

While the Port Master Plan is not responsible for the urban design guidelines for SDIA, it does outline general goals that address the design of new development for property within its own jurisdiction. The primary goals of the Port Master Plan concern the preservation of views, access and use of the bay, and maintaining the bay and tidelands as an attractive physical and biological entity. The proposed Northside Improvements would not prohibit any of these goals from being implemented.

In summary, the proposed Northside Improvements would be consistent with the Port Master Plan’s goals that address aesthetics and development design and impacts would be less than significant.

California Coastal Act

The primary goals of Section 30251 of the California Coastal Act are to preserve scenic resources along the coastal areas, minimize landform alteration and to be visually compatible with the character of the surrounding area. As discussed earlier in this section, implementation of the proposed Northside Improvements would not result in any significant impacts to key views, and the Proposed Project is in keeping with the existing character of the area which is currently an airport facility. Therefore, the proposed Northside Improvements would not result in significant impacts related to these guidelines.

City of San Diego Community Plans

As described above, the proposed Northside Improvements would not result in any significant impacts to views of scenic resources from public viewing locations to the east and south of the Project site. Further, the proposed Northside Improvements would not conflict with the current character of the Project area because proposed improvements, including the CONRAC and cargo facilities, would be consistent and compatible with the existing surrounding transportation and commercial/light industrial uses. Although the CONRAC would be of a somewhat greater overall scale relative to existing surrounding structures and uses, the facility would be substantially shorter than the existing Port of San Diego administrative building and would be similar in nature and architectural style to, and compatible with, existing commercial and aviation facilities adjacent to the Project site. Therefore, the proposed Northside Improvements would be consistent with the applicable urban design guidelines and view corridor preservation policies included in Midway/Pacific Highway Corridor Community Plan and Uptown Community Plan and impacts would be less than significant.

Construction Impacts

Construction activities, including storage and use of materials and equipment, truck traffic, and stockpiling of soils, associated with implementation of the proposed Northside Improvements would be visible by the public from I-5, Pacific Highway, connector ramps, and other roadways to the east of the Project site, and from Laurel Street and North Harbor Drive to the south. In addition, construction activities would be visible from distant views along some streets within residential areas along the Point Loma peninsula. The following measures would be incorporated during construction of all AMP projects, including the proposed Northside Improvements, to ensure that short-term aesthetics impacts would be less than significant:

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During construction activity, the construction contractor shall ensure that construction material, equipment, and staging areas are screened from the public wherever feasible. Appropriate screening material, such as temporary fencing with opaque material, shall be used to buffer and screen views of construction activity and the construction site.

5.2.3 Conclusions

As discussed above, the proposed Northside Improvements would not result in any significant impacts to aesthetic and visual resources and no mitigation measures are warranted. This conclusion is consistent with the conclusions regarding impacts to aesthetics and visual resources contained in the AMP Final EIR.
5.3 Traffic and Circulation

The supplemental analysis of Project-related traffic and circulation impacts presented in the Draft Supplemental EIR was specific to impacts associated with replacement of the Solar Turbines employee parking (i.e., traffic impacts that were not otherwise already addressed in the AMP Final EIR). As discussed in Chapter 4 of this Final Supplemental EIR, based on comments received on the Draft Supplemental EIR expressing concern about the elimination of the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot. As such the supplemental traffic and circulation impacts analysis included in the Draft Supplemental EIR is no longer warranted and has been deleted in conjunction with preparation of this Final Supplemental EIR.

This section addresses the potential impacts to traffic and circulation from implementation of the proposed Northside Improvements. The following provides a summary of the traffic and circulation analysis in the AMP Final EIR that relates to the proposed Northside Improvements, a supplemental analysis specific to potential traffic impacts associated with the AMP improvements based on more detailed description of the subject Northside Improvements, and conclusions regarding whether the proposed Northside Improvements would result in any significant traffic or circulation impacts and whether any new or modified mitigation measures are warranted.

The currently proposed development plan for the Northside area is comparable to that assumed in the SDIA AMP Final EIR, with the most notable exception being that the currently proposed CONRAC is smaller than originally anticipated. The vehicle trip generation, distribution characteristics, potential impacts, and mitigation measures (i.e., transportation improvements) delineated in the AMP Final EIR are considered to still be valid and applicable to the current proposal. In addition to not changing the basic traffic impact and mitigation characteristics that are presented in the AMP Final EIR, the development plans currently proposed for the Northside area do not materially change how or when traffic-related mitigation measures would be implemented, be it near-term or long-term, as described in the AMP Final EIR.

As discussed in Section XV, Transportation/Traffic, of the AMP Draft Supplemental EIR NOP Initial Study (see Appendix A of this Supplemental EIR), the analysis of impacts and conclusions of less than significant impact was based on analyses that considered the effects of increased traffic load and capacities, levels of service, changes in traffic patterns, hazardous conditions, emergency access, inadequate levels of parking, and conflicts with local traffic policies, plans and programs. These analyses contained in the AMP Final EIR are fully applicable to the proposed Northside Improvements, and adequately addressed potential impacts for these issues. Additionally, as described in Section 5.1 of this Supplemental EIR, the analysis and conclusions related to cumulative impacts in the AMP Final EIR are considered to be valid and applicable to the proposed Northside Improvements.

For reference purposes, the following provides a summary of the traffic and circulation analysis in the AMP Final EIR that relates to the proposed Northside Improvements.

As further described below, additional information has been developed subsequent to completion of the AMP Final EIR and the AMP Draft Supplemental EIR NOP Initial Study with regard to the development of the Terminal Link Roadway. Specifically, additional design information is now available regarding the alignment of the roadway and where existing non-airport uses may be directly affected by the proposed route. The subject roadway is a planned on-airport road that would connect the northside development area and south terminal area. As shown in Figure 4-2, this roadway would require the replacement of an employee parking lot currently used by Solar Turbines Industries located along the southeast edge of SDIA property. The traffic and circulation analysis contained in this section focuses on the potential impacts associated with that employee parking being located elsewhere, specifically to a location that SDCRAA considers to be the preferred replacement site for the Solar Turbines employee parking lot.
The supplemental analysis presented herein takes into account the AMP Final EIR's analysis of traffic impacts projected to occur with ultimate implementation of the AMP Airport Land Use Plan, which are considered to be more conservative (worst-case) than the impacts associated with the Airport Implementation Plan (i.e., Airport Land Use Plan includes buildout of all uses contemplated in the AMP, while the Airport Land Use Plan includes the near-term improvements proposed to meet 2015 demand levels).

5.3.1 Summary of Relevant Analysis in Airport Master Plan Final EIR

Section 5.3, Traffic and Circulation, of the AMP Final EIR addresses potential impacts to traffic and circulation movements from implementation of the AMP. The following provides a summary of Section 5.3 of the AMP Final EIR as related to the currently proposed Northside Improvements. The following discussion focuses on the analysis of impacts to roadway segments and intersections contained in the AMP Final EIR. While Section 5.3 of the AMP Final EIR also addresses impacts of the AMP on freeway segments, metered on-ramps, railroad crossings, transit, parking, terminal curbsides and on-airport roadways, such transportation facilities are not anticipated to be affected by the replacement of the Solar Turbines employee parking which is the focus of the supplemental traffic analysis provided herein.

5.3.1.1 General Approach and Methodology

The overall approach used to identify the traffic impacts of the AMP improvements in the AMP Final EIR is based on a comparison of traffic conditions under each AMP project alternative considered in the AMP Final EIR with the No Project Alternative (i.e., none of the AMP improvements are implemented) for each analysis year.

The traffic impact analysis followed applicable guidelines from the following professional transportation organizations and state and local agencies:

- San Diego Traffic Engineers Council (SANTEC) and Institute of Transportation Engineers (ITE) - California Border Section
- San Diego Association of Governments (SANDAG)
- California Department of Transportation (Caltrans)
- City of San Diego

The general approach to the traffic impact analysis conducted for the AMP Final EIR included an assessment of traffic conditions and associated traffic impacts resulting from the AMP Airport Land Use Plan for future years, near-term (2015) and mid-/long-term or horizon year (2020, 2025, and 2030) conditions. The traffic analysis was conducted for the AM and PM commute peak hours and average daily traffic conditions.

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17 City of San Diego - Development Services Department, California Environmental Quality Act (CEQA), Significance Determination Thresholds, January 2007.
The study area used in the traffic analysis in the AMP Final EIR included the area immediately surrounding SDIA including North Harbor Drive south of the Terminals and streets to the east providing access to the Airport. This area is bound by I-5, North Harbor Drive, Grape Street, Washington Street and the San Diego Bay channel. The traffic analysis study area was expanded to include Nimitz Boulevard and Rosecrans Street west of SDIA, India/San Diego Street east of I-5, and additional mainline freeway segments along I-5 and I-8. These streets and associated intersections were added to the study area due to an increase in airport traffic on these streets under the AMP. The study area is shown in Figure 5.3-1 in Section 5.3, Traffic and Circulation, of the AMP Final EIR.

5.3.1.2 Regulatory Framework

The City of San Diego, Caltrans, North County Transit District (NCTD), the San Diego Metropolitan Transit System (MTS) and SDCRAA have overall authority for the ground transportation systems surrounding SDIA. SANDAG is the metropolitan planning organization responsible for programming transportation improvements and for obtaining Federal and State funding for projects of regional significance. Each of these authorities, in coordination with local, state and national professional transportation organizations has developed guidelines for the analysis of proposed projects, the determination of impacts and mitigation measures, and cost sharing.

The traffic impact analysis for the AMP followed applicable guidelines from the following documents:

- City of San Diego - Development Services Department, California Environmental Quality Act (CEQA) Significance Determination Thresholds, January 2007.

5.3.1.3 Significance Criteria

Significance criteria for analyzing street/roadway segments and intersections from implementation of the AMP as included in the AMP Final EIR are as follows:

- If a street/roadway segment or intersection operates at LOS D or better without the project, and the project causes the LOS to deteriorate to LOS E or LOS F (regardless of the change in delay, speed or volume-to-capacity ratio), then the impact is considered significant.
- If a street/roadway segment, or intersection operates at LOS E or F without the project and the project causes an increase in delay or reduction in speed or volume-to-capacity ratio above the thresholds summarized in Table 5.3-1 then the impact is considered significant. If the LOS remains at E or F and any increase in delay or reduction in speed, or volume-to-capacity ratio is within the allowable threshold summarized in Table 5.3-1 then the impact is not significant.
Table 5.3-1
Traffic Impact Significance Thresholds

<table>
<thead>
<tr>
<th>Level of Service with Project</th>
<th>Allowable Change Due to Project Impacts ¹</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Roadway Segments</td>
</tr>
<tr>
<td></td>
<td>V/C ²</td>
</tr>
<tr>
<td>E</td>
<td>0.02</td>
</tr>
<tr>
<td>F</td>
<td>0.01</td>
</tr>
</tbody>
</table>

¹ If a proposed project’s traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that will restore and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see footnote 2).

² All level of service (LOS) measurements are based upon Highway Capacity Manual (HCM) procedures or peak hour conditions. However, V/C ratios for roadway segments may be estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways and intersections is generally “D” (“C” for undeveloped locations.)

³ V/C = Volume to Capacity ratio

⁴ Speed = Speed measured in miles per hour

⁵ Delay = Average control delay per vehicle measured in seconds for intersections

Source: City of San Diego - Development Services Department, CEQA, Significance Determination Thresholds, January 2007.

Street Segment Significance Criteria
As shown in Table 5.3-1, an impact to street segment operations resulting from the project would be considered significant if:

- The street segment operates at an acceptable LOS, defined as LOS D or better, under the No Project Alternative and the project causes the street segment operations to deteriorate to LOS E or F.
- The street segment operates at LOS E under the No Project Alternative and the project causes the volume to capacity ratio to increase by more than .02.
- The street segment operates at LOS F under the No Project Alternative and the project causes the volume-to-capacity ratio to increase by more than .01.

Intersection Operations Significance Criteria
As shown in Table 5.3-1, an impact to intersection operations resulting from the project would be considered significant if:

- The intersection operates at an acceptable LOS, defined as LOS D or better, under the No Project Alternative and the project causes the intersection operations to deteriorate to LOS E or F.
- The intersection operates at LOS E under the No Project Alternative and the project causes intersection delay to increase by more than 2.0 seconds.
- The intersection operates at LOS F under the No Project Alternative and the project causes intersection delay to increase by more than 1.0 second.
5.3.1.4 Existing Conditions

The following provides an overview of the street segment and intersection operations in the AMP study area at the time the AMP EIR was prepared.

**Existing Street Segment Operations**

Existing street segment volumes and operations are summarized in Table 5-3.11 of the AMP Final EIR and the ADT for street segments in the study area are depicted in Figure 5.3-4 of the AMP Final EIR. All street segments in the study are within jurisdiction of the City of San Diego and several are classified as San Diego region Congestion Management Program (CMP) Arterials. The purpose of the CMP is to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG is the designated Congestion Management Agency for the San Diego region CMP. CMP Arterials are part of the overall CMP system, which includes those roadways that serve the highest level of regional traffic, serve major regional facilities, and provide significant inter-community traffic service and freeway congestion relief. The following street segments in the study area are designated as CMP Arterials:

- North Harbor Drive
- Grape Street
- Hawthorn Street
- Pacific Highway

**Existing Conditions - LOS E**

As shown in Table 5-3.11 of the AMP Final EIR, the following streets segments were determined to operate at LOS E:

- Grape Street between Pacific Highway and Kettner Boulevard
- Washington Street between Kettner Boulevard and San Diego Avenue
- Rosecrans Street between Barnett Avenue and Sports Arena Boulevard

**Existing Conditions - LOS F**

As shown in Table 5-3.11 of the AMP Final EIR, the following streets segments were determined to operate at LOS F:

- North Harbor Drive between Rental Car Road and Laurel Street
- Grape Street between Kettner Boulevard and I-5
- Hawthorn Street between Kettner Boulevard and I-5
- Sassafras Street between Kettner Boulevard and India Street
- India Street between Laurel Street and Palm Street
- India Street between Palm Street and Sassafras Street
- India Street between Sassafras Street and Washington Street
- Rosecrans Street between Nimitz Boulevard and Barnett Avenue

**Existing Intersections**

Figure 5.3-5 of the AMP Final EIR depicts existing intersection geometry for the analysis intersections included in the study area. Existing intersection peak hour turning volumes used for the analysis are shown in Table 5-3.12 of the AMP Final EIR and depict total traffic at each intersection. The existing
intersection operations are summarized in Table 5-3.13 of the AMP Final EIR. All analysis intersections were determined to operate at LOS D or better.

### 5.3.1.5 Impact Analysis

The AMP Final EIR traffic and circulation impact analysis was a comprehensive and thorough evaluation of the ground transportation network in the Airport area. The traffic and circulation analysis identified impacts of various development alternatives for existing (2005), near-term (2010 and 2015) and mid-/long-term or horizon year (2020, 2025, and 2030) conditions. The full analysis and identification of all impacts is included in Section 5.3.5, of the AMP Final EIR. Additional detail of the traffic and circulation impact analysis is included in Appendix D of the AMP Final EIR.

#### Street Segments

Table 5-3.46 of the AMP Final EIR summarizes the street segment operations for each analysis year under the AMP Airport Land Use Plan.

#### Street Segments with Significant Traffic Impacts

The following roadway segments would have potentially significant traffic impacts:

**Year 2015**

- North Harbor Drive between Rental Car Road and Hawthorn Street, which operates at LOS F under both the AMP Airport Land Use Plan and No Project Alternative and experiences an increase in v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
- Grape Street between North Harbor Drive and I-5, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
- Hawthorn Street between North Harbor Drive and Pacific Highway, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
- Hawthorn Street between Pacific Highway and Kettner Boulevard, which increased from LOS D under the No Project Alternative to LOS E under the AMP Airport Land Use Plan.
- Hawthorn Street between Kettner Boulevard and I-5, which operates at LOS F under both the AMP Airport Land Use Plan and No Project Alternative and experiences an increase in v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
- Kettner Boulevard between Washington Street and Sassafras Street, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
- Kettner Boulevard between Sassafras Street and Palm Street, which increased from LOS D under the No Project Alternative to LOS E under the AMP Airport Land Use Plan.
- Laurel Street between North Harbor Drive and Pacific Highway, which increased from LOS D under the No Project Alternative to LOS E under the AMP Airport Land Use Plan.
- Laurel Street between Pacific Highway and Kettner Boulevard, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.
Sassafras Street between Pacific Highway and India Street, which operates at LOS F under both the AMP Airport Land Use Plan and No Project Alternative and experiences an increase in v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.

Washington Street between Kettner Boulevard and San Diego Street, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.

India Street between Laurel Street and Washington Street, which operates at LOS F under both the AMP Airport Land Use Plan and No Project Alternative and experiences an increase in v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.

Rosecrans Avenue between Barnett Avenue and Nimitz Boulevard, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.

Year 2015

- All locations identified in Year 2015 above, except:
  - Hawthorn Street between Kettner Boulevard and I-5, which operates at LOS F under both the AMP Airport Land Use Plan and No Project Alternative but the impact decreased to a level of insignificance due to a decrease in background traffic and shift in regional distribution.
  - Laurel Street between North Harbor Drive and Pacific Highway, which improved from LOS E under the AMP Airport Land Use Plan in 2015 to LOS D under the AMP Airport Land Use Plan in 2030 due to a decrease in background traffic and shift in regional distribution.

- North Harbor Drive between Terminal 1 Access and Rental Car Road, which operates at LOS E and F under both the AMP Airport Land Use Plan and No Project Alternative and experience an increase in the v/c ratio of over 0.01 under the AMP Airport Land Use Plan compared to the No Project Alternative.

- North Harbor Drive between Hawthorn Street and Grape Street, which increased from LOS D under the No Project Alternative to LOS E under the AMP Airport Land Use Plan.

- Kettner Boulevard between Palm Street and Laurel Street, which increased from LOS D under the No Project Alternative to LOS E under the AMP Airport Land Use Plan.

Intersections

Tables 5-3.48 and 5-3.49 of the AMP Final EIR show the intersection turning volumes under the AMP Airport Land Use Plan for each analysis year.

Intersections with Significant Traffic Impacts

The following intersections would have significant traffic impacts:

Year 2015

- Hawthorn Street and North Harbor Drive (AM), which deteriorated to LOS F under the AMP Airport Land Use Plan.

- Laurel Street and Pacific Highway (PM), which operates at LOS E in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 2 seconds under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Washington Street and Pacific Highway NB Ramps (AM), which deteriorated to LOS E under the AMP Airport Land Use Plan.
Year 2030

- Hawthorn Street and North Harbor Drive (AM & PM), which operates at LOS E or F in the AM and PM peak hours under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Laurel Street and Pacific Highway (PM), which operates at LOS E in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 2 seconds under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Grape Street and Pacific Highway (PM), which operates at LOS E in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Grape Street and Kettner Boulevard (PM), which operates at LOS E and F in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Grape Street and I-5 Southbound On-Ramp (PM), which operates at LOS F in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Sassafras Street and Kettner Boulevard (PM), which operates at LOS E and F in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

- Washington Street and Pacific Highway NB Ramps (PM), which operates at LOS E and F in the PM peak hour under both the AMP Airport Land Use Plan and No Project Alternative and would experience an increase in delay greater than 1 second under the AMP Airport Land Use Plan compared to the No Project Alternative.

5.3.1.6 Construction Impacts

Implementation of the AMP improvements would create construction impacts to traffic and circulation from increases in traffic volumes on project area roadways. These impacts would be considered less-than-significant due to their temporary nature. But in order to minimize disruption to travelers and neighbors, SDIA has committed to the following two activities in order to mitigate construction activities on the surrounding environment. These activities are expected to further ameliorate less-than-significant impacts and will be included in the Mitigation, Monitoring and Reporting Program as additional actions taken by the SDCRAA.

1. Establish a Construction Coordination Office within the Ground Transportation Department. This office would operate during the life of the AMP development 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:
2. 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 AMP improvements due to traffic generated by trucks hauling materials and equipment, and construction workers commuting to and from SDIA. The critical issue relating to project construction involves maintenance of traffic in the immediate construction zone, and handling the additional traffic related to transportation of construction materials and crews. No construction traffic would be expected to use residential streets 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 a.m. to 4:00 p.m., or eight to nine truck trips per hour during the a.m. peak hour. Because these impacts are temporary, no 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 a.m. 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 significant impacts to traffic and circulation are expected.

5.3.1.7 Cumulative Impacts

All traffic and circulation analysis presented in the AMP Final EIR was conducted using data from the Regional Transportation Model maintained by SANDAG (excluding airport traffic). SANDAG provided existing and forecast traffic for 2005, 2010, and 2015. This “background” traffic was added to forecasts of SDIA generated traffic associated with the Airport and specific projects alternatives. SANDAG traffic forecasts include traffic associated with all approved plans and projects incorporated in SANDAG’s model.
Traffic forecasts for future years include traffic associated with approved plans/projects included in SANDAG's Series 10 forecasts including but not limited to:

- Naval Training Center/Liberty Station Precise Plan/EIR (January 2000/September 2001)
- North Embarcadero Visionary Plan Final EIR (April 2000)

The Series 10 forecast does not include the following projects, which had not been accepted by the San Diego City Council at the time of the model run. However, the Series 10 forecasts assumed development at these locations based on General Plan Zoning that is assumed to be similar or more intense than land uses assumed in the following EIRs:

- Old Police Headquarters and Park Project Draft EIR (July 2005) or Final EIR (February 2006)
- Centre City Development Corporation (CCDC) Master Plan Draft EIR (July 2005) or Final EIR (January 2006)
- Woodfin Suites Hotel and Port Master Plan Amendment Project Draft EIR (March 2006)

Since SANDAG forecasts account for all approved plans and projects within the region, all traffic estimates used in the study account for cumulative traffic. Therefore, traffic impacts presented in the AMP Final EIR represent cumulative impacts anticipated in the study area relative to evaluation of the AMP. In addition the implementation of the Airport Land Use Plan describe a maximum development scenario accommodating regional growth at SDIA and represent a worst case development impact scenario for SDIA.

5.3.1.8 Mitigation Measures/Other Improvements

All significant impacts resulting from implementation of the AMP are identified in Section 5.3.5 of the AMP Final EIR. For each significant impact, mitigation measures are identified in Section 5.3.8 of the AMP Final EIR.

All alternatives would result in potentially significant impacts to traffic and circulation by 2030. The future airport uses under the AMP Airport Land Use Plan describe a maximum development scenario accommodating regional growth at SDIA and represent a worst case development impact scenario. 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 AMP Final EIR mitigation measures to mitigate the AMP's traffic impacts. While the SDCRAA operates under strict provisions required by certain 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 funding 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.

The AMP Final EIR mitigation measures would reduce traffic impacts to a level of less than significant. However, the roadway segments, intersection, arterial roadways, and freeway ramps and operations are within the legal authority, responsibility and jurisdiction of the City or Caltrans, not SDCRAA. As such, 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. Thus, if these agencies do not implement the mitigation measures identified and adopted by SDCRAA, it is possible that the traffic impacts of the AMP will remain significant after AMP implementation.
Per Section O, Transportation/Circulation and Parking, of the City of San Diego's CEQA Significance Determination Thresholds dated January 2007, traffic mitigation measures are required to reduce the project's direct significant and/or cumulatively considerable traffic impacts. Where the AMP improvements were projected to cause a significant traffic impact, as defined under the CEQA Significance Determination Thresholds, mitigation measures were identified to reduce that level below the applicable threshold. In addition, while not required by CEQA or San Diego's Significance guidelines, as a matter of policy, the AMP Final EIR identifies other traffic improvement measures aimed at restoring traffic caused by general regional growth to LOS D or better. These improvement measures are identified for informational purposes only. Sometimes the mitigation measure aimed at reducing the Project's direct or cumulative impact to less than significant also achieves the effect of restoring traffic to acceptable levels (defined by San Diego as LOS D or better); however, in other instances, additional traffic improvement measures are identified to restore traffic caused by regional growth to acceptable levels (defined by San Diego as LOS D or better). While mitigation measures reduce all impacts of the AMP improvements to a level of less than Significant, in some instances, no practicable traffic improvements were identified to restore traffic caused by general regional growth to LOS D or better. In such instances, because the traffic is not caused by the AMP improvements, but rather by general regional growth, this is not considered a significant and unavoidable impact.

The following identifies the mitigation measures proposed in the AMP Final EIR to mitigated significant impacts on street segments and intersections from implementation of the AMP Airport Land Use Plan.

**AMP Airport Land Use Plan - Mitigation for Significant Street Segment Impacts**

The following mitigation is identified for street segments with potentially significant traffic impacts. Where mitigation to No Project conditions and acceptable LOS conditions (defined by the City of San Diego to be LOS D) differs, separate mitigation measures are identified. Operations after implementation of proposed mitigation to No Project conditions are shown in Table 5-3.100 of the AMP Final EIR and, if necessary, additional improvements to LOS D conditions are shown in Table 5-3.101 of the AMP Final EIR for informational purposes.

**Year 2015**

- **North Harbor Drive between Rental Car Access Road and Laurel Street:**
  - **Mitigation:** Provide 4 additional travel lanes for a total of 10 lanes (5 westbound + 5 eastbound) to mitigate to No Project conditions.
  - **Other Improvements:** A 10-lane Prime configuration (4 additional travel lanes) is not adequate to improve the segment to LOS D or better in 2015 and 2030 and no feasible improvement is available to improve the segment to LOS D conditions due to limited right-of-way available along San Diego Bay.

- **North Harbor Drive between Laurel Street and Hawthorn Street:**
  - **Mitigation:** Provide 4 additional travel lanes for a total of 10 lanes to mitigate to No Project conditions through 2030 and to LOS D in 2015.
  - **Other Improvements:** 10 lanes not adequate to improve the segment to LOS D in 2020 through 2030 and no feasible improvement is available to mitigate to LOS D conditions due to limited right-of-way available along San Diego Bay.

- **Grape Street between North Harbor Drive and Pacific Highway:**
  - **Mitigation:** Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions through 2030.
  - **Other Improvements:** This improvement would also improve the street to LOS D through 2030.
Grape Street between Pacific Highway and Kettner Boulevard:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions through 2030.
- **Other Improvements**: Two additional lanes for 5 lanes total required to improve the segment to LOS D through 2025.
- **Other Improvements**: Three additional lanes for 6 lanes total required to improve the segment to LOS C in 2030.

Grape Street between Kettner Boulevard and I-5:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions.
- **Other Improvements**: 6-lane Major configuration required to improve the segment to LOS D through 2025.
- **Other Improvements**: Reclassification to 6-lane Prime is required to improve the segment to LOS D in 2030.

Hawthorn Street between North Harbor Drive and Pacific Highway:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions and LOS D through 2030.

Hawthorn Street between Pacific Highway and Kettner Boulevard:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions.
- **Other Improvements**: This improvement would also improve the segment to LOS D or better through 2030.

Hawthorn Street between Kettner Boulevard and I-5:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes which would require prohibiting parking on one side to mitigate to No Project conditions in 2015.
- **Other Improvements**: 5 lanes required to improve the segment to LOS D or better in 2015.

Kettner Boulevard between Washington Street and Sassafras Street:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes to mitigate to No Project conditions and improve the segment LOS D through 2030.

Kettner Boulevard between Sassafras Street and Palm Street:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes to mitigate to No Project conditions.
- **Other Improvements**: This improvement would also improve the segment to LOS D through 2030.

Laurel Street between North Harbor Drive and Pacific Highway:
- **Mitigation**: Provide one additional travel lane for a total of 5 lanes to mitigate to No Project conditions.
- **Other Improvements**: This improvement would also improve the segment to LOS D through 2025.
- **Other Improvements**: In 2030 background traffic decreased and no significant impacts were witnessed.
Laurel Street between Pacific Highway and Kettner Boulevard:
- **Mitigation**: Reclassify from 4-Lane Collector to 4-Lane Major Arterial to mitigate to No Project conditions.
- **Other Improvements**: This improvement would also improve the segment LOS D through 2025.
- **Other Improvements**: One additional lane (5-Lane Major) required to improve the segment to LOS D in 2030.

Sassafras Street between Pacific Highway and Kettner Boulevard:
- **Mitigation**: Provide one additional eastbound travel lane to have two westbound and two eastbound travel lanes to mitigate to No Project conditions and to LOS C and B through 2030.

Sassafras Street between Kettner Boulevard and India Street:
- **Mitigation**: Provide one additional eastbound travel lane to have one westbound and two eastbound travel lanes to mitigate to No Project conditions.
- **Other Improvements**: Two additional lanes for 4 lanes total required to improve the segment to LOS D or better until 2030.

Washington Street between Kettner Boulevard and San Diego Street:
- **Mitigation**: Reclassify to 4-lane Major to mitigate to No Project conditions.
- **Other Improvements**: The proposed implementation will improve the segment to LOS D through 2030.

India Street between Laurel Street and Palm Street:
- **Mitigation**: Provide one additional travel lane for a total of 3 lanes one-way which would require prohibiting on-street parking to mitigate to No Project conditions.
- **Other Improvements**: Two additional lanes for 4 lanes total required to improve the segment to LOS D through 2030.

India Street between Palm Street and Sassafras Street:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes one-way which would require prohibiting on-street parking to mitigate to No Project conditions.
- **Other Improvements**: This improvement would also improve the segment to LOS D in 2020 and 2025.
- **Other Improvements**: Reclassify to 4-lane Major to improve the segment to LOS D through 2030.

India Street between Sassafras Street and Washington Street:
- **Mitigation**: Provide one additional travel lane for a total of 4 lanes one-way which would require prohibiting on-street parking to mitigate to No Project conditions.
- **Other Improvements**: Reclassify to 4-lane Major to improve the segment to LOS D or better until 2030.

Rosecrans Avenue between Barnett and Sports Arena:
- **Mitigation**: Reclassify from 6-Lane Major Arterial to 6-Lane Prime Arterial to mitigate to No Project conditions.
Other Improvements: The proposed improvements improve the segment to LOS C through 2030.

Rosecrans Avenue between Quimby and Barnett:
- Mitigation: Provide one additional lane for a total of 6 lanes to mitigate to No Project conditions.
- Other Improvements: The proposed improvements improve the segment to LOS D through 2030. Sufficient right of way along portions of Rosecrans Avenue may not be available to add a sixth lane, as such it is unknown at this time whether mitigation is feasible.

Rosecrans between Nimitz and Quimby:
- Mitigation: Provide one additional lane for a total of 5 lanes to mitigate to No Project conditions.
- Other Improvements: 6 lanes are required to improve the segment to LOS D or better through 2030.

Year 2030
- All mitigation identified in Year 2015, except Laurel Street between North Harbor Drive and Pacific Highway which improved to LOS D under the Land Use Plan.
- North Harbor Drive between Terminal 1 Access and Winship Lane:
  - Mitigation: Provide 2 additional travel lanes for a total of 10 lanes to mitigate to No Project conditions.
  - Other Improvements: The proposed improvement would also improve the segment to LOS D through 2030.
- North Harbor Drive between Winship Lane and Rental Car Access Road:
  - Mitigation: Provide 2 additional travel lanes for a total of 10 lanes to mitigate to No Project conditions.
  - Other Improvements: The proposed improvement would also improve the segment to LOS D through 2030.
- North Harbor Drive between Hawthorn Street and Grape Street:
  - Mitigation: Provide one additional lane for a total of 7 lanes to mitigate to No Project conditions.
  - Other Improvements: The proposed improvement would also improve the segment to LOS D through 2030.

AMP Airport Land Use Plan - Mitigation for Significant Intersection Impacts
The following mitigation is identified for intersections with potentially significant traffic impacts. Where mitigation to No Project conditions and improvements to acceptable LOS D conditions (defined by the City of San Diego to be LOS D) differs, separate mitigation measures and improvements are identified. Operations after implementation of proposed mitigation to No Project conditions are shown in Table 5-3.114 of the AMP Final EIR and, if necessary, additional intersection improvements to LOS D or better conditions are shown in Table 5-3.115 of the AMP Final EIR for informational purposes only.
Year 2015

- Hawthorn Street and North Harbor Drive (AM & PM): Restripe the westbound left turn lane to a shared left and right to mitigate to No Project conditions. This improvement would also improve the intersection to LOS C in the AM and D in the PM peak hours.
- Laurel Street and Pacific Highway (PM):
  - Mitigation: Provide southbound right turn overlap to mitigate to No Project conditions.
  - Other Improvements: This improvement would also improve the intersection to LOS D.
- Washington Street and Pacific Highway NB Ramps (AM & PM):
  - Mitigation: Optimize the signal timing by changing the cycle length to 80 seconds to mitigate to No Project conditions.
  - Other Improvements: This improvement would also improve the intersection to LOS D.

Year 2030

- Hawthorn Street and North Harbor Drive (AM & PM):
  - Mitigation: Restripe westbound left turn lane to a shared left and right to mitigate to No Project conditions.
  - Other Improvements: Add an exclusive westbound left turn lane to improve the intersection to LOS E.
- Laurel Street and Pacific Highway (PM):
  - Mitigation: Provide southbound right turn overlap to mitigate to No Project conditions.
  - Other Improvements: Optimize signal timing (cycle length = 120 seconds or less) to improve the intersection to LOS D.
- Grape Street and Pacific Highway (PM):
  - Mitigation: Add an exclusive northbound right turn lane to mitigate to No Project conditions.
  - Other Improvements: This improvement would also improve the intersection to LOS D conditions.
- Grape Street and Kettner Boulevard (PM):
  - Mitigation: Add exclusive southbound left turn lane to mitigate to No Project conditions.
  - Other Improvements: Add a fourth eastbound through lane to improve the intersection to LOS B.
- Sassafras Street and Kettner Boulevard (PM):
  - Mitigation: Add an exclusive southbound right turn lane to mitigate to No Project conditions.
  - Other Improvements: This improvement would also improve the intersection to LOS C conditions.
- Grape Street and I-5 Southbound On-Ramp (PM):
  - Other Improvements: Add another exclusive eastbound right turn lane to improve the intersection to LOS D and would result in a 3-lane on-ramp.
- Washington Street and Pacific Highway NB Ramps (AM & PM):
  - Mitigation: Optimize signal timing (increase cycle length to 90) to mitigate to No Project conditions.
Other Improvements: This improvement would also improve the intersection to LOS D conditions.

5.3.1.9 Level of Significance after Mitigation Measures

Per Section O, Transportation/Circulation and Parking, of the City of San Diego's CEQA Significance Determination Thresholds dated January 2007 (described in Section 5.3.3 of the AMP Final EIR), mitigation measures have been identified to mitigate the project's direct significant and/or cumulatively considerable traffic impacts. For informational purposes only additional actions that would be necessary to improve the LOS to D or better were also provided.

Mitigation measures were identified for each potentially significant impact per the City's guidelines. After mitigation, each potentially significant impact caused by the implementation of the AMP would be reduced to less than significant. In addition, when possible, additional actions were identified to improve the level of service of the transportation facility to within the City's acceptable guidelines, LOS D or better, even though the AMP improvements would not cause the traffic condition. In many instances the traffic improvement mitigation measures 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 practicable traffic improvement measure could be identified to improve the transportation facility to LOS D or better. However, because CEQA only requires mitigation for impacts caused by the project, the lack of traffic improvement measures in such instances is not considered a significant impact. As a result, after mitigation, all traffic related impacts are reduced to less than significant.

Although the mitigation measures identified would reduce traffic impacts to a 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, or the Port District, not SDCRAA. As such, 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 AMP improvements would remain significant after Project implementation.

5.3.2 Supplemental Analysis

The general approach and methodology used in this supplemental traffic and circulation analysis is the same as that used in AMP Final EIR, but the AMP project assumptions have been amended with traffic and circulation changes associated with implementation of replacement of the Solar Turbines employee parking at SDIA. This supplemental analysis includes an assessment of traffic conditions and associated traffic impacts resulting from the AMP Airport Land Use Plan (which now includes the traffic resulting from implementation of the Solar Turbines Replacement Parking Lot) for future years, near-term (2015) and horizon year (2030) conditions. The supplemental traffic analysis was conducted for the AM and PM commute peak hours and average daily traffic conditions consistent with the analysis periods used for the AMP Final EIR. For each future analysis year, traffic conditions for the AMP were based on the same traffic volumes identified in the AMP Final EIR; however, with adjustments to volumes based on the redistribution of traffic associated with the relocation of the Solar Turbines Parking Lot.

The regulatory framework and significance criteria used in this supplemental traffic and circulation analysis remain the same as in the AMP Final EIR. The following provides a supplemental analysis specific to potential traffic and circulation impacts associated with relocation of existing Solar Turbines employee parking.

5.3.2.1 Supplemental Study Area

The study area for the traffic and circulation analysis for this Supplemental EIR is a subset of the full study area identified in the AMP Final EIR that includes only those roadway segments and intersections
that would experience a change in traffic activity as a result of redistributing traffic from the existing Solar Turbines Parking Lot to the future proposed replacement parking lot. It is anticipated that traffic flows on the other roadway segments and intersections studied in the AMP Final EIR would not be affected as a result of the redistribution of the Solar Turbines traffic and have, therefore, been excluded from the sub area studied for this Supplemental EIR. As shown in Figure 5.3-1, the study area extends to the west to include the North Harbor Drive/Rental Car Road intersection, extends to the east to include the Pacific Highway/Laurel Street intersection, extends to the south to include North Harbor Drive/Laurel Street intersection, and includes to the north to include the existing and proposed replacement site for the Solar Turbines Employee Parking Lot. This study area also includes specific street segments relevant to the traffic and circulation impact analysis for the proposed Solar Turbines Replacement Parking Lot.
Figure 5.3-1
Traffic and Circulation Supplemental Analysis Study Area
Not to Scale

Source: Ricondo & Associates Inc., September 2010
Prepared By: CDM, October, 2010
5.3.2.2 AMP Project (with Replacement of Solar Turbines Employee Parking Lot)

This supplemental analysis relates specifically to the future need to relocate the Solar Turbines Employee Parking Lot for construction of the Terminal Link Roadway, which is a component of the Northside Improvements. As shown in Figure 4-2, the Terminal Link Roadway is planned to be constructed through the area currently occupied by the Solar Turbines Employee Parking Lot (which is approximately 3.2 acres in total size). Figure 4-2 also shows the preferred replacement location for the Solar Turbines employee parking lot which is located at the eastern end of the former Teledyne Ryan-Industries site. Access to the replacement parking lot would be from North Harbor Drive at the east end of the former Teledyne Ryan-Industries site.

It is anticipated that the replacement employee parking lot would generally be of the same size and serve the same purpose as currently used by Solar Turbines Industries. Furthermore, because the entrance to the replacement lot is located approximately 450 feet from the closest entrance to the existing lot on Laurel Street, it is anticipated that the traffic patterns outside of the concentrated sub-area studied for this Supplemental EIR would remain unchanged and that changes in traffic flow would be limited to those roadways and intersections in close proximity to the existing and proposed parking lot sites that are depicted in Figure 5.3.2.

5.3.2.3 Traffic Counts Associated with Solar Turbines Parking

All existing and future traffic volume forecasts identified in the AMP Final EIR are still considered valid for this supplemental traffic and circulation analysis. This includes the airport traffic patterns, the street segment average daily traffic volumes, and AM/PM peak turning movements for study area intersections. The relevant AMP Final EIR traffic volumes used for the supplemental traffic and circulation analysis are included below.

Based on information supplied by Solar Turbines Industries, their employee parking lot located on SDIA property contains 550 total spaces. Although the lot is not always full due to rotating shifts, it is considered fully used (at the same level) for all future years for the purpose of this analysis. Of the 550 spaces, 60 percent (or 330 spaces) are used by shift employees that arrive to and depart from the plant during three off-peak hour shifts (6:00 a.m. to 2:30 p.m., 2:30 p.m. to 11:00 p.m., and 11:00 p.m. to 6:00 a.m.). The remaining 40 percent (or 220 spaces) are used by office employees who work from 8:00 a.m. to 5:00 p.m. and are included in this analysis as peak hour activity.

The overall volume of traffic generated by Solar Turbines Industries is included in the Average Daily Traffic (ADT) and Intersection Counts in the AMP Final EIR. Changes in the use of street segments or intersections associated with relocation of existing parking to the Solar Turbines Replacement Parking Lot are identified in the following section.

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18 The distribution of Solar Turbines employee traffic during the day was provided by Solar Turbines Industries, September 2010.
5.3.2.4 Supplemental Impact Analysis

The traffic and circulation impact analysis for relocation of the Solar Turbines employee parking area focused on potential impacts to the street segments and intersections included in the study area. As shown in Figure 5.3-2, two street segments and two intersections were included in the impact analysis. These include the following:

- Street Segments: North Harbor Drive (from Rental Car Road to Laurel Street) and Laurel Street (from North Harbor Drive to Pacific Highway).
- Intersections: No. 10 - North Harbor Drive/Laurel Street, and No. 13 - Laurel Street/Pacific Highway. Numerical designations for the intersections are consistent with the designations from the AMP Final EIR.

Street Segment Impact Analysis

Based on the ADT volumes generated by Solar Turbines employees who use their current employee lot on SDIA property, an analysis was conducted to determine the existing travel routes used by employees accessing the existing parking lots, the future routes employees would use to get to the proposed location, and the resultant change in traffic movements that would occur on the two street segments listed above as a result of the redistribution of these volumes. These changes were incorporated into the traffic and circulation totals of the AMP Final EIR.

Table 5.3-2 summarizes the street segment operations for each analysis year under the AMP implementation with the Replacement Solar Turbines Employee Parking Lot. Table 5.3-3 compares the street segment volumes-to-capacity (v/c) ratios under AMP implementation with the Replacement Solar Turbines Employee Parking Lot against the No Project Alternative to identify traffic impacts in accordance with the impact methodology used in the AMP Final EIR. The following roadway segments that were previously identified in the AMP Final EIR as having potentially significant impacts would still have potentially significant traffic impacts with the replacement parking.
Figure 5.3-2
Study Area Street Segments and Intersections
Supplemental Environmental Impact Report

Source: Ricondo & Associates Inc., September 2010
Prepared By: CDM, September, 2010
### Table 5.3-2

**2015-2030 Street Segment Operations – AMP with Replacement Solar Turbines Employee Parking Lot**

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Segment</th>
<th>Classification</th>
<th>Lanes</th>
<th>LOS(^1) E-ADT(^2)</th>
<th>2005 (Existing)</th>
<th>2015</th>
<th>2030</th>
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<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Tot ADT</td>
<td>Tot ADT</td>
<td>Tot ADT</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,000s</td>
<td>1,000s</td>
<td>V/C</td>
</tr>
<tr>
<td>North Harbor Drive</td>
<td>Rental Car - Laurel</td>
<td>6-Lane Prime</td>
<td>6D</td>
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<td>73.9</td>
<td>1.33</td>
<td>E</td>
</tr>
<tr>
<td>Laurel Street</td>
<td>Harbor - Pacific</td>
<td>4-Lane Major</td>
<td>4L</td>
<td>40.0</td>
<td>26.4</td>
<td>0.66</td>
<td>C</td>
</tr>
</tbody>
</table>

\(^1\) LOS = Level of Service  
\(^2\) ADT = Average Daily Traffic  


### Table 5.3-3

**2015-2030 Street Segment Impacts – AMP with Replacement Solar Turbines Employee Parking Lot**

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Segment</th>
<th>2015</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No Proj</td>
<td>No Proj</td>
</tr>
<tr>
<td></td>
<td></td>
<td>V/C(^1)</td>
<td>LOS(^2)</td>
</tr>
<tr>
<td>North Harbor Drive</td>
<td>Rental Car - Laurel</td>
<td>1.57</td>
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</tr>
<tr>
<td>Laurel Street</td>
<td>Harbor - Pacific</td>
<td>0.82</td>
<td>D</td>
</tr>
</tbody>
</table>

\(^1\) V/C = Volume to Capacity Ratio  
\(^2\) LOS = Level of Service  

Street Segments with Previously Identified Significant Traffic Impacts

Years 2015 and 2030

As identified in the AMP Final EIR, North Harbor Drive between Rental Car Road and Laurel Street was shown to operate at LOS F in 2005 (i.e., Existing Conditions). The AMP Final EIR also showed that for 2015 and 2030, this roadway segment would experience an increase in the v/c ratio of over 0.01 under AMP implementation (see Table 5-3.47 of the AMP Final EIR). As shown in Table 5.3-3, it is anticipated that AMP implementation with the Replacement Solar Turbines Employee Parking Lot would continue to produce a significance impact along this section of North Harbor Drive based on the analysis prepared for this Supplemental EIR.

As identified in the AMP Final EIR, Laurel Street between North Harbor Drive and Pacific Highway was shown to operate at LOS E in 2015 and then improve to LOS D by 2030 (see Table 5-3.47 of the AMP Final EIR). As shown in Table 5.3-3, the analysis prepared for this Supplemental EIR also indicates that AMP implementation with the Replacement Solar Turbines Employee Parking Lot would produce a significance impact (LOS E) along this section of North Harbor Drive in 2015 and improve to LOS D in 2030.

Intersection Impact Analysis

Table 5.3-4 and Table 5.3-5 show the intersection turning movement volumes under AMP implementation with the Replacement Solar Turbines Employee Parking Lot for years 2015 and 2030. Table 5.3-6 shows the resulting intersection operations. Future intersection lane configurations are shown in Figure 5.3-2.

Table 5.3-7 compares the intersection delay under AMP implementation with the Replacement Solar Turbines Employee Parking Lot against the No Project Alternative to identify intersection impacts in accordance with the impact methodology used in the AMP Final EIR. Based on the significance criteria, the following intersection that was previously identified in the AMP Final EIR as having potentially significant impacts would still have potentially significant traffic impacts with the replacement parking:

Intersection with Previously Identified Significant Traffic Impacts

Years 2015 and 2030

As identified in the AMP Final EIR, the Laurel Street/Pacific Highway intersection was shown to operate at LOS C in 2005 (i.e., Existing Conditions). The AMP Final EIR also showed that for 2015 and 2030, this intersection would experience an increase in delay of over 2 seconds during the PM peak hour under AMP implementation (see Table 5-3.51 of the AMP Final EIR). As shown in Table 5.3-7, it is anticipated that AMP implementation with the Replacement Solar Turbines Employee Parking Lot would continue to produce a significant impact at the Laurel Street/Pacific Highway intersection during the PM peak hour.

5.3.2.5 Construction Impacts

Development of the Solar Turbines Replacement Parking Lot would result in temporary traffic increases on some streets in the nearby area due to construction worker travel and materials delivery and haul trips. The streets most likely to be affected by construction traffic would likely include North Harbor Drive, Laurel Street, nearby I-5 ramps, and possibly Pacific Highway.

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. Because these impacts are temporary, no significant impacts are anticipated. Further,
implementation of plans and rules outlined in 5.3.1.6 above would minimize disruption to area roadway travelers during construction activities.

5.3.2.6 Mitigation Measures/Other Improvements

This Supplement EIR analysis for traffic and circulation found no new significant impact for the AMP with the Replacement Solar Turbines Employee Parking Lot other than that which was identified in the AMP Final EIR. Specifically, the only significant impacts identified in this supplemental analysis are related to the North Harbor Drive street segment between Rental Car Road and Laurel Street, the Laurel Street segment between North Harbor Drive and Pacific Highway, and the Laurel Street/Pacific Highway intersection. The mitigation measures and other improvement for these street segments and intersection have already been identified in Sections 5.3.8.1 and 5.3.8.2, respectively, of the AMP Final EIR (see also Section 5.3.1.8 above) and would be applicable to impacts associated with the AMP with the Replacement Solar Turbines Employee Parking Lot. No additional significant impacts were identified in this Supplemental EIR analysis and therefore, no additional mitigation measures or other improvements other than those identified in the AMP Final EIR are necessary.

5.3.2.7 Level of Significance after Mitigation Measures

The level of significance after mitigation measures for the North Harbor Drive street segment (between Rental Car Road-Laurel Street), the Laurel Street segment (between North Harbor Drive and Pacific Highway), and the Laurel Street/Pacific Highway intersection have already been identified in Sections 5.3.8.1 and 5.3.8.2, respectively, of the AMP Final EIR. All other land use changes due to the AMP Project (with the Replacement Solar Turbines Employee Parking Lot) are less than significant; therefore, additional mitigation is not required.

5.3.3 Conclusions

As discussed above, the proposed site for replacement of the Solar Turbines Parking Area would not result in any new significant impacts to traffic and circulation movements other than what was identified in the AMP Final EIR. The significant impact to the North Harbor Drive street segment (between Rental Car Road and Laurel Street), the Laurel Street segment (between North Harbor Drive and Pacific Highway), and the Laurel Street/Pacific Highway intersection was previously identified in the AMP Final EIR as well as in this Supplemental EIR. Because the mitigation measures for the North Harbor Drive street segment, the Laurel Street segment, and the Laurel Street/Pacific Highway intersection have already been identified in the AMP Final EIR, no additional mitigation measures resulting from the Supplemental EIR are warranted.
### Table 5.3-4

2015 Intersection Turning Volumes – AMP with Replacement Solar Turbines Employee Parking Lot

<table>
<thead>
<tr>
<th>Intersection Number</th>
<th>Intersection Name</th>
<th>NBL ¹</th>
<th>NBT</th>
<th>NBR</th>
<th>SBL</th>
<th>SBT</th>
<th>SBR</th>
<th>EBL</th>
<th>EBT</th>
<th>EBR</th>
<th>WBL</th>
<th>WBT</th>
<th>WBR</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Laurel St./N. Harbor Dr.</td>
<td>AM</td>
<td>0</td>
<td>0</td>
<td>26</td>
<td>4</td>
<td>492</td>
<td>1,362</td>
<td>0</td>
<td>0</td>
<td>2,256</td>
<td>15</td>
<td>4,155</td>
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</tr>
<tr>
<td></td>
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<td>52</td>
<td>0</td>
<td>11</td>
<td>1,270</td>
<td>2,348</td>
<td>0</td>
<td>0</td>
<td>1,999</td>
<td>102</td>
<td>5,782</td>
</tr>
<tr>
<td>13</td>
<td>Laurel St./Pacific Highway</td>
<td>AM</td>
<td>41</td>
<td>409</td>
<td>101</td>
<td>97</td>
<td>321</td>
<td>524</td>
<td>115</td>
<td>613</td>
<td>2</td>
<td>51</td>
<td>848</td>
<td>69</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>131</td>
<td>726</td>
<td>171</td>
<td>152</td>
<td>541</td>
<td>454</td>
<td>527</td>
<td>856</td>
<td>74</td>
<td>56</td>
<td>965</td>
<td>85</td>
</tr>
</tbody>
</table>

¹ NB, SB, EB, WB = Northbound, Southbound, Eastbound & Westbound; L = left turn, T = through, R = right turn


### Table 5.3-5

2030 Intersection Turning Volumes – AMP with Replacement Solar Turbines Employee Parking Lot

<table>
<thead>
<tr>
<th>Intersection Number</th>
<th>Intersection Name</th>
<th>NBL ¹</th>
<th>NBT</th>
<th>NBR</th>
<th>SBL</th>
<th>SBT</th>
<th>SBR</th>
<th>EBL</th>
<th>EBT</th>
<th>EBR</th>
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<th>WBT</th>
<th>WBR</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Laurel St./N. Harbor Dr.</td>
<td>AM</td>
<td>0</td>
<td>0</td>
<td>47</td>
<td>0</td>
<td>3</td>
<td>519</td>
<td>1,563</td>
<td>0</td>
<td>0</td>
<td>2,704</td>
<td>24</td>
<td>4,830</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>0</td>
<td>0</td>
<td>25</td>
<td>0</td>
<td>7</td>
<td>1,319</td>
<td>2,600</td>
<td>0</td>
<td>0</td>
<td>2,391</td>
<td>126</td>
<td>6,468</td>
</tr>
<tr>
<td>13</td>
<td>Laurel St./Pacific Highway</td>
<td>AM</td>
<td>42</td>
<td>453</td>
<td>114</td>
<td>71</td>
<td>256</td>
<td>451</td>
<td>127</td>
<td>538</td>
<td>1</td>
<td>81</td>
<td>1,045</td>
<td>106</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>136</td>
<td>771</td>
<td>183</td>
<td>109</td>
<td>417</td>
<td>370</td>
<td>399</td>
<td>721</td>
<td>52</td>
<td>90</td>
<td>1,254</td>
<td>131</td>
</tr>
</tbody>
</table>

¹ NB, SB, EB, WB = Northbound, Southbound, Eastbound & Westbound; L = left turn, T = through, R = right turn

### Table 5.3-6

**2015-2030 Peak Hour Intersection Operations — AMP with Replacement Solar Turbines Employee Parking Lot**

<table>
<thead>
<tr>
<th>Intersection Number</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Year 2005</th>
<th>Year 2015</th>
<th>Year 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Delay (Sec.)</td>
<td>LOS²</td>
<td>Delay (Sec.)</td>
</tr>
<tr>
<td>10</td>
<td>Laurel Street/ North Harbor Drive</td>
<td>AM</td>
<td>10.6</td>
<td>B</td>
<td>10.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>14.8</td>
<td>B</td>
<td>19.4</td>
</tr>
<tr>
<td>13</td>
<td>Laurel Street/ Pacific Highway</td>
<td>AM</td>
<td>33.0</td>
<td>C</td>
<td>36.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>34.0</td>
<td>C</td>
<td>68.7</td>
</tr>
</tbody>
</table>

¹ (Sec.) = Seconds  
² LOS = Level of Service

**Source:** AMP Final EIR, April 2008; amended by Ricondo & Associates, Inc., 2010.

### Table 5.3-7

**2015-2030 Peak Hour Intersection Impacts — AMP with Replacement Solar Turbines Employee Parking Lot**

<table>
<thead>
<tr>
<th>Intersection Number</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Year 2015</th>
<th>Year 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>No.Proj. Delay (Sec.)</td>
<td>Project Delay (Sec.)</td>
</tr>
<tr>
<td>10</td>
<td>Laurel Street/ North Harbor Drive</td>
<td>AM</td>
<td>10.1</td>
<td>10.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>16.3</td>
<td>19.4</td>
</tr>
<tr>
<td>13</td>
<td>Laurel Street/ Pacific Highway</td>
<td>AM</td>
<td>33.7</td>
<td>36.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>62.4</td>
<td>68.7</td>
</tr>
</tbody>
</table>

¹ (Sec.) = Seconds 

**Source:** AMP Final EIR, April 2008; amended by Ricondo & Associates, Inc., 2010.
5.4 Utilities

This section addresses the potential impacts associated with utilities improvements for the Proposed Project. The following provides a summary of the utilities analyses in the AMP Final EIR that relate to the proposed Northside Improvements, a supplemental analysis specific to the utilities associated with the Proposed Project based on more detailed information for the Northside Improvements, and conclusions regarding whether the proposed Northside Improvements would result in any significant impacts related to utilities and whether any new or modified mitigation measures are warranted.

The discussion below focuses on utilities relating to electrical service, natural gas, aircraft hydrant fueling, telecommunications, water, sanitary sewer, and storm drain. As discussed in Section XVI, Utilities and Service Systems, and Section VIII, Hydrology and Water Quality, of the AMP Draft Supplemental EIR NOP Initial Study (see Appendix A of this Supplemental EIR), the AMP Final EIR analysis of impacts and conclusions of less than significant impact related to these utilities are still applicable to the proposed Northside Improvements. Those sections of the AMP Final EIR address the aforementioned utilities both in terms of operational impacts associated with connecting or improving existing utilities to serve the uses proposed under the AMP and in terms of construction-related impacts associated with the development of the necessary utilities improvements. Regarding the latter, construction impacts are also addressed within the air quality, noise, and traffic sections of the AMP Final EIR. The AMP Final EIR analyses of such construction impacts, as related to the Proposed Project, are acknowledged in the AMP Draft Supplemental EIR NOP Initial Study - see Sections III, Air Quality, XI, Noise, and XV, Transportation/Traffic. As further described below, additional information has been developed subsequent to completion of the AMP Final EIR with regard to the conceptual layout of each utility system within the Northside area, which is the basis of the supplemental analysis presented herein.

Additional discussion and analysis of Project-specific utilities impacts are presented below; however, as described in Section 5.1 of this Supplemental EIR, the analysis and conclusions related to cumulative impacts in the AMP Final EIR are considered to be valid and applicable to the proposed Northside Improvements, and no additional discussion or analysis of cumulative impacts with respect to utilities is warranted or included herein.

5.4.1 Summary of Relevant Analysis in Airport Master Plan Final EIR

Section 5.11, Utilities and Service Systems, of the AMP Final EIR addresses most of the utilities associated with the AMP, including for uses proposed in the Northside area, while Section 5.6, Hydrology and Water Quality, addresses storm drain impacts. Sections 5.5, Air Quality, 5.1, Noise, and 5.3, Transportation/Traffic, of the AMP Final EIR include discussions of construction-related impacts, which are relevant to evaluation of the Proposed Project. The following provides a summary of those sections of the AMP Final EIR as related to the currently proposed Northside Improvements.

5.4.1.1 General Approach and Methodology

The primary focus of the utilities analysis is on the capacities and capabilities of existing public utilities and service systems and examines how the AMP improvements would affect them. The focus of the construction analysis is on temporary air quality, noise, and traffic impacts that would occur during the construction/placement of the utilities improvements.

Water service demand was assessed using the water demand factors established by the City of San Diego Water Department, which provides water service to SDIA. Water supply availability was assessed in compliance with California Water Code requirements in a City of San Diego-prepared Water Supply Assessment, which was incorporated into the AMP Final EIR by reference. The Water Supply Assessment addressed the demand estimates for the AMP in comparison to anticipated

Other utility providers’ facilities were identified through review of maps, available studies, and other documents; field reconnaissance; and communications with personnel at San Diego Gas and Electric Company (SDG&E), City of San Diego and SDIA. Potential impacts to public utilities and service systems were evaluated by (a) assessing the potential for the AMP improvements to increase demand and (b) comparing the ability of the service provider/public facility to serve the AMP developments and accommodate the associated increase in demand, and (c) addressing whether existing utility lines would need to be relocated or otherwise directly affected by construction/operation of project elements.

The potential hydrology and water quality implications of the AMP were determined by reviewing the Municipal Stormwater Permit Annual Report (January 2006) and applying basic hydrology and water quality engineering principals to assess potential impacts.

With regard to construction impacts, the potential impacts to air quality were evaluated in the AMP Final EIR by using appropriate and up-to-date analytical methods and computer models. Consistent with CEQA guidelines, the analyses were comprised of an emissions inventory and dispersion modeling of existing (i.e., baseline) and future-year conditions. The results were then compared to applicable air quality standards and other CEQA criteria to determine the significance of the potential impacts. For the evaluation of construction noise impacts, the AMP Final EIR considered the proximity of noise sensitive uses, such as homes, to construction areas and estimated a “worst-case” construction noise level by combining the individual equipment noise levels within a typical mix of construction equipment. With respect to construction traffic impacts, the AMP Final EIR acknowledged the temporary and localized nature of such impacts, which are anticipated to be less than significant, and delineated a number of measures that would serve to reduce such impacts.

5.4.1.2 Regulatory Framework

**Electrical Service**

The Federal Energy Regulatory Commission (FERC) regulates rates for wholesale electric power sales of electricity and transmission in interstate commerce for investor-owned electric utilities, power marketers, power pools, power exchanges, and Regional Transmission Operators. FERC does not regulate the physical construction of generation, transmission, or distribution facilities. The California Public Utilities Commission (CPUC) regulates electrical rates, distribution, and services.

**Natural Gas**

The FERC regulates prices, services, and the construction of the interstate natural gas pipelines that serve California, while the CPUC regulates intrastate and local natural gas distribution facilities and services, natural gas procurement, pipelines, as well as production and gathering. In addition, regulations related to natural gas services at the local level include the California Building Code, the California Health and Safety Code, the California Fire Code and their associated implementing ordinances at the County and City levels.

**Water Service**

At the federal level, the primary regulations relating to water services are associated with water quality. These laws and regulations include the Clean Water Act (CWA), the goal of which is pollution prevention, and the Safe Drinking Water Act (SDWA). The latter, enacted by Congress in 1974 and amended in 1986 and 1996, requires protection of drinking water and its source lakes, reservoirs, springs, and groundwater wells. The SDWA divides the responsibility of ensuring safe drinking water among the U.S. EPA, states, and local service providers.
At the state level there are two agencies that oversee water services. The first is the State Water Resources Control Board (including its Regional Water Quality Control Boards), which is responsible for the enforcement of the Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code). The Porter-Cologne Act deals with the potential discharges into water bodies that could result in a negative impact to water quality.

The second agency is the Department of Water Resources (DWR), whose mission is the overall management of California's water resources. The regulations overseen by DWR regarding water service availability include the Urban Water Management Planning Act, and those sections of the California Water Code added/amended by Senate Bills (SBs) 610 and 221. The California Act, adopted in 1983, requires all urban water suppliers within the state to prepare an UWMP and update them every five years.

San Diego's arid climate and the fact that the majority of the region's water is imported, results in a limited water supply and availability. The drought cycles have resulted in a water conservation program throughout the City and region. Pursuant to San Diego Municipal Code Section 147.04, all buildings, prior to a change in ownership, are required to be certified as having water-conserving plumbing fixtures in place. All residential, commercial, and industrial water customers who receive water from the City of San Diego Water Department Public Utilities Department are affected by this ordinance.

Recycled water use in the City of San Diego is regulated by Ordinance 0-17327 ("Mandatory Reuse Ordinance") adopted by the San Diego City Council on July 24, 1989. This ordinance specifies that "recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment."

**Storm Drain**

The Clean Water Act: The discharge of any pollutant to navigable water is governed by the Federal Water Pollution Control Act (referred to as the Clean Water Act or CWA) of 1972 and its subparts, which include the National Pollutant Discharge Elimination System (NPDES). More recently, the NPDES was further strengthened by the Water Quality Act (WQA) of 1987, which included three provisions addressing stormwater discharges. Inside this legislation, five types of stormwater discharges were identified and subjected to NPDES permits, including discharges associated with construction, industrial, and municipal activity.

**Total Maximum Daily Load Designation:** The Total Maximum Daily Load (TMDL) program, established under Section 303(d) of the Clean Water Act, identifies and attempts to restore waters that do not meet water quality standards, even though the discharges received are in compliance with existing pollution controls. The TMDL is the maximum amount of pollutants that a waterbody can accept and still meet water quality standards. EPA has established regulations requiring that NPDES permits be revised to be consistent with any approved TMDL. In the case of a select few airports, the NPDES permit incorporates limits based on TMDL, in which waste loads are specifically matched to the receiving body of water. Federal regulations require that development of the TMDL consider contributions from point sources (federally permitted discharges) and nonpoint sources. TMDLs are established at the level necessary to implement the applicable water quality standards. Point sources are defined in the CWA, Section 502. Nonpoint sources are not defined in the statute, but are considered to be any source that is not covered under the point source definition. A typical example of a nonpoint source is stormwater.

**Construction Stormwater Permit:** In response to NPDES regulations, the California State Water Resources Control Board (SWRCB) issued the Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities (NPDES General Permit No. CAS000002; generally referred to as the Construction General Permit), which serves as one

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19 The following discussion of the regulatory framework related to the Construction Stormwater Permit as contained in the AMP Final EIR has been modified herein to provide more current information.
statewide General Permit for construction activities. The statewide permit, amended in September 2009 as SWRCB Order No. 2009-0009-DWQ, includes requirements for construction sites that disturb one (1) or more acres. All projects involving one (1) acre or more of soil disturbance will require compliance with the Construction General Permit. The Construction General Permit requires that the owner provide a Notice of Intent, a Stormwater Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs), elimination or reduction of non-stormwater discharge to stormwater systems and other waters of the nation, and lastly that the owner perform inspections of all construction project related BMPs.

**Industrial Stormwater Discharge Permit:** SDIA operates under SWRCB Water Quality Order No. 97-03, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities (NPDES General Permit No. CAS000001; generally referred to as the Industrial General Permit). Under the Industrial General Permit, SDIA is required to control and eliminate sources of pollution in stormwater through development and implementation of a SWPPP. The SDCRAA developed a comprehensive plan for controlling and elimination of pollution sources entitled SDIA's Storm Water Management Plan (SWMP) which serves as SDIA's SWPPP for the Industrial General Permit.

**Municipal Stormwater Discharge Permit:** Also in response to NPDES requirements, SDIA operates under California Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2007-0001, Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego (County), the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the SDCRAA, (NPDES No. CAS0108758; generally referred to as the San Diego Municipal Permit). As of August 2003, the San Diego RWQCB required the SDCRAA to demonstrate compliance with the San Diego Municipal Permit by developing a Jurisdictional Urban Runoff Management Program (JURMP). As part of the JURMP, each copermittor is required to develop a construction component to reduce pollution during all stages of construction and a Standard Urban Stormwater Mitigation Plan (SUSMP) process to address the potential post-construction discharge of pollutants to stormwater from new development and redevelopment projects. The SDCRAA has met these requirements by developing the SDIA SWMP such that it includes both a construction oversight component and a SUSMP process to address new development and redevelopment. The SDCRAA also requires compliance with the Construction General Permit for all projects on airport property that disturb one acre or more of soil.

**Porter-Cologne Water Quality Act:** Under the Porter-Cologne Water Quality Control Act (Porter-Cologne), the SWRCB has the ultimate authority over state water rights and water quality policy. The Porter-Cologne Act established nine RWQCBs to oversee water quality at the local and regional level.

**Coastal Zone Management Act:** In 1990, the United States Congress amended the Coastal Zone Management Act (CZMA) by adding the Coastal Zone Act Reauthorization Amendments (CZARA). Section 6217 of CZARA established the Coastal Nonpoint Pollution Control Program, which requires EPA to develop and implement BMPs to control nonpoint source pollution in coastal water. The definition of coastal waters in California was expanded to include the entire state. Pursuant to Section 6217(g) of CZARA, six major categories of nonpoint sources addressed by CZARA include agriculture, forestry, urban areas, marinas, hydromodification projects, and wetlands. In summary, while the NPDES permitting program essentially regulates stormwater and urban runoff, virtually all other nonpoint sources of coastal water pollution are subject to the Coastal Nonpoint Pollution Control Program under CZARA.

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20 The following discussion of the regulatory framework related to the Industrial Stormwater Discharge Permit as contained in the AMP Final EIR has been modified herein to provide more current information.

21 The following discussion of the regulatory framework related to the Municipal Stormwater Discharge Permit as contained in the AMP Final EIR has been modified herein to provide more current information.
5.4.1.3 Significance Criteria

Utilities

For the purposes of the AMP analysis, potential significant utilities and service systems impacts were evaluated based on the CEQA State Guidelines and in cooperation with SDCRAA. The project would have a significant utilities and service systems impact if results in:

- Interruption in Service -- Interruption or disruption of utility services could occur as a result of physical displacement and subsequent relocation of public utility infrastructure. Such impacts would be considered significant if the result would be a direct long-term service interruption or permanent disruption of essential public utilities;
- Need for Additional Capacity -- A significant impact would occur if an alternative would result in the need for additional capacity of utility infrastructure or additional services, which could not be supplied by existing utility service providers; or
- Decrease in Level of Service -- A significant impact would occur if an alternative would cause a substantive decrease in existing levels of utility service.

Air Quality

A project may have significant impacts to air quality if it:

- Conflicts with or obstructs implementation of an applicable air quality plan;
- Violates any air quality standard or contribute substantially (i.e., emits pollutants at a level equal to or greater than 5 percent of the California Ambient Air Quality Standards (CAAQS)) to an existing or projected air quality violation;
- Exceeds the following quantitative thresholds for the "criteria" pollutants of CO, PM10/PM2.5 and SO_x, or the O_3 precursors of NO_x and VOC in tons/year: CO = 100; NO_x = 40; PM10 = 15; PM2.5 = 10; SO_x = 40; and VOC = 13.7;22
- Results in increased PM10 concentrations by 5 micrograms per cubic meter (µg/m^3) at the maximum exposed individual (MEI) and an exceedance of the PM10 significance threshold;
- Causes CO "hot-spot" levels to exceed a 1 hour value of 20 parts per million (ppm) or an 8-hour average of 9 ppm;
- Exposes sensitive receptors (i.e., schools, hospitals, resident- or day-care facilities, etc.) to substantial concentrations of hazardous air pollutants (HAPs) such as diesel PM;
- Creates objectionable odors affecting a substantial number of people; or
- Releases substantial quantities of air contaminants beyond the boundaries of the premises upon which the (stationary) source emitting the contaminants is located.

Noise

The project would have a significant construction noise impact if:

- Construction noise levels exceed 75 decibels (dB) in residential areas; or
- Construction with the project would result in excessive ground-borne vibration and/or changes in temporary or periodic ambient noise levels (based upon CEQA standards).

22 CO = carbon monoxide; SO_x = sulfur oxides; NO_x = nitrogen oxides; O_3 = ozone; VOC = volatile organic compounds; PM10 = particulate matter less than 10 micrometers in diameter; and PM2.5 = particulate matter less than 2.5 micrometers in diameter.
Transportation/Traffic

Significance criteria 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. Based on these guidelines, a significant impact would occur under the following conditions:

- If a freeway, street/roadway segment, or intersection operates at Level of Service (LOS) D or better without the project, and the project causes the LOS to deteriorate to LOS E or LOS F (regardless of the change in delay, speed or volume-to-capacity ratio), then the impact is considered significant.
- If a freeway, street/roadway segment, or intersection operates at LOS E or F without the project and the project causes an increase in delay or reduction in speed or volume-to-capacity ratio above specific thresholds (see Table 5-3.9 in the AMP Final EIR) then the impact is considered significant. If the LOS remains at E or F and any increase in delay or reduction in speed, or volume-to-capacity ratio is within the allowable threshold then the impact is not significant.
- If a metered freeway ramps experiences delays less than 15 minutes without the project and the project causes delays to exceed 15 minutes the impact is considered significant.
- If a metered freeway ramp experiences delays greater than 15 minutes without the project and the project causes an increase in delay above the specific threshold or ramp storage capacities are exceeded then the impact would be considered significant.
- If the project is deficient by more than 10 percent of the required amount of parking the impact would be considered significant if one of the following occurs:
  1) Parking shortfall or displacement of existing parking would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking, or
  2) Parking deficiency would severely impede the accessibility of a public parking facility, such as a park or beach.

5.4.1.4 Environmental Setting

Electrical Service

Electrical power and natural gas service at SDIA are provided by SDG&E, which supplies power to a population of 1.3 million business and residential accounts in a 4,100 square-mile service area spanning two counties and 25 communities. SDG&E addresses power and gas requirements for upcoming development projects on a case-by-case basis, and SDG&E consults with developers to incorporate energy saving devices into project design, where feasible. Forecasting future electric power and natural gas consumption demand is performed on a continual basis by SDG&E. In situations where projects with large power loads are planned, these new large power loads are considered together with other existing or anticipated future loads in the project vicinity, and electrical substations are upgraded or new substations are built if the capacities of existing substations are exceeded. Direct impacts to electrical and natural gas facilities are addressed by SDG&E at the time incoming development projects occur.

Near SDIA, relative to the Northside area, the Pacific Highway right-of-way contains three 12-kilovolt (kV) circuits fed from the Kettner substation. Two of the circuits currently feed power to the former General Dynamics site in the northern portion of SDIA near the intersection of Sassafras Street and Pacific Highway.

Additional details regarding thresholds of significance for each traffic analysis category addressed in the AMP Final EIR are presented in Sections 5.3.3.1 through 5.3.3.9 of that EIR.
**Natural Gas**

Natural gas utilities at SDIA, in the vicinity of the Northside area, include a 4-inch main with 60 pounds per square inch pressure (PSI) that connects to the former General Dynamics property from Sassafras Street and a 4-inch line with 150 PSI from Pacific Highway terminating at the west end of the site.

**Aviation Fuel**

Aviation fuel is supplied to the San Diego region by a 16-inch common carrier pipeline extending south from Los Angeles. This fuel pipeline is operated by Kinder Morgan Energy Partners, L.P. (formerly Santa Fe Pacific Pipeline Partners, Ltd.), and it connects to the Kinder Morgan fuel terminal in Mission Valley. Aviation fuel from the fuel terminal is provided to the airport fuel storage tank farm, located on the west side of the Northside Improvements area, via an 8-inch-diameter branch line from the 10th Street Marine Terminal.

**Telecommunication Systems**

Utility providers such as AT&T, IBM, and independent cable companies service communications systems for telephone, large-scale computer systems, and cable television in the City of San Diego. Communication system needs for incoming projects are serviced by these utility providers on an as-needed basis. Near SDIA, both Pacific Highway and North Harbor Drive house fiber optics and copper line for telecommunications. Two central office diverse feed locations are located at the south side of SDIA.

AT&T is mandated by the State Public Utilities Code to provide telephone service wherever it is requested throughout the State of California. AT&T, therefore, must provide ongoing telephone service. Forecasting future service demand is performed by computerized statistical modeling based on land use patterns, zoning, and other growth indicators. When possible, AT&T engineers contact developers regarding future development plans early on in a project's conceptual planning stages, to establish upcoming service demand.

**Water Demand/Supply and Systems**

Approximately 90 percent of the San Diego region's water is imported, while 10 percent is supplied from water produced locally through a system of reservoirs and pipelines. The San Diego County Water Authority (SDCWA) is the main wholesale supplier of water in San Diego County. Imported water is supplied to SDCWA by The Metropolitan Water District of Southern California (Metropolitan), which serves the greater southern California area. The City of San Diego Water Department Public Utilities Department purchases water from SDCWA and delivers it throughout the City.

The City's Water Department Public Utilities Department maintains a complex water treatment and distribution system to support approximately 1.2 million people over a 330 square mile area. The City maintains three water treatment plants with a combined total treated capacity of 294 million gallons per day (MGD). Along with the potable water supply, the City of San Diego provides recycled water from treated wastewater to a level that is approved for irrigation, manufacturing and other non-drinking/non-potable purposes.

The majority of the water system at SDIA consists of pipes ranging in size from 12- to 16-inches in diameter. The secondary system of water laterals branching off of the primary system consists of 8- to 16-inch water lines providing service to the terminals, aprons, and the adjacent former Teledyne Ryan facilities along North Harbor Drive. Water service to the fuel farm and air traffic control tower extends from the water system in Pacific Highway along Washington Street.
Wastewater/Sanitary Sewer

Wastewater (sewer) service in the SDIA area is provided by the City of San Diego Metropolitan Sewerage System, which is owned by the City of San Diego, and operated by the San Diego Metropolitan Wastewater Department (SDMWWD), City of San Diego Public Utilities Department. The SDMWWD, City of San Diego Public Utilities Department serves 2.2 million people from the City of San Diego and 15 other cities and special wastewater/water districts.

Sewer service at SDIA is provided by a network of pipes ranging from 6 to 21 inches in diameter. Wastewater from SDIA is conveyed to the Point Loma Wastewater Treatment Plant via a 15-inch line located just south of North Harbor Drive. There also is a 36-inch regional trunk sewer line under Kettner Boulevard, which also transports wastewater north and then southwesterly to the Point Loma Wastewater Treatment Plant.

The primary public sewer system lines serving the area in the vicinity of SDIA are routed along North Harbor Drive, Laurel Street, and Pacific Highway. Relative to the Northside area, Pacific Highway houses a 51-inch 39-inch sewer primary line which the City of San Diego is currently in the process of slip-lining with a 33-inch pipe, and a secondary 8-inch sewer line. The primary line runs from Sassafras Street to Laurel Street, continuing southeast along Pacific Highway. This line eventually bends west and connects to the 108-inch Sewer Interceptor located in North Harbor Drive. The 8-inch line in Pacific Highway serves the former General Dynamics site between Vine Street and the extension of Olive Street along the south side of Pacific Highway. At the extension of Olive Street with Pacific Highway, the 8-inch sewer line outlets to the primary line.

Storm Drain

In 2005 approximately 85-90 percent of Airport property was considered impervious area as the surface is covered by buildings and paved surfaces.

Surface water in the vicinity of SDIA is dominated by San Diego Bay to the south and a leg of the bay called the boat channel, which runs north-south along the western boundary of the Airport. Drainage typically flows in a southerly direction toward the Bay and a southwesterly direction toward the boat channel. The largest body of fresh water in proximity to SDIA is the San Diego River, which flows in an east-west direction and drains into the Pacific Ocean approximately one mile to the north. The storm drain system for SDIA includes a network of lines throughout the Airport area, ranging in diameter from 18 inches near the northeast tip of the Airport to 84 inches at the southeast tip of the Airport. In the Northside area of the Airport, there is a storm drain line extending along Pacific Highway that ranges in diameter from 24 inches at the eastern edge of the site to 54 inches at the west end of the site. Two north-south lines are located in the central portion of the site; one being 60 inches in diameter and the other being 42 inches.

5.4.1.5 Impact Analysis

The utilities impact analysis in the AMP Final EIR evaluates the ability to provide service to the proposed AMP facilities, while the air quality, noise, and traffic sections of the AMP Final EIR include evaluations of temporary impacts associated with AMP-related construction activities. The AMP Final EIR analysis of utilities impacts is summarized below, and a summary of construction impacts is provided in Section 5.4.1.6 which follows thereafter.

Electrical Service

Implementation of the AMP would generate increased demand because it would result in new structures being built that would require electrical service. As indicated above, there are several 12 kV lines near SDIA, which provide connections to two different substations. Also as noted above, SDG&E continually
assesses projected demand and plans and operates accordingly. Although extension of on-airport electrical power lines would be required, this would not exceed the capacity of SDG&E to provide service.

**Natural Gas**

A 10-inch-diameter 400 PSI natural gas line runs north/south near the west edge of Terminal 2. The Terminal 2 West Expansion would require this line to be relocated. The engineering for moving the line would be done by SDG&E upon receipt of the finalized footprint for the Terminal 2 plan. The adjoining streets could have sufficient gas facilities to accommodate most SDIA proposed activities. Utility extensions would be required to serve new facilities.

**Aviation Fuel**

Implementation of the AMP would include elements that might increase or decrease aviation fuel consumption at SDIA, but it would not significantly affect the ability of the existing aviation fuel system to service aircraft at the Airport. None of the Airport Implementation Plan projects would directly impact and/or require the relocation of existing aviation fuel lines or related facilities at SDIA.

**Telecommunications**

Both Pacific Highway and North Harbor Drive house fiber optics and copper line for telecommunications. It is anticipated that these ducts would provide ample service for possible expansion of SDIA as well as existing facilities. Two central office diverse feed locations are located at the south side of the Airport. This diverse feed could accommodate airport expansion and development at the former General Dynamics site.

**Water Demand/Supply And Systems**

Based on the preparation of a Water Supply Assessment by the City of San Diego Water Department that specifically finds that adequate water supply would be available for the AMP, which would include Northside Improvements, water supply impacts are assessed as less than significant. While it is acknowledged that reductions in water imports from the Bay-Delta could affect water supplies in the San Diego region, the long-term nature of any such reduction is unknown, and regional water suppliers (such as Metropolitan and SDCWA) have been and actively continue to pursue other water sources.

In terms of the water delivery or conveyance system, the land uses for each project component would result in an increased demand for water, which would require an extension of water conveyance facilities on SDIA. In the northern portion of the Airport, implementation of the AMP uses, including those associated with the Northside Improvements, would require extension of water utilities from Pacific Highway. It should be noted, relative to impacts on water supply, the uses proposed in the Northside Improvements that involve water consumption, such as the proposed CONRAC and cargo warehouse facilities, would represent a replacement of existing uses that currently consume water (i.e., the existing rental car companies and existing cargo warehouse operations). As such, the water demands associated with those types of uses as part of the Northside Improvements would not be new. Additionally, the consolidation of the existing rental car facilities into a single new facility that includes water conservation features in its design and operation offers the potential for certain water use efficiencies that do not currently exist.

None of the AMP improvements would require the relocation of major water supply lines.

**Sanitary Sewer**

Development of SDIA in accordance with the AMP would result in additional wastewater-generating facilities (e.g., sinks, toilets). Because the number of passengers traveling through SDIA would not be substantively affected by the AMP, the addition of new facilities would not cause a substantive increase in
wastewater generation at SDIA. The development of the northern portion or the Airport and/or the reuse of the former Teledyne Ryan property could, however, generate new uses at SDIA with an associated (but unquantified) increase in wastewater generation. This increase in wastewater generation would not be significant, however, because of the wastewater treatment capacity available to SDIA and because of the Airport's location near large SDMWWD City of San Diego Public Utilities Department wastewater collection pipelines and Pump Station No. 2. As a result, little-to-no off-airport infrastructure would be required to convey increased wastewater flows from SDIA to the SDMWWD City of San Diego Public Utilities Department sewer system and the Point Loma Wastewater Treatment Plant. Capacity impacts to SDMWWD City of San Diego Public Utilities Department wastewater treatment facilities would be offset through payment of applicable sewer capacity fees, to the extent required by law.

Based on the available treatment capacity, the proximity of SDIA to major wastewater collection pipelines and the measures that would be used to avoid damage to the large sewer pipelines under the former NTC parcel, the AMP would have a less-than-significant impact on sewers.

**Storm Drain**

The Airport Implementation Plan development includes approximately 39 acres of newly created impervious area associated with surface parking, aircraft parking, and additional terminal roof expansion. However, 85-90 percent of the existing Airport property is already considered impervious surface; as such, an increase of approximately six percent in total impervious area would be a less than significant impact to aquifer recharge and existing drainage patterns.

All future development is subject to the San Diego Municipal Permit and the SDIA SWMP. The SWMP requires that all construction activities at the Airport with the potential to impact stormwater runoff provide for BMPs; therefore, impacts relative to construction and grading and erosion and sedimentation would be less than significant. In addition, both the SDIA SWMP and the Construction General Permit require the development and implementation of a project specific Storm Water Pollution Prevention Plan (SWPPP) to prevent the discharge of pollutants to stormwater from all construction activities associated with future developments that disturb one acre or more of soil.

The San Diego Municipal Permit and the SDIA SWMP (more specifically, the SUSMP contained therein) require the selection, design, and incorporation of post-construction stormwater pollutant source control BMPs and stormwater treatment control BMPs to ensure that future development does not increase stormwater pollutant loads and does not change urban runoff flow rates, velocities, or durations. The San Diego Municipal Permit and the SUSMP process also require that the long-term operation and maintenance of treatment and flow-control facilities are adequately addressed before construction.

The Airport Implementation Plan would be implemented by the SDCRAA and, therefore, would include provisions to meet the requirements of the SDIA SWMP, the San Diego Municipal Permit, and the Construction General Permit, and thereby would have a less than significant impact on urban runoff.

**5.4.1.6 Construction Impacts**

As indicated above, the Section 5.11, *Utilities*, of the AMP Final EIR includes a discussion of construction related impacts, as do also Section 5.5, *Air Quality*, Section 5.1, *Noise*, and Section 5.3, *Transportation/Traffic*, of that EIR. The following summarizes the discussion found within each of the subject sections.

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24 The following discussion of impacts from implementation of the AMP projects related to stormwater runoff as contained in the AMP Final EIR has been modified herein to provide more current information regarding SDCRAA compliance with regulatory permits. Such information does not alter the conclusion of a less than significant impact on urban runoff as stated in Section 5.6 of the AMP Final EIR.
Utilities

Construction of the utilities improvements associated with the AMP would require water for dust suppression, and would generate small amounts of construction waste and construction debris. In addition, minimal wastewater is expected to be generated during construction. These utility and service needs would be within the capacity of the respective utility and service systems and would not cause a significant impact.

Implementation of the AMP improvements could also require that existing utility infrastructure be relocated. Prior to severing existing utility lines, replacement lines would be brought into service. Accordingly, disruptions in service would be avoided or limited to the short amount of time necessary to make new connections. All utility relocation would be conducted in close coordination with (or by) the respective service providers. Accordingly, construction impacts on utilities and service systems would not be significant.

Air Quality

Construction-related emissions are primarily associated with exhaust from heavy equipment, delivery trucks and construction worker vehicles; dust from site preparation and demolition activities; and fugitive emissions from the storage/transfer of raw materials. Although these emissions are temporary in nature and generally confined to the construction site and the access/egress roadways, they were quantified in the AMP Final EIR to determine if they would be significant under CEQA.

For the analysis, the construction schedules and requirements (i.e., work crews, equipment types, etc.) for each project included in the Airport Implementation Plan were developed, or estimated, by construction engineers familiar with the airport improvements. From that analysis, the total hours of equipment operation (by equipment type), work crew trips, and daily activity levels were derived for the anticipated five-year construction period. These data and information were then combined with appropriate emission factors obtained from the CARB OFFROAD2007 and EMFAC2007 models to obtain estimates of annual total emissions of CO, NOx, VOC, SOx, and PM10/2.5. The results of the analysis found that the projected construction-related emissions would be less than the CEQA Thresholds for the entire construction period.

Noise

Table 5-1.16 in the AMP Final EIR delineates the maximum noise level by the equipment types that would be used in construction of the AMP improvements, as well as the resulting noise at various distances from the construction zones. Among the various equipment types, the maximum noise levels would be produced by the pile drivers, with resulting noise levels in the nearest residential areas of 62.8 dB to 48.0 dB at distances of 1,500 to 4,000 from the sources, respectively. Relative to the Northside area, the projected noise level of 62.8 dB would be most applicable, based on the proximity of existing residences located across I-5.

Based upon this analysis, the construction noise would not exceed 75 dB in residential areas. The construction noise would be lower than the aircraft and highway noise that occurs in the residential areas near the construction zones. Due to the louder noise levels and more frequent events that occur with aircraft operations and surface vehicle traffic and in consideration of the logarithmic quantities of noise measured in decibels, aircraft and highway noise would continue to be the determinative sources in the noise environment. Thus, the ambient noise levels would not be expected to increase due to the construction activity. Additionally, the construction work would not be expected to result in excessive ground-borne vibration to home sites. Therefore, the construction work would cause less than significant impacts in regard to noise associated with implementation of the AMP.
Transportation/Traffic

There would be a temporary and unavoidable increase in traffic volumes on project area roadways during construction of the AMP improvements due to traffic generated by trucks hauling materials and equipment, and construction workers commuting to and from SDIA. The critical issue relating to project construction involves maintenance of traffic in the immediate construction zone, and handling the additional traffic related to transportation of construction materials and crews. No construction traffic would be expected to use residential streets 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. Because these impacts are temporary, no significant impacts are anticipated and no mitigation measures are required. It should be noted, however, that the contractor would prepare a traffic control plan as part of construction contract in order to ensure that construction worker and truck trips are minimized during a.m. peak hours and will not use residential streets to access SDIA.

Notwithstanding that the AMP Final EIR analysis of construction traffic impacts concluded that such impacts would be temporary and less than significant, as described above, the Final EIR includes certain traffic management measures that nevertheless would be implemented during construction to reduce such impacts on the surrounding environment. Those measures are summarized below in Section 5.4.1.7.

5.4.1.7 Mitigation Measures/Other Improvements

Utilities

Implementation of the AMP would include coordination with the affected utility providers/service system operators with regard to extending services and/or relocating utility lines. Similarly, SDCRAA would pay necessary engineering or facility expansion fees to affected service providers (e.g., SDG&E reengineering fees). These measures are considered to be elements of the AMP and not mitigation. Because the AMP would not generate significant impacts, no utility mitigation is required.

Air Quality

Although the AMP Final EIR concluded that construction-related air quality impacts would be less than significant, and therefore do not require mitigation measures, the following measures are proposed to nevertheless be implemented as part of the construction plans and process in order to reduce air quality impacts:

- Prevent construction equipment and delivery trucks from excess idling during periods of inactivity.
- Substitute low- and zero-emitting equipment whenever possible.
- Implement a construction-employee shuttle service, rideshare program and/or on-site food service to reduce vehicle trips.
- Use electrical drops in place of temporary electrical generators wherever possible.
- Modify the construction schedule so that total annual emissions of NOx are more evenly distributed over the entire construction period and do not exceed the CEQA quantitative thresholds in any one year.
- Apply non-toxic soil stabilizers to all inactive construction areas including areas with disturbed soils and stockpiles of raw materials.
- Stabilize on-site truck haul routes and staging areas with dust-prevention materials.
- Reduce truck speeds on haul routes to minimize dust entrainment.
- Remove mud and dirt from haul truck wheels and cover truck bodies before leaving the construction site(s).
- Permanently cover all ground surfaces with vegetation or impervious materials as soon as practicable.
- Curtail and/or modify construction activities on extremely windy days.
- Post a publicly visible sign with the contact information for reporting dust complaints.

**Noise**

No significant construction-related noise impacts are anticipated to occur and no mitigation measures are proposed.

**Transportation/Traffic**

Similar to air quality above, the AMP Final EIR concluded that construction-related traffic impacts would be less than significant, but, nevertheless, proposed to implement certain measures that would serve to reduce such impacts. Such measures are as follows:

Establish a Construction Coordination Office within the Ground Transportation Department. This office would operate during the life of the AMP improvements 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 restriping, 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.
5.4.1.8 Level of Significance after Mitigation Measures

Impacts related to utilities, including construction-related impacts, from implementation of the AMP would be less than significant.

5.4.2 Supplemental Analysis

The following provides a supplemental analysis specific to utilities associated with the Proposed Project based on more detailed descriptions of the subject Northside Improvements, and conclusions regarding whether the proposed Northside Improvements would result in any significant utilities impacts and whether any new or modified mitigation measures are warranted. The supplemental analysis includes two components; Utilities Demands, and Construction Impacts.

The supplemental analysis of Utilities Demands evaluates how the additional detailed information now available regarding the nature, size, and location of the proposed Northside Improvements relates to the assumptions and analyses contained in the AMP Final EIR relative to the ability of the existing utilities to accommodate the demands of the project (i.e., would utilities demands be substantially different in terms of amount or specific location served than addressed in the AMP Final EIR).

The supplemental analysis of Construction Impacts evaluates how the additional detailed information now available regarding the nature, size, and location of the proposed utilities improvements relates to the construction impacts analysis in the AMP Final EIR, particularly with regard to temporary air quality, noise, and traffic impacts.

Utilities Demands

As indicated in Section 4.1.1, Proposed Airport Land Use Plan, of the AMP Final EIR, the land uses contemplated for the Northside area include, but were not limited to, a CONRAC facility and adjacent public parking, and new/replacement air cargo facilities. Those are the same types of land uses identified for the Northside Improvements in the Proposed Project, in essentially the same locations as generally assumed within the AMP Final EIR with the exception of the public parking facility now being proposed to occur on the north and east sides of the CONRAC facility instead of the west side. That variation in the layout of the CONRAC and adjacent parking area switch in side-by-side locations would not materially change the evaluation of utilities demand impacts within the AMP Final EIR. The size of the CONRAC facility currently proposed in the Northside Improvements is smaller than the facility originally anticipated, which, if anything, would result in reduced demands related to utilities improvements. Given that the AMP Final EIR found that no significant impacts related to utilities would result from implementation of the AMP, the proposed Northside Improvements would not result in any significant impacts to utilities and no mitigation measures are warranted. Any work within the City's public right-of-way (PROW) will be reviewed for conformance with the City's Storm Water Regulations.

Construction Impacts

Overview of Construction Activities

As can be seen in Figures 4.3 through 4.8 of this Supplemental EIR, the conceptual system layout for each type of utility associated with the Northside Improvements calls for new lines extending throughout the project site and connecting to existing utilities in the nearby area. Most of the utility connections would occur near the intersection of Pacific Highway and Sassafras Street on the northeast side of the site, and several would occur near the on-airport access road adjacent to the fuel farm on the west side of the site. The proposed "backbone" for many of the proposed utility lines would occur along the new interior road that is planned to extend west through the middle of the site from Pacific Highway/Sassafras Street. Individual service lines would extend from the backbone to each of the proposed major facilities. It is anticipated that construction/placement of the new utility lines would occur in conjunction with site
preparation and infrastructure installation (i.e., grading, preparation, and construction of the new central roadway, which serves the CONRAC facility, parking facility, and air cargo facility) would include provisions for the various backbone systems, and the development of each of those major facilities would include the individual utility lines that are required. That would also be the case for the construction/installation of water quality BMPs associated with the storm water drainage system proposed for the Northside area. The specific BMPs to be provided for the Proposed Project would be determined during the detailed design stages as necessary and appropriate to meet the applicable water quality regulations summarized in Section 5.4.1.2 above. The potential BMPs may include some combination of subsurface facilities, such as underground water storage/treatment vaults and conduits, surface level facilities, such as porous pavement and rock/vegetated infiltration basins and channels, and building features such as green roofs and roof drainage collection and storage systems for reuse of runoff (i.e., greywater, irrigation, fire protection). These types of BMPs would be developed in conjunction with other construction occurring during the subsurface, surface, and building construction phases. As such, the vast majority of the construction activities associated with the provision of utilities to the Northside Improvements would occur as part of the construction program for each major facility. The types of construction equipment involved in the utilities improvements would generally be the same as those involved in other aspects of site development and are anticipated to include, but not be limited to, excavators/trenchers, backhoes, loaders, dump trucks, welders/generators, compactors/rollers, pavers, and pick-up trucks.

The one notable utility improvement that would extend well outside the main area of the Northside Improvements is the proposed force main storm drain line. From the proposed pump station located near the existing airport control tower complex center of the Northside Improvements area, the line would follow the alignment of the on-airport service road that runs south and then west to the U.S. Navy Boat Channel near the western edge of the Airport (see Figure 4-9). It is anticipated that construction of the line would occur using a “cut and cover” approach, whereby a stretch of narrow trench would be excavated, gravel fill or other base materials would be placed at the bottom of the trench, a segment of pipe would be placed in the trench and welded to the adjoining segment, and the trench would be backfilled and repaved if/as appropriate. This process would proceed incrementally in a linear fashion, which would limit the amount of area under active construction at any given time. At the west end of the proposed pipeline, construction of the outlet structure to the boat channel would occur from the top of slope using cranes, concrete pump trucks with boom extensions, and specialized equipment to prepare the slope area below the pipe outlet and install the baffle structure and concrete drainage channel.

Air Quality Impacts

Construction of the proposed utilities improvements would involve surface disturbance and excavation activities, which would generate fugitive dust, and the operation of construction equipment powered by internal combustion engines that emit various air pollutants. Exhaust emissions from materials delivery and haul trucks and from construction worker travel would also contribute to air quality impacts. As indicated above, the majority of the utilities improvements would take place within the boundary of the Northside Improvements project area and would likely occur as part of the construction program for the proposed uses (i.e., during site preparation and infrastructure installation).

There are no sensitive receptors, such as homes, schools, or hospitals, in proximity to where the utilities construction activities would occur; the nearest sensitive uses are the residences on the other (east) side of I-5, approximately 1,500 feet to the northeast. No construction-related impacts such as those related to fugitive dust or odors are anticipated to occur at those distant areas, notwithstanding that numerous dust control measures are proposed to minimize dust generation at the site (see Section 5.4.1.7 above).

Criteria pollutant emissions associated with utilities construction for the Northside Improvements would be less than significant. As described in Section III, Air Quality, of the AMP Draft Supplemental EIR NOP Initial Study (see Appendix A of this Supplemental EIR), the AMP Final EIR estimated the construction-
related air pollutant emissions associated with implementation of the Airport Implementation Plan improvements and concluded that such emissions would be less than significant. Development of the Northside Improvement facilities is anticipated to occur after completion of other major improvements assumed in the Airport Implementation Plan and the overall construction activity levels at the Airport would be less than the construction period addressed in the AMP Final EIR. As such, the construction-related air quality impacts associated with the Northside Improvements, including the proposed utilities improvements, are anticipated to be less than significant.

Noise Impacts

Development of the proposed utilities improvements would generate noise from construction equipment and construction activities, which would result in temporary noise impacts on nearby areas. Construction of the utilities improvements would likely occur in conjunction with the overall construction activities associated with development of the Northside Improvements. As indicated above in Section 5.4.1.6, the noise-sensitive use closest to the Northside Improvements area is approximately 1,500 feet to the northeast, on the other side of I-5. The AMP Final EIR calculated the combined noise levels associated with a mix of typical construction equipment and estimated the noise level at the nearest sensitive receptor to be approximately 62.8 dB, which is well below the 75 dB threshold of significance. As such, no significant construction-related noise impacts are anticipated to occur from the proposed utilities improvements.

Transportation/Traffic Impacts

Development of the proposed utilities improvements would result in temporary traffic increases on some streets in the nearby area due to construction worker travel and materials delivery and haul trips. The streets most likely to be affected by construction traffic would likely include Pacific Highway and nearby I-5 ramps, Sassafras Street near Pacific Highway, and Washington Street near Pacific Highway. As indicated in Section 5.4.1.6 above, 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. Because these impacts are temporary, no significant impacts are anticipated.

5.4.3 Conclusions

As discussed above, the proposed Northside Improvements would not result in any significant impacts to utilities and no mitigation measures are warranted. This conclusion is consistent with the conclusions regarding utilities and related construction impacts (i.e., air quality, noise, and traffic) contained in the AMP Final EIR.
5.5 Greenhouse Gas Emissions

This section addresses the potential impacts related to greenhouse gas (GHG) generation associated with implementation of the AMP improvements, which include the Northside Improvements. The following provides a summary of the GHG emissions analysis in the AMP Final EIR, a supplemental discussion of environmental initiatives that have been undertaken by the SDCRAA since publication of the AMP Final EIR that address GHG, and conclusions regarding whether the proposed Northside Improvements would alter the conclusions related to GHG as contained in the AMP Final EIR and whether any new or modified mitigation measures are warranted.

As indicated above, the discussion below focuses on GHG emissions associated with implementation of the AMP improvements, which include the Northside Improvements. As described in Section 5.1 of this Supplemental EIR, the analysis and conclusions related to cumulative impacts in the AMP Final EIR are considered to be valid and applicable to the proposed Northside Improvements, and no additional discussion or analysis of cumulative impacts with respect to GHG emissions is warranted or included herein.

5.5.1 Summary of Relevant Analysis in Airport Master Plan Final EIR

Section 5.19, Greenhouse Gas Emissions, of the AMP Final EIR addresses potential GHG emissions from implementation of the AMP. The following provides a summary of Section 5.19 of the AMP Final EIR.

5.5.1.1 General Approach and Methodology

For the AMP assessment, GHGs associated with the planned projects at SDIA were estimated for aircraft, ground support equipment/auxiliary power units (GSE/APU), motor vehicles, stationary sources, as well as construction equipment. The input parameters were similar to those used in support of the emissions inventory of criteria pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC), etc. Input data such as activity levels or material throughput rates (i.e., fuel usage, vehicle miles traveled (VMT), electrical consumption) are applied to appropriate emission factors (i.e., in units of GHG emissions per gallons of fuel). However, the AMP GHG analysis focused not only on the principle GHG of carbon dioxide (CO2), but also included nitrogen oxide (N2O) and methane (CH4). The results were reported as CO2-equivalents based on Intergovernmental Panel on Climate Change (IPCC) Global Warming Potential Values and are expressed as total tons of airport-related emissions.

Emission factors were obtained from the U.S. Energy Information Administration, the IPCC, and the U.S. Environmental Protection Agency (EPA), and California Air Resources Board (CARB).

5.5.1.2 Regulatory Framework

In September 2006, California passed the California Global Warming Solutions Act (CGWSA), which was added to the Health and Safety Code Section 38500 (commonly referred to as AB 32). This addition states that global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. It also requires that the state reduce emissions of GHG
emissions to 1990 levels by 2020. To effectively implement the cap, CGWSA directs the CARB to develop appropriate regulations.

5.5.1.3 Significance Criteria

At the time the AMP Final EIR was prepared, there were no statewide CEQA thresholds of significance established for GHGs. That is still the case today. However, in recognition of the emerging concern regarding GHG emissions, AB 32 calls for CARB to adopt regulations requiring the reporting and verification of GHG emissions statewide and that a limit equivalent to 1990 levels be achieved by the year 2020.

Given the complex interactions between various global and regional-scale physical, chemical, atmospheric, terrestrial, and aquatic systems that result in the physical expressions of global climate change, it is impossible to determine what levels of GHG emissions would result in altered environmental conditions. For the AMP Final EIR analysis, a project’s incremental contribution to global climate change would be considered significant if, due to the size or nature of the project, it would generate a substantial increase in GHG emissions relative to the future should the AMP not proceed (i.e., No Project Alternative) leading to significant physical impacts.

5.5.1.4 Environmental Setting

Various gases in the earth’s atmosphere, classified as GHGs, play a critical role in determining the earth’s surface temperature. Among prominent GHGs are CO$_2$, CH$_4$, ozone (O$_3$), water vapor, N$_2$O, and chlorofluorocarbons (CFCs). Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively, GHGs are a global pollutant.

Baseline (2005) conditions for the three most common GHG compounds associated with SDIA are summarized in Table 5.5-1. Direct emissions are those that occur on the airport site, through the aircraft Landing/Take-off Operation (LTO) and associated with airport-related motor vehicles traveling to and from SDIA. Indirect emissions are those that occur beyond the aircraft LTO.

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28 Placer Vineyards Specific Plan Final Revised EIR, October 2006.
5.5.1.5 Impact Analysis

For the AMP Final EIR analysis, GHG emissions were calculated through the use of input data such as activity levels or material throughput rates (i.e., fuel usage, vehicle miles traveled (VMT), electrical consumption) that are applied to appropriate emission factors (i.e., in units of GHG emissions per gallons of fuel). Table 5.5-2 summarizes the GHG emissions inventory results for the SDIA AMP.
Recognizing that there were no CEQA guidelines for determining significance criteria for GHG emissions at the time the AMP Final EIR was prepared, the assessment was for disclosure purposes only. CO$_2$ emission for the year 2004 in California totaled approximately 492 million gross metric tons of CO$_2$ equivalents. The information and data presented in the AMP Final EIR GHG Emissions section fulfill the initial designs of addressing GHG’s under the CEQA process by broadly quantifying the “carbon footprint” of the Airport under Baseline conditions and future years, both with and without the planned improvements.

### 5.5.1.6 Construction Impacts

Analysis for construction generated GHG emissions was not completed for the AMP Final EIR as fuel and energy consumption specifics are beyond the level of detail provided in a standard construction schedule. Therefore any analysis of construction generated GHG emissions would be too speculative to analyze.

### 5.5.2 Supplemental Analysis

The following provides a supplemental discussion of environmental initiatives that have been undertaken by the SDCRAA since publication of the AMP Final EIR that address GHG, and a qualitative analysis regarding whether the proposed Northside Improvements would alter the conclusions related to GHG as contained in the AMP Final EIR and whether any new or modified mitigation measures are warranted.

#### 5.5.2.1 GHG Emissions Associated with Northside Improvements

As indicated above in Section 5.5.1.1, the input parameters used in the assessment of GHG emissions were similar to those used in support of the emissions inventory of criteria pollutants (i.e., CO, NO$_x$, VOC, CO$_2$, N$_2$O, CH$_4$).
etc.), which were addressed in Section 5.5, *Air Quality*, of the AMP Final EIR. As such, the land use and development assumptions used in the air quality analysis are also reflected in the GHG analysis, which includes a CONRAC, public parking, and air cargo facilities in the northern portion of SDIA, and a terminal link roadway connecting the proposed northside facilities to the main terminal area. The uses included in the currently proposed Northside Improvements are generally consistent with the assumptions in the AMP Final EIR, notwithstanding that the size of the currently proposed CONRAC is smaller than the one described in the AMP Final EIR. The GHG emissions associated with the Northside Improvements are, therefore, accounted for, if not slightly overestimated, in the AMP Final EIR.

### 5.5.2.2 Measures to Control/Reduce GHG Emissions

Subsequent to completion of the AMP Final EIR, SDCRAA established various new commitments and programs specifically designed to control and reduce GHG emissions at SDIA, which included two key elements: (1) a Memorandum of Understanding with the State Attorney General; and (2) a formal Air Quality Management Plan.

#### 5.5.2.2.1 Memorandum of Understanding (MOU) for Reduction of GHG

In May 2008, subsequent to completion of the AMP Final EIR, the SDCRAA and the Attorney General of the State of California entered into an MOU calling for the implementation of specific measures to control GHG emissions associated with SDIA, including as related to development of the AMP improvements and operations at the Airport. The types of GHG control measures identified in the MOU addressed the following:

1. **Reduction in Aircraft On-the-Ground Energy Usage**
   a. Landside Power and Preconditioned Air at All New Gates
   b. Retrofit Existing Gates with Landside Power and Preconditioned Air
   c. Provision of Landside Power at All New Cargo Facilities and Hangars
   d. Retrofit All Existing Cargo Facilities and Hangars with Landside Power
   e. Cargo and General Aviation Aircraft Use of Landside Power
   f. Aircraft Movements
2. **Reduction of Landside Energy Usage**
   a. Replacement of Existing Tow Vehicles With Electric or Alternative Fuel Aircraft Pushback Tractors
   b. Replacement of Shuttles with Electric or Alternative Fuel Vehicles
3. **Use of Green Materials and Sustainable Design**
   a. Use of Cool Roofs (or Solar Panels) and Cool Pavements
   b. Construct All New Facilities to Meet LEED Certification (or equivalent), with a Target of Silver of Better
4. **Use of Green Construction Methods and Equipment**
   a. Use of Construction Equipment Running on Alternative Fuels or Particulate Traps
5. Coordination and Encouragement of Tenants to Address GHG
   a. Recycling
   b. Sale of Unleaded Mogas
   c. Reduction of Carbon Footprint

This innovative MOU, highlighted on the State Attorney General's website, was one of the first of its kind for airports in California and the provisions of the MOU were integrated into the subsequent development of an Air Quality Management Plan for SDIA, which is described below.

5.5.2.2.2 SDCRAA Air Quality Management Plan (AQMP)

The AQMP provides a comprehensive program for implementation of the types of GHG control measures recommended in the aforementioned MOU, as well as measures for the control and reduction of criteria pollutants. The AQMP complements several other environmental initiatives that SDCRAA has planned or in-place for SDIA, such as the Airports Council International North America (ACI-NA) Sustainability Initiative and the SDCRAA Sustainability Policy. These environmental initiatives along with various state and regional environmental initiatives provide additional measures for the control and reduction of GHG.

Section 5 of the AQMP delineates numerous tasks that specifically address the GHG control measures described in the MOU, outlining the recommended means and timeframes for implementing such measures. The following summarizes the recommended tasks related to implementation of the MOU measures, many of which have been completed or are currently ongoing.

**MOU Measure 1a-e -- Reduction in Aircraft On-the-Ground Energy Usage**

- Meet with airlines and cargo operators regarding the MOU and plans to implement landside power and preconditioned air (PCA).
- Design landside power and PCA, if applicable, into all improvements at terminals, cargo facilities, and general aviation facilities.
- Incorporate landside power and PCA into the design of the Terminal 2 West expansion.
- Lease agreements, other enforceable agreements, and the airports operations manual should include statements that the landside power and PCA shall be utilized as soon as possible upon arrival at the gate, unless there are safety considerations.
- Engineering staff will be updated on any recondition or refurbishing project that would require the incorporation of landside power and PCA.
- Track and quantify GHG emission reductions associated with landside power and PCA.

**MOU Measure 1f -- Aircraft Movements**

- Coordinate with Air Transport Associations (ATA), airlines, and FAA regarding practical measures that can be implemented to reduce GHG emissions associated with aircraft movement.
- Select alternatives to reduce aircraft movement emissions by 20 percent by 2015.
MOU Measure 2a -- Replacement of Existing Tow Vehicles with Electric or Alternative Fuel Aircraft Pushback Tractors

- Meet with ATA, airlines, and FAA regarding aircraft pushback tractors and conversion to electric or alternative fuels.
- Conduct annual GSE surveys to determine the number of vehicles that are reaching the end of their useful lives and to make sure that each vehicle is properly permitted.
- Work with airlines and ATA to research the commercial availability and safety of electric and alternative fuel pushback tractors as well as the necessary operations associated with such procedures.
- Determine viability of electric or alternative fuel pushback tractors for use at SDIA.
- Work with federal, state, and local agencies to take advantage of funding programs that can be used to offset the cost to install electric recharging and alternative fuel fueling stations.
- If electric or alternative fuel pushback tractors are not viable or a reasonable alternative is not available, the SDCRAA shall confer with the Attorney General's office for a deferral of this MOU specific measure.

MOU Measure 2b -- Replacement of Shuttles with Electric or Alternative Fuel Vehicles

- Develop incentive program regarding conversion of airport shuttles.
- Meet with shuttle operators regarding the conversion of alternative fuels and incentive programs.
- Shuttle operators will submit written requests or concerns regarding the incentive program to the SDCRAA.
- Work with SANDAG, Clean Energy, San Diego County Air Pollution Control District, and other stakeholders to develop necessary infrastructure to support alternative fuels.
- Track and quantify GHG emission reductions associated with shuttle conversion to alternative fuels.

MOU Measure 3a and b -- Use of Green Materials and Sustainable Design

- Meet with planning and engineering staff to detail that these requirements are being met at SDIA.
- Incorporate sustainable technologies into capital projects.
- Track and quantify GHG emission reductions associated with use of green materials and sustainable design.

MOU Measure 4 -- Use of Green Construction Methods and Equipment

- Meet with planning and engineering staff to reaffirm use of green construction methods and equipment.
- Develop specifications for construction methods and equipment.
- Enforce any non-compliance with the construction specifications.
- Document carbon dioxide equivalents (CO$_2$e) being reduced for each project by use of green construction methods compared to traditional means.
MOU Measure 5a, b, and c -- Coordination and Encouragement of Tenants

- Meet with planning and engineering staff on a semi-annual basis to discuss the recycling program and ways to increase the recycling efforts.
- Develop an educational program for recycling at the airport.
- Meet with tenants and other stakeholders to promote recycling at the airport.
- Meet with general aviation operators to evaluate alternatives to leaded avgas and the potential number of aircraft that can utilize unleaded avgas.
- Document recycling efforts, type and quantity of recycled materials, and amount (CO₂e) being reduced compared to baseline scenario in which waste was landfilled.

For each category of MOU measures, the AQMP identifies the obstacles to implementation that must be considered relative to further defining the feasibility, means and methods, and timing of the specific tasks summarized above.

5.5.3 Conclusions

The AMP Final EIR evaluation of GHG emissions is inclusive of those associated with the proposed Northside Improvements. However, with subsequent completion of the MOU and AQMP described above, which set forth numerous measures for the control and reduction of GHG emissions at SDIA, the GHG impacts associated with the Northside Improvements, as well as for the Airport overall, would be less than those presented in the AMP Final EIR.
CHAPTER 6: OTHER EFFECTS OF THE PROPOSED PROJECT

The following sections summarize the discussions of significant irreversible environmental changes, significant unavoidable effects, growth-inducing impacts, and effects not found to be significant presented in Chapter 6, Other Effects of the Proposed Project, of the AMP Final EIR, and whether such conclusions are altered as a result of the analyses contained in this Supplemental EIR.

6.1 Significant Irreversible Environmental Changes

An evaluation of significant irreversible environmental changes that would be caused by implementation of the AMP, including the proposed Northside Improvements, is required under CEQA Guidelines Section 15126.2(c). As indicated in Section 15126.2(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

As indicated in Section 6.1 of the AMP Final EIR, construction associated with implementation of the AMP would require the long-term commitment of nonrenewable and renewable natural resources and land. These resources include, but are not limited to: petrochemical construction material; lumber; sand and gravel; asphalt; steel; copper; lead, and other metals and construction materials. Fossil fuels for construction equipment and vehicles would also be consumed.

Implementation of the AMP would increase the need for resources used in construction; heating and cooling of commercial and office spaces; water; transportation of people and goods; lighting and other associated energy needs. However, SDIA is committed to construct the AMP projects to meet high standards for efficiency and environmental design, consistent with Leadership in Energy and Environmental Design (LEED) standards. Implementation of LEED standards that emphasize strategies for sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality would reduce the use of renewable and nonrenewable resources that would continue over time through construction and long-term operation of AMP projects. Additionally, the MOU between SDCRAA and the State Attorney General as well as the AQMP for SDIA, include numerous measures involving reduced fuel consumption and resource utilization, which serve to reduce GHG emissions. As such, the incremental increase in the demand for resources is expected to be less than significant. As indicated in Section 5.4, Utilities and Service Systems, of this Supplemental EIR, the conclusion of less-than-significant impacts on renewable and nonrenewable resources would remain unchanged and there is sufficient capacity to serve the proposed Northside Improvements. (See also Section XVI, Utilities and Service Systems, of the AMP Draft Supplemental EIR NOP Initial Study in Appendix A of this Supplemental EIR.)

Implementation of the AMP, including the proposed Northside Improvements, would result in the commitment of land resources for airfield, terminal, ground transportation, and airport support facilities. However, the area proposed for development is already committed to these types of uses as the California State Lands Commission has classified these lands to be used for the benefit of the people of California and in the movement and transport of people, goods and services. Thus, implementation of the
AMP, including the proposed Northside Improvements, would not result in a new commitment of land resources for this use.

The existing project site is an already disturbed land form, having historically been tidelands that have been contoured using engineered fill. Thus, implementation of the AMP, including the proposed Northside Improvements, would not result in the conversion of undisturbed land to airport-related uses.

### 6.2 Significant Unavoidable Effects

As described in Section 6.2 of the AMP Final EIR, implementation of the AMP could result in significant unavoidable effects related to air quality and associated human health effects from exposure to toxic air pollutants. As described in Section III, Air Quality, of the AMP Draft Supplemental EIR NOP Initial Study (Appendix A of this Supplemental EIR), the proposed Northside Improvements, which include certain improvements assumed in the AMP Final EIR to be in the Airport Land Use Plan but not specifically called out in the AMP Final EIR as part of the Airport Implementation Plan, would not change the conclusions of the AMP Final EIR air quality analysis. Inclusion of the currently proposed improvements along with the projects specified in the AMP Final EIR for the Airport Implementation Plan would not materially change the quantitative and qualitative evaluation of impacts and, moreover, were already accounted for in the AMP Final EIR as part of the Airport Land Use Plan. The air pollutant emissions for both the Airport Land Use Plan and the Airport Implementation Plan are driven primarily by aircraft operations and related GSE operations and, both being based on the same aviation activity forecast, are very similar. The relatively minor increases in emissions from the Airport Land Use Plan, compared to the Airport Implementation Plan, appear primarily in the area of motor vehicle emissions. The greater emissions reflect the fact that project-related vehicle emissions associated with the Airport Land Use Plan include those associated with development of the CONRAC, air cargo facilities, and other transportation improvements not included in the Airport Implementation Plan. If, however, the greater motor vehicle emissions associated with the Airport Land Use Plan were factored into the impacts analysis for the Airport Implementation Plan, the AMP Final EIR conclusions would not change.

No other significant unavoidable effects would occur with implementation of the AMP. As indicated by the results of the analyses in Chapter 5 of this Supplemental EIR, this conclusion would not change as no significant unavoidable impacts would occur from implementation of the proposed Northside Improvements.

### 6.3 Growth-Inducing Impacts

CEQA Guidelines, Section 15126.2(d) requires the discussion of the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Examples of growth-inducing actions include establishing a major new employment opportunity. Projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively, would also be considered growth inducing.

As indicated on page 5.4-3 of the AMP Final EIR, implementation of the land use and development plans contemplated under the AMP would not significantly affect population or housing. Developing SDIA with the proposed land uses would not displace any residents or residences because the proposed project locations currently contain airport or aviation industrial uses. The planned development also would not generate enough new employment opportunities at SDIA to affect the job/housing balance or induce growth that would affect this balance (see also Section 6.2, Growth-Inducing Impacts, of the AMP Final EIR). Additionally, the level of improvements proposed at SDIA would not be such to entice new residents to the San Diego area, thereby creating a need for new housing. These conclusions in the AMP Final EIR, which apply to the overall land use and development plans for SDIA overall, would also apply...
6.4 Effects Not Found to be Significant

In accordance with Section 15128 of the State CEQA Guidelines, an EIR must contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

The AMP Final EIR addressed a full range of environmental issues in detail. No topics or issues identified in the State CEQA Guidelines checklist or in the FAA Airport Environmental Handbook were eliminated from discussion.

As described in the NOP for the AMP Draft Supplemental EIR, for many of the environmental issue areas, the analyses and conclusions in the AMP Final EIR are considered to be applicable to, and adequate for, the proposed Northside Improvements. As such, no additional analysis regarding the majority of the environmental issue areas addressed in the AMP Final EIR was determined to be warranted for this Supplemental EIR. More specifically, the NOP for the AMP Draft Supplemental EIR, through an Initial Study based on Appendix G of the CEQA Guidelines, determined that the Proposed Project would result in "no impact" or "less than significant impact" in the following subject areas:

- Agricultural Resources;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology/Water Quality
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services; and
- Recreation.

Since the impacts of the Proposed Project with respect to these subject areas were determined to be "less than significant," these subject areas were not evaluated in this Supplemental EIR.

In addition, the NOP for the AMP Draft Supplemental EIR determined that the Proposed Project would result in "no impact" or "less than significant impact" related to transportation/traffic and utilities/service systems. As described in Section 5.1 of this Supplemental EIR, based on comments received on the NOP, as well as additional review conducted in conjunction with this Supplemental EIR, further discussion and minimal additional analysis for these two environmental issue areas, as well as further discussion of the topic of GHG emissions, was determined to be appropriate and is included in Chapter 5 of this Supplemental EIR. The analysis of traffic and circulation impacts associated with the Proposed Project included in the Draft Supplemental EIR was limited to impacts associated with replacement of the Solar Turbines employee parking. As discussed in Chapter 4 of this Final Supplemental EIR, based on comments received on the Draft Supplemental EIR expressing concern about the elimination of the Solar Turbines employee parking that currently exists along the southeastern edge of the Airport, the SDCRAA has refined the proposed alignment of the Terminal Link Roadway to avoid impacts to the Solar Turbines employee parking lot.
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CHAPTER 7: CLOSING SECTIONS

This chapter provides the following: a list of the individuals from the San Diego County Regional Airport Authority and consultants involved in the preparation and development of this Supplemental EIR; a list of persons and organizations consulted during preparation of this Supplemental EIR; and a glossary of terms used in this Supplemental EIR; and the mailing list identifying parties to whom the Notice of Availability and/or hard copies of the Draft Supplemental EIR were sent.

7.1 List of Preparers of EIR and Certification

Table 7-1

<table>
<thead>
<tr>
<th>Name</th>
<th>Education</th>
<th>Experience (Years)</th>
<th>Responsibility</th>
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<tbody>
<tr>
<td>Ted Anasis, AICP</td>
<td>B.S. Environmental Policy Analysis and Planning</td>
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<td>Manager - Airport Planning</td>
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<td>Director of Airport Systems Planning</td>
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Ricondo & Associates

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<td>Project description</td>
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<td>Project description, visual simulations</td>
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<td>Traffic impact analysis/documentation</td>
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CDM

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Table 7-1
List of Preparers

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<td>Document production</td>
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</table>
## 7.2 List of Persons and Organizations Consulted

### Table 7-2

<table>
<thead>
<tr>
<th>Name</th>
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<td>Dennis Castrillo</td>
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<tr>
<td>Ann Gonsalves</td>
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<tr>
<td>Jeffrey Szymanski</td>
<td>City of San Diego Development Services Department</td>
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<td>Suhail Khalil</td>
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<td>Susan Baldwin</td>
<td>San Diego Association of Governments (SANDAG)</td>
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<td>James W. Royle, Jr.</td>
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<td>David L. Butler</td>
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<td>John Helmer</td>
<td>San Diego Unified Port District</td>
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<tr>
<td>Candice D. Magnus</td>
<td>San Diego Unified Port District</td>
</tr>
<tr>
<td>Jim Lerner</td>
<td>State of California Air Resources Board</td>
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<tr>
<td>Don Chadwick</td>
<td>State of California Department of Fish and Game</td>
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<tr>
<td>Meredith Osborne</td>
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<tr>
<td>Edmund Pert</td>
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<tr>
<td>Greg Holmes</td>
<td>State of California Department of Toxic Substances Control</td>
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<td>Sandy Hesnard</td>
<td>State of California Department of Transportation</td>
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<tr>
<td>Jacob Armstrong</td>
<td>State of California Department of Transportation District 11</td>
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<tr>
<td>Al Cox</td>
<td>State of California Department of Transportation District 11</td>
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<td>Bill Figge</td>
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<td>Chris Schmidt</td>
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<td>Scott Morgan</td>
<td>State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit</td>
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7.3 Glossary

**Air Pollutant** - Any substance in air that could, in high enough concentration, harm man, other animals, vegetation, or material. Pollutants may include almost any natural or artificial composition of airborne matter capable of being airborne. They may be in gases, particulates, or in combinations thereof. Generally, they fall into two main groups: (1) those emitted directly from identifiable sources and (2) those produced in the air by interaction between two or more primary pollutants, or by reaction with normal atmospheric constituents, with or without photoactivation.

**Airside** - Facilities principally related to the airfield. Airside facilities often include the runway and taxiway system, runway safety areas, the runway approach area, and associated equipment such as airfield lighting and navigational aids.

**Airfield** - The area of an airport devoted to use by aircraft. This includes the runways, taxiways, gate area and aprons.

**Ambient Noise Level** - The level of noise that is all-encompassing within a given environment for which a single source cannot be determined. It is usually a composite of sounds from many and varied sources near to and far from the receiver.

**Built Conditions** - The existing human-made environment including such things as buildings, streets and open spaces.

**Decibel (dB)** - Commonly used to define the level produced by a sound source. The decibel scale is logarithmic; e.g., when the scale goes up by ten, the perceived level is twice as loud.

**Environment** - The physical conditions which exist within an area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

**Environmental Impact Report (EIR)** - A detailed report prepared under the California Environmental Quality Act (CEQA) describing and analyzing the potential significant environmental effects of a project and discussing ways to mitigate or avoid the effects.

**Federal Aviation Administration (FAA)** - The Federal Aviation Administration (FAA) is the element of the United States government with primary responsibility for the safety of civil aviation. Among its major functions are the regulation of civil aviation to promote safety and fulfill the requirements of national defense and development and operation of a common system of air traffic control and navigation for both civil and military aircraft.

**Fixed Base Operator (FBO)** - An operator of an aviation facility at a fixed location with access to the airfield. An FBO can be a full service or limited use facility. A full service FBO sells fuel, provides hangar space, and offers a variety of services such as flight instruction, flight charters, and maintenance. A limited use FBO would not offer fuel, and would be limited to hangar space, maintenance, or other support uses such as instrumentation or engine repairs.

**General Aviation (GA)** - All civil aviation except scheduled passenger and cargo airlines.

**General Plan** - A compendium of city or county policies regarding long-term development, in the form of maps and accompanying text. A General Plan is a legal document required of each local agency by the State of California Government Code Section 65301 and adopted by a city council or board of supervisors.
Greenhouse Gases - Gases that trap heat in the earth's atmosphere. Both naturally occurring and anthropogenic (man-made) greenhouse gases include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃).

Habitat - The natural home of a plant or animal.

Impact - The effect, influence, or imprint of an activity or the environment. Impacts include: direct or primary effects which are caused by the project and occur at the same time and place; indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. 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.

Impervious Surface - Ground surface that cannot be penetrated by water. It includes paved and compacted surfaces, as well as those covered by buildings.

Landside - The portion of an airport that is not designed for aircraft to operate on. This includes, but is not limited to, parking garages, roadways, landscaping, and passenger pick-up/drop-off areas.

Landform - A natural feature of a land surface.

Land Use - The purpose or activity for which a piece of land or its building is designed, arranged, or intended, or for which it is occupied or maintained.

Land Use Plan - An adopted map depicting the approximate location of residential, commercial, public, semi-public, and private-uses, open space, and road systems with a statistical summary of areas and densities for these land uses.

Leasehold - Property held by lease.

Level of Service (LOS) - A concept developed to quantify the degree of comfort afforded to drivers as they travel on a given roadway. The degree of comfort includes such elements as travel time, number of stops, total amount of stopped delay, etc. As defined in the Highway Capacity Manual, six grades are used to describe LOS, and are denoted A through F.

Mean Sea Level (MSL) - The height of the surface of the sea for all stages of the tide, used as a reference for elevations. Also called sea level datum.

Noise - Any sound that is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying.

Runway Safety Area (RSA) - A defined surface surrounding the runway and extending beyond the runway end, prepared or suitable for reducing the risk of damage to airplanes in the event of an undershoot, overshoot, or veer off the runway that provides greater accessibility for firefighting and rescue equipment during such incidents.

Setback - The minimum distance required by zoning to be maintained between two structures or between a structure and a property line.

View Corridor - The line of sight - identified as to height, width, and distance - of an observer looking toward an object of significance to the community (e.g., ridgeline, river, historic building, etc.); the route that directs the viewer's attention.

Volume to Capacity Ratio (V/C) - The ratio of flow rate to capacity for a transportation facility.

Zoning - Local codes regulating the use and development of property. The zoning ordinance divides the city or county into land use districts or “zones,” illustrated on zoning maps, and specifies the allowable uses within each such zone. It establishes development standards such as minimum lot size, maximum structure, height, building setbacks, and yard size.
7.4 Draft Supplemental EIR Mailing List

The following is a list of the parties to whom copies of the Draft Supplemental EIR was sent for review and/or to whom notice of the availability (NOA) of the Draft Supplemental EIR was sent.
Federal Agencies (NOA)

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Rear Admiral William French
Commander, Navy Region Southwest
United States Navy
937 North Harbor Drive
San Diego, CA 92132-0058
<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Position</th>
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<tbody>
<tr>
<td>Mr. Gary Honcoop</td>
<td>Mgr, Strategic Analysis/Liaison</td>
<td>Air Resources Board</td>
<td>1001 &quot;I&quot; Street, P.O. Box 2815, Sacramento, CA 95812</td>
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<tr>
<td>Mr. Mark Delaplaine</td>
<td>Federal Consistency Manager</td>
<td>California Coastal Commission</td>
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<td>Ms. Mary D. Nichols</td>
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<td>Air Resources Board</td>
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<td>Dr. Jim Lerner</td>
<td>Air Pollution Specialist</td>
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<td>Ms. Diana Lilly</td>
<td>Coastal Planner</td>
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<tr>
<td>Ms. Mary Small</td>
<td>South Coast Regional Manager</td>
<td>California Coastal Conservancy</td>
<td>1330 Broadway, 13th Floor, Oakland, CA 94612</td>
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<td>Mr. Larry Simon</td>
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<td>California Coastal Commission</td>
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<tr>
<td>Ms. Marilyn Fluharty</td>
<td>Dept of Fish &amp; Game (Region 5)</td>
<td>Dept of Conservation</td>
<td>4949 Viewridge Avenue, San Diego, CA 92123</td>
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<tr>
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<td>Dept. of General Services</td>
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<td>707 3rd Street, W. Sacramento, CA 95605</td>
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<td>Ms. Sherilyn Sarb</td>
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<td>Dept of Forestry &amp; Fire Protection</td>
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<tr>
<td>Mr. Michael J. Mulligan</td>
<td>Deputy Regional Manager</td>
<td>Dept of Fish &amp; Game</td>
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<tr>
<td>Mr. Ron Bolyard</td>
<td>Aviation Planner</td>
<td>Caltrans, Div of Aeronautics MS#40</td>
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<tr>
<td>Mr. George Armstrong</td>
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<td>Caltrans, Div of Aeronautics MS#40</td>
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<tr>
<td>Mr. Phillip Crimmins</td>
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<tr>
<td>Mr. Al Cox</td>
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<tr>
<td>Mr. Mario Orso</td>
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<tr>
<td>Mr. Chris Schmidt</td>
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<td>Cal EPA</td>
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<tr>
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<td>Cal EPA</td>
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</table>
State Agencies continued (NOA)

Captain C.M. McGagin  
Commander, San Diego Area  
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Mr. Dave Singleton  
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Native American Heritage Commission  
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Reclamation Board  
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Sacramento, CA 95814

Ms. Bea Griffey  
Regional Water Quality Control Board  
San Diego Region (9)  
9174 Sky Park Court, Ste. 100  
San Diego, CA 92123-4340
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<tr>
<td>Mr. Frank Alessi</td>
<td>Executive Vice President</td>
<td>Centre City Development Corp</td>
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<td>401 “B” Street, Fourth Floor</td>
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<td>San Diego, CA 92101</td>
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<tr>
<td>Mr. Kevin Faulconer</td>
<td>Council President Pro Tem</td>
<td>City of San Diego, District 2</td>
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<td>Mr. Brad Richter</td>
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<tr>
<td>Mr. Casey Tanaka</td>
<td>Mayor</td>
<td>City of Coronado</td>
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<td>Coronado, CA 92118</td>
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<tr>
<td>Mr. Mr. Samir Hajiri</td>
<td>Senior Traffic Engineer</td>
<td>City of San Diego</td>
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<tr>
<td>Kelly Broughton</td>
<td>Director</td>
<td>City of San Diego, Devel Svcs Dept</td>
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<td>City of San Diego, Develop Svcs</td>
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<td>Mr. Job Nelson</td>
<td>Director, Intergovernmental Relations</td>
<td>City of San Diego</td>
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<td>Ms. Edith Gutierrez</td>
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<tr>
<td>Mr. Mr. Donn LiPera</td>
<td>Project Manager, SA &amp; Mitig Prgm</td>
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<td>Mr. Mike Hix</td>
<td>Project Manager, SA &amp; Mitig Prgm</td>
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<tr>
<td>Mr. Mr. Mike Zdon</td>
<td>Project Manager, SA &amp; Mitig Prgm</td>
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<tr>
<td>Mr. Gary Gallegos</td>
<td>Executive Director</td>
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<tr>
<td>Mr. Mr. Muggs Stoll</td>
<td>Director of Land Use &amp; Transportation</td>
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<td></td>
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<td>810 Mission Avenue</td>
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<td>Oceanside, CA 92054-2825</td>
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<tr>
<td>Ms. Rosa Maria S. Abreu</td>
<td>Assistant Director</td>
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<td></td>
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<td>10124 Old Grove Road</td>
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<td>San Diego, CA 92131-1649</td>
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<td>Mr. Andy Hamilton</td>
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<td>Mr. James Gilhooly</td>
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<td>Mr. Paul Grimes</td>
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<td>Mr. Michael Huff, A.S.I.D.</td>
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<td>Mr. Bill Ingram</td>
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<td>Mr. John Karpinski</td>
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<td>Mr. Darrell Roberson</td>
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<td>Mr. Wayne Smith</td>
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<td>Ms. Ardetta Steiner</td>
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<tr>
<td>Mr. Harris H. Steiner</td>
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<tr>
<td>Mr. Tom Stewart</td>
<td>Malcolm Pimie, Inc.</td>
<td>455 Capitol Mall, Ste. 330-A Sacramento, CA 95814</td>
</tr>
<tr>
<td>Name</td>
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<td>City, State, ZIP</td>
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<tr>
<td>Ms. Margo Tarnquay</td>
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<td>Ms. Margaret B. Valentine</td>
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<tr>
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<td>Adcentive Group</td>
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<td>Mr. James E. Whalen</td>
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<tr>
<td>Mr. Paul Zablotny</td>
<td>4739 Glacier Avenue</td>
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4801 Santa Monica Avenue
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Point Loma Hervey Branch Library
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San Diego, CA 92107-1606
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<tr>
<td>Mr. Peter Van Valkenburg</td>
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<tr>
<td>Alamo/Enterprise/National/WeCar</td>
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<tr>
<td>Attn: Airport Relations Dept</td>
</tr>
<tr>
<td>700 Corporate Park Drive, 3rd Floor</td>
</tr>
<tr>
<td>St. Louis, MO 63105</td>
</tr>
<tr>
<td>Ms. Lorie Tallarico</td>
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<tr>
<td>Avis Rent a Car System, Inc.</td>
</tr>
<tr>
<td>513 Eccles Avenue</td>
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<tr>
<td>S. San Francisco, CA 94080</td>
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<tr>
<td>Mr. Bob Fore</td>
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<td>Budget San Diego</td>
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<tr>
<td>3125 Pacific Hwy</td>
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<td>San Diego, CA 92562</td>
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<td>Ms. Tammy Branham</td>
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<td>Dollar Thrifty Automotive Group, Inc.</td>
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<tr>
<td>5330 E. 31st Street</td>
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<td>Mr. Allen Rezapour</td>
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<tr>
<td>Fox Rent a Car</td>
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<td>5500 W. Century Blvd</td>
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<td>Ms. Connie Gurich</td>
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<td>Hertz Corporation</td>
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<td>6151 Century Blvd, Ste 600</td>
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<td>Mr. John Macdonald</td>
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<td>Midway Rent a Car, Inc.</td>
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<td>4751 Wilshire Blvd #120</td>
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<td>Raj Zakharia</td>
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<td>Pacific Rent-a-Car, Inc.</td>
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<td>Mr. Ray Noohi</td>
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<td>West Coast Rent a Car</td>
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APPENDIX A

Notice of Preparation (NOP), NOP Comment Letters, and Scoping Meeting Materials
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Part II: NOP Comment Letters
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APPENDIX A
Part I

Notice of Preparation (NOP)
Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report

Lead Agency: San Diego County Regional Airport Authority

Mailing Address: P.O. BOX 82776
              San Diego, CA 92138-2776

Physical Address: 3225 N. Harbor Drive
                  San Diego, CA 92101

Contact: Ted Anasis

The San Diego County Regional Airport Authority (SDCRAA) will be the CEQA Lead Agency and will prepare a Supplemental Environmental Impact Report (SEIR) for the project identified below. We need to know the view of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the project.

The SDCRAA is requesting input from interested governmental and quasi-governmental agencies, other organizations and private citizens regarding the scope and content of environmental information to be included in the SEIR. Public agencies receiving this notice may need to use the SEIR prepared by the SDCRAA when considering their permits or other approvals for the proposed project.

Any public agencies that respond to this Notice of Preparation are requested, at a minimum, to:

1. Described significant environmental issues, reasonable alternatives and mitigation measures that they would like to have addressed in the Draft SEIR.
2. State whether they are a responsible or trustee agency for the project, explain why and note the specific project elements that are subject to their regulatory authority.
3. Provide the name, address and phone number of the person who will serve as the point of contact throughout the environmental review process for this project.

The project description, location and the potential environmental effects are contained in the attached materials. A copy of the Initial Study is attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Ted Anasis, AICP, at the mailing address shown above. We will need the name for a contact person in your agency.

Project Title: San Diego International Airport Master Plan - Amendments to the Airport Land Use Plan and Airport Implementation Plan

Project Location: San Diego County
                 City (nearest) San Diego County

Project Description: See the following description of the proposed project.

Date: May 20, 2010

Signature

Title Manager, Airport Planning

Telephone 619.400.2478

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375
Project Description

Project Location

The proposed project is located at San Diego International Airport (SDIA). SDIA is located in the northwest portion of the downtown area within the City of San Diego, and is generally 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. Figure 1 shows the general location of SDIA within the regional context.

The proposed improvements that comprise the project to be addressed in the Supplemental Environmental Impact Report (SEIR) are primarily located within the northern portion of the airport, with the exception of a proposed on-airport access road that would extend along the eastern and southeastern boundary of the airport. The specific nature and location of those improvements are described below in Project Characteristics.

Project Background

The SDIA Airport Master Plan (AMP) describes numerous improvements planned to occur at the airport, generally delineated within an overall Airport Land Use Plan (Figure 2) and more specifically defined within a proposed Airport Implementation Plan (Figure 3). At the time when the Draft Environmental Impact Report (DEIR) for the AMP was being prepared, the projects included within the Airport Implementation Plan were those that had an immediate purpose and need and were predominantly under the complete development control of the SDCRAA. As such, information regarding the design and operation characteristics and implementation timing of those projects was determined. The AMP also envisioned other improvements that would be developed by future tenants or in partnership with future tenants; however, the details of those future projects were not available at the time (i.e., needed more input from tenants and key stakeholders). Such projects were included in concept within the Airport Land Use Plan, along with the other improvements planned for the airport, but were not included in the Airport Implementation Plan (i.e., the Airport Land Use Plan provides the overall development framework for all improvements planned at the airport, of which the more detailed improvements defined in the Airport Implementation Plan are a subset). Based on information available at the time, the AMP FEIR addressed potential impacts associated with the Airport Implementation Plan improvements at a project-level of analysis, and the impacts associated with land uses and conceptual improvements in the Airport Land Use Plan at a program-level of analysis. The Final Environmental Impact Report (FEIR) for the AMP was certified in May 2008. Since that time, additional coordination with, and receipt of input from, various airport tenants and key stakeholders has occurred, and further planning of certain conceptual improvements identified in the Airport Land Use Plan has been completed. A revised Airport Land Use Plan has been drafted that would amend the currently adopted AMP Airport Land Use Plan based upon additional design planning and minor refinements to the designated land use areas in the northern portion of the airport. A proposed Airport Implementation Plan – Northside Improvements has been prepared that describes the development projects proposed for the northern portion of the airport based upon the facility requirements derived from the airport forecast and coordination with the airport tenants and stakeholders. The improvements associated with the revised Airport Land Use Plan (Figure 2) and the proposed Airport Implementation Plan – Northside Improvements (Figure 3) include the following:

- Consolidated Rental Car (CONRAC) Facility
- Air Cargo Warehouse Facilities and Associated Improvements
- Central Receiving/Distribution Center
- Terminal Link Roadway (along the eastern perimeter of the airport connecting the proposed northside facilities to the southside of the airport)
- On-site utilities improvements to serve the proposed development
Project Characteristics

CONRAC Facility

As described in the AMP Airport Land Use Plan and related FEIR, a CONRAC facility was planned to be constructed in the airport's northside area consisting of an 11,170 space parking structure with 3.3 million square feet. The structure would include 9,000 rental car ready/return and storage spaces and 2,170 public parking spaces.

However, since adoption of the AMP and completion of the FEIR, further coordination with all of the rental car agencies on their rental car forecasts and facility requirements has resulted in the need for a smaller CONRAC facility. As depicted in Figure 3, the current proposal is to construct a 1.9 million square foot facility for rental car ready/return and storage operations with up to 6,500 parking spaces. This is a reduction of approximately 1.4 million square feet from what was originally planned and analyzed in the AMP FEIR. The smaller CONRAC facility is planned in the same location designated in the Airport Land Use Plan for Ground Transportation land uses (Yellow). The smaller CONRAC facility is located along Pacific Highway oriented closest to the Sassafras/Pacific Highway intersection that will serve as the primary access point to the CONRAC.

The smaller CONRAC facility is currently planned to be a four level parking structure (with the fourth level covered) that would measure approximately 52 feet in height. The facility would total approximately 1.9 million square feet of space and encompass a footprint of approximately 27.5 acres. The space would include a 40,200 square foot customer service building integrated into the front of the parking structure. The facility would operate 24 hours per day, seven days per week. Shuttle service to and from the passenger terminals would be provided in common use CONRAC buses that would utilize a new Terminal Link Roadway (see below) for access between the passenger terminals and the CONRAC facility. Customers would be dropped-off and picked-up at the CONRAC customer service building.

The primary ground access to the CONRAC facility would be located near the intersection of Pacific Highway/Sassafras Street. This intersection would be used by customers for returning rental cars as well as exiting the facility. A service access for the CONRAC facility would be via the Pacific Highway/Washington Street intersection and connecting to a new on-site road between the new CONRAC and air cargo facilities. The service access route would be utilized by employees, maintenance vehicles, semi-truck car carriers, fueling vehicles, etc.

In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Proposed Airport Implementation Plan would be relocated west of the proposed CONRAC facility. The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure will be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street.

Air Cargo Warehouse Facilities and Associated Improvements

As depicted in Figure 3, new air cargo facilities would be located parallel to, and on the northside of, Taxiway C. The currently proposed facilities would include 225,000 square feet of warehouse space for air cargo, and an aircraft parking apron with up to nine (9) parking positions for cargo aircraft. All current and future air cargo operators would be consolidated into the new cargo facilities. The proposed cargo warehouse facilities would be designed to accommodate future air cargo volumes at SDIA.

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1 This height distance is measured from the surface of the ground floor to the surface of the top floor (44 feet) plus an estimate of eight additional feet for a planned canopy or hard top. The ultimate height for the structure will be determined during final design.
Due to the existing lack of warehouse space at SDIA, all air cargo operations (including the sorting and staging of pallets/containers) are currently conducted out in the open on former runway/taxiway and apron areas in the northern portion of the airfield. The new facilities would provide an enclosed area (warehouse) within which incoming and outgoing cargo can be sorted and staged prior to being transferred between trucks and aircraft. As currently planned, two air cargo warehouse structures would be approximately 116 feet deep, total approximately 1,939 feet in length, and setback 1,113 feet from the runway to provide airspace clearance for the tails of aircraft parked in front of the warehouse. The height of the structures would range from 10 to 20 feet.

The planned air cargo facilities would include the construction of a new aircraft parking apron area. A taxilane would be constructed adjacent to the cargo ramp and parallel to Taxiway C.

Central Receiving/Distribution Center

A 40,000 square foot Central Receiving/Distribution Center (CRDC) would be constructed at the far northwest end of the cargo area (on the northwest side of the control tower). The CRDC would provide a single receipt point of all goods presently delivered to the airport. Distribution of these goods to various locations would be conducted by a single delivery service at scheduled times and would eliminate individual vendors at unscheduled intervals. It is anticipated that the CRDC would operate from 3 a.m. to 5 p.m. seven days a week, with the peak of activity being from 4 a.m. to noon.

Access to the air cargo warehouse facilities would be via the Washington Street/Pacific Highway intersection and an existing on-airport perimeter road to the existing terminals.

Terminal Link Roadway

The Terminal Link Roadway, identified as a transit corridor in the AMP FEIR, would be a dedicated non-public on-airport road that connects the northside development area and south terminal area. As depicted in Figure 3, the road alignment would run south from the Sassafras Street/Pacific Highway intersection to the eastern end of the runway then turn west and proceed to the intersection of North Harbor Drive and the existing Rental Car Access Road. This alignment would take the roadway through the existing general aviation area, the Runway Safety Area (RSA) for Runway 27, and an employee parking lot on State of California lands operated by the Unified Port District of San Diego and leased to Solar Turbines. Related planning considerations for the Terminal Link Roadway include the following:

- Various alignments through the existing general aviation area were evaluated by the San Diego County Regional Airport Authority (SDCRAA) and the preferred option includes relocation of the fixed based operator (FBO). As shown in the AMP FEIR, the relocation of a future FBO facility for general aviation is included in the Airport Implementation Plan.
- The SDCRAA has determined that it would be feasible to construct the Terminal Link Roadway around the end of Runway 27 (i.e., retain the existing airfield service road that extends around Runway 27, place a new airfield security fence along the outside edge of that roadway and construct the Terminal Link Roadway between the new security fence and the existing airport boundary fence).
- The SDCRAA is currently in the process of coordinating with the Unified Port District of San Diego to identify alternate locations for the employee parking leased to Solar Turbines. It is currently anticipated that relocated parking would be provided within approximately 0.5 mile of the Solar Turbines facility.

The Terminal Link Roadway would be dedicated to SDCRAA vehicles and passenger shuttle buses, and no public vehicles would be permitted to use the roadway. As defined in the Northside Planning study, the 2-lane roadway would provide one twelve-foot wide lane in each direction with six-foot shoulders on each side for an overall right-of-way dimension of 36 feet.
On-Site Utilities

Development of the new CONRAC facility, air cargo warehouse and CRDC facilities described above would include on-site utilities improvements to provide water, sewer, natural gas, storm drain, power, and communications infrastructure for each of the planned facilities. The main trunk lines, or “backbone system,” of the new utilities would generally be located within the new on-site access road proposed to extend west from Sassafras Street at Pacific Highway, with the smaller service lines extending generally north and south from the backbone system. The new utility lines would connect to the existing utility infrastructure located nearby, with the majority of the new connections occurring in the vicinity of Pacific Highway and Sassafras Street. Some utilities such as water lines, natural gas lines, and telecommunication lines would also have connections to existing utilities at both the east side and the west side of the proposed development area. No major improvements to existing off-site utilities are currently anticipated to be necessary for the proposed development.

Potential Environmental Effects

The AMP FEIR addressed the potential environmental effects associated with a variety of improvements planned to occur at SDIA in the near-term and in the more distant future. As discussed in the attached Initial Study, the majority of potential environmental effects associated with the improvements described above have already been adequately addressed in the AMP FEIR. There are, however, some issue areas that warrant further evaluation in order to fully address the potential environmental effects specific to the proposed improvements. Such evaluation will be completed as a Supplement to the AMP FEIR (i.e., the SEIR), providing only the additional information and analysis necessary to address potential impacts associated with the subject improvements to the extent that they are not otherwise fully addressed in the AMP FEIR. As more fully described in the attached Initial Study, such potential environmental effects to be addressed in the SEIR include the following topic:

- Aesthetics.
Notice of Preparation

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Figure 3

Legend
- - - Existing airport property boundary
Existing structures to be removed
Future apron pavement
Future taxiway/taxilane
Future surface parking
Future GA facilities (approved in Airport Implementation Plan)
Future terminal link roadway
Future service road
Existing ATCT Facilities

Notes:
1/ The Future Taxilane will be constructed as part of the new General Aviation development (approved as part of the Airport Implementation Plan) and the new air cargo facilities.
2/ Taxiway C Realignment (approved as part of the Airport Implementation Plan).

Source: San Diego County Regional Airport Authority, March 2010.
Environmental Checklist and Impact Analysis

1 Project Title: San Diego International Airport Master Plan - Amendments to Airport Land Use Plan and Airport Implementation Plan

2 Lead Agency Name and Address: San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

3 Contact Person and Phone Number: Ted Anasis, AICP
619.400.2478

4 Project Location: San Diego International Airport, 3225 N. Harbor Drive, San Diego, CA

5 Project Sponsor's Name and Address: San Diego County Regional Airport Authority (SDCRAA)
P.O. Box 82776
San Diego, CA 92138-2776

6 General Plan Designation: Institutional & Public and Semi-Public Facilities; Industrial Employment (per the City of San Diego General Plan; however, the SDCRAA is a local entity of regional government responsible for land use determinations at the airport)

7 Zoning: International Airport

8 Description of Project: The San Diego International Airport (SDIA) Airport Master Plan (AMP) delineates numerous improvements planned to occur at the airport, as generally defined within the long-term development framework of the AMP Airport Land Use Plan. Several of those improvements are more specifically defined for implementation within the Airport Implementation Plan. The AMP Final Environmental Impact Report (FEIR), certified in May 2008, addresses the land uses and improvements contemplated in the Airport Land Use Plan at a program-level of analysis, and the specific improvements of the Airport Implementation Plan at a project-level of analysis, based on information available at the time. Over the past two years, additional planning and coordination with airport tenants and stakeholders has occurred regarding land use areas identified in the Airport Land Use Plan that now enables them to be added to the Airport Implementation Plan. Such improvements are planned primarily in the northern portion of the airport, also referred to as the Northside Development area, and include:

- a Consolidated Rental Car (CONRAC) Facility;
- Air Cargo Warehouse Facilities and Associated Improvements;
- Central Receiving/Distribution Center;
- a Terminal Link Roadway along the eastern perimeter of the
airport connecting the proposed northside facilities to the main terminal area; and

- On-site utility improvements to serve the proposed development.

Please see the accompanying Notice of Preparation for additional information regarding the Project Description. The aforementioned improvements provide the basis for proposed amendments to the adopted AMP Airport Land Use Plan and Airport Implementation Plan, which constitute the Proposed Project for review under the California Environmental Quality Act (CEQA). The analysis provided herein evaluates the degree to which the impacts associated with these improvements have already been addressed in the AMP FEIR and what additional analysis is warranted.

Environmental Factors Potentially Affected:

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

- [x] Aesthetics
- [ ] Agricultural Resources
- [ ] Air Quality
- [ ] Biological Resources
- [ ] Cultural Resources
- [ ] Geology/Soils
- [ ] Hazards and Hazardous Materials
- [ ] Hydrology/Water Quality
- [ ] Land Use/Planning
- [ ] Mineral Resources
- [ ] Noise
- [ ] Population/Housing
- [ ] Public Services
- [ ] Recreation
- [ ] Transportation/Traffic
- [ ] Utilities/Service Systems
- [x] Mandatory Findings of Significance

Determination:

On the basis of this initial evaluation:

- [ ] I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- [ ] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

- [ ] I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- [x] I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and (2) has been addressed by mitigation measures based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- [ ] I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Signature: [Signature]
Date: May 20, 2010

Ted Anasis, AICP
Printed Name
San Diego County Regional Airport Authority
For

San Diego International Airport Master Plan
Amendments to Airport Land Use Plan
and Airport Implementation Plan

Initial Study: May 20, 2010
Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:

   (a) Earlier Analysis Used. Identify and state where earlier analyses are available for review.

   (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to the environmental effects of a project in whatever format is selected.

9. The explanation of each issue should identify:

   (a) The significance criteria or threshold, if any, used to evaluate each question

   (b) The mitigation measure identified, if any, to reduce the impact to a less-than-significant level
I. AESTHETICS. Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Have a substantial adverse effect on a scenic vista?</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>c. Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Discussion:**

Section 5.13, Aesthetics, of the AMP FEIR addresses potential impacts to aesthetic resources from implementation of the AMP. That section cross-references Section 5.12, Light Emissions, of the AMP FEIR relative to light and glare impacts. The following evaluates the extent to which those analyses apply to the Proposed Project.

a. **Would the project have a substantial adverse effect on a scenic vista?**

   **Potentially Significant Impact.** As described on page 5.13-7 of the AMP FEIR, existing visual resources within the SDIA project area consist of natural and human-made features. Natural visual features include San Diego Bay, the Pacific Ocean and distant views of the Point Loma peninsula. The human-made features include the downtown skyline and various historic structures located on the east side of U.S. MCRD San Diego. The AMP FEIR evaluates potential impacts from 23 key view locations, six of which are located around the northern portion of the airport (i.e., Key Views 12 through 17). The analysis of potential impacts at these view locations includes very general consideration of the types of uses envisioned in the Airport Land Use Plan. The AMP FEIR analysis provides a more detailed discussion of impacts related to improvements proposed under the Airport Implementation Plan. Given that the proposed CONRAC, air cargo improvements envisioned in the Northside Development area now have more project definition and specificity than at the time the AMP FEIR was completed, additional analysis of potential visual impacts associated with those improvements, similar to the analysis provided in the AMP FEIR for the Airport Implementation Plan improvements, can be accomplished to further evaluate the potential for significant visual impacts.

The visual impacts associated with development of the Project elements in the Northside Development area are, for now, considered to be potentially significant. The analysis presented in the AMP FEIR will be supplemented with additional information specific to the improvements currently being proposed.
b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?

**Less Than Significant Impact.** The project site is largely vacant or occupied by airport uses, and is devoid of any notable trees, rock outcroppings, or other such scenic resources. The City of San Diego Progress Guide and General Plan Update designates North Harbor Drive and Sports Arena Boulevard in the project area as scenic highways. Views of the project site from these two roadways are dominated by existing airport improvements in the foreground and background, respectively. Implementation of the Proposed Project would not significantly alter the nature and character of those existing views. As such, the conclusion remains that the potential impact would be less than significant and no additional analysis is warranted.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

**Potentially Significant Impact.** As summarized above, the AMP FEIR provides a general program level of consideration of visual impacts associated with the Airport Land Use Plan, and a more detailed evaluation of impacts associated with improvements under the Airport Implementation Plan. Although the currently proposed improvements were included in concept within the Airport Land Use Plan, the additional project details and specificity now available for those improvements provide a basis for further evaluation of potential visual impacts. The visual impacts are, for now, considered potentially significant and additional information and analysis will be developed to supplement the AMP FEIR.

d. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

**Less Than Significant Impact.** As cross-referenced in Section 5.13 of the AMP FEIR, Section 5.12, *Light Emissions*, addresses potential lighting and glare impacts associated with development at SDIA. The AMP FEIR analysis of impacts associated with new development, such as that associated with the Airport Implementation Plan, indicates light and glare associated with the SDIA project site is presently generated by buildings and exterior sources to protect and secure people, property and the air transportation system. Implementation of the Airport Implementation Plan, as addressed within the AMP FEIR, would increase the size of terminal facilities, aircraft parking, apron, aircraft taxi lane, surface and structured parking and vehicle circulation, as well as reconfigure airfield, roadways, and parking facilities. Increased building and exterior sources would result in greater amounts of light emanating from interior and exterior sources. The addition of the currently proposed improvements to the Airport Implementation Plan would materially alter the essence and conclusions of the FEIR analysis. Additionally, inclusion of the following measures from the AMP FEIR as components of the Proposed Project would reduce impacts to a less than significant level.

- The light fixtures specified for the project design must comply with the standard of the Illuminating Engineering Society for full cutoff capability.
- Exterior lighting shall be designed and located as to avoid intrusive effect on runway operations, so as not to result in an air safety hazard. Lighting fixtures shall use shielding, if necessary, to prevent spill lighting on adjacent off-site uses.

Relative to construction-related impacts, page 5.12-3 of the AMP FEIR indicates that construction activities could create light or glare impacts during both daylight and non-daylight hours if safety and security lights were not positioned correctly. With the following measure as a component of the Proposed Project during construction, those impacts would be reduced to a less than significant level.
• During construction activities, the construction contractor shall ensure that temporary construction-related lighting shall be arranged so that direct rays would not shine on or produce glare for adjacent street traffic, or community, biological or scientific resources.

The impacts analysis concludes on page 5.12-4 of the AMP FEIR that, because the AMP project includes improvements (i.e., features and measures incorporated into the project to reduce environmental impacts) to ameliorate the effects of light and glare from additional illumination at SDIA resulting from the Proposed Project and from construction, there would be a less than significant impact due to light emissions.

The AMP FEIR analysis summarized above is fully applicable to the Proposed Project, and adequately addresses potential light and glare impacts. No additional analysis is warranted.

<table>
<thead>
<tr>
<th>II. AGRICULTURAL RESOURCES.</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>c. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
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</tbody>
</table>

Discussion:

Section 5.21, Effects Not Found to be Significant, of the AMP FEIR, specifically page 5.21-2, provides a discussion regarding agricultural land. The following summarizes the basis for such a conclusion that new development at SDIA would not affect agricultural resources.

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. SDIA is underlain by artificial fill and bay deposits, neither of which is identified in the Soil Candidate Listing for prime farmland and farmland of statewide importance by the United States
Department of Agriculture. Further, SDIA is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. Urban Land is land that is primarily covered by buildings, streets, and sidewalks, and, hence, it is unavailable for agricultural activity. Made Land consists of smooth, level areas that have been filled with excavated and transported soil material, paving material, and soil material dredged from lagoons, bays, and harbors, which is also unavailable for agricultural activity. As such, implementation of the Proposed Project would have no impact on farmland. No further analysis is warranted.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. No agricultural resources or operations exist within the project limits or adjacent areas. The project site is not zoned for agricultural use but is designated for airport uses; and no Williamson Act contracts apply to the project site. No further analysis is warranted.

c. Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use?

No Impact. No agricultural resources or operations exist within the project limits or adjacent areas. No further analysis is warranted.

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### AIR QUALITY

<table>
<thead>
<tr>
<th>Impact Level</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>✗</td>
<td></td>
<td>✓</td>
<td>✗</td>
</tr>
<tr>
<td>b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td>✗</td>
<td></td>
<td>✓</td>
<td>✗</td>
</tr>
<tr>
<td>c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?</td>
<td>✗</td>
<td></td>
<td>✓</td>
<td>✗</td>
</tr>
<tr>
<td>d. Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>✗</td>
<td></td>
<td>✓</td>
<td>✗</td>
</tr>
<tr>
<td>e. Create objectionable odors affecting a substantial number of people?</td>
<td>✗</td>
<td></td>
<td>✓</td>
<td>✗</td>
</tr>
</tbody>
</table>
Discussion:
Section 5.5, Air Quality, of the AMP FEIR addresses potential impacts to air quality from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As described in greater detail below, the analysis and conclusions of the AMP FEIR relative to air quality impacts related to operational emissions are considered to be applicable to, and adequate for, the improvements included in the Proposed Project. As also described below, implementation of the Proposed Project would add certain improvements to the Airport Implementation Plan; however, the addition of those improvements is not expected to substantially increase the amounts of construction-related emissions addressed in the AMP FEIR. This is due to the fact that implementation of the currently proposed improvements in the northern portion of the airport is anticipated to occur sometime after the peak construction period assumed in the AMP FEIR. As such, no additional analysis regarding potential air quality impacts is warranted.

Operational Emissions: The AMP FEIR includes a delineation of the federal, state, and local regulatory framework applicable to the AMP including the Airport Land Use Plan. The AMP FEIR indicates that implementation of the Airport Land Use Plan, which includes the types of uses included in the Proposed Project, would result in exceedance of the threshold of significance for emission loads of oxides of nitrogen (NOx) in 2030 compared to the No Project Alternative. As indicated in Sections 5.5.6.5 and 5.5.6.6 of the AMP FEIR, implementation of either the Airport Land Use Plan or the No Project Alternative would each exceed the thresholds of significance for concentrations of NO2, Particulate Matter of a size 10 microns or less in diameter (PM10), and Particulate Matter of a size 2.5 microns or less in diameter (PM2.5). All of the exceedances are attributable primarily to emissions from aircraft operations, which for the most part are not within the control of SDCRAA, and from the associated ground service equipment (GSE) operations.

Regarding operational emissions related to the Airport Implementation Plan, as described in Section 5.5.6.1 of the AMP FEIR, the estimated emissions loads and concentrations for 2015 and 2030 are generally comparable to those of the Airport Land Use Plan and the No Project Alternative (i.e., the differences in total emissions and concentration levels between the plans are typically around five percent). Conclusions regarding significant air quality impacts associated with the Airport Implementation Plan are generally comparable to those summarized above for the Airport Land Use Plan, understanding that the improvements within the Airport Implementation Plan are a subset of, and comprise the vast majority of, the land uses and improvements contemplated in the Airport Land Use Plan. The emissions and associated exceedances identified in the AMP FEIR for both the Airport Implementation Plan and the Airport Land Use Plan are driven primarily by aircraft operations and associated GSE.

Implementation of the Proposed Project, which includes certain improvements assumed in AMP FEIR to be in the Airport Land Use Plan but not specifically called out in the AMP FEIR as part of the Airport Implementation Plan, would not change the conclusions of the AMP FEIR air quality analysis. Inclusion of the currently proposed improvements along with the projects specified in the AMP FEIR for the Airport Implementation Plan would not materially change the quantitative and qualitative evaluation of impacts and, moreover, were already accounted for in the AMP FEIR as part of the Airport Land Use Plan. As indicated above, the air pollutant emissions for both the Airport Land Use Plan and the Airport Implementation Plan are driven primarily by aircraft operations and related GSE operations and, both being based on the same aviation activity forecast, are very similar. The relatively minor increases in emissions from the Airport Land Use Plan, compared to the Airport Implementation Plan, appear primarily in the area of motor vehicle emissions. The greater emissions reflect the fact that project-related vehicle emissions associated with the Airport Land Use Plan include those associated with development of the CONRAC, air cargo facilities, and other
transportation improvements not included in the Airport Implementation Plan. If, however, the greater motor vehicle emissions associated with the Airport Land Use Plan were factored into the impacts analysis for the Airport Implementation Plan, the AMP FEIR conclusions would not change. Provided below are Tables 5-5.20 and 5-5.21 from the AMP FEIR delineating the Airport Implementation Plan emissions for 2015 and 2030, as originally stated in the AMP FEIR and as otherwise would occur when using the mobile source emissions from the Airport Land Use Plan (i.e., Airport Land Use Plan include mobile source emissions associated with the CONRAC, air cargo facilities, and access road). The shaded rows in each table present the Airport Land Use Plan on-site and off-site motor vehicle emissions for 2015 and 2030 from Tables 5.5-29 and 5.5-30, respectively, from the AMP FEIR. Also shaded are the rows indicating the airport emissions totals, the differences from the No Project Alternative, and the significance conclusions with the inclusion of mobile source emissions associated with the addition of the CONRAC, air cargo facilities, and other transportation improvements.

AMP FEIR Table 5-5.20
2015 Airport Implementation Plan Alternative
Air Emissions Inventory (tons per year)

<table>
<thead>
<tr>
<th>Source</th>
<th>CO</th>
<th>VOC</th>
<th>NOx</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aircraft</td>
<td>426</td>
<td>133</td>
<td>1,004</td>
<td>92</td>
<td>22</td>
<td>22</td>
</tr>
<tr>
<td>GSE/APU</td>
<td>193</td>
<td>7.4</td>
<td>31</td>
<td>2.3</td>
<td>1.0</td>
<td>0.9</td>
</tr>
<tr>
<td>Stationary Sources</td>
<td>4.1</td>
<td>3.5</td>
<td>13</td>
<td>4.0</td>
<td>0.7</td>
<td>0.7</td>
</tr>
<tr>
<td>Motor Vehicles (On-site) - Original AIP</td>
<td>35</td>
<td>1.6</td>
<td>3.7</td>
<td>0.0</td>
<td>0.8</td>
<td>0.6</td>
</tr>
<tr>
<td><strong>Motor Vehicles (On-site) - With Emissions from ALUP</strong></td>
<td>47</td>
<td>2.3</td>
<td>4.9</td>
<td>0.1</td>
<td>1.1</td>
<td>0.8</td>
</tr>
<tr>
<td>Motor Vehicles (Off-site) - Original AIP</td>
<td>141</td>
<td>5.4</td>
<td>34</td>
<td>0.3</td>
<td>3.1</td>
<td>2.0</td>
</tr>
<tr>
<td><strong>Motor Vehicles (Off-site) - With Emissions from ALUP</strong></td>
<td>168</td>
<td>6.44</td>
<td>41</td>
<td>0.3</td>
<td>3.7</td>
<td>2.3</td>
</tr>
<tr>
<td>2015 Airport Total - Original AIP</td>
<td>799</td>
<td>151</td>
<td>1,085</td>
<td>98</td>
<td>28</td>
<td>26</td>
</tr>
<tr>
<td><strong>2015 Airport Total - With Emissions from ALUP</strong></td>
<td>825</td>
<td>152</td>
<td>1,090</td>
<td>98</td>
<td>28</td>
<td>27</td>
</tr>
<tr>
<td>2015 No Project Total</td>
<td>778</td>
<td>150</td>
<td>1,082</td>
<td>97</td>
<td>27</td>
<td>26</td>
</tr>
<tr>
<td><strong>Differences(+/−) - Original AIP</strong></td>
<td>21</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td><strong>Differences(+/−) - With Emissions from ALUP</strong></td>
<td>47</td>
<td>2</td>
<td>8</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>CEQA Thresholds</td>
<td>100</td>
<td>13.7</td>
<td>40</td>
<td>40</td>
<td>15</td>
<td>10</td>
</tr>
<tr>
<td>Potentially Significant? - Original AIP</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Potentially Significant? - With Emissions from ALUP</strong></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

AIP - Airport Implementation Plan
ALUP - Airport Land Use Plan
**AMP FEIR Table 5-5.21**

**2030 Airport Implementation Plan Alternative**

**Air Emissions Inventory (tons per year)**

<table>
<thead>
<tr>
<th>Source</th>
<th>CO</th>
<th>VOC</th>
<th>NOx</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aircraft</td>
<td>449</td>
<td>163</td>
<td>1,461</td>
<td>121</td>
<td>31</td>
<td>31</td>
</tr>
<tr>
<td>GSE/APU</td>
<td>99</td>
<td>4.4</td>
<td>19</td>
<td>2.6</td>
<td>0.5</td>
<td>0.4</td>
</tr>
<tr>
<td>Stationary Sources</td>
<td>4.1</td>
<td>3.7</td>
<td>13</td>
<td>4.0</td>
<td>0.7</td>
<td>0.7</td>
</tr>
<tr>
<td>Motor Vehicles (On-site) - Original AIP</td>
<td>21</td>
<td>0.9</td>
<td>2.0</td>
<td>0.0</td>
<td>1.0</td>
<td>0.8</td>
</tr>
<tr>
<td>Motor Vehicles (On-site) - With Emissions from ALUP</td>
<td>29</td>
<td>1.3</td>
<td>2.7</td>
<td>0.1</td>
<td>1.4</td>
<td>1.1</td>
</tr>
<tr>
<td>Motor Vehicles (Off-site) - Original AIP</td>
<td>91</td>
<td>3.8</td>
<td>18</td>
<td>0.3</td>
<td>3.6</td>
<td>2.1</td>
</tr>
<tr>
<td>Motor Vehicles (Off-site) - With Emissions from ALUP</td>
<td>106</td>
<td>4.5</td>
<td>22</td>
<td>0.4</td>
<td>4.2</td>
<td>2.1</td>
</tr>
<tr>
<td>2030 Airport Total - Original AIP</td>
<td>664</td>
<td>175</td>
<td>1,513</td>
<td>128</td>
<td>37</td>
<td>35</td>
</tr>
<tr>
<td>2030 Airport Total - With Emissions from ALUP</td>
<td>687</td>
<td>177</td>
<td>1,518</td>
<td>128</td>
<td>38</td>
<td>36</td>
</tr>
<tr>
<td>2030 No Project Total</td>
<td>626</td>
<td>172</td>
<td>1,456</td>
<td>122</td>
<td>36</td>
<td>34</td>
</tr>
<tr>
<td>Differences(+/−) - Original AIP</td>
<td>38</td>
<td>3</td>
<td>57</td>
<td>6</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Differences(+/−) - With Emissions from ALUP</td>
<td>61</td>
<td>5</td>
<td>62</td>
<td>6</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>CEQA Thresholds</td>
<td>100</td>
<td>13.7</td>
<td>40</td>
<td>40</td>
<td>15</td>
<td>10</td>
</tr>
<tr>
<td>Potentially Significant? - Original AIP</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Potentially Significant? - With Emissions from ALUP</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

**AIP** - Airport Implementation Plan

**ALUP** - Airport Land Use Plan

As indicated above, the values that incorporate the motor vehicle emissions associated with the Airport Land Use Plan are very similar to, and in some cases the same as, the values originally estimated in the AMP EIR for the Airport Implementation Plan. There is no change in the conclusions regarding the impact significance of the air pollutant emissions.

With regard to air pollutant concentrations, a comparison between the values associated with the Airport Implementation Plan and the Airport Land Use Plan for 2015 and 2030, as presented in Tables 5.5-23, 5.5-24, 5.5-30, and 5.5-31 of the AMP FEIR, shows a similar relationship to that described above relative to emissions - being that there is not much difference between the plans. Again, the main reason is that both emissions and concentrations are driven primarily by aircraft operations and associated GSE operations, and that both plans assume the same future aviation activity level forecast. The relatively minor differences in motor vehicle emissions for the two plans, as summarized above, would not result in major changes in pollutant concentrations if such emissions associated with the Airport Land Use Plan were incorporated into the analysis of the Airport Implementation Plan. There would be no material changes in conclusions regarding the significance of air pollutant concentrations associated with implementation of the Airport Implementation Plan.

The conclusion of the AMP FEIR analysis, presented on page 5.5-41 of the AMP FEIR, indicates that implementation of the proposed AMP project, including the Airport Implementation Plan and the Airport Land Use Plan, would not conflict with or obstruct implementation of an applicable air quality plan; however, significant impacts from project-related NOx emissions were identified as being
unavoidable. That conclusion would not change with implementation of the Proposed Project (i.e., inclusion of additional improvements in the Airport Implementation Plan that were already included, and accounted for, in the Airport Land Use Plan. No additional analysis of this aspect of air quality impacts is warranted.

Construction Emissions: The AMP FEIR analysis also addresses construction-related emissions associated with the proposed development of improvements anticipated to occur within five years after approval of the AMP. Those improvements included the projects originally assumed within the Airport Implementation Plan, which comprise the vast majority of the projects contemplated in the AMP. The AMP FEIR analysis concludes that construction emissions would be less than applicable thresholds of significance, although emissions of NOx and Particulate Matter (PM) of a size 10 microns or less in diameter or of a size 2.5 microns or less in diameter (PM10 and PM2.5) would come within 10 percent of significance thresholds. Although the Proposed Project would add certain improvements to the Airport Implementation Plan, construction of those additional improvements is not expected to occur for several years and is likely to be preceded by construction of most, if not all, of the projects originally included in the Airport Implementation Plan. As indicated in Table 5-5.46 of the AMP FEIR, the highest levels of air pollutant emissions are expected to occur within the second, third, and fourth years after approval of the AMP, with a notable drop in construction emissions starting in the fourth year and a major drop in emissions in the fifth. Construction of the currently proposed improvements, such as the CONRAC and the air cargo facilities, is not anticipated to occur until sometime near or after the completion of other major improvements such as those originally included in the Airport Implementation Plan. As such, the AMP FEIR analysis of construction-related emissions is considered to already provide a conservative ("worst-case") estimate of potential air quality impacts; hence, no additional analysis is warranted.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The AMP FEIR analysis indicates that concentrations of ambient air pollutant emissions associated with implementation of the Airport Land Use Plan and Airport Implementation Plan would not exceed National Ambient Air Quality Standards, but would exceed California Ambient Air Quality Standards for NO2 and PM10/PM2.5. As noted above, such exceedances would, however, occur in the future even if the new development did not occur (i.e., would occur even under the No Project Alternative), based on anticipated increases in aircraft operations. Implementation of the proposed AMP Project would, therefore, not result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation (see page 5.5-37 of the AMP FEIR). As indicated above, implementation of the Proposed Project, which calls for amendments to the Airport Land Use Plan and Airport Implementation Plan to accommodate the results of additional project planning would not materially change the air pollutant emissions and concentrations, and the associated significance conclusions, presented in the AMP FEIR. No additional analysis is warranted.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. As indicated in Section 5.5.8 of the AMP FEIR's analysis of cumulative air quality impacts, the estimated amounts of NOx, volatile organic compounds (VOC), and carbon monoxide (CO) emissions from aircraft and GSE associated with SDIA under both Baseline and future year conditions are well within the amounts contained in the current Ozone State Implementation Plan (SIP) and CO Maintenance Plan for San Diego County. Therefore, the emissions associated with planned improvements to SDIA, in combination with all the emissions from
other sources in the area, are fully accounted for and are not expected to impede the area’s progress to attaining National Ambient Air Quality Standards and California Ambient Air Quality Standards for these pollutants. As noted above, implementation of the Proposed Project would not materially change the cumulative air quality impacts conclusions of the AMP FEIR analysis. No additional analysis is warranted.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** As described on page 5.5-11 of the AMP FEIR, sensitive receptors in proximity to the airport include the school and residential areas of Liberty Station to the west and northwest; Spanish Landing Park and the recreation area along Navy Lagoon to the south and west; and the military installations (i.e., Marine Corps Recruit Depot (MCRD) and United States Coast Guard) to the north and southeast. To provide a conservative (worst-case) analysis, other receptors were placed along the SDIA property boundary approximately 1,000 feet apart as a means of the identifying areas of highest pollutant concentrations whether the public had access or not - see Figure 5.5-2 for the locations of the 33 receptors analyzed. The AMP FEIR air quality analysis estimates future concentrations at these receptors assuming buildout of the uses included in the Airport Land Use Plan, with the highest concentrations summarized in Tables 5-5.30 and 5-5.31 for the modeling years 2015 and 2030, respectively. The results indicate exceedances of the California Ambient Air Quality Standards for NO₂, PM10 and PM2.5. Such exceedances would also occur under the Airport Implementation Plan and the No Project Alternative, as indicated in Tables 5-5.42 and 5-5.44 of the AMP FEIR. These conclusions and supporting analysis would not be materially changed by the Proposed Project. No additional analysis is warranted.

e. Would the project create objectionable odors affecting a substantial number of people?

**No Impact.** Given the basic nature and location of the proposed improvements, including a CONRAC between the airfield and industrial/commercial uses to the north, an on-airport access road between the airfield and adjacent existing roadways, and air cargo warehouse facilities adjacent to the airfield, implementation of the Proposed Project would not create objectionable odors affecting a substantial number of people. No further analysis is warranted.
### IV. BIOLOGICAL RESOURCES.

Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td></td>
<td>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td></td>
<td>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td></td>
<td>Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td></td>
<td>Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>e.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td></td>
<td>Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>f.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td></td>
<td>Conflict with the provisions of an adopted habitat conservation plan; natural communities conservation plan; or other approved local, regional, or state habitat conservation plan?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Discussion:**

Section 5.8, *Biotic Communities/Endangered and Threatened Species*, of the AMP FEIR addresses potential impacts to biotic resources including listed species, and Section 5.9, *Wetlands*, of the AMP EIR addresses potential impacts to wetland resources from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Proposed Project.
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

**Less Than Significant Impact.** As indicated on page 5.8-1 of the AMP FEIR, the vast majority of SDIA is developed or highly disturbed and devoid of any sensitive biotic resources. The two notable exceptions are the California least tern nesting areas ("ovals") at the southeast portion of SDIA and the undeveloped portion of the former Naval Training Center at the southwest portion of SDIA. As such, the improvements currently proposed in the northern portion of the airport are not located at, or near, the two sensitive resource areas. The Proposed Project on-airport access road that would connect the northern and southern portions of the airport would pass to the south of, but away from, the California least tern nesting areas. More specifically, the proposed access road would be aligned along the south edge of the airport property, which would place it approximately 75 to 100 feet away from the nearest point of the nesting area. The existing airfield service road located immediately south of and adjacent to the nest area would remain in place, and that service road along with a new segment of airfield security fence would separate the new on-airport access road from the least tern nesting area. Based on the above, potential impacts to the California least tern nesting area are anticipated to be less than significant.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game and U.S. Fish and Wildlife Service?

**No Impact.** As indicated on page 5.9-2 of the AMP FEIR, there are currently no wetlands (i.e., riparian habitat) at SDIA.\(^1\) There is no other sensitive natural community at SDIA. As such, no impact to wetlands would occur from the Proposed Project and no further analysis is warranted.

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

**No Impact.** As noted above, there are no wetlands near the currently proposed improvements; hence, no impact would occur and no further analysis is warranted.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

**No Impact.** As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of two areas in the southern portion of the airport (i.e., the California least tern nesting areas ("ovals") at the southeast portion of SDIA and the undeveloped portion of the former Naval Training Center at the southwest portion of SDIA). Those areas do not support any movement of species. No impact would occur from the Proposed Project and no further analysis is warranted.

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

**No Impact.** As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of two areas in the southern portion of the airport. Those areas do not support any

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\(^1\) Although page 5.9-2 of the AMP FEIR notes the presence of a small disturbed wetlands area within the former NTC parcel, that disturbed wetlands no longer exists.
resources that are subject to local policies or ordinances such as a tree preservation policy or ordinance. No impact would occur from the Proposed Project and no further analysis is warranted.

f. Would the project conflict with the provisions of an adopted habitat conservation plan; natural communities conservation plan; or any other approved local, regional, or state habitat conservation plan?

No Impact. As indicated on page 5.8-6 of the AMP FEIR, SDIA is not within an adopted habitat management plan or natural communities conservation plan. Although the airport is within the municipal limits of the City of San Diego, and the City is a participating jurisdiction in the San Diego Multiple Species Conservation Program (MSCP), State Tidelands along San Diego Bay are specifically excluded from the MSCP. These State Tidelands are addressed in the San Diego Bay Integrated Natural Resources Management Plan, which was prepared by the U.S. Navy and the Port of San Diego; however, that plan does not focus on “developed fill areas” such as SDIA, nor does it provide applicable guidance for the development of SDIA or the former Teledyne Ryan (TDY) leasehold. As such, no impact would occur and no further analysis is warranted.

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V. CULTURAL RESOURCES. Would the project:

<table>
<thead>
<tr>
<th>Would the Project</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Cause a substantial adverse change in the significance of a historical resource as defined in California Environmental Quality Act (CEQA) Section 15064.5?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
<tr>
<td>d. Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.7, Historic, Architectural, Archaeological, Paleontological, and Cultural Resources, of the AMP FEIR addresses potential impacts to such resources from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

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

No Impact. As delineated in Section 5.7.3.1 of the AMP FEIR, the Allied Aerospace Building is a potential historic resource located in the northern portion of SDIA. The Teledyne-Ryan Complex is an historic district located along the southeastern portion of SDIA. Development of the improvements currently proposed in the northern portion of the airport would not impact the Allied Aerospace
Building. Construction of the new access road between the northern and southern portions of the airport would be away from buildings and would not impact the historic/architectural characteristics of the existing Teledyne-Ryan buildings or the Allied Aerospace Building. No impact is expected to occur and no further analysis is warranted.

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

**No Impact.** As indicated on page 5.7-10 of the AMP FEIR, no archaeological sites have been identified within the SDIA Master Plan project area. The current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, archaeological resources would not be anticipated in the project area. No impact is expected to occur and no further analysis is warranted.

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

**No Impact.** As indicated on page 5.7-10 of the AMP FEIR, the SDIA Master Plan area is built on what was originally mudflats and bay. Decades of dredging and placement of fill soils have built up the airport area to its current topography. Based on this, there is no potential for paleontological resources within the project area. No impact is anticipated to occur and no further analysis is warranted.

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

**No Impact.** As noted above, the current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, human remains would not be anticipated in the project area. No impact is expected to occur and no further analysis is warranted.
VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

   ii. Strong seismic groundshaking?

   iii. Seismic-related ground failure, including liquefaction?

   iv. Landslides?

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

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

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Discussion:

Section 5.14, Geology and Soils, of the AMP FEIR addresses potential impacts related to these environmental factors from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.
a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

**Less Than Significant Impact.** As indicated on page 5.14-7 of the AMP FEIR, there are no active or potentially active faults known to underlie SDIA and adjacent areas; however, several designated Earthquake Fault Zones occur in close proximity to the south and east, raising the possibility that unknown faults may underlie the project site. The potential for seismically-induced ground rupture is considered less than significant because: (1) the probability of a seismic event of sufficient magnitude to induce surface rupture occurring within the SDIA Airport Land Use Plan area is considered low; (2) project-specific geotechnical investigations required for all development projects would include a fault evaluation study for all proposed structures intended for human occupancy (as previously defined), and would either verify that active faults are not present or that adequate buffers occur, or would identify additional measures to address associated potential impacts (e.g., relocating structures to provide appropriate buffers); and (3) said geotechnical investigations would identify design and construction measures to address potential ground rupture effects for additional proposed facilities such as utilities and pavement, including efforts such as the use of engineered fill (e.g., proper composition and placement methodology), appropriate subgrade design and reinforced concrete, and shorter pipeline lengths with flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards such as Uniform Building Code (UBC), Greenbook and/or American Society for Testing and Materials (ASTM) are incorporated into project design and construction, potential impacts related to seismically induced ground rupture would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

ii. Strong seismic ground shaking?

**Less Than Significant Impact.** As described on pages 5.14-7 and 5.14-8 of the AMP FEIR, estimated ground acceleration (shaking) levels within and around SDIA could potentially result in significant impacts to proposed facilities such as structures, foundations or utilities, depending on site- and event-specific factors such as event duration, motion frequency and underlying soil/geologic conditions. The project design for new development at SDIA, including the Proposed Project, however, would incorporate measures to accommodate projected seismic loading, pursuant to the recommendations in the required site-specific geotechnical investigation, as well as existing regulatory/industry standards such as the UBC, Greenbook and/or ASTM International. Specific measures from the noted standards (and/or other pertinent sources) that may be used in the project design to accommodate seismic loading include proper fill composition, depth, moisture content and compaction (pursuant to ASTM requirements); use of properly reinforced concrete and masonry; anchoring (or other means for securing applicable structures); and use of appropriate pipeline materials and/or flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards are incorporated into project design and construction, potential impacts related to seismically induced ground acceleration would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.
iii. **Seismic-related ground failure, including liquefaction?**

**Less Than Significant Impact.** As indicated on page 5.14-8 of the AMP FEIR, SDIA and vicinity are within an area considered to have a generally high potential for liquefaction. The project design for any new development at SDIA, including the Proposed Project, would incorporate measures to address potential liquefaction and related effects, pursuant to recommendations in the required site-specific geotechnical investigation and the previously noted regulatory/industry standards. In the event certain standard measures to remediate liquefaction effects such as ground modification (e.g., dynamic compaction) or the use of deep foundations are determined to be infeasible, additional equally effective measures would be employed as described in the AMP FEIR. Assuming that the results of the required geotechnical investigation, as well as appropriate elements of regulatory/industry standards, are incorporated into project design and construction, potential impacts related to seismically induced liquefaction and related effects would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

iv. **Landslides?**

**No Impact.** As indicated on page 5.14-9 of the AMP FEIR, SDIA and adjacent areas exhibit generally level and low-lying topography, which is not subject to a significant risk from landslides. No impacts would occur and no further analysis of this issue is warranted.

b. **Would the project result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** As indicated on page 5.14-10 of the AMP FEIR, construction activities associated with all new development at SDIA would increase the potential for soil erosion and sedimentation; however, as cross-referenced to Section 5.6, *Hydrology and Water Quality*, of the AMP FEIR, such activities would be subject to National Pollution Discharge Elimination System (NPDES) control requirements, as administered through SDIA Stormwater Management Plans (SWMP). Those measures would serve to reduce erosion and sedimentation impacts to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis of this issue is warranted.

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

**Less Than Significant Impact.** See discussions above regarding liquefaction and landslide hazards. Page 5.14-9 of the AMP FEIR addresses other geotechnical issues such as expansive soils, corrosive soils, and compressible materials. The subject analysis concludes that, with implementation of measures recommended in the required project-specific geotechnical investigations, potential impacts would be reduced to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Proposed Project. No further analysis is warranted.

d. **Is the project located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

**Less Than Significant Impact.** See above.
e. Would the project have soils that are incapable of supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**No Impact.** SDIA and adjacent areas utilize the City's sanitary sewer system, not septic tanks or other alternative wastewater disposal system. No impact would occur and no further analysis is warranted.

<table>
<thead>
<tr>
<th>VII. HAZARDS AND HAZARDOUS MATERIALS.</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>
Discussion:

Section 5.15, Hazards and Hazardous Materials, of the AMP FEIR addresses potential impacts related to hazardous materials from implementation of the AMP. Section 5.16, Human Health Risk Assessment, of the AMP FEIR addresses potential human health risk impacts from implementation of the AMP, including as related to emissions of hazardous air pollutants. The following evaluates the extent to which those analyses apply to the Proposed Project.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. As indicated on page 5.15-4 of the AMP FEIR, a variety of hazardous materials typically associated with the operation of a commercial airport, including those of airport tenants, are used at SDIA. Such use and activities are strictly regulated by numerous federal, state, and local safety regulations. Because the Airport Land Use Plan, which includes the types of uses proposed for the northern portion of the airport under the Proposed Project, would not involve the generation, use or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport, the proposed plan would not create additional long-term risks to the public or the environment from these substances. Potential impacts would, therefore, be less than significant and no further analysis is warranted.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As indicated above, a variety of hazardous materials are used at SDIA, and such use is strictly regulated by numerous federal, state, and local safety regulations. The Airport Land Use Plan, which includes the types of uses proposed for the northern portion of the airport under the Proposed Project, would not involve the generation, use or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport. Development of new facilities at the airport would be subject to current safety management requirements and design standards that serve to minimize, if not avoid, the potential for the occurrence of, and significant hazards from, upset and accident conditions. Potential impacts would, therefore, be less than significant and no further analysis is warranted.

c. Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school?

Less Than Significant Impact. There is a Montessori School located approximately 0.23 mile east of the Proposed Project area, specifically at 1323 West Spruce Street across from Interstate 5. The proposed uses, which include rental car facilities and cargo facilities, may involve the handling of hazardous materials/wastes; however, such materials/wastes would generally be of a common nature, such as fuels, lubricants, paints, cleansers/solvents, and the like. No acutely hazardous materials, substances, or wastes are anticipated for the proposed uses. As indicated above, the handling of hazardous materials/wastes at the airport is subject to a number of federal, state, and local safety regulations. Based on the nature of the materials/wastes associated with the proposed uses and the existing regulatory framework that applies to the handling of such materials/wastes, potential impacts, if any, to uses in the nearby area would be less than significant. No further analysis of that issue is warranted.

With regard to potential impacts from hazardous emissions, the AMP FEIR includes a human health risk assessment that accounts for hazardous air pollutants (HAPs) from a variety of airport-related...
sources including aircraft, GSE, motor vehicles, and stationary sources. Potential impacts are addressed in terms of the receptors (people) at different types of land uses including residences, schools, recreational facilities, and places of employment. Potential health risks are characterized in terms of: (1) cancer incidence (i.e., the probability of an individual contracting cancer from a lifetime [i.e., 70 years] exposure to HAPs in the ambient air); and, (2) non-cancer risks (i.e., eye watering, respiratory or heart ailments, and other non-cancer related diseases) that are either chronic (i.e., produced from a continuous exposure occurring over an extended period of time [weeks, months, years] or acute (i.e., produced within a short period of time [few minutes to several days] following an exposure to HAPs). Table 5-16.2 of the AMP FEIR presents the results of the human health risk assessment relative to receptor types and risk categories. The risk values reported in the table are the "worst-case" conditions based on the highest values found at the numerous receptor locations modeled in the analysis. Table 5.16-2 provides the risk values associated with future operation of the uses contemplated in the Airport Land Use Plan, including the types of uses proposed for the northern portion of the airport under the Proposed Project. The analysis concludes that risk of cancer incidence and the non-cancer chronic (long-term) health risk would be less than significant for all receptor types. The non-cancer acute (short-term) health risk for school areas would be less than significant. The only potential health risks that were found to exceed the recommended threshold of significance were for non-cancer acute health risks at the worst-case receptors for residential, recreational, and off-site worker areas. The risk levels exceeding the recommended thresholds were found to be driven principally by the HAPs acrolein and formaldehyde, which are largely attributable to aircraft, GSE, and motor vehicles.

The improvements and uses associated with the Proposed Project include the same types of uses assumed in the AMP FEIR for the northern portion of the airport, although under the current proposal the amount of development would be less than contemplated in the AMP FEIR analysis (i.e., smaller CONRAC). As such, the AMP FEIR health risk assessment accounts for, if not overestimates, HAP emissions from the Proposed Project improvements. While the AMP FEIR analysis may have overestimated the amount of emissions associated with future development in the northern part of SDIA, those emissions are only a portion of the airport's overall emissions that influence the level of risk in surrounding areas. The predominant source of airport emissions is from aircraft operations, particularly during aircraft takeoffs, landings, and taxiing. The reduction in landside development associated with the current proposal, compared to the AMP FEIR land use assumptions, would not materially affect the aircraft operation assumptions of the AMP FEIR. As such, the resultant reduction in HAP emissions associated with the current proposal would reduce the estimated risk levels to only a very limited extent and would not change the basic conclusions of the AMP FEIR analysis of human health risk impacts.

Implementation of the Proposed Project development improvements would contribute to the airport's overall HAP emissions, which would result in significant impacts related to non-cancer health risks. Section 5.16.7 of the AMP FEIR presents mitigation measures proposed to reduce those impacts. Such measures include: MM5.16-1 for airport terminal design considerations to reduce emissions from GSE and aircraft auxiliary power units; MM5.16-2 for airport tenants to replace diesel-fueled equipment/vehicles with low- and no-emission equipment/vehicles; MM5.16-3 through MM5.16-7 for airside improvements to facilitate more efficient movement of aircraft (reduce engine emissions), roadway system improvements to facilitate more efficient movement of vehicles, and enhancement of the transit plaza; and, MM5.16-8 through MM5.16-12 for reducing emissions from construction activities, such as by using low- and no-emission equipment, encouraging the use of transit and carpooling by workers, and use of grid power rather than from portable generators.

This issue, as related to the Proposed Project, has been adequately addressed in the AMP FEIR and no further analysis is warranted.
d. Is the project located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Less Than Significant Impact.** As described on page 5.15-5 and shown in Figure 5.15-1 of the AMP FEIR, there are 15 sites and facilities at and near SDIA that are known, or have the potential, to contain hazardous wastes or environmental contamination. Relative to the Proposed Project, this includes five sites and facilities in or near the northern portion of the airport and three sites and facilities in or near the southern portion of the airport. As more fully described on pages 5.15-8 through 5.15-10 of the AMP FEIR, the eight sites/facilities include the following:

<table>
<thead>
<tr>
<th>Name</th>
<th>General Location</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Northern Portion of Airport</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport Fuel Farm - Site No. 6</td>
<td>North central tip of SDIA</td>
<td>Site of the existing airport fuel farm. Contains two 1 million-gallon aboveground storage tanks for jet fuel. No reported environmental contamination or significant leaks.</td>
</tr>
<tr>
<td>Former Live-Fire Training Facility - Site No. 7</td>
<td>North central edge of SDIA, south of Fuel Farm</td>
<td>This 3-acre site was used until 1987 for live-fire training. Now covered with dirt or asphalt, the extent of residual soil/groundwater contamination (if any) is unknown.</td>
</tr>
<tr>
<td>Former General Dynamics Facility - Site No. 8</td>
<td>Comprises majority of northeast portion of SDIA</td>
<td>90-acre site formerly used for manufacturing of aircraft and other military equipment. Presently vacant and serves as a staging area for unloading trucks and parking cars. Chemicals of concern include chlorinated hydrocarbons, petroleum hydrocarbons and chromium. Designated for &quot;open field&quot; land-uses.</td>
</tr>
<tr>
<td>Jimsair UST - Site No. 9</td>
<td>East central edge of SDIA</td>
<td>Underground storage tank (UST) associated with an existing Fixed-base operator (FBO).</td>
</tr>
<tr>
<td>Baron-Blakeslee Facility - Site No. 16</td>
<td>North of I-5 (Off-Airport)</td>
<td>Chemical use and storage facility listed on state lists for environmental corrective action.</td>
</tr>
<tr>
<td><strong>Southern Portion of Airport</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Former Teledyne-Ryan Facility - Site No. 5</td>
<td>S.E. sector of airport, N. of Harbor Dr.</td>
<td>Also known as the former Northrop Grumman Corp. and Ryan Aeronautical Company facility, this 47-acre site is presently occupied with vacant buildings and other supporting infrastructure. The environmental condition of the property is currently under litigation.</td>
</tr>
<tr>
<td>Convair Lagoon - Site No. 11</td>
<td>S. of airport property, W. of the U.S. Coast Guard facility and S. of Harbor Dr.</td>
<td>10-acre shallow embayment, site of stormwater conveyance system outfall. Evidence of PCB contamination in sediments reported in 1979. Sampling indicates the former Teledyne-Ryan Facility is the primary source.</td>
</tr>
<tr>
<td>U.S. Coast Guard Facility - Site No. 12</td>
<td>S.E. of airport property, and S. of Harbor Dr.</td>
<td>Facility is listed on federal and state lists for hazardous materials and USTs. No reported soil or groundwater contamination or significant spills.</td>
</tr>
</tbody>
</table>
Figure 5.15-2 of the AMP FEIR shows the location of the development uses proposed for the northern and southern portions of the airport relative to the eight sites/facilities described above. Relative to the northern portion of the airport, Sites No. 8 and No. 9 are located within the area proposed for future development, but Sites No. 6, No. 7, and No. 16 are removed from the development area. Relative to the southern portion of the airport, Site No. 5 is located within the area through which the proposed on-airport access road would extend, but Sites No. 11 and No. 12 are removed from the subject improvement area. As indicated on page 5.15-11 of the AMP FEIR, relative to the fact that such sites/facilities occur at or near the proposed development area, "plans are already in place or under development to avoid or mitigate any potential impacts associated with these sites." Recent environmental assessment of Site No 8 above provides additional information to further define the extent of contamination and to identify the appropriate mitigation measures required by statute and/or regulation ("Phase II Environmental Assessment Report, Former General Dynamics Lindbergh Field Plant Facility, San Diego, California – Kleinfelder, December 2009). In light of the recent studies, the information in, and conclusions of, the AMP FEIR relative to listed sites/facilities and their relationship to future development are considered to still be valid and applicable to the Proposed Project. Potential impacts would be less than significant and no further analysis is warranted.

e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Less Than Significant Impact. The improvements associated with the Proposed Project would occur within the boundary of SDIA. Development of the proposed uses, which are generally contemplated in the Airport Land Use Plan, is subject to numerous design and operational requirements, particularly those set forth by the FAA, specifically intended and designed to address potential safety hazards. As described on page 5.2-15 of the AMP FEIR, the Airport Land Use Compatibility Plan (ALUCP) for SDIA, which aims to protect public health and safety from noise and other hazards related to the operation of SDIA, indicates that the Airport Land Use Plan would be compatible with the goal of the ALUCP. A similar analysis for the Airport Implementation Plan is provided on page 5.2-19 of the AMP FEIR and finds, for essentially the same reasons as indicated above for the Airport Land Use Plan, the potential impacts would be less than significant. The currently proposed northside development improvements would be consistent with the Airport Land Use Plan and has the same basis for conclusions as the Airport Implementation Plan. As such, potential airport-related safety impacts would be less than significant and no further analysis is warranted.

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

No Impact. The project is not within the vicinity of a private airstrip. No further analysis is warranted.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Page 5.15-11 of the AMP FEIR states that there are no potential hazards to public safety or impairment to emergency response or evacuation plans associated with the Airport Land Use Plan, based largely on the fact that the proposed improvements would not involve the generation, use, or storage of hazardous materials in quantities or types that are substantially different from those that currently exist. Page 5.15-13 of the AMP FEIR states that same conclusion for the Airport Implementation Plan for essentially the same reason. The currently proposed northside development improvements include the types of uses proposed in the Airport Land Use Plan. Potential impacts associated with the Proposed Project would be less than significant and no further analysis is warranted.
h. Would the project expose people or structures to the risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is within an existing urban industrial environment dominated by concrete and asphalt, well removed from wildlands. There is no fire hazard relative to wildlands. No impact would occur and no further analysis is warranted.

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Violate any water quality standards or waste discharge requirements?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>f. Otherwise substantially degrade water quality?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>g. Place housing within a 100-year flood plain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>h. Place within a 100-year flood plain structures that would impede or redirect flood flows?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

- Potentially Significant Impact
- Less Than Significant Impact with Mitigation Incorporated
- No Impact

j. Contribute to inundation by seiche, tsunami, or mudflow?

- Potentially Significant Impact
- Less Than Significant Impact with Mitigation Incorporated
- No Impact

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**Discussion:**

Section 5.6, *Hydrology and Water Quality*, of the AMP FEIR addresses potential impacts related to surface hydrology and water quality from implementation of the AMP. Section 5.14, *Geology and Soils*, of the AMP FEIR includes a discussion of groundwater from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Proposed Project.

a. **Would the project violate any water quality standards or waste discharge requirements?**

   **Less Than Significant Impact.** As indicated on page 5.6-10 of the AMP FEIR, all future development is subject to the Airport Stormwater Management Plan (SWMP). This would include improvements in the Proposed Project area. The SWMP incorporates the terms of the General Industrial Storm Water Permit which satisfies construction general permit requirements. The SWMP requires that all municipal activities, inclusive of new development, to provide for Best Management Practices (BMPs); therefore, impacts relative to construction, grading, as well as erosion and sedimentation would be less than significant. No further analysis is warranted.

   The Airport Land Use Plan, which includes the northside development area, encompasses the former General Dynamics Facility, the Landmark Aviation Fixed Base Operator General Aviation Facilities site, and the TDY complex. While these sites have the potential for existing soil contamination as described in Section 5.15 of the AMP FEIR, any improvements to these areas, including those associated with the Proposed Project, would require additional coordination with review agencies to limit potential for surface, aquifer, and groundwater contamination. Such coordination and follow-up would address water quality standards and serve to reduce potential water quality impacts to a level that is less than significant. No further analysis is warranted.

   With regard to urban runoff associated with future use of the site, as discussed on page 5.6-10 of the AMP FEIR, the Airport Land Use Plan, which includes the types of uses proposed for the subject northside development improvements, would be implemented by the SDCRAA. Such implementation would include provisions to meet the requirements of the SDIA SWMP, which would result in a less than significant impact on urban runoff. No further analysis is warranted.

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

   **No Impact.** As indicated on page 5.14-5 of the AMP FEIR, shallow, unconfined groundwater has been reported at depths of between 5 and 12 feet below the surface at SDIA. Groundwater levels within SDIA are generally static due to the proximity of the bay and lack of substantive withdrawals.
(i.e., through wells and/or pumping), although aquifer levels can vary locally in accordance with mean high tide elevations and diurnal tidal fluctuations. Overall groundwater movement in the site and vicinity is west and south toward San Diego Bay, although this movement may also vary locally.

With the possible exception of temporary construction-related dewatering of shallow groundwater, if required for development of the proposed improvements, approval and implementation of the Proposed Project would not involve withdrawal of groundwater. Development of the Project site could add a very minor amount of new impervious surface area, which would reduce on-site surface water infiltration and groundwater recharge. This impact would be less than significant, given that the vast majority of the site is already, and has long been, paved. No further analysis is warranted.

c. **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site?**

   **Less Than Significant Impact.** There are no streams of rivers at or near the project site. The northside development area is flat and has been subject to previous development, which included the routing of surface flows into the local stormdrain system, as appropriate. Implementation of the Proposed Project may involve some minor rerouting of surface flows, based on the location and orientation of new structures, but is not expected to result in any appreciable change in surface drainage patterns. Potential impacts to surface drainage patterns would be less than significant and no further analysis is warranted.

   Regarding the potential for the project to result in substantial erosion or siltation, please see the discussion above in Section VI (b.) of this Initial Study. As indicated, potential impacts would be less than significant. No further analysis is warranted.

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

   **Less Than Significant Impact.** As indicated above, there are no streams or rivers at the project site, and the vast majority of the site has been previously developed. Implementation of the Proposed Project would not result in a substantial increase in the rate or amount of surface runoff that would result in flooding. Potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.

e. **Would the project create or contribute runoff water, that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

   **Less Than Significant Impact.** See discussions above in Sections VIII (a.), (c.), and (d.). Potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.

f. **Would the project otherwise substantially degrade water quality?**

   **Less Than Significant Impact.** See discussion above in Section VIII (a). Potential impacts to water quality would be less than significant and no further analysis is warranted.

g. **Would the project place housing within a 100-year flood plain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

   **No Impact.** The Proposed Project does not entail the construction of housing. No further analysis is warranted.
h. Would the project place within a 100-year flood plain structures that would impede or redirect flood flows?

Less Than Significant Impact. As indicated on page 5.6-9 of the AMP FEIR, virtually all of SDIA is mapped as Zone X, "areas determined to be outside the 500-year floodplain." Approximately 8.9 acres of the former TDY property is within the mapped 100-year floodplain and could experience up to one foot of flooding during a 100-year storm. As such, none of the development proposed within the northern portion of the airport as part of the proposed improvements would place structures within a 100-year flood plain. Development of the new on-airport access road between the northern and southern portions of the airport would include a segment that passes through the TDY property. This would not, however, represent a structure that impedes or redirects flood flows and no further analysis is warranted.

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

Less Than Significant Impact. There are no levees or dams at or near SDIA that pose a potential for flooding at the project site. Implementation of the improvements contemplated in the Proposed Project would increase the number of people and structures occurring in the northern portion of the airport; however, as indicated directly above, the subject area is not within a 100-year flood plain. Although a portion of the project-related access road would extend through a designated 100-year flood plain at the Teledyne Ryan property, no significant risk or loss, injury, or death would be expected to occur. The SDCRAA would close the road to public access should unsafe flooding conditions be present during or after a major storm. No further analysis is warranted.

j. Would the project contribute to inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. SDIA is not near any confined water bodies posing a seiche hazard, nor is it near hillside areas posing a mudflow hazard. As indicated on page 5.6-9 of the AMP FEIR, tsunamis associated with seismic activity are a potential flood hazard; however, the highest recorded tsunami in San Diego Bay was approximately 5 feet from peak to trough, which would not affect SDIA. As such, potential impacts would be less than significant and no further analysis is warranted.

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### IX. LAND USE AND PLANNING.

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<th>Potentially Significant Impact</th>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
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</table>

a. Physically divide an established community? ☐ ☐ ☐ ✔

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

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<th>Potentially Significant Impact</th>
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Discussion:

Section 5.2, Land Use Planning, of the AMP FEIR addresses potential impacts related to land use plans and land use compatibility from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

a. Would the project physically divide an established community?

**No Impact.** The currently proposed improvements within the Northside Development area would all occur within the boundaries of the airport and would be comparable to, and compatible with, the other airport-related uses that currently exist. Relative to the Proposed Project, existing off-airport uses adjacent to the northern portion of the airport include the Marine Corps Recruit Depot to the west and northwest and commercial/industrial uses and Interstate 5 to the northeast and east. Existing off-airport uses adjacent to the project-related southern portion of the airport include Harbor Drive and industrial/manufacturing uses to the south. Implementation of the Proposed Project would not physically divide an established community. There would be no impact and no further analysis is warranted.

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

**Less Than Significant Impact.** The AMP FEIR analyzed the compatibility of the Airport Land Use Plan, which includes the types of uses associated with the Proposed Project, with numerous land use plans, policies, and regulations. Those plans, policies, and regulations include: the California Tidelands Trust; the California Coastal Act; the SDIA Airport Land Use Compatibility Plan; the San Diego Port Master Plan/California Coastal Act; the City of San Diego Strategic Framework Element; City of San Diego Community Plans including those for the Peninsula, Uptown, Midway-Pacific Highway Corridor, and Downtown Community Plan Areas; North Bay Redevelopment Plan, Naval Training Center (NTC) Redevelopment/Reuse Plan; NTC Precise Plan and Local Coastal Program; San Diego Airport Approach Overlay Zone; and, City of San Diego Airport Environ Overlay Zone (AEOZ). The AMP FEIR evaluation related to each of these land use plans, policies, and regulations found that approval of the then proposed Airport Land Use Plan would not result in any significant conflicts. The AMP FEIR analysis of the land use plan compatibility of the Airport Implementation Plan also concluded that no significant conflicts would occur, in most cases by virtue of the fact that the improvements proposed in the Airport Implementation Plan were consistent with the Airport Land Use Plan. In other cases, the fact that the proposed uses were airport-related and SDIA has long been an airport accounted for in applicable planning documents, and all new development would be subject to airport-related development standards, were the bases for concluding that no significant land use conflicts would occur. That analytical framework and basis for conclusions would also apply to the improvements associated with the Proposed Project. Potential impacts would be less than significant and no further analysis is warranted.
c. Would the project conflict with any applicable habitat conservation plan or natural communities conservation plan?

No Impact. The project involves development proposed in the northern portion of SDIA, which is in a highly urbanized setting that is largely devoid of biological resources. As discussed above in Section IV (f.), the Proposed Project is not located within any habitat conservation plan or natural communities’ conservation plan. There would be no impact related to such a plan and no further analysis is warranted.

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<tr>
<th>MINERAL RESOURCES. Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporatted</th>
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<tbody>
<tr>
<td>a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</td>
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<tr>
<td>b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?</td>
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<td>✓</td>
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Discussion:

Section 5.21, *Effects Not Found to be Significant*, of the AMP FEIR, specifically page 5.21-2, provides a discussion of mineral resources. The following summarizes that discussion, as applicable to the Proposed Project.

a. **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. SDIA is underlain by artificial fill and bay deposits and is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. SDIA is not listed as a mineral resource recovery site. As such, SDIA does not contain a known mineral resource of value to the region or residents of California. Implementation of the Proposed Project would have no impact on mineral resources and no further analysis is warranted.

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

No Impact. See above.
XI. NOISE. Would the project:

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<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
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</thead>
<tbody>
<tr>
<td>a.</td>
<td>Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?</td>
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<tr>
<td>b.</td>
<td>Expose persons to or generate excessive groundborne vibration or groundborne noise levels?</td>
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<td>c.</td>
<td>Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
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<tr>
<td>d.</td>
<td>Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>☐</td>
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<tr>
<td>e.</td>
<td>Be located within an airport land use plan area, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
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<tr>
<td>f.</td>
<td>Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?</td>
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Discussion:

Section 5.1, Noise, of the AMP FEIR addresses potential impacts related to noise, including from aircraft, surface traffic (i.e., motor vehicles on nearby roadways), and construction from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

Less Than Significant Impact. With regard to potential impacts from aircraft noise, the AMP FEIR states: "Aircraft noise analysis is limited to the Proposed Airport Implementation Plan as the land uses within the Proposed Airport Land Use Plan would have a less than significant impact on airfield operations. Specifically, while additional cargo facilities are included with the North Area projects, aircraft operations, including nighttime cargo operations, are not forecasted to increase for a given year due to the Proposed Airport Land Use Plan." (See pages 5.1-6 and 5.1-14 of the AMP FEIR). The currently proposed northside development improvements are consistent with the land use assumptions of the Airport Land Use Plan; hence, the AMP FEIR conclusion that potential aircraft noise impacts would be less than significant is still valid and applicable. No further analysis of this aspect of noise impacts is warranted.
With regard to potential impacts from surface traffic noise, the AMP FEIR analysis includes traffic from the near-term development of uses under the Airport Implementation Plan as well as from the longer term buildout of uses under the Airport Land Use Plan. As indicated on page 5.1-28 of the AMP FEIR, comparison of peak hour $L_{eq}$ noise level increases for AMP buildout with peak hour $L_{eq}$ for the No Project Alternative (i.e., the comparison basis for assessing the potential for significant impacts) indicates a maximum increase of 0.7 dBA, which is less than significant. Relative to impacts measured in terms of Community Noise Equivalent Level (CNEL), the completion of the AMP improvements is assessed as having a less than significant noise impact because it would only incrementally increase daily noise (compared to the No Project Alternative) by 0.7 CNEL. At only one location would the increase compared to the existing condition be in excess of 3.0 dBA $L_{eq}$, and this location is adjacent to an industrial facility (Solar Turbine) and commercial uses. The land uses currently proposed for the northside development area are similar in nature to those assumed in the AMP FEIR for the Airport Land Use Plan; however, the amount of development currently proposed is less than originally assumed. Specifically, the Airport Land Use Plan in the AMP FEIR anticipates the CONRAC to be a 6-story structure with 11,200 vehicle spaces, whereas the Proposed Project reduces that to 4 stories with 4,670 spaces. As such, traffic generation associated with the current proposal would be less than that estimated in the AMP FEIR, and the associated increases in surface traffic noise levels would also be less than calculated in the AMP FEIR. The surface traffic noise impacts associated with implementation of the Northside Development improvements associated with the Proposed Project would, therefore, be less than significant. No further analysis of this aspect of noise impacts is warranted.

With regard to potential impacts from construction noise, Section 5.1.4 of the AMP FEIR provides an estimate of construction noise levels based on a typical mix of construction equipment. This mix of equipment includes pile drivers, which typically have the highest noise levels and the greatest potential to result in noise impacts on nearby noise sensitive uses. As indicated in Table 5-1.16 on page 5.1-31 of the AMP FEIR, the maximum noise levels produced by pile drivers would be approximately 69.2 dB at a distance of 1,000 feet from the source. The nearest residence to the Northside Development area is approximately 1,000 feet to the east, across Interstate 5. The threshold of significance for construction noise is 75 dB in residential areas. As such, the maximum noise level estimated for construction activities would not exceed 75 dB in residential areas. It should also be noted that the construction noise would be lower than the aircraft noise and highway noise that occurs in the residential areas near the construction zones. Due to the louder noise levels and more frequent events that occur with aircraft operations and surface vehicle traffic and in consideration of the logarithmic quantities of noise measured in decibels (see Section B.1.1 of Appendix B of the AMP FEIR), aircraft and highway noise would continue to be the determinative sources in the noise environment. Thus, the ambient noise levels would not be expected to increase due to the construction activity. Based on the above, the construction work associated with the improvements contemplated under the Proposed Project would cause less than significant impacts in regard to noise. No further analysis is warranted.

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. As indicated on page 5.1-30 of the AMP FEIR, construction work would not be expected to result in excessive ground-borne vibration to home sites. This is considered particularly true for the improvements contemplated under the Proposed Project, given the distant and location of the nearest residence being approximately 1,000 feet and on the other side of Interstate 5 (i.e., would have a greater potential to experience vibration impacts, if any, from heavy truck travel on the nearby freeway than from airport construction activities). Potential vibration impacts associated with project construction would be less than significant. No additional analysis is warranted.
c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. See discussion above in Section XI (a.).

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

Less Than Significant Impact. See discussion above in Section XI (b.).

e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The improvements contemplated under the Proposed Project are located at SDIA. There would be no people residing at the project site, and potential noise exposure impacts to surrounding areas are discussed in Section XI (a.) above (i.e., less than significant). People working at the project site would be exposed to noise levels typical of an airport. Such noise exposure is regulated by state and federal Occupational Safety and Health Administration (OSHA) standards. Potential impacts would be less than significant and no further analysis is warranted.

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

No Impact. The project is not within the vicinity of a private airstrip. No further analysis is warranted.

XII. POPULATION AND HOUSING. Would the project:

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<tr>
<th>Category</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
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<th>No Impact</th>
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<tbody>
<tr>
<td>a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?</td>
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<td>❑</td>
<td>✔</td>
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<tr>
<td>b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
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<tr>
<td>c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?</td>
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Discussion:

Section 5.4, Population and Housing, of the AMP FEIR addresses potential population and housing impacts from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.
a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

**Less Than Significant Impact.** As indicated on page 5.4-3 of the AMP FEIR, implementation of the land use and development plans contemplated under the AMP would not significantly affect population or housing. Developing SDIA with the proposed land uses would not displace any residents or residences because the Proposed Project locations currently contain airport or aviation industrial uses. The planned development also would not generate enough new employment opportunities at SDIA to affect the job/housing balance or induce growth that would affect this balance (see also Section 6.2, *Growth-Inducing Impacts*, of the AMP FEIR). Additionally, the level of improvements proposed at SDIA would not be such to entice new residents to the San Diego area, thereby creating a need for new housing. These conclusions in the AMP FEIR, which apply to the overall land use and development plans for SDIA overall, would also apply to improvements contemplated under the Proposed Project; population and housing impacts would be less than significant and no further analysis is warranted.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The Proposed Project area is part of an airport. There is no housing on the site. No housing would be displaced by the Proposed Project. No further analysis is warranted.

c. Would the project displace a substantial number of people, necessitating the construction of replacement housing elsewhere?

**No Impact.** See above.

<table>
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<th>_PUBLIC SERVICES. Would the project:</th>
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<tr>
<td>a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:</td>
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- **Fire protection?**
- **Police protection?**
- **Schools?**
- **Parks?**
- **Other public facilities?**

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<tr>
<th>Potentially Significant Impact</th>
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San Diego International Airport Master Plan
Amendments to Airport Land Use Plan
and Airport Implementation Plan

San Diego International Airport Master Plan
Amendments to Airport Land Use Plan
and Airport Implementation Plan

Initial Study
May 20, 2010
Discussion:

Section 5.17, Public Services, of the AMP FEIR addresses potential impacts related to fire protection and law enforcement. Section 5.18, Recreation, addresses potential impacts related to parks and recreation. Section 5.21, Effects Not Found to be Significant, discusses environmental impacts determined during the Notice of Preparation (NOP) process for the AMP DEIR to not be significant, including those related to schools and libraries. The following evaluates the extent to which those analyses apply to the Proposed Project.

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

Less Than Significant Impact. The AMP FEIR addresses potential impacts to fire protection services relative to required fire flow, response distance and time from existing fire stations and the respective fire department's judgment for needs in the area. As indicated on page 5.17-40 of the AMP FEIR, new development proposed at SDIA is expected to have sufficient fire flow, given the capacity of the water lines serving SDIA. This includes the 12- to 16-inch water mains at SDIA and the secondary system of water laterals branching off of the primary system, which consists of 8- to 16-inch water lines providing service to the terminals and apron areas, as well as the adjacent TDY facilities along Harbor Drive. Of particular note with regard to fire protection is a 10-inch fire service water line surrounding the fuel storage tank farm connected along the north side of the main runway to a 16-inch ductile iron fire service. This 16-inch fire service extends along the access road between MCRD and the former General Dynamics site, where it joins a 12-inch main near the intersection of Washington Street and Pacific Highway.

While additional aircraft movements, passenger activity, and cargo facility development would potentially increase the potential for fires and airfield incidents, standard procedures for plan review would ensure that new construction is developed in conformance with the Uniform Fire Code, the SDF Code, FAA Codes, and other applicable standards. As such, new development would have adequate fire hydrants, fire flow, fire prevention and warning systems, and fire equipment access to all structures and areas of the property.

The San Diego Fire Department's (SDFD's) response time is a function of the type of emergency and the equipment required; for example, it would take more time to get larger equipment to the site than smaller equipment. It is expected that the Airport Station and Stations 1, 3, and 8, with mutual aid from Stations 4, 5, 7, 11, 15, 20 and 22 would continue to provide fire protection services on the airfield and at the airport and maintain adequate response times and service levels. In addition, the SDFD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in aircraft types, increases in aircraft movements and passenger activity. No new fire fighting facilities are expected to be constructed and there would be no need for existing fire stations to be relocated.

The traffic congestion associated with the demolition and construction of major projects within and adjacent to SDIA property would have the potential to hamper or delay emergency response. However, temporary roadway Level of Service (LOS) deficiencies associated with compromised emergency response would be minimized through implementation of a construction traffic management plan, which would be prepared and implemented as appropriate for each project. This would ensure proper advanced coordination with SDFD and planning of detours and emergency access routes to maintain response times.
Based on the above factors, new development at SDIA, including that contemplated in the Airport Land Use Plan such as the types of uses currently proposed for the Northside Development, would result in less than significant impacts on fire protection and emergency medical (i.e., paramedic) services. No additional analysis is warranted.

**Police protection?**

**Less Than Significant Impact.** As described on page 5.17-43 of the AMP FEIR, the San Diego Harbor Police Department (SDHPD) would be expected to incur both short-and long-term impacts related to the construction and operation of new development planned for SDIA. Short-term impacts would include: increase in emergency calls during construction; reports and investigations of construction thefts; and required plan checks and physical inspections; these are addressed below.

Long-term (i.e., operational) impacts would include increases in calls for service, business watch and other crime prevention services, as well as increases in case reports. Such new development would not, however, adversely affect the airport substation's protection or operational activities (e.g., through physical impacts to the substation or restrictions in station personnel's access to airport facilities).

Due to the level of security provided at SDIA for civil aviation protection reasons, incidents of theft, destruction or damage at SDIA facilities and to employee vehicles and property are not expected to increase as a result of new development. The proposed development of additional on-airport parking would result in an increase in the number of vehicles parked on-site, which in turn could potentially result in a corresponding increase in vehicle-related incidents (e.g., thefts and break-ins). Overall, however, new development would not result in a significant increase in required law enforcement workload. Furthermore, given the amount of new development anticipated to occur at SDIA and considering that the first response would be from the SDHPD substation at the airport, the new development would not measurably affect Priority 1 response time goals. In addition, the SDHPD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in activities at the airport.

During periods of demolition and construction within and adjacent to SDIA property, construction activities and associated traffic congestion would have the potential to increase response times and increase traffic patrol and other law enforcement activities. These potential impacts would be addressed through coordination and planning with law enforcement and fire protection agencies to reduce effects from construction on traffic, emergency access, and response times. The standard procedures for plan review would also address coordination with local law enforcement agencies to ensure that measures, such as detour plans, scheduling, and traffic control, are implemented where needed to avoid congestion that would hamper emergency response.

Based on the factors discussed above, new development contemplated to occur at SDIA, including that currently proposed for the Northside Development area, would have a less than significant impact on law enforcement. No further analysis is warranted.

**Schools?**

**No Impact.** As indicated in Section 5.21.5 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for schools deal mainly with residential developments that could influence school enrollment. The proposed improvements and future land uses at SDIA do not include any residential development. Additionally, they would not directly impact any schools; that is, all improvements would be physically on existing airport property. No significant noise changes were determined due to the development proposed at SDIA, nor is it growth inducing as detailed in Chapter Six, Other Effects of the Proposed Project, of the AMP FEIR. As such, future development at SDIA, including under the Proposed Project, would not impact school enrollment. No further analysis is warranted.
Parks?

No Impact. See discussion below in Section XIV (a.).

Other public facilities?

No Impact. As indicated in Section 5.21.6 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for libraries deal mainly with residential developments that could influence library use. The proposed improvements and future land uses at SDIA do not include any residential development. Also, they are physically on existing airport property and would not include occupation or closure of any libraries. The proposed development at SDIA is not growth inducing as detailed in Chapter Six, Other Effects of the Proposed Project, of the AMP FEIR, and therefore, would not impact library use. No further analysis is warranted.

<table>
<thead>
<tr>
<th>XIV. RECREATION. Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
<td>☐</td>
</tr>
<tr>
<td>b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
<td>☐</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.18, Recreation, of the AMP FEIR addresses potential impacts related to parks and recreation from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. As discussed on page 5.18-3 of the AMP FEIR, new development planned to occur at SDIA, including the type of development proposed for the subject northside development improvements, would not generate increased numbers of visitors to San Diego. Similarly, the employment opportunities created by the expansion of the existing airport facilities would be minor in comparison to the regional labor market and would not be expected to draw new residents to the San Diego area. Accordingly, the new development is not expected to induce new growth within the region that would create an increased demand for parks or other recreational resources.

The development of SDIA in accordance with the Airport Land Use Plan, which would include uses proposed for the northside development area, would not result in any direct impacts to park or recreational facilities. This assessment reflects that the expansion of SDIA would be limited to former aviation industrial Port Tideland leaseholds and a portion of the former NTC that has already been
transferred to SDCRAA. No airport facilities would be expanded into existing or planned recreational areas.

New development would not generate noticeable changes in noise contours off airport. Accordingly, there would be no noise-related effects to the recreational facilities near the airport or under its approach and departure flight paths. Similarly, it is not anticipated that new development would significantly affect viewers at Spanish Landing Park, Harbor Island or other areas where scenic views contribute substantially to the recreational experience.

Based on the above, improvements contemplated under the Proposed Project would have a less than significant impact on recreation. No further analysis is warranted.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact. See above.

---

**XV. TRANSPORTATION/TRAFFIC.** Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
<td>❑</td>
</tr>
<tr>
<td>b.</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
<td>❑</td>
</tr>
<tr>
<td>c.</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
</tr>
<tr>
<td>d.</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
<td>❑</td>
</tr>
<tr>
<td>e.</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
<td>❑</td>
</tr>
<tr>
<td>f.</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
<td>❑</td>
</tr>
<tr>
<td>g.</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>✓</td>
</tr>
</tbody>
</table>
Discussion:

Section 5.3, Traffic and Circulation, of the AMP FEIR addresses potential traffic impacts from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Proposed Project.

a. Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Less Than Significant Impact. As indicated on page 5.3-4 of the AMP FEIR, the traffic analysis for the AMP FEIR assessed traffic conditions and associated traffic impacts for existing (2005), near-term (2010 and 2015) and mid-/long-term or horizon year (2020, 2025, and 2030) conditions. Impacts are evaluated relative to street segments, intersections, freeway segments and ramps, and railroad crossings. The AMP FEIR analysis of traffic impacts from development under the Airport Implementation Plan, which proposes improvements designed to accommodate airport activity levels projected to occur by 2015, delineates, in the main text of the FEIR, impacts anticipated to occur in 2010, 2015, and 2030. Impacts for 2020 and 2025 are presented in Appendix D of the AMP FEIR. The AMP FEIR analysis of traffic impacts associated with the Airport Land Use Plan is based on a worst-case/conservative assumption that buildout of all land uses envisioned under the Plan occurs by 2015, with the increases in airport-related traffic for the subsequent modeling years (i.e., 2020, 2025, and 2030) being the result of naturally occurring increases in aviation activity forecasted to occur in the future. The AMP FEIR traffic analysis of the Airport Land Use Plan delineates, in the main text of the FEIR, impacts anticipated to occur in 2015 and 2030. Impacts for 2020 and 2025 are presented in Appendix D of the AMP FEIR.

Both the analysis of the Airport Implementation Plan and the analysis of the Airport Land Use Plan assume future increases in traffic generation after completion of the proposed improvements/land uses would occur in conjunction with the forecasted increases in activity levels at SDIA through 2030. Although the AMP FEIR traffic analysis for each plan addresses the same milestone years and utilizes the same airport activity forecast, the analysis of each plan differs in the fact that the traffic generation of the Airport Land Use Plan assumes the development of all AMP land uses by 2015 while the traffic generation for the Airport Implementation Plan does not include certain improvements such as the CONRAC and air cargo facilities planned for the northern portion of the airport and the airport support uses planned for the TDY site in the southern portion of the airport.

In comparing the traffic analyses completed for the two plans, it can be concluded that the analysis of the Airport Land Use Plan is the more conservative (worst-case) of the two, based on the comparatively greater amount of development assumed under that plan. Given that the land uses included in the Proposed Project relative to the Northside Development area are generally consistent with, if not slightly less (i.e., smaller CONRAC) than, the uses assumed in the Airport Land Use Plan, it can be reasonably concluded that the long-term traffic impacts associated with the Proposed Project have been accounted for in the AMP FEIR. Although the AMP FEIR traffic analysis for the Airport Implementation Plan includes an evaluation of traffic impacts in 2010, an analysis year that was not included in Airport Land Use Plan impacts evaluation, the currently proposed addition of the CONRAC and air cargo facilities to the Airport Implementation Plan would not result in impacts that weren't previously disclosed in the FEIR. Development of the CONRAC and air cargo facilities is not expected to occur until after completion of the improvements assumed in the AMP FEIR for 2010 modeling year. Had the CONRAC and air cargo facilities been included in the Airport Implementation Plan as originally assumed and addressed in the AMP FEIR, the traffic associated with those improvements would have been included in the 2015, or later, modeling year. Since the AMP FEIR analysis of the Airport Land Use Plan includes a conservative (worse-case) assumption that all
proposed uses, including the CONRAC and air cargo facilities, would be developed by 2015, the potential impacts of those improvements have already been evaluated and disclosed in the AMP FEIR. No further analysis is warranted.

b. **Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

**Less Than Significant Impact.** As indicated on page 5.3-23 of the AMP FEIR, San Diego Association of Governments (SANDAG) is the designated Congestion Management Agency for the San Diego Region. Congestion Management Plan (CMP) arterials designated by SANDAG are part of the overall CMP system, which includes those roadways that serve the highest level of regional traffic, serve major regional facilities, and provide significant inter-community traffic service and freeway congestion relief. Street segments in the study area designated as CMP Arterials include: North Harbor Drive; Grape Street; Hawthorn Street; and Pacific Highway. As described above, the traffic impacts associated with implementation of the improvements contemplated in the Proposed Project have already been addressed and disclosed in the AMP FEIR’s analysis of the Airport Land Use Plan, which assumes all new development is completed by 2015. In light of that, the traffic impacts associated with the Proposed Project have been adequately addressed and no further analysis of this issue is warranted.

c. **Would the project result in a change in vessel traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** The improvements proposed at SDIA, including those associated with the Proposed Project, would all occur on land and would not affect any vessel traffic patterns. No impact would occur and no further analysis is warranted.

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

**Less Than Significant Impact.** Implementation of the Proposed Project would include construction of a new on-airport access road between the northern and southern portions of the airport, as well as completion of the east-west access road proposed across the northern portion of the Airport. The subject roads would be designed and constructed in accordance with applicable City of San Diego roadway standards, which provide for safe operation. As such, potential impacts would be less than significant and no further analysis is warranted.

e. **Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** Implementation of the Proposed Project would include construction of new facilities. As indicated on page 5.17-44 of the AMP FEIR, development plans would be reviewed by the San Diego Harbor Police Department (SDHPD) and City of San Diego Fire-Rescue Department (SDFD), and other agencies to help ensure compliance with all applicable codes, ordinances, policies, and standards. Such review would include verification that adequate emergency access is provided and maintained. As such, potential impacts related to emergency access would be less than significant. No further analysis is warranted.

f. **Would the project result in inadequate parking capacity?**

**Less Than Significant Impact.** As indicated on page 5.3-65 of the AMP FEIR, the CONRAC proposed in the northern portion of the airport would, under the original concept, be developed with 9,000 ready, return, and storage spaces to accommodate rental car demand through 2015. The 2,170 parking spaces at the SAN Park Pacific Highway provided in the Airport Implementation Plan (i.e., northward relocation of the existing 1,670-space SAN Park Pacific Highway parking facility plus the addition of 500 new spaces) would also be accommodated in this structure (i.e., total of 11,170 parking spaces within the CONRAC structure). However, as rental car demand grows past 2015
requirements it was anticipated that rental car functions will begin to replace public parking functions in the north area structure. By 2030, it was assumed that all 2,170 public parking spaces in the North Area would be converted to rental car use. This phase-out of the North Area public parking would be offset by the new 3,000 parking spaces at the TDY site, which is assumed to capture the public parking demand previously accommodated in the SAN Park Pacific Highway facility. Under the Proposed Project, the CONRAC would be developed with up to 6,500 parking spaces, which is considered sufficient for the rental car needs at the airport. In conjunction with the size reduction and advanced implementation of the CONRAC facility, the improvement of the SAN Park Pacific Highway surface parking facility described in the Airport Implementation Plan would be relocated west of the proposed CONRAC facility. The 2,170 public parking spaces originally envisioned to be included in the CONRAC structure would be located in this new surface parking lot. Access to the new parking lot would be provided via the new on-site road that connects to Sassafras Street and Washington Street. Page 5.3-81 of the AMP FEIR indicates that implementation of the Airport Land Use Plan would not remove any parking lots designated for public use. Such would still be the case under the current proposal; hence, the conclusion of the AMP FEIR relative to parking impacts is still valid and no further analysis is warranted.

g. **Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**No Impact.** The Proposed Project would not conflict with policies or potential opportunities supporting alternative transportation. No barriers to pedestrian or bicycle circulation are anticipated. No further analysis is warranted.

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>XVI. UTILITIES AND SERVICE SYSTEMS.</td>
<td>Would the project:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>
### Discussion:

Section 5.11, *Utilities and Service Systems*, of the AMP FEIR addresses potential impacts related to energy (electricity and natural gas), telecommunication systems, water demand/supply and systems, sewer, and solid waste from implementation of the AMP. The following evaluates the extent to which the analyses pertaining to the questions posed below apply to the Proposed Project.

**a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**No Impact.** As indicated below in Section XVI (b.), implementation of the Proposed Project would result in a less than significant increase in wastewater volumes generated at the airport, which would be subject to payment of applicable sewer capacity fees. Based on the nature of the currently proposed improvements, implementation of the Proposed Project would have no effect on the wastewater treatment requirements set forth by the state Regional Water Quality Control Board-San Diego Region for the City of San Diego. No further analysis is warranted.

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

**No Impact.** As indicated below in Sections XVI (d.) and (e.), implementation of the Airport Land Use Plan, which includes the currently proposed uses, would not have a significant impact on existing water or wastewater systems. The Project would not require or result in the construction of new water or wastewater treatment plants or expansion of existing facilities. No further analysis is warranted.

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

**Less Than Significant Impact.** As indicated above in Section VIII (e.), the Project's potential impacts to surface drainage volumes would be less than significant and no further analysis is warranted.
d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

**Less Than Significant Impact.** A Water Supply Assessment by the City of San Diego Water Department specifically found that adequate water supply would be available for development proposed at SDIA - see page 5.11-11 of the AMP FEIR. This includes the uses assumed for the Airport Land Use Plan, which includes the uses in the Proposed Project. In terms of the water delivery or conveyance system, the land uses for each project component would result in an increased demand for water, which would require an extension of water conveyance facilities on SDIA. Within the northern portion of the airport, development of uses contemplated under the Proposed Project would require extension of water utilities from Pacific Highway. Such utility extensions are typical for most new development projects. As such, the Project's potential impacts related to water supply and water systems are assessed as less than significant. No further analysis is warranted.

e. Has the wastewater treatment provider, which serves or may serve the project, determined that it has adequate capacity to serve the projected demand of the project in addition to the provider's existing commitments?

**Less Than Significant Impact.** Development of SDIA in accordance with the proposed Airport Land Use Plan, which includes the types of land uses contemplated under the Proposed Project, would result in additional wastewater-generating facilities (e.g., sinks, toilets). The development of the northern portion of the airport and/or the reuse of the former TDY property could generate new uses at SDIA with an associated (but unquantified) increase in wastewater generation. As discussed on page 5.11-12 of the AMP FEIR, this increase in wastewater generation would not, however, be significant because of the wastewater treatment capacity available to SDIA and because of the airport's location near large San Diego Metropolitan Wastewater Department (SDMWWWD) wastewater collection pipelines and Pump Station No. 2. As a result, little-to-no off airport infrastructure would be required to convey increased wastewater flows from SDIA to the SDMWWWD sewer system and the Point Loma Wastewater Treatment Plant. Capacity impacts to SDMWWWD wastewater treatment facilities would be offset through payment of applicable sewer capacity fees, to the extent required by law. Potential sewer system impacts related to implementation of the Proposed Project, being accounted for within the Airport Land Use Plan, would be less than significant. No further analysis is warranted.

f. Is the project served by a landfill with sufficient permitted capacity to accommodate the solid waste disposal needs of the project?

**Less Than Significant Impact.** Operation of the new development proposed at SDIA is anticipated to result in an increase of solid waste generated at SDIA. This increase would be negligible in comparison to the available disposal capacity described on pages 5.11-7 and 5.11-8 of the AMP FEIR. Construction and demolition activities would result in a substantial temporary increase of solid waste generation at SDIA. However, recycling, salvage, reuse, and disposal options would be identified in a Solid Waste Management Plan in advance of all activities in order to minimize the amount of debris directed to local landfills. This plan would include the identification of locations for sorting of materials for reuse and recycling. At least 50 percent of all waste generated during construction and demolition activities would be recycled in accordance with the City of San Diego's Construction and Demolition Debris Diversion Ordinance. As indicated on page 5.11-13 of the AMP FEIR, future development proposed at SDIA would have a less than significant impact on the solid waste disposal system. No further analysis is warranted.
g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

**Less Than Significant Impact.** The disposal of municipal (non-hazardous) waste would occur at Miramar Landfill in accordance with applicable state and local requirements (there are no applicable federal requirements - see Section 5.11.2.3 of the AMP FEIR for discussion of the regulatory framework related to solid waste generation/disposal). Any hazardous waste resulting from construction, demolition, and operations at SDIA would not be disposed at Miramar Landfill and would instead be disposed at a landfill approved to receive hazardous waste, as required by local and state regulations, or otherwise treated/managed in accordance with federal, state, and local requirements (see Section 5.15.2 of the AMP FEIR for discussion of the regulatory framework applicable to hazardous wastes). The project's potential impacts related to the regulation of solid waste would be less than significant. No further analysis is required.

<table>
<thead>
<tr>
<th>XVII. MANDATORY FINDINGS OF SIGNIFICANCE.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?</td>
</tr>
<tr>
<td>b. Does the project have impacts that are individually limited but cumulatively considerable? (&quot;Cumulatively considerable&quot; means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)</td>
</tr>
<tr>
<td>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
</tr>
</tbody>
</table>
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

**Less Than Significant Impact.** As described above in Section IV, the Proposed Project would occur at SDIA, which is highly developed and largely devoid of biological resources. The one notable exception is, however, the presence of two nesting areas for the California least tern, which is a federal and state listed endangered species. A portion of the on-airport access road currently proposed between the northern and southern portions of the airport would come in close proximity to the nesting areas. As such, construction activities associated with the proposed access road pose the potential to significantly impact a listed species. This issue warrants further analysis.

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

**Less Than Significant Impact.** Table 5-20.6 of the AMP FEIR summarizes the conclusion of the cumulative impacts analysis completed for each environmental topic addressed in the AMP FEIR, as follows:

<table>
<thead>
<tr>
<th>Topic</th>
<th>AMP FEIR Section</th>
<th>Incremental contribution to significant cumulative impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise</td>
<td>5.1</td>
<td>The SDCRAA is not currently aware of any proposed projects that would create cumulative noise impacts in combination with aircraft and highway noise exposure levels.</td>
</tr>
<tr>
<td>Land Use Planning</td>
<td>5.2</td>
<td>Cumulative developments envisioned would be consistent with the land uses defined in the area's Community Plans or in the Port Master Plan. Consequently, these future developments when combined with the AMP Project would not result in any significant land use impacts.</td>
</tr>
<tr>
<td>Traffic and Circulation</td>
<td>5.3</td>
<td>Since SANDAG forecasts account for all approved plans and projects within the region, all traffic estimates used in the study account for cumulative traffic. Therefore, traffic impacts represent cumulative impacts anticipated in the study area under each alternative.</td>
</tr>
<tr>
<td>Population and Housing</td>
<td>5.4</td>
<td>AMP Project would not incrementally contribute to a significant cumulative population and housing impact because it would not require relocation of residents, demolish or relocate residences or measurably affect jobs/housing balance.</td>
</tr>
<tr>
<td>Air Quality</td>
<td>5.5</td>
<td>Conservatively high background concentrations levels were modeled to account for air emission sources outside</td>
</tr>
</tbody>
</table>
### Summary of Cumulative Impacts by Topic

<table>
<thead>
<tr>
<th>Topic</th>
<th>AMP FEIR Section</th>
<th>Incremental contribution to significant cumulative impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology and Water Quality</td>
<td>5.6</td>
<td>The current storm drain system is considered to be undersized; therefore, any additional flow would exacerbate this condition unless improvements to the existing system are made. All SDIA projects must adhere to the SWMP; therefore, water quality impacts would be less than significant individually and cumulatively.</td>
</tr>
<tr>
<td>Historic, Architectural, Paleontological and Cultural Resources</td>
<td>5.7</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because there would be no impacts to historic/cultural resources.</td>
</tr>
<tr>
<td>Biotic Communities/Endangered &amp; Threatened Species</td>
<td>5.8</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because it would not directly affect sensitive vegetation communities or valuable habitat and because other reasonably foreseeable projects would not affect California least terns.</td>
</tr>
<tr>
<td>Wetlands</td>
<td>5.9</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because only 0.1 acre of isolated, disturbed (and non-jurisdictional) wetland habitat would be affected by the AMP Project.</td>
</tr>
<tr>
<td>Coastal Resources</td>
<td>5.10</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact to coastal resources because it would be consistent with the coastal resources management and planning policies of the California Coastal Act, and because other developments in the Coastal Zone also would be required to be consistent with these policies.</td>
</tr>
<tr>
<td>Utilities and Service Systems</td>
<td>5.11</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because service providers would be able to accommodate proposed SDIA improvements and other projected developments.</td>
</tr>
<tr>
<td>Light Emissions</td>
<td>5.12</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because the project site is already in an urbanized area and is highly illuminated.</td>
</tr>
<tr>
<td>Aesthetics</td>
<td>5.13</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because it would be in compliance with applicable aesthetic design guidelines and visual resource plans and policies.</td>
</tr>
</tbody>
</table>
### Summary of Cumulative Impacts by Topic

<table>
<thead>
<tr>
<th>Topic</th>
<th>AMP FEIR Section</th>
<th>Incremental contribution to significant cumulative impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geology and Soils</td>
<td>5.14</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because geology and soils impacts would be confined to the airport study area and would not add to the geology and soils impacts of other area projects.</td>
</tr>
<tr>
<td>Hazards and Hazardous Materials</td>
<td>5.15</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because measures would be taken during construction to limit potential for impacts, and hazards associated with the NTC site would be mitigated separately.</td>
</tr>
<tr>
<td>Human Health Risk Assessment</td>
<td>5.16</td>
<td>As with the air quality analysis, the HHRA included long range plans for increased traffic due to forecast demand. Although the AMP Project contributes incrementally to human health risk effects, the non-cancer effects found for 2015 are attributable primarily to the pollutant acrolein and the impacts are likely overstated due to the aircraft engine speciation profiles used in the analysis.</td>
</tr>
<tr>
<td>Public Services</td>
<td>5.17</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because new developments can be accommodated and because new public services are added as required.</td>
</tr>
<tr>
<td>Recreation</td>
<td>5.18</td>
<td>AMP Project would not incrementally contribute to a significant cumulative impact because it would have virtually no effect on recreational resources.</td>
</tr>
</tbody>
</table>

The AMP FEIR cumulative impacts analyses consider the SDIA AMP Project as a whole, including both the Airport Implementation Plan and the Airport Land Use Plan without a distinction between the two. The types of improvements contemplated under the Proposed Project are included in the Airport Land Use Plan. The addition of those improvements to the Airport Implementation Plan, improvements already addressed in the AMP FEIR as part of the Airport Land Use Plan, does not change the basic conclusions of the cumulative impacts analyses in the AMP FEIR. Those conclusions are considered to still be valid and applicable to the Proposed Project; no further analysis is warranted.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

**Potentially Significant Impact.** As indicated in the discussions above, implementation of the Proposed Project has the potential to result in significant impacts that may have not been fully addressed in the AMP FEIR. Although all of the currently proposed improvements were fully considered in the AMP FEIR relative to impacts associated with the Airport Land Use Plan, the current proposal to amend the adopted AMP Airport Land Use Plan and Airport Implementation Plan in light of additional project details regarding certain Northside Development area improvements...
warrants the preparation of additional information and analysis to supplement the AMP FEIR. Specifically, additional information and analysis for impacts that could directly or indirectly impact people is warranted relative to aesthetics.
APPENDIX A
Part II

NOP Comment Letters
STATE AGENCIES
Notice of Preparation

May 24, 2010

To: Reviewing Agencies

Re: San Diego International Airport Master Plan - Amendments to Airport Land Use Plan and Airport Implementation Plan
SCH# 2005091105

Attached for your review and comment is the Notice of Preparation (NOP) for the San Diego International Airport Master Plan - Amendments to Airport Land Use Plan and Airport Implementation Plan draft Environmental Impact Report (EIR).

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

Please direct your comments to:

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

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

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

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Attachments
cc: Lead Agency
SCH# 2005091105
Project Title San Diego International Airport Master Plan - Amendments to Airport Land Use Plan and Airport Implementation Plan
Lead Agency San Diego County Regional Airport Authority

Type NOP Notice of Preparation

Description The San Diego International Airport Master Plan delineates numerous improvements planned to occur at the airport, as generally defined within the long-term development framework of the AMP Airport Land Use Plan. Several of those improvements are more specifically defined for implementation within the Airport Implementation Plan. The AMP Final Environmental Impact Report (FEIR), certified in May 2008, addresses the land uses and improvements contemplated in the Airport Land Use Plan at a program-level of analysis, based on information available at the time. Over the past two years, additional planning and coordination with airport tenants and stakeholders has occurred regarding land use areas identified in the Airport Land Use Plan that now enables them to be added to the Airport Implementation Plan. Such improvements are planned primarily in the northern portion of the airport, also referred to as the Northside Development Area, and include:

* a Consolidated Rental Car (CONRAC) Facility;
* Air Cargo Warehouse Facilities and Associated Improvements;
* Central Receiving/Distribution Center
* a Terminal Link Roadway along the eastern perimeter of the airport connecting the proposed northside facilities to the main terminal area; and
* On-site utility improvements to serve the proposed development.

Lead Agency Contact
Name Ted Anasis
Agency San Diego County Regional Airport Authority
Phone (619) 400-2478
Fax
email
Address P.O. Box 82776
City San Diego
State CA Zip 92138-2776

Project Location
County San Diego
City San Diego
Region
Cross Streets San Diego International Airport - North Harbor Drive
Lat / Long
Parcel No.

Proximity to:
Highways I-5
Airports San Diego International Airport
Railways
Waterways
Schools
Land Use GP Des: Institutional Z Public and Semi-Public Facilities; Industrial employment (per the City of San Diego General Plan; however, the SDCRAA is a local entity of the regional government responsible for land use determinations at the airport)
Zoning: International Airport

Note: Blanks in data fields result from insufficient information provided by lead agency.
<table>
<thead>
<tr>
<th>Project Issues</th>
<th>Aesthetic/Visual; Other Issues</th>
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<tr>
<td><strong>Reviewing Agencies</strong></td>
<td>Resources Agency; California Coastal Commission; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Office of Emergency Management Agency, California; Native American Heritage Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Airport Projects; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9</td>
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<th>Date Received</th>
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<tr>
<td>Start of Review</td>
<td>05/24/2010</td>
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<tr>
<td>End of Review</td>
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Note: Blanks in data fields result from insufficient information provided by lead agency.
STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

Notice of Preparation

May 24, 2010

To: Reviewing Agencies

Re: San Diego International Airport Master Plan - Northside Improvements
   SCH#: 2010-051062

Attached for your review and comment is the Notice of Preparation (NOP) for the San Diego International Airport Master Plan - Northside Improvements draft Environmental Impact Report (EIR).

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

Please direct your comments to:

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

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

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

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Attachments
cc: Lead Agency

RECEIVED
JUN 01 2010
PLANNING DEPT. #44
SCH# 2010051062
Project Title San Diego International Airport Master Plan - Northside Improvements
Lead Agency San Diego County Regional Airport Authority

Type NOP Notice of Preparation
Description The proposed Northside Improvements project consists of amendments to the Airport Land Use Plan and Airport Implementation Plan for the currently adopted San Diego International Airport Master Plan to include the following projects: 1) consolidated rental car facility; 2) air cargo warehouse facilities; 3) centralized receiving and distribution center; 4) terminal link roadway; and 5) on-site utilities improvements.

Lead Agency Contact
Name Ted Anasis
Agency San Diego County Regional Airport Authority
Phone 619-400-2478
Fax
email
Address P.O. Box 82776
City San Diego
State CA Zip 92138-2776

Project Location
County San Diego
City San Diego
Region
Cross Streets North Harbor Drive; Pacific Highway and Sassafras Street
Lat / Long
Parcel No.

Township Range Section Base

Proximity to:
Highways Interstate Hwy 5
Airports San Diego International Airport
Railways BN&SF
Waterways San Diego Bay
Schools
Land Use International Airport/International Airport

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9

Date Received 05/24/2010 Start of Review 05/24/2010 End of Review 06/22/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.
State Resources Agency

Fish & Game Region 1E
Laurie Harmonberger

Fish & Game Region 2
Jeff Drongesen

Fish & Game Region 3
Charles Armor

Fish & Game Region 4
Julie Vance

Fish & Game Region 5
Don Chadwick

Habitat Conservation Program

Fish & Game Region 6
Gabriella Gatchel

Habitat Conservation Program

Fish & Game Region 8 I/M
Brad Henderson

Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Game M
George Isaac

Marine Region

Other Departments

Food & Agriculture
Steve Shafer

Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Anna Garfield

Environmental Services Section

Dept. of Public Health
Bridgette Billings

Dept. of Health Drinking Water

Independent Commissions, Boards

Delta Protection Commission
Linda Flack

Cal EMA (Emergency Management Agency)
Dennis Castillo

Governor's Office of Planning & Research
State Clearinghouse

Native American Heritage
Comm.
Debbie Treadway

Public Utilities Commission
Lea Wong

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Marina Brand

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

Caltrans - Division of Aeronautics
Sandy Neswood

Caltrans - Planning
Terry Pencovic

California Highway Patrol
Scott Loschler

Office of Special Projects

Housing & Community Development
CEQA Coordinator

Housing Policy Division

Dept. of Transportation

Caltrans, District 1
Rex Jakus

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Bruce de Terra

Caltrans, District 4
Lisa Carboni

Caltrans, District 5
David Murray

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Eimer Alvarez

Caltrans, District 8
Dan Kopulsky

Caltrans, District 9
Gary Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Chris Herre

Cal EPA

Air Resources Board

Airport Projects
Jim Lamer

Transportation Projects
Douglas Ito

Industrial Projects
Mike Tolskran

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality

State Water Resources Control Board
Steven Herrera

Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

Other

Last Updated on 03/24/10
Memorandum

Date: May 26, 2010
To: All Reviewing Agencies
From: Scott Morgan, Acting Director
Re: SCH # 2010051062
San Diego International Airport Master Plan – Northside Improvements

The State Clearinghouse distributed the above-referenced Notice of Preparation on May 24, 2010 to your agency for review and comment. It has come to our attention that the document was issued a new State Clearinghouse Number and sent out twice in error. For all future correspondence regarding this project, please use the original State Clearinghouse Number SCH# 2005091105. We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Ted Anasis
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776
June 16, 2010

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

NOTICE OF PREPARATION (NOP) FOR A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN – NORTHSIDE IMPROVEMENTS PROJECT (SCH# 2005091105), SAN DIEGO COUNTY

Dear Mr. Anasis:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: “The San Diego International Airport (SDIA) Airport Master Plan (AMP) delineates numerous improvements planned to occur at the airport. The improvements associated with the revised Airport Land Use Plan and the proposed Airport Implementation Plan – Northside Improvements include the following: Consolidated Rental car (CONRAC) Facility; Air Cargo warehouse Facility and Associated Improvements; Central Receiving/Distribution Center; Terminal Link Roadway, and on-site utilities improvements to serve the proposed development. The proposed project is located at San Diego International Airport (SDIA). The SDIA is located in the northwest portion of the downtown area within the City of San Diego, and is generally 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. The project site is largely vacant or occupied by airport uses. SDIA is designated as “Urban Land” and ‘Made Land”’.

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

1) The EIR should evaluate whether conditions within the Project Area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

• 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.

- GeoTracker: 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).

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project Area 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.

3) Any environmental investigations, sampling and/or remediation for a 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. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.
4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) 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.

5) Future 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.

6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor 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.

7) 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). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses 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.

8) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC’s Voluntary Cleanup Coordinator, at (714) 484-5489.
If you have any questions regarding this letter, please contact me at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,

Greg Holmes  
Unit Chief  
Brownfields and Environmental Restoration Program

cc: Governor’s Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
state.clearinghouse@opr.ca.gov

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
ADelacr1@dtsc.ca.gov

CEQA # 2927
June 22, 2010

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

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report (DIER) for the San Diego International Airport Master Plan

Dear Mr. Anasis:

The Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the San Diego International Airport Master Plan (AMP) DEIR. The following statements and comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seq.) and Fish and Game Code Section 1600 et seq.

The San Diego International AMP delineates numerous upgrades planned to occur at the airport, as generally defined within the long-term development framework of the AMP Airport Land Use Plan. The final EIR for the AMP, certified in May, 2008, addressed the planned land uses and upgrades at a programmatic level of analysis, based on the information available at the time. Since then, further planning and coordination with airport tenants and stakeholders has taken place. Improvements planned primarily in the northern portion of the airport, or the "Northside Development Area", are now being added to the Airport Implementation Plan. These include a Consolidated Rental Car facility, air cargo warehouse facilities and associated improvements, a central receiving/distribution center, a terminal link roadway along the eastern perimeter of the airport connecting the proposed Northside facilities to the main terminal area, and on-site utility improvements to serve the proposed development.

The area within the boundaries of the San Diego International Airport (SDIA) is mostly either developed or consists of disturbed vegetation such as baccharis scrub or non-native grassland. However, the California least tern (Sterna antillarum browni; federal and state listed endangered, and state fully protected), the western snowy plover (Charadrius alexandrinus novosus; federally listed as threatened), and the California horned lark (Eremophila alpestris actia; a state species of concern) are known to utilize the SDIA. Patches of ruderal vegetation in the ovals between taxiways, and the runways and roads themselves serve as habitat for these species. California least terns nest in several areas around the SDIA, with Oval 3 South on the southern side of the taxiways being the most consistently used (according to the final EIR for the AMP, May, 2008).

The Department offers the following comments and recommendations to assist the Airport Authority in avoiding or minimizing potential project impacts on biological resources.

Conserving California’s Wildlife Since 1870
Specific Comment

The NOP states that the proposed on-airport access road that would connect the northern and southern portions of the airport would pass to the south of, but away from, the California least tern nesting areas. At the nearest point, the road would pass within 75 to 100 feet of the least tern nesting area. The DEIR should fully analyze and discuss the potential impacts of increased traffic and associated increases in noise, light, movement of passing cars, etc. on nesting least terns. Pursuant to Section 3511 of the California Fish and Game Code, the least tern is designated as a State Fully Protected species. This designation prohibits take or possession of this species at any time (i.e., no take authorizations from the State are available). This also applies to any parts of the animal (e.g., in the case of birds, their eggs).

General Comments

Biological Resources within the Project's Area of Potential Effect

1. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.

   a) Per CEQA Guidelines, Section 5125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.

   b) A thorough assessment of rare plants and rare natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see: http://www.dfg.ca.gov/habcon/plant/) (hard copy available on request).

   c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.dfg.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

   d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:

   a) A discussion of impacts associated with increased lighting, noise, human activity, changes in drainage patterns, changes in water volume, velocity, and quality, soil erosion, and/or sedimentation in streams and water courses on or near the project site, with mitigation measures proposed to alleviate such impacts should be included.

   b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff, soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater.

   c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

   d) A cumulative effects analysis should be developed as described under CEQA Guidelines Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities in Southern California (Attachment 1) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from March 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist should conduct a survey for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer shall be a minimum width of 300 feet (500 feet for raptors), shall be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

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

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Meredith Osborne at (858) 636-3163.

Sincerely,

Edmund Pert
Regional Manager
South Coast Region

Attachment:
Rare Natural Communities in Southern California
Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Database and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

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<td>Mesquite Bosque</td>
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<td>Elephant Tree Woodland</td>
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S1.2
Southern Foredunes
Mono Pumice Flat
Southern Interior Basalt Flow Vernal Pool

S2.1
Venturan Coastal Sage Scrub
Diegan Coastal Sage Scrub
Riversidean Upland Coastal Sage Scrub
Riversidean Desert Sage Scrub
Sagebrush Steppe
Desert Sink Scrub
Mafic Southern Mixed Chaparral
San Diego Mesa Hardpan Vernal Pool
San Diego Mesa Claypan Vernal Pool
Alkali Meadow
Southern Coastal Salt Marsh
Coastal Brackish Marsh
Transmontane Alkali Marsh
Coastal and Valley Freshwater Marsh
Southern Arroyo Willow Riparian Forest
Southern Willow Scrub
Modoc-Great Basin Cottonwood Willow Riparian
Modoc-Great Basin Riparian Scrub
Mojave Desert Wash Scrub
Engelmann Oak Woodland
Open Engelmann Oak Woodland
Closed Engelmann Oak Woodland
Island Oak Woodland
California Walnut Woodland
Island Ironwood Forest
Island Cherry Forest
Southern Interior Cypress Forest
Bigcone Spruce-Canyon Oak Forest

S2.2
Active Coastal Dunes
Active Desert Dunes
Stabilized and Partially Stabilized Desert Dunes
Stabilized and Partially Stabilized Desert Sandfield
Mojave Mixed Steppe
Transmontane Freshwater Marsh
Coulter Pine Forest
Southern California Fellfield
White Mountains Fellfield

S2.3
Bristlecone Pine Forest
Limber Pine Forest
From: Al Cox [al_cox@dot.ca.gov]
Sent: Monday, June 28, 2010 11:11 AM
To: Airport Planning
Subject: SDIA Master Plan NOP Re. SDIR
Attachments: SDIASMasterPlanSDEIR.pdf

Please find attached Caltran's comment letter regarding the SDIA Notice of Preparation for a Draft Supplemental Environmental Impact Report for the Airport Master Plan.

(See attached file: SDIASMasterPlanSDEIR.pdf)

If you need further information or have any questions please contact me.

Thank you,

Al Cox
Public Transportation Branch
District 11 Planning Dept.
CA Dept. of Transportation
Mail Station 240
4050 Taylor Street
San Diego, CA 92110
(619) 688-6003
FAX: (619) 688-4299

RECEIVED
JUN 28 2010
PLANNING DEPT. #44
June 28, 2010

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

Dear Mr. Anasis:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Notice of Preparation (NOP) for a Draft Supplemental Environmental Impact Report (DSEIR) for the Airport Master Plan – North Side Improvements for the San Diego International Airport located in the City of San Diego. As you are aware, Caltrans has forwarded a number of letters to the San Diego County Regional Airport Authority (SDCRAA) regarding our concerns about the proposed mitigation for the preferred alternative’s impacts to State highway facilities. The NOP states the only possible significant impact requiring further study has to do with aesthetics. However, due to this latest plan for North Side Improvements, further traffic analysis is necessary to determine the redistribution of traffic and corresponding roadway mitigation required for both State facilities and local arterials.

Additionally, based on the May 28, 2010 final report, Traffic Mitigation for Airport Master Plan (AMP) FER - Airport Implementation Plan, the DSEIR should discuss what short term surface transportation improvements would be initiated due to the proposed North Side improvements. Also, discussion should be provided related to how the placement of the facilities along Pacific Highway would not preclude future roadway improvements, including the placement of Interstate 5 connector ramps, as contemplated in the 2030 Regional Transportation Plan.

The San Diego Association of Governments (SANDAG) is also in the process of planning the location of the Airport Intermodal Transportation Center (AITC), which will include a pedestrian overcrossing of Pacific Highway to the consolidated rental car facility (CONRAC) and a dedicated on-airport shuttle bus system. While the AITC is a separate project, the synergy between the AMP North Side Improvements and AITC is important and some specific design features will be required to successfully integrate the two projects.

"Caltrans improves mobility across California"
The proposed project is growth inducing as defined by CEQA and consequently will attract more vehicular trips than previously forecasted. It should be noted that Caltrans, SANDAG and the City of San Diego share concerns about the project’s traffic impacts and the need for mitigation. Therefore, clarification should be provided regarding the specific project related traffic impacts to surface transportation facilities, the implementation of mitigation measures to address those impacts in the near term, and how they will be coordinated with longer range mitigation associated with other AMP improvements over time.

We appreciate continued involvement in the AMP and the AITC planning process. Caltrans looks forward to continuing cooperation with the SDCRAA in coordinating land use and transportation issues associated with the AMP and the Destination Lindbergh planning efforts.

If you have any questions or require further information, please contact Chris Schmidt, Chief of Public Transportation at (619) 220-7360 or via email at Chris_Schmidt@dot.ca.gov.

Sincerely,

BILL FIGGE
Deputy District Director of Planning

c: Muggs Stoll, SANDAG
Dave Schumacher, SANDAG
Miriam Kirschner, SANDAG
Mark Thompson, San Diego Metropolitan Transit Service
Tait Galloway, City of San Diego, Planning Dept.
June 28, 2010

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

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Deputy District Director of Planning

C: Muggs Stoll, SANDAG
   Dave Schumacher, SANDAG
   Miriam Kirshner, SANDAG
   Mark Thompson, San Diego Metropolitan Transit Service
   Tait Galloway, City of San Diego, Planning Dept.
LOCAL AGENCIES
AVAILABILITY OF A NOTICE OF PREPARATION FOR A
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN – NORTHSIDE IMPROVEMENTS

PROJECT DESCRIPTION AND LOCATION: The San Diego County Regional Airport Authority has prepared a Notice of Preparation (NOP) for a Draft Supplemental Environmental Impact Report (SEIR) for the Airport Master Plan - North Side Improvements for San Diego International Airport located in the City of San Diego.

COPIES OF THE NOTICE OF PREPARATION ARE AVAILABLE from the Airport Planning Department, San Diego County Regional Airport Authority, with offices located in the Commuter Terminal at San Diego International Airport, 3225 North Harbor Drive, San Diego, CA, during the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. Copies of the NOP may be downloaded at www.san.org under Airport Initiatives/Environmental/Environmental Review/CEQA. A copy of the same may also be requested by contacting Ted Anasis at (619) 400-2478.

A REVIEW PERIOD, during which the San Diego County Regional Airport Authority will receive scoping comments upon the proposed Draft SEIR, commences on May 20, 2010. Comments should be addressed to the San Diego County Regional Airport Authority. The deadline for receiving written comments regarding the scope of the Draft SEIR is June 28, 2010. Comments may be submitted by:

- Mail to the Authority offices at SDCRAA, P.O Box 82776, San Diego, CA 92138-2776 (these comments must be postmarked by Friday, June 25, 2010).

- E-mail to the Authority offices at planning@san.org. The Airport Authority will accept comments to this notice via e-mail received by 5:00 p.m. on Monday, June 28, 2010, if the comments: (i) contain less than 2,000 words; and (ii) the e-mail comments do not contain any attachments. Any comments or responses to this notice containing more than 2,000 words, or which are accompanied by any attachments, must be delivered in writing to the address specified above, or they will not be considered as a valid response to this notice.

- Delivery to the Authority offices at San Diego International Airport or faxed to (619) 400-2459 by 5:00 p.m. on Monday, June 28, 2010.

A PUBLIC SCOPING MEETING will be held at the Airport Authority offices located on the third floor of the Commuter Terminal at San Diego International Airport from 5:30 p.m. to 7:00 p.m. on Tuesday, June 8, 2010. Parking at the Commuter Terminal will be validated.

The public scoping meeting will consist of a brief overview presentation of the project and the environmental review process. Attendees will have an opportunity to ask questions and provide oral and written comments on the scope and content of the SEIR.
June 25, 2010

San Diego County Regional Airport Authority
Attention: Ted Anasis
Airport Planning
P.O. Box 82776
San Diego, California 92101

Re: Comments on Notice of Preparation of a Supplemental Environmental Impact Report for Amendments to the Airport Land Use Plan and Airport Implementation Plan

Dear Mr. Anasis:

Thank you for the opportunity to comment on the scope and content of the Supplemental Environmental Impact Report (SEIR) being prepared for the Amendments to the Airport Land Use Plan and Airport Implementation Plan (Proposed Project). Unified Port of San Diego (District) staff has reviewed the Notice of Preparation (NOP) dated May 20, 2010, and submits the following comments:

- District staff is concerned that the new roadway that would be constructed to access the 6,500-space Consolidated Rental Car (CONRAC) facility, the 2,170-space public surface lot, the future air cargo facilities and the Central Receiving and Distribution Center would be accessed primarily via its entrance at Sassafras Street. The SEIR needs to clearly identify points of ingress and egress for rental car patrons/shuttles, cargo operators, public parkers and delivery trucks to access the proposed facilities and how this increased traffic would affect operations at the Port Administration Building located at the corner of Pacific Highway and Sassafras Street.

When crafting the circulation plans for all northside facilities, District staff encourages the San Diego County Regional Airport Authority (SDCRAA) to consider the Washington Street entrance as the point of ingress and egress for all rental cars, cargo operators and delivery trucks to the Central Receiving and Distribution Center.

- The NOP indicates that the 2008 Airport Master Plan Final Environmental Impact Report (FEIR) adequately addressed the majority of potential environmental effects associated with the Proposed Project; however the FEIR was programmatic and not project specific. To the extent the details of the specific development components were not known or analyzed in the 2008 FEIR, they should be analyzed in the SIER and all potential environmental impacts should be clearly identified. For example, more detail is now available about how rental cars and cargo will be handled in the new CONRAC and cargo facilities. The SEIR should analyze any traffic and circulation impacts associated with these facilities and should identify mitigation measures that will offset impacts on area-wide traffic and circulation.

- The SEIR should analyze any changes or enhancements contemplated to the existing Interstate 5 ramp systems to provide access to the proposed northside facilities. The SEIR should discuss how ramp operations will be affected, and how traffic and land use could be impacted in the area surrounding the Airport.

- The proposed alignment of the new on-airport Terminal Access Roadway that would link the northern and southern portions of the Airport would effectively displace a parking lot along
Laurel Street that is currently leased to the District’s tenant Solar Turbines. The District’s employee parking lot located across the street from the Port Administrative Building would also be displaced by the proposed alignment. The SEIR should acknowledge and analyze these parking impacts and provide mitigation where necessary.

- The SEIR should discuss and analyze traffic and circulation impacts the Terminal Link Roadway would cause to N. Harbor Drive, Pacific Highway and the adjoining properties.

- As outlined in our letter dated September 19, 2009 (see attached), District staff is concerned about mitigation measures that directly or indirectly affect District properties and leaseholds. We are specifically concerned about the implementation plan for the nineteen proposed roadway improvements that are the result of traffic mitigation measures identified in the 2008 FEIR. The implementation of the proposed roadway improvements was not analyzed in the 2008 FEIR, and the proposed implementation plans presented after the FEIR’s certification show that the improvements may adversely affect District tidelands by eliminating or encroaching upon public access and District leaseholds, park, landscaping, sidewalks, and parking. Any implementation plan that expands roadways onto current District property needs to be analyzed in the SEIR.

- All land use assumptions for those areas under the District’s jurisdiction should be based upon the certified Port Master Plan (PMP). The SEIR should also clearly state whether any assumptions were based on other key planning documents, whether produced by the District or other jurisdictions.

- The SEIR should analyze if there are land use impacts to District tidelands. If any proposed roadway or other improvements could conflict with the existing PMP, the SEIR should state whether or not they would be subject to PMP consistency review and identify if a PMP Amendment would be requested of the Board of Port Commissioners.

District staff would like to thank SDCRAA for this opportunity to comment on the NOP. While we appreciate and recognize the SDCRAA’s need to implement the Airport Master Plan, we do not believe the proposed improvements should impact District property or private leaseholds on District property. Port staff proposes that we work with SDCRAA staff to seek solutions where necessary.

This concludes the Port’s comments on the NOP. District staff looks forward to continue working with SDCRAA in a meaningful and productive manner towards achieving mutually beneficial solutions. If you would like to meet with District staff to discuss these comments, please contact me at (619) 686-6283 or Candice D. Magnus, Associate Redevelopment Planner, at (619)-686-6583.

Sincerely,

John Helmer,
Director, Land Use Planning

cc: Dirk Mathiason
    Irene McCormack
    Candice D. Magnus
September 18, 2009

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

Re: Comments on Draft Traffic Mitigation for Airport Master Plan FEIR (Airport Implementation Plan)

Dear Mr. Anasis:

Thank you for the opportunity to comment on the Draft Implementation Plans for traffic mitigation identified in the Airport Master Plan (AMP) Final Environmental Impact Report (FEIR) for the San Diego International Airport (SDIA), which was certified by the San Diego County Regional Airport Authority (SDCRAA) Board in April of 2008. Port staff appreciates SDCRAA’s desire to work cooperatively with the Port to identify areas of concern and seek possible solutions regarding the proposed plans. However, Port staff is concerned about mitigation measures that directly or indirectly affect Port properties and Port leaseholds. With this in mind, the Port submits the following comments on the Draft Implementation Plans.

Comments on Initial Implementation Plan (presented by SDCRAA Staff in August 2008)

In August of 2008, SDCRAA staff presented to Port staff an Initial Implementation Plan and preliminary graphics for 19 proposed roadway improvements that are the result of traffic mitigation measures identified in the FEIR. At that time, Port staff stated that many of the proposed roadway improvements in the Plan would impact Port tidelands along North Harbor Drive from Rental Car Road to Grape Street. The Initial Implementation Plan Report showed an expanded right-of-way for North Harbor Drive, which was achieved by extending the road width onto current Port property. The roadway improvements extending north of Grape Street eliminated or encroached into park, landscaping, sidewalks, and parking.

Port staff informed SDCRAA staff that the proposed roadway expansion as described in the Initial Implementation Plan would conflict with the existing Port Master Plan and that a Port Master Plan Amendment (PMPA) and California Environmental Quality Act (CEQA) review would be necessary. Port staff also stated that the Board of Port Commissioners (BPC) needs to authorize processing of a PMPA and CEQA review.

Comments on Alternative Implementation Plan (presented March 2009)

In March of 2009, SDCRAA staff presented an Alternative Implementation Plan for several of the roadway improvements along North Harbor Drive that addressed some of Port staff’s concerns and
avoided the majority of the issues mentioned above for the areas between Winship Lane and Laurel Street. However, Port staff continues to have concerns because no alternatives were presented for the area between Laurel Street and Hawthorn Street adjacent to the current Solar Turbines leasehold.

Port staff met with the current tenant of that leasehold, Solar Turbines, to investigate the feasibility of shifting Harbor Drive roadway improvements northwards away from the public park/plaza and promenade area and towards the Solar Turbines facility. Solar Turbines representatives voiced their objections to these improvements as they would adversely affect access to their facility and parking areas. Port staff recommends that the SDCRAA, Solar Turbines and the Port work together to come up with a solution to this potential problem.

Conclusion

In summary, Port staff would like to thank the SDCRAA for working with us on the Draft Implementation Plans for traffic mitigation identified in the FEIR. While we appreciate and recognize the SDCRAA’s need to implement the Airport Master Plan traffic mitigation, we do not believe those improvements should impact Port property or private leaseholds on Port property. Port staff proposes that we work with SDCRAA staff to seek alternative solutions where necessary. Whether SDCRAA decides to proceed with the Initial Implementation Plan or the Alternative Implementation Plan, either would be subject to Port CEQA and Port Master Plan consistency review.

This concludes the Port’s comments on the Draft Implementation Plans. Port staff looks forward to continue working with SDCRAA in a meaningful and productive manner towards achieving mutually beneficial solutions. If you would like to meet with Port staff to discuss these comments, please contact me at (619) 686-6283 or Candice D. Magnus, Associate Redevelopment Planner, at (619)-686-6583.

Sincerely,

[Signature]

John Helmer

Director, Land Use Planning

cc: Dirk Mathiason
    Duane Bennett
    Candice D. Magnus
    Matt Valerio
Attached please find the City of San Diego comments to the above referenced project.

ELIZABETH SHEARER-Nguyen / ASSOCIATE PLANNER
City of San Diego / Development Services Department / Environmental Analysis Section
1222 First Avenue, MS 501 / San Diego, CA / 92101 / Phone: 619.446.5569 / Fax: 619.446.5499

Please Note: Work hours are M-F 6am to 230pm.
June 25, 2010

Submitted via email to: planning@san.org
Hard copy to follow via mail

Mr. Ted Anasis
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92101

Subject: Notice of Preparation for the Draft Supplemental Environmental Impact Report for the San Diego International Airport Master Plan – Amendments to the Airport Land Use Plan and Airport Implementation Plan

To Mr. Anasis:

The City of San Diego (“City”) has received and reviewed the Notice of Preparation for the Draft Supplemental Environmental Impact Report for the San Diego International Airport Master Plan – Amendments to the Airport Land Use Plan and Airport Implementation Plan and appreciates this opportunity to provide comments to the San Diego County Regional Airport Authority. In response to the DEIR, the City has identified potential environmental issues that may result in a significant impact to the environment. Continued coordinated planning between the City, the San Diego County Regional Airport Authority, and other local, regional, state, and federal agencies will be essential.

Staff from the Development Services Department (“DSD”), the City Planning and Community Investment Department, and the Environmental Services Department (ESD) have reviewed the DEIR and have the following comments regarding the content of the DEIR:
DEVELOPMENT SERVICES DEPARTMENT:
ANN GONSAVES (619) 446-5294 ACONSLAVES@SANDIEGO.GOV

The Notice of Preparation for the Draft Supplemental EIR for the SDIA Airport Master Plan – Northside Improvements and the accompanying Initial Study assert that all transportation/traffic impacts were conservatively addressed in the May 2008 Airport Master Plan EIR and therefore no additional analysis is contemplated in this Draft SEIR. However, the City of San Diego expressed concerns with the adequacy of the May 2008 EIR transportation analysis and reiterates those same concerns as it relates to this project. Please see the City of San Diego letter of comment of February 4, 2008.

In addition, we have the following comments:

1. An updated transportation impact study should compare the impacts of the Northside Improvements project against existing conditions in order to establish significance of impacts and identify project mitigation measures.

2. The proposed “Terminal Link Roadway” should be constructed entirely within the current airport footprint in order to avoid negatively impacting traffic operations on North Harbor Drive.

3. The updated transportation impact study should provide mitigation measures for Northside Improvements project impacts expected along Washington Street, Pacific Highway, Sassafras Street and other locations, which will be impacted by the reassignment of existing traffic and generation of additional traffic due to the project facilities. All intersection level of service analysis should also include queuing analysis.

DEVELOPMENT SERVICES DEPARTMENT:
Jeffrey Szymanski (619) 446-5324 JSZYMANSKI@SANDIEGO.GOV

The State of California’s Resources Agency has adopted revisions (December 30, 2009) to the State CEQA Guidelines (Title 14, California Administrative Code Section 15000 et.se.) to address the analysis and mitigation of greenhouse gasses (GHG) pursuant to Senate Bill (SB) 97. Please include an analysis of the project’s potential cumulative impacts on Greenhouse Gases pursuant to the CEQA Guidelines.
CITY PLANNING & COMMUNITY INVESTMENT, COMMUNITY PLANNING DIVISION:  
Tait Galloway (619) 533-4550 TGALLOWAY@SANDIEGO.GOV

1. Address how the proposed structures would impact views from the adjacent residential areas.

2. Address alternative options that would allow the Terminal Link Roadway to stay entirely on airport property; and thereby, eliminate the need to route shuttle buses on North Harbor Drive.

3. Address if the shuttles from the CONRAC would be consolidated or would individual car rental companies continue to operate their own shuttles.

4. Address how the proposed project would impact the ability to implement the Destination Lindbergh preferred scenario adopted by the Airport Authority Board.

5. Address how vehicle traffic (rental cars and freight trucks) associated with the proposed project would affect at grade rail crossings and all rail operations in the rail corridor from West Washington Street to Laurel Street for both existing and forecasted 2030 vehicle and rail traffic conditions.

6. Address the traffic impacts of the proposed project, including a “plan-to-ground” comparison, comparing existing conditions to projected traffic conditions in the forecast 2030 year with the proposed project.

7. Address City streets and roadway improvement measures to mitigate the proposed project traffic impacts based on the future 2030 traffic demand that are consistent with all applicable City standards and regulations.

8. Address freeway improvement measures to mitigate the proposed project traffic impacts based on the future 2030 traffic demand.

9. Address transit improvements to and from the airport (North Harbor Drive terminals and the proposed facilities at Pacific Highway) to increase the transit ridership and to reduce the future 2030 traffic impacts.

10. Address if any proposed mitigation measure would result in the need for the City to amend the Circulation Element of an affected community plan or public facilities financing plan, which includes, but is not limited to the following: Midway-Pacific Highway Corridor, Old San Diego, Uptown, and Downtown.
11. Address transportation demand management strategies, including, but not limited to free or reduced cost transit passes for employees of the Airport Authority and airport tenants, to increase transit ridership and to reduce the future 2030 traffic impacts.

12. Provide a Transportation Phasing Plan for the required transportation mitigation measures based on the traffic need and the existing right-of-way constrains that are consistent with all applicable City standards and regulations.

ENVIRONMENTAL SERVICES DEPARTMENT
Samantha Garcia, Resource Management Intern (858) 627-3302 SamanthaG@sandiego.gov
Lisa Wood, Senior Planner (858)-573-1236 or lwood@sandiego.gov

Initial Study: Section XVI. Utilities and Service Systems Item f (page 44):
This section of the document references available disposal capacity as described on pages 5.11-7 and 5.11-8 of the AMP FEIR. This section concludes that the increase in solid waste generation would be negligible in comparison to the available disposal capacity. This analysis does not take into account several recent events impacting disposal capacity in the region, including: legal challenges to the capacity of the Sycamore Landfill, and the recent changes regarding the proposed Campo and Gregory landfills. Furthermore, the analysis does not address the challenge of using a de minimus discussion to address potentially cumulatively significant impacts in CEQA documents. Finally, the analysis uses compliance with ordinances to mitigate the impact. Compliance with the City’s ordinances is satisfactory for projects that are below the City’s threshold of 60 tons of waste. This threshold was developed in consultation with the City’s Environmental Services Department, which is responsible for the City’s solid waste management system. Below 60 tons of waste, the City’s ordinances are considered sufficient to mitigate direct and cumulative impacts on disposal capacity and the solid waste management system as a whole. However, for projects that exceed this threshold, a potentially cumulatively significant impact remains.

Typically, a broader analysis of potential impacts to solid waste management systems is provided in what is usually section XIV, Public Services, (section XIII in this document), or sometimes in the greenhouse gas analysis section. Projects have solid waste impacts not only associated with the generation, transportation, and disposal of waste, but also in recycling and other services. While the new guidelines shied away from a full “life cycle” consideration of projects, for example a comparison of the relative merits of various building materials, they did make it clear with the new GHG requirements that a broad view of impacts should be considered. Solid waste generation is a very significant impact associated with the construction and ongoing operation of almost every project, and impacts to the overall solid waste management system should be addressed. The City bears responsibility for ensuring that solid
waste services are provided, and that impacts associated with these services are considered, and is under federal and state mandates concerning how to provide these services.

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 FEIR and provide four copies of the document for distribution to the commenting department. If you have any additional questions regarding the City’s review of the DEIR, please contact Jeffrey Szymanski, Associate Planner at (619) 446-5324 or via email at JSzymanski@sandiego.gov.

Sincerely,

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

ESN:JS

cc: Myra Herrmann, Senior Planner, Development Services
Ann Gonsalves, Senior Traffic Engineer, Development Services Department
Tait Galloway, Senior Planner, Community Planning & Community Investment
Lisa Wood, Senior Planner, Environmental Services Department
Review and Comment online file
June 25, 2010

Submitted via email to: planning@san.org
Hard copy to follow via mail

Mr. Ted Anasis
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92101

Subject: Notice of Preparation for the Draft Supplemental Environmental Impact Report for the San Diego International Airport Master Plan – Amendments to the Airport Land Use Plan and Airport Implementation Plan

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ANN GONSALVES (619) 446-5294 AGONSALVES@SANDIEGO.GOV

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Jeffrey Szymanski (619) 446-5324 JSZYMANSKI@SANDIEGO.GOV

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CITY PLANNING & COMMUNITY INVESTMENT, COMMUNITY PLANNING DIVISION:
Tait Galloway (619) 533-4550 TGALLOWAY@SANDIEGO.GOV

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8. Address freeway improvement measures to mitigate the proposed project traffic impacts based on the future 2030 traffic demand.

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12. Provide a Transportation Phasing Plan for the required transportation mitigation measures based on the traffic need and the existing right-of-way constrains that are consistent with all applicable City standards and regulations.

ENVIRONMENTAL SERVICES DEPARTMENT
SAMANTHA GARCIA, Resource Management Intern (858) 627-3302 SAMANTHAG@SANDIEGO.GOV
LISA WOOD, SENIOR PLANNER (858)-573-1236 OR LWOOD@SANDIEGO.GOV

Initial Study: Section XVI, Utilities and Service Systems Item f (page 44):
This section of the document references available disposal capacity as described on pages 5.11-7 and 5.11-8 of the AMP FEIR. This section concludes that the increase in solid waste generation would be negligible in comparison to the available disposal capacity. This analysis does not take into account several recent events impacting disposal capacity in the region, including: legal challenges to the capacity of the Sycamore Landfill, and the recent changes regarding the proposed Campo and Gregory landfills. Furthermore, the analysis does not address the challenge of using a de minimus discussion to address potentially cumulatively significant impacts in CEQA documents. Finally, the analysis uses compliance with ordinances to mitigate the impact. Compliance with the City’s ordinances is satisfactory for projects that are below the City’s threshold of 60 tons of waste. This threshold was developed in consultation with the City’s Environmental Services Department, which is responsible for the City’s solid waste management system. Below 60 tons of waste, the City’s ordinances are considered sufficient to mitigate direct and cumulative impacts on disposal capacity and the solid waste management system as a whole. However, for projects that exceed this threshold, a potentially cumulatively significant impact remains.

Typically, a broader analysis of potential impacts to solid waste management systems is provided in what is usually section XIV, Public Services, (section XIII in this document), or sometimes in the greenhouse gas analysis section. Projects have solid waste impacts not only associated with the generation, transportation, and disposal of waste, but also in recycling and other services. While the new guidelines shied away from a full “life cycle” consideration of projects, for example a comparison of the relative merits of various building materials, they did make it clear with the new GHG requirements that a broad view of impacts should be considered. Solid waste generation is a very significant impact associated with the construction and ongoing operation of almost every project, and impacts to the overall solid waste management system should be addressed. The City bears responsibility for ensuring that solid
waste services are provided, and that impacts associated with these services are considered, and is under federal and state mandates concerning how to provide these services.

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 FEIR and provide four copies of the document for distribution to the commenting department. If you have any additional questions regarding the City’s review of the DEIR, please contact Jeffrey Szymanski, Associate Planner at (619) 446-5324 or via email at JSZYMANSKI@SANDEDGO.GOV.

Sincerely,

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

ESN: JS

cc: Myra Herrmann, Senior Planner, Development Services
    Ann Gonsalves, Senior Traffic Engineer, Development Services Department
    Tait Galloway, Senior Planner, Community Planning & Community Investment
    Lisa Wood, Senior Planner, Environmental Services Department
    Review and Comment online file
Hello Ted, please find SANDAG's comment letter on the Notice of Preparation for the Airport Master Plan - North Side Improvements for San Diego International Airport attached. A mailed hardcopy will follow.

Thank you.-Ron

RECEIVED
JUL 01 2010
PLANNING DEPT. #44
July 1, 2010

Mr. Ted Anasis
SDCRAA
P.O. Box 82776
San Diego, CA 92138-2776

Dear Mr. Anasis:

SUBJECT: Notice of Preparation for the Airport Master Plan - North Side Improvements for San Diego International Airport

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Airport Master Plan - North Side Improvements for San Diego International Airport. SANDAG’s comments are made from a regional perspective, emphasize the need for land use and transportation coordination, and are based on policies contained in the Regional Comprehensive Plan (RCP) and the 2030 Regional Transportation Plan (RTP).

State law gives SANDAG the authority to determine whether a project or plan will need to be reviewed for regional significance. SANDAG staff has reviewed this project and determined that it is regionally significant due to the amount of traffic generated. Therefore, environmental review of this project should include consideration of applicable policy objectives contained in the RCP and the RTP.

Comments

Based on our initial review of the NOP, we have the following comments:

- The California Environmental Quality Act (CEQA) checklist used to evaluate transportation impacts is not consistent with the current CEQA guidelines which should be used instead. The current guidelines take a much more multimodal approach than the previous one.

- We understand from the NOP that the Authority intends to downsize the CONRAC facility with public parking included as surface parking in the project and to convert the public surface parking to rental car parking by 2030. We feel that elimination of the public parking may be premature for two reasons:
• It is our understanding that by 2030 the north side terminal facilities will be under development, which includes public parking facilities. Deleting public parking on the north side would, therefore, seem to be counter to the long-range Destination Lindbergh Plan that was completed in spring 2009. In addition, the location for the additional rental car parking appears to be in the same location as the future airport terminal building. Please clarify how the proposal for additional rental car parking fits into the long-range Destination Lindbergh Plan.

• The California High Speed Rail (HSR) system planned for implementation between 2020 and 2030 will require parking at this location. Furthermore, locating this parking at the CONRAC facility could be a revenue source for the Airport Authority. We ask that the project not preclude the ability to retain this parking in the future for the HSR system.

• The wording on page 42 of the NOP seems to indicate that this phase-out of the north side public parking would be offset by the new 3,000 parking spaces at the Teledyne Ryan (TDY) site. This new parking would be inconsistent with the Destination Lindbergh Master Plan. Based on discussions with your staff, they indicated that no parking is being proposed on the TDY site. We would suggest the wording in the NOP be clarified to specifically state that no parking is being proposed on the TDY site.

• We understand the Intermodal Transit Center (ITC) is not part of this project; however, we had understood that the ITC project and the joint coordination effort between the Airport Authority and SANDAG would be referenced. We ask that the ITC be referenced and that the pedestrian bridge that will link with the ITC and the Terminal Link Roadway be shown on drawings for north side improvement plans.

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or sba@sandag.org.

Sincerely,

SUSAN BALDWIN
Senior Regional Planner

RSA/dsn
July 1, 2010

Mr. Ted Anasis
SDCRAA
P.O. Box 82776
San Diego, CA 92138-2776

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Sincerely,

Susan Baldwin
Senior Regional Planner

RSA/dsn
ORGANIZATIONS
Mr. Royle:

Thank you for your email regarding the zip code. We discovered the error after sending the document to print. The version posted on the Authority website has already been corrected.

Sincerely,

Airport Planning

From: Jim Royle [mailto:jwroyle@cts.com]
Sent: Monday, May 31, 2010 2:28 PM
To: Airport Planning
Subject: NOP for Master Plan Amendments DDSEIR

Please note that the Zip Code in the mailing address at the top of the Notice of Preparation sent out for the DSEIR for the Amendments to the Airport Land Use Plan and Airport Implementation Plan is incorrect. It gives 92101 for the mailing address, not 92138.

Glad I noticed before I printed and mailed my letter from the San Diego County Archaeological Society!

Jim Royle
From: Jim Royle [jwroyle@cts.com]
Sent: Monday, May 31, 2010 2:28 PM
To: Airport Planning
Subject: NOP for Master Plan Amendments DDSEIR

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Jim Royle

RECEIVED
MAY 31 2010
PLANNING DEPT. #44
San Diego County Archaeological Society, Inc.
Environmental Review Committee

1 June 2010

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

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report
Amendments to the Airport Land Use Plan and Airport Implementation Plan

Dear Mr. Anasis:

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

Section V of the Notice of Preparation concludes that no impact to archaeological resources exist in the project area north of the runway and that, therefore, “no further analysis is warranted.”

The Fall 2002/Winter 2003 issue of the Maritime Museum’s Mains’ lHaul includes, on page 57, a map “adapted from a Port District map in the San Diego Historical Society Research Archives”. That map shows dates for fill at various locations around San Diego Bay. The area of potential impacts for the subject project includes fill dates of 1942, 1940 and “1925?”.

While the 1940’s fill was from dredging and thus is unlikely to include cultural material, the source of the 1920’s fill needs to be confirmed. If it is certain that it was from dredging, the NOP’s conclusion would be correct and no impacts to archaeological resources would be expected. However, if the 1920’s fill might be from landslide sources, additional consideration is required. Inclusion of a requirement for an archaeological monitor to be present during geotechnical borings in that area would provide a basis for determining the need for any additional archaeological studies.

SDCAS appreciates being included in the environmental review process for this project. Please ensure we are included in the distribution of the DSEIR.

Sincerely,

[Signature]
James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
    File
COMMUNITY PLANNING GROUPS
San Diego International Airport
Airport Planning
Community Feedback

SPEAKER/QUESTION CARD

If you wish to speak or ask a question, please complete this form with your specific topic or question:

1. Reduce size of CONTRAC facilities - will it allow expansion when T-1 becomes obsolete?

2. Service Road - are there any safety concerns during contra-flow ops on runway 9?

Name: Subhi Khali
Address: PCPB Airport Committee
Phone: (619) 224-1527

RECEIVED
JUN 08 2010
PLANNING DEPT. #44
From: Morning Star [morningstar.resvc@cox.net]  
Sent: Friday, June 25, 2010 5:31 PM  
To: Anasis Theodore  
Cc: Wilschetz Keith; Charles Mellor; Matt Awbrey; Tony Kempton; Tait Galloway; Robert MacCulloch  
Subject: PCPB official comment (attached) - SDIA Master Plan SEIR 5/20/10  
Attachments: PCPB_SDIA-SEIR comment-approved_6-17-10.pdf

Dear Ted,

Thank you for presenting SDIA Master Plan SEIR to PCPB on Thursday June 17, 2010. Please find PCPB comment approved by its board and signed by Chair, Subcommittee Chair and Co-Chair (attached). Please reply to confirm receipt. Thank you.

Best Regards,

Suhail Khalil  
Morning Star Real Estate Services  
(619) 224-1527 - Office  
MorningStar.RESVC@cox.net  

RECEIVED  
JUN 25 2010  
PLANNING DEPT. #44
Narrative: PCPB Airport Committee met June 2, 2010 to review SDIA SEIR and recommend comments to full board on June 17, 2010. Recommendation passed unanimously transcribed as follows:

Support CONRAC element to relocate all rental car facilities off N. Harbor Dr. (Port property) and develop new consolidated rental car facility on airport north-side property off Pacific Coast Hwy.

Support dedicated roadway on airport property to connect all terminals to CONRAC.

Request SDCRAA formally remove T-2 parking structure project on airport south-side off N. Harbor Drive from SDIA Master Plan EIR indefinitely.

Concerns regarding improvements to air-cargo facilities may eliminate future opportunity to relocate T-1 to north-side and proposed SANDAG Inter-modal Transit Center plan with no High Speed Rail connections to CONRAC.

Concerns regarding shuttle service safety on proposed dedicated roadway during SDIA Contra-Flow operations with no Engineered Material Arrestor Systems (E-MAS) in place on runway 9.

Recommend SDCRAA
1.) Further studies on runway 9 safety deficiencies
2.) Separate study to relocate air-cargo operations off SDIA property
3.) Regional Aviation Strategic Plan study to include Inter-modal Transportation HUB with no High Speed Rail proposed by SANDAG on May 25, 2010 linked to CONRAC Shuttle facility.

Comment approved by PCPB unanimously on June 17, 2010

Signed:

Charles Mello, PCPB Chair
Robert Maculloch, subcom. Chair
Suhail Khalil, subcom. Co-Chair

Submitted by PCPB Airport Committee
June 2, 2010
APPENDIX A
Part III

Scoping Meeting Materials
I. Purpose of Scoping Meeting
II. Northside Improvements
III. AMP Programmatic EIR
IV. Supplemental EIR Process
Purpose of Public Hearing

- Provide an opportunity for public and agency comment concerning the potential environmental effects of the Northside Improvements to be identified in the Supplemental Environmental Impact Report.

Background

- AMP included an Airport Land Use Plan and Implementation Plan depicting airport uses and proposed projects.
- AMP Programmatic EIR analyzed Airport Land Use Plan including Airport Support and Ground Transportation Uses including a Consolidated Rental Car Facility.
- AMP Final EIR evaluated “worst case” impacts including proposed CONRAC facility, air cargo, and a dedicated roadway.
Proposed Actions

- Revise Airport Land Use Plan
- Amend Use Areas in Adopted Airport Master Plan
- Propose Implementation Plan – Northside Improvements
  - Consolidated Rental Car Facility
  - Air Cargo Facility
  - Central Receiving/Distribution Center
  - Terminal Link Roadway
  - Utility Improvements
- No Project/No Action Alternative

Revised Airport Land Use Plan
Environmental issues previously addressed in AMP EIR

<table>
<thead>
<tr>
<th>Aesthetic/Visual</th>
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<tr>
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<td>Wetland/Riparian</td>
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<td>Sewer Capacity</td>
<td>Wildlife</td>
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<td>Social</td>
<td>Growth Inducing</td>
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<td>Geologic/Seismic</td>
<td>Soil Erosion</td>
<td>Incompatible Land Use</td>
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<tr>
<td>Jobs/Housing</td>
<td>Solid Waste</td>
<td>Cumulative Effects</td>
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</table>
Purpose of Supplemental EIR

- Evaluate any new potentially significant impacts associated with the Northside Improvements not previously addressed in AMP Programmatic EIR.
- An Initial Study was completed along with the NOP to evaluate whether the impacts of the Northside Improvements have already been addressed in the AMP Programmatic EIR.
- The following slides summarize the environmental findings of that evaluation.

Environmental Findings for Potentially Affected Categories

- **Traffic** – The currently proposed CONRAC is smaller in size and operations than that addressed in the AMP EIR; therefore, the associated traffic generation and impacts would be less than previously addressed in the AMP EIR.
- The dedicated roadway would be used for shuttle vehicles, reducing traffic on dedicated streets.
- Central Receiving Distribution Center would use airport road, reducing traffic further.
Environmental Findings for Potentially Affected Categories

- **Air Quality** – Air pollutant emissions associated with the AMP, which includes the Proposed Project, are well below *de minimis* thresholds and therefore is presumed to conform to the State Implementation Plan. National Ambient Air Quality Standards are exceeded for PM2.5 as expected since the San Diego area includes PM2.5 violations. The Proposed Project will not cause or contribute to a new violation nor increase the frequency or severity of any air quality standard.

- **Light Emissions and Visual Impacts** – Appropriate lighting components have been added to the Proposed Project to reduce the impact of intrusive lighting; however, potential visual/aesthetic impacts of the Project will be further evaluated in the SEIR based on new details regarding the proposed Northside improvements.
Environmental Findings for Potentially Affected Categories

➢ **Noise** – The Proposed Project would not change AMP finding of no significant increase in noise levels when compared to the No Project Alternative.

➢ **Land Use** – The Proposed Project is compatible with the existing terminal building, ground transportation, and air support facilities already on the project site, and is compatible with adjacent uses.

Environmental Findings for Potentially Affected Categories

➢ **Historic, Architectural, Archeological, and Cultural Resources** – The Proposed Project will have no adverse effect on historic architectural resources.

➢ **Endangered Species** – The Proposed Project will not adversely affect the California least tern, which is the only endangered species near the Project.
Overall Findings of the Initial Study for Northside Improvements

- The impacts associated with the Northside Improvements were sufficiently addressed in the AMP EIR for all environmental topics except Aesthetics.
- The availability of new details regarding the site plan and building plan for the CONRAC will allow the SEIR to further evaluate the potential for significant impacts to views and aesthetics.

State Environmental Review Process (CEQA)

- PREPARE DRAFT PROJECT DESCRIPTION
- NOTICE OF PREPARATION sent to state and local agencies May 20 – June 28, 2010
- PUBLIC SCOPING MEETING June 8, 2010
- PUBLISH DRAFT SEIR for 45-day Public Review Period
- PREPARE FINAL SEIR And Response to Comments on Draft SEIR
- REVIEW OF FINAL SEIR AND RESPONSES
  - Authority Makes Decision on Certification of Final SEIR
  - Authority Adopts Findings and Mitigation Measures
- NOTICE OF DETERMINATION Issued by Authority
# Scoping Comments on Draft Supplemental EIR

Comments due by June 28, 2010

<table>
<thead>
<tr>
<th>Method</th>
<th>Details</th>
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</table>
| Mail   | San Diego County Regional Airport Authority  
Attn: Airport Planning Department  
P.O. Box 82776  
San Diego, CA  92138-2776 |
| E-mail | [planning@san.org](mailto:planning@san.org)  
• E-mails must contain less than 2,000 words  
• No attachments |
| Deliver| San Diego International Airport  
Commuter Terminal – Third Floor  
3225 North Harbor Drive, San Diego, CA  92101 |
| Fax    | Attn: Airport Planning  
(619) 400-2459 |