

Section 3.11

Land Use and Planning

3.11.1 Introduction

This section analyzes the proposed project's impacts related to land use and planning, including impacts from both construction and operational activities. As part of this analysis, the section describes the general approach and methodology, regulatory framework, environmental setting, and significance criteria used to evaluate the proposed project's effects related to land use and planning. It provides a description of relevant land use plans and policies and addresses any potential physical impacts associated with any identified inconsistency of the proposed project with the provisions of the plans.

Comments in response to the NOP specific to potential land use impacts were received from the following agencies and individuals.

- California Coastal Commission commented that the project requires a coastal development permit and would be reviewed for consistency with Chapter 3 policies of the California Coastal Act.
- San Diego Association of Governments (SANDAG) commented that the EIR should acknowledge SANDAG's proposed implementation of the Airport Express transit services identified in the San Diego Airport Multimodal Accessibility Plan (AMAP).
- Oral comments during scoping meetings noted that the proposed project needs to be looked at in relation to various other plans, including the California Coastal Act, Regional Transportation Plan and Sustainable Communities Strategy, City of San Diego's General Plan, and City of San Diego's Climate Action Plan. Section 3.3, Greenhouse Gases and Climate Change, addresses consistency with the Climate Action Plan. See also Section 3.14, Traffic and Circulation, regarding consistency with mobility plans.
- The Unified Port of San Diego commented that the EIR will need to consider the cumulative impacts of the Port District's varied planning efforts, including an update of the Port Master Plan and additional Port District development plans on tidelands. A discussion of consistency with the current Port Master Plan (PMP) and current planning efforts is provided herein, and future consideration of the Port of San Diego's future projects is addressed in Chapter 4, Cumulative Impacts Analysis.

All written and oral comments received during the NOP process are provided in Appendix R-A. Comments received specific to land use impacts are addressed within this section of the EIR.

3.11.2 General Approach and Methodology

The Land Use and Planning Section documents the existing on-site and off-site land uses and identifies any land use changes that would occur on-site as a result of the proposed project. Additionally, this section identifies existing land use designations and relevant state, regional, and local land use plans, policies, and regulations to determine if the proposed project is consistent with relevant regulatory land use plans and policies. The emphasis of the analysis is on plan consistency and potential conflicts between the proposed project and existing land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. The proposed project is considered consistent with the provisions of the identified state, regional, and local plans if it meets the general intent of the applicable land use plans. A given project need not be in perfect conformity with each and every policy, nor does state law require precise conformity of a proposed project with every policy or land use designation for a site.¹ Further, inconsistencies with land use policies are not by themselves a significant environmental impact; the inconsistency would have to relate to an environmental issue to be considered significant under CEQA.² Further, inconsistencies are only considered significant impacts if the inconsistencies result in significant adverse effects on the *physical* environment not analyzed in the other resource sections of the EIR. Under State CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.

There are currently no formal requirements or procedures to evaluate environmental justice impacts under CEQA. However, there is existing federal policy that addresses environmental justice and several state agencies provide guidance on their environmental justice requirements and procedures. The California Coastal Commission adopted a final Environmental Justice Policy on March 8, 2019, and that policy document is analyzed as applicable to the proposed project at the conclusion of the California Coastal Act Chapter 3 analysis (see Section 3.11.6.2.1 below).³

Similarly, the California Coastal Commission adopted a Sea Level Rise Policy Guidance document in August 12, 2015 and adopted a Science Update to the Sea Level Rise Policy Guidance in 2018.⁴ That policy document is analyzed as applicable to the proposed project at the conclusion of the California Coastal Act Chapter 3 analysis (see Section 3.11.6.2.1 below).

The analyses herein provide an overview of the most relevant policies and development standards from the various planning documents, and provides a consistency conclusion based upon the specific policies presented, as well as each planning document in its entirety.

¹ San Francisco Tomorrow et al. v. City and County of San Francisco (2014) 229 Cal.App.4th 498; Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490; San Franciscans Upholding the Downtown Plan v. City & County of San Francisco (2002) 102 Cal.App.4th 656; Sequoyah Hills Homeowners Assn. V. City of Oakland (1993) 23 Cal.App.4th 704, 719.

² City of San Diego. California Environmental Quality Act Significance Determination Thresholds. July 2016.

³ California Coastal Commission. Environmental Justice Policy, March 8, 2019. Available: <https://www.coastal.ca.gov/env-justice/>.

⁴ California Coastal Commission. Sea Level Rise Policy Guidance - Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits. Originally adopted 12, 2015. Updated November 7, 2018. Available: <https://www.coastal.ca.gov/climate/slrguidance.html>.

3.11.3 Regulatory Framework

This section presents a summary of existing land use plans and policies that affect development of the project site and surrounding area, including state, regional, and local plans that apply to the project site and the area surrounding the project site.

3.11.3.1 Land Use Plans and Policies

3.11.3.1.1 State

There are several state and regional land use regulations, plans, and policies that are relevant to the project site and regional area as described below.

California Tidelands Trust

The public trust doctrine is a common law doctrine that holds that tidelands and submerged lands (including former tide and submerged lands that have been filled) be held in trust by the State of California for the benefit of the people of California. As stated in Public Resources Code Section 6009, tidelands are held by the State of California subject to the public trust for public purposes, including “commerce, navigation, fisheries, and other recognized uses, and for preservation in their natural state.” Lands subject to the public trust are held in trust by the state on behalf of the public. Some of these lands were conveyed into private ownership prior to the enactment of a state constitutional prohibition on alienation of tidelands. Other lands were granted, in trust, to the local jurisdictions in which they are located. Granted public trust lands are generally subject to public trust restrictions on their use, as well as any additional limitations set forth in the granting statute (often called the statutory trust). Some trust grants allow only visitor-serving recreational uses or open space, while others authorize uses such as ports, harbors, airports, wharves, and other structures necessary to facilitate commerce and navigation.⁵

The state enabling legislation that created the San Diego Unified Port District (Port of San Diego or Port District) also conveyed and granted in trust to the Port District the tidelands and submerged lands surrounding San Diego Bay. This includes most of those lands upon which SDIA is situated. The exception is a thin strip of land along Pacific Highway at the northern edge of the property that is not designated as “tidelands.” The SDIA property, while under the control and jurisdiction of SDCRAA, remains in the public trust held by the Port District. Any proposed land uses by SDCRAA must be consistent with the proposed uses for those lands held in trust by the Port District.

The San Diego Unified Port District Act⁶ provides the official planning policies that are consistent with the Public Trust Doctrine for the physical development of the tidelands and submerged lands conveyed and granted in trust to the Port District. The San Diego Unified Port District Act identifies statewide purposes for uses of tide and submerged lands held in trust by the Port District, including airports and airport support facilities. Specifically, Section 87(a) of the San Diego Unified Port District Act identifies the following purposes of use relevant to the proposed project:

⁵ California State Lands Commission. Public Trust webpage. 2019. Available: <https://www.slc.ca.gov/public-engagement/#pubtrust>.

⁶ San Diego Unified Port District Act. California Harbors and Navigation Code, Appendix 1. Revised May 2016.

Section 87: Purposes for Use of Tide and Submerged Lands Held In Trust by District.

- The tide and submerged lands conveyed to the district by any city included in the district shall be held by the district and its successors in trust and may be used for purposes in which there is a general statewide purpose, as follows:
 - For the establishment, improvement, and conduct of airport and heliport or aviation facilities, including, but not limited to, approach, takeoff, and clear zones in connection with airport runways, and for the construction, reconstruction, repair, maintenance, and operation of terminal buildings, runways, roadways, aprons, taxiways, parking areas, and all other works, buildings, facilities, utilities, structures, and appliances incidental, necessary, or convenient for the promotion and accommodation of air commerce and air navigation.
 - For the construction, reconstruction, repair, and maintenance of highways, streets, roadways, bridges, belt line railroads, parking facilities, power, telephone, telegraph or cable lines or landings, water and gas pipelines, and all other transportation and utility facilities or betterments incidental, necessary, or convenient for the promotion and accommodation of any of the uses set forth in this section.
 - For the construction, reconstruction, repair, maintenance, and operation of public buildings, public assembly and meeting places, convention centers, parks, playgrounds, bathhouses and bathing facilities, recreation and fishing piers, public recreation facilities, including, but not limited to, public golf courses, and for all works, buildings, facilities, utilities, structures, and appliances incidental, necessary, or convenient for the promotion and accommodation of any of those uses.

California Coastal Act

The California Coastal Act⁷ was passed by the State legislature in 1976 and became effective January 1, 1977. The California Coastal Act is a State-level policy and regulatory mechanism that is applicable to the proposed project. The California Coastal Commission must grant and issue a Coastal Development Permit(s) in order for the proposed project to be developed.

Prior to the formation of the SDCRAA, SDIA was governed by and considered part of the Port of San Diego and was included in the Port's certified PMP. Since January 1, 2003, however, the Port's PMP no longer serves as the coastal planning document for SDIA. Section 170060(c) of the SDCRAA Act states:

“The authority [SDCRAA] shall be responsible for making any necessary application to the California Coastal Commission pursuant to the California Coastal Act of 1976 [Division 20 (commencing with Section 30000) of the Public Resources Code] and to other agencies in accordance with other applicable laws in effect on the effective date of the act that added this section for improvements upon coastal lands under the control of the authority [SDCRAA] through a lease.”

⁷ Public Resources Code, Section 30000, et. seq.

Since the SDCRAA inception, SDCRAA staff has initiated all coastal permitting directly with the California Coastal Commission. Because SDIA is no longer part of the Port, the standard of review for all development projects is Chapter 3, Coastal Resources Planning and Management Policies, and the Environmental Justice Policy of the California Coastal Act. Analysis of the proposed project's consistency with the California Coastal Commission's Sea Level Rise Policy Guidance is also included herein as a standard of review. The policies of the PMP and Chapter 8, Ports, of the Act are no longer applicable.

California Coastal Act Chapter 3 identifies coastal planning and management policies in the areas of public access, recreation, marine environment, land resources, development, and industrial development. As addressed in greater detail in Section 3.11.6.2.1, specific policies that are relevant to the proposed project include ensuring that development does not interfere with public access to the shoreline, preserving coastal recreation uses and scenic views, and protecting biological habitats and water quality.

Environmental Justice

Under Section 30604(h) of the California Coastal Act, the California Coastal Commission may consider environmental justice when issuing a coastal development permit. Environmental justice is defined by California Coastal Act Section 30107.3 as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."

The California Coastal Commission adopted a final Environmental Justice Policy on March 8, 2019.⁸ The policy's stated goal is to provide guidance on how the California Coastal Commission will implement its environmental justice authority, including how it will consider environmental justice in coastal development permits. The policy iterates the California Coastal Commission's mission to protect California's coast and ocean for the benefit of all people and to ensure equitable access to clean, healthy, and accessible coastal environments for communities that have been disproportionately overburdened by pollution or with natural resources subject to permanent damage for the benefit of wealthier communities. It recognizes that coastal development should be inclusive for all and provide equitable benefits for communities that have historically been excluded or harmed by coastal development.

Sea Level Rise

The California Coastal Commission adopted a Sea Level Rise Policy Guidance document in August 12, 2015 and adopted a Science Update in 2018⁹ to incorporate the updated best available science, including recommended use of updated sea level rise projection tables provided in the California Ocean Protection Council's State of California Sea-Level Rise Guidance 2018 Update.¹⁰ Impacts of sea level rise identified in State of California Sea-Level Rise Guidance 2018 Update include flooding

⁸ California Coastal Commission. Environmental Justice Policy, March 8, 2019. Available: <https://www.coastal.ca.gov/env-justice/>.

⁹ California Coastal Commission. Sea Level Rise Policy Guidance - Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits. Originally adopted 12, 2015. Updated November 7, 2018. Available: <https://www.coastal.ca.gov/climate/slrguidance.html>.

¹⁰ California Ocean Protection Council. State of California Sea-Level Rise Guidance 2018 Update. 2018. Available: http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf.

and inundation, increased coastal erosion, changes in sediment supply and movement, and saltwater intrusion to varying degrees along the California coast. These effects in turn could have a substantial impact on the coastal economy and could put important coastal resources and coastal development at risk.

The California Coastal Commission Sea Level Rise Policy Guidance identifies principles for addressing sea level rise in the coastal zone, including through local coastal program certifications and coastal development permit decisions. The guiding principles for addressing sea level rise are identified as: (1) use science to guide decisions; (2) minimize coastal hazards through planning and development standards; and (3) maximize protection of public access, recreation, and sensitive coastal resources; and (4) maximize agency coordination and public participation.

3.11.3.1.2 Regional

San Diego Forward: The Regional Plan

SANDAG is the designated metropolitan planning organization for San Diego County and 18 cities, including the City of San Diego. SANDAG does not have land use authority but is federally mandated to create regional planning documents that address transportation, growth management, hazardous waste management, and air quality issues. SANDAG adopted San Diego Forward: The Regional Plan in October 2015 (Regional Plan)¹¹ which provides a vision and implementation plan for growth in the San Diego region by 2050. The Regional Plan integrates two of SANDAG's previous planning documents for the region: the Regional Comprehensive Plan for the San Diego region (RCP) adopted in 2004; and, the 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) adopted in 2011.

The Regional Plan promotes sustainability, economic prosperity, and quality of life in the San Diego region, through integrating land uses, transportation systems, infrastructure needs, and public investment strategies within a regional framework. It provides a blueprint for improving mobility, preserving open space and creating a healthy community that allows the region to meet state mandated regional targets for GHG emissions reductions from passenger vehicle use.

Specific to the Airport, the Regional Plan identifies SDIA as providing critical infrastructure for regional mobility and goods movement. As cited below and described further under the discussion of California Senate Bill (SB) 10, a key continuing implementation action identified in the Regional Plan is for SANDAG to coordinate with SDCRAA on aviation and transit planning as follows:

Coordinate with the Airport Authority to implement the Regional Aviation Strategic Plan and the Airport Multimodal Accessibility Plan to maximize the efficiency and effectiveness of existing and planned aviation facilities. Move forward on the Intermodal Transit Center adjacent to San Diego International Airport, ground access plans, and direct connector ramps to improve access to and from the San Diego International Airport.

¹¹ San Diego Association of Governments. San Diego Forward: The Regional Plan | 2015-2050. October 9, 2015. Available: <http://www.sdforward.com/>.

The planning process for San Diego Forward: The 2019 – 2050 Regional Plan is currently underway. Release of the conceptual framework and draft policies is anticipated in late 2019, and release of the draft plan is anticipated in the fall of 2020.¹²

Senate Bill 10

Senate Bill 10 (SB10) of 2007 and the California Public Utilities Code (Sections 132357, 132358, and 132359) requires SDCRAA and SANDAG to conduct airport multimodal planning in San Diego County. The planning provisions of SB10 include the development of a Regional Aviation Strategic Plan (RASP) and an Airport Multimodal Accessibility Plan (AMAP). SDCRAA has led preparation of the RASP to identify a strategy to improve the performance of the 12 public use airports in San Diego County. SANDAG has led the preparation of the AMAP to develop a multimodal strategy to improve surface transportation access to airports.

Regional Aviation Strategic Plan

The RASP,¹³ prepared in March 2011 by SDCRAA, identified long-term transportation needs and evaluated a range of potential improvements and changes to airports in San Diego County with the goal of improving the performance of the regional airport system. Potential regional strategies considered included full build-out of facilities at SDIA, introducing or enhancing passenger service at other airports in the region (i.e., Brown Field Municipal Airport, McClellan-Palomar Airport), improving access to Tijuana Rodriguez International Airport, considering alternative ground transportation options (i.e., high speed rail), or optimizing general aviation and/or air cargo operations at facilities other than SDIA to maximize use of SDIA for commercial passenger activity. Specific to SDIA, the RASP identified that even with full build-out, passenger capacity of SDIA can only marginally be improved due to site constraints.

Airport Multimodal Accessibility Plan

The AMAP,¹⁴ prepared in 2012 by SANDAG, identified ground access improvement alternatives at airports in San Diego County, including SDIA. The identified alternatives included the potential advanced planning for an Airport ITC at the northside of SDIA, which has connections that include trolley, commuter rail, and local and regional buses; planning for the longer term identified other potential connections that may include a high-speed rail station, direct connector ramps from Interstate 5 (I-5), and a people mover that could replace the shuttle bus connection between the northside and southside of the Airport. The AMAP is envisioned as ultimately leading to passenger access and processing on the northside of the Airport.

3.11.3.1.3 Local On-site Land Use Plans and Policies

The Airport-specific land use plans are described below.

¹² San Diego Association of Governments. San Diego Forward: The 2019-2050 Regional Plan Fact Sheet. April 2019. Available: https://www.sandag.org/uploads/publicationid/publicationid_1811_16978.pdf.

¹³ San Diego County Regional Airport Authority. Regional Aviation Strategic Plan. Prepared by Jacobs Consultancy. March 2011. Available: <http://www.san.org/Airport-Projects/Regional-Aviation-Strategic-Plan#134188-technical-report>.

¹⁴ San Diego Association of Governments. Final San Diego Airport Multimodal Accessibility Plan. Prepared by CH2MHill and HNTB. March 2012. Available: http://www.sandag.org/uploads/publicationid/publicationid_1644_14238.pdf.

San Diego County Regional Airport Authority Act

Assembly Bill 93 established the San Diego County Regional Airport Authority Act (SDCRAA Act) in 2001, which created SDCRAA as a local entity of regional government to oversee SDIA operations. SDCRAA assumed control of SDIA from the Port District in January 2003 when the SDCRAA Act became effective. The SDCRAA Act grants to SDCRAA all land use planning 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.

Airport Master Plan

The first comprehensive Master Plan was prepared for SDIA by the Port District in 2001; however, it was not adopted prior to the transfer of airport ownership and operation to SDCRAA in 2003. The draft Master Plan was updated and adopted by SDCRAA in May 2008. The 2008 Airport Master Plan (AMP) documents the planning process for SDIA and provides guidance for development of the Airport to meet continued passenger, cargo, and operations growth at SDIA. It represents the approved actions to be accomplished for phased development of the Airport.

During the planning process, the following eight goals were developed to address the constraints and opportunities present at SDIA:

- Improve Levels of Service (LOS) for Airport customers and users;
- Improve airport safety and security for Airport customers and users;
- Utilize property and facilities efficiently:
 - Maintain balance of passenger volumes and operations among the Airport's facilities;
 - Improve 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 stakeholder and community input; and
- Compatibility with surrounding land uses and Authority policies.

Overall objectives and detailed objectives to address specific issues were then developed to provide a guideline for carrying out the planning process and meeting the eight goals identified above. The overall objectives are to: (1) Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, airport safety and security, and enhancing airport access; and (2) Develop facilities that utilize airport property and facilities efficiently and are compatible with surrounding land uses. The detailed objectives are organized into six categories, including two categories, environmental and financial, pertaining to all phases of the master-planning process, and four categories of land uses (Airfield, Terminal,

Ground Transportation, and Airport Support), pertaining to providing a framework for developing improved airport facilities.

Airport Land Use Plan

An Airport Land Use Plan was adopted in conjunction with the Airport Master Plan, described above. The Airport Land Use Plan is a program level planning guide that depicts the boundaries of SDIA and designates location for the four general land use categories: Airfield, Terminal, Ground Transportation, and Airport Support (see Figure 3.11-1). The Airport Land Use Plan guides and groups similar uses to ensure compatible, shared, and orderly development of airport facilities. It may be modified or amended to respond to changes in the demand for airport facilities as identified in future passenger, operations, and cargo forecasts.

The four general categories of airport land use for SDIA are described as follows:

- **Airfield land uses** include runways, taxiways, aircraft parking aprons, and other facilities associated with the accommodation of aircraft. The land use plan designates additional area north of the runway for taxiway improvements, apron area, and relocation of cargo aircraft parking positions.
- **Terminal land uses** include areas associated with passenger processing such as ticketing, baggage claim, security screening, concourse space, and other facilities required to be housed in the terminal structure.
- **Ground Transportation land uses** include public and employee parking, access and circulation roadways, terminal curbsides, rental car facilities, commercial vehicle and taxicab staging areas, and all other vehicle and transit access facilities.
- **Airport Support land uses** include general aviation, air cargo, air traffic control and aircraft navigational aid facilities, fuel storage, aircraft rescue and firefighting facilities, and airport maintenance facilities.

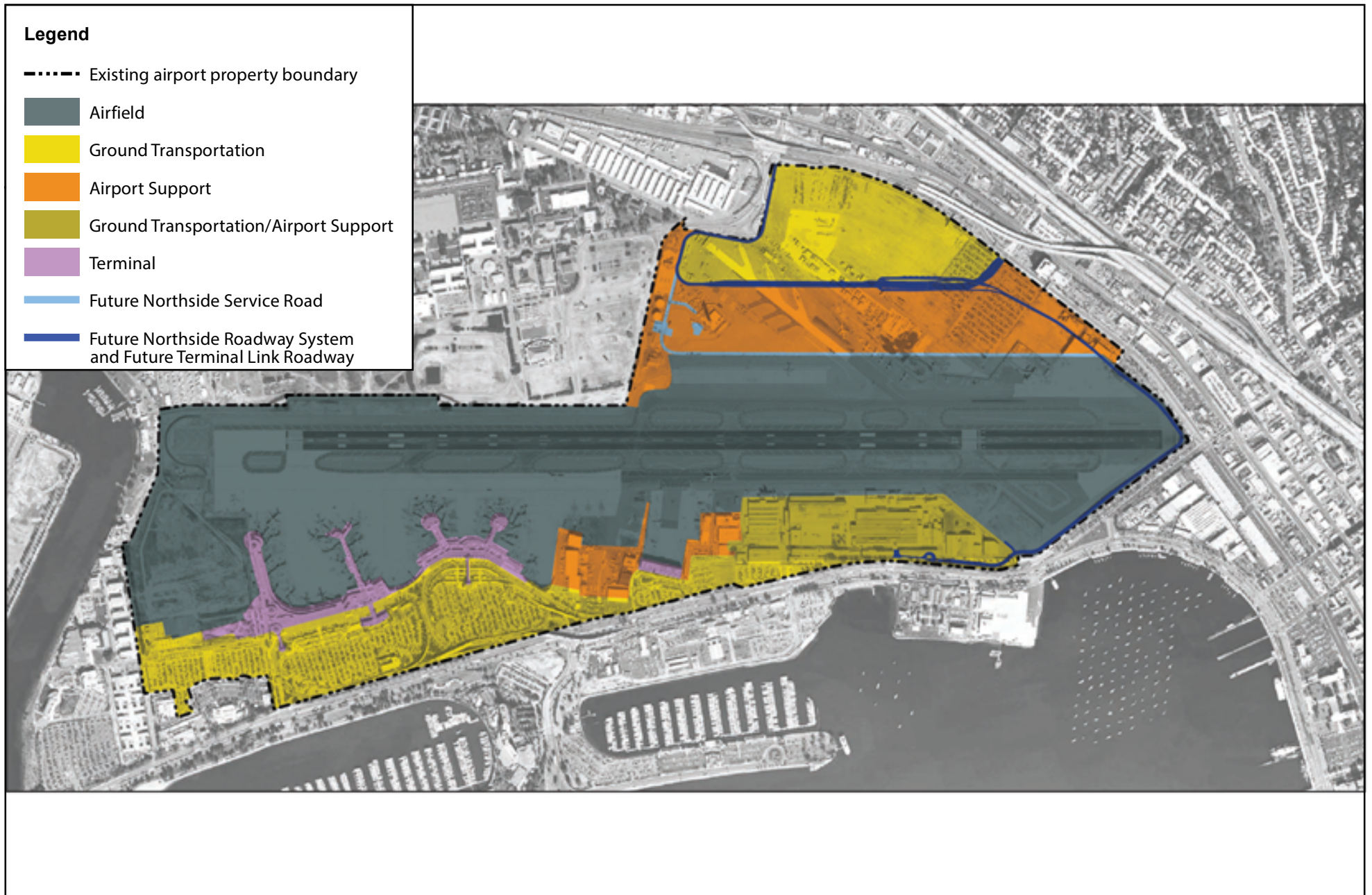
Airport Layout Plan

An Airport Layout Plan (ALP) refers to the official plan drawing approved by the FAA that depicts all existing and planned airport facilities, runway and taxiway safety areas, and the property boundary and data tables describing various components of an airport. The ALP is shown in Figure 3.11-2.

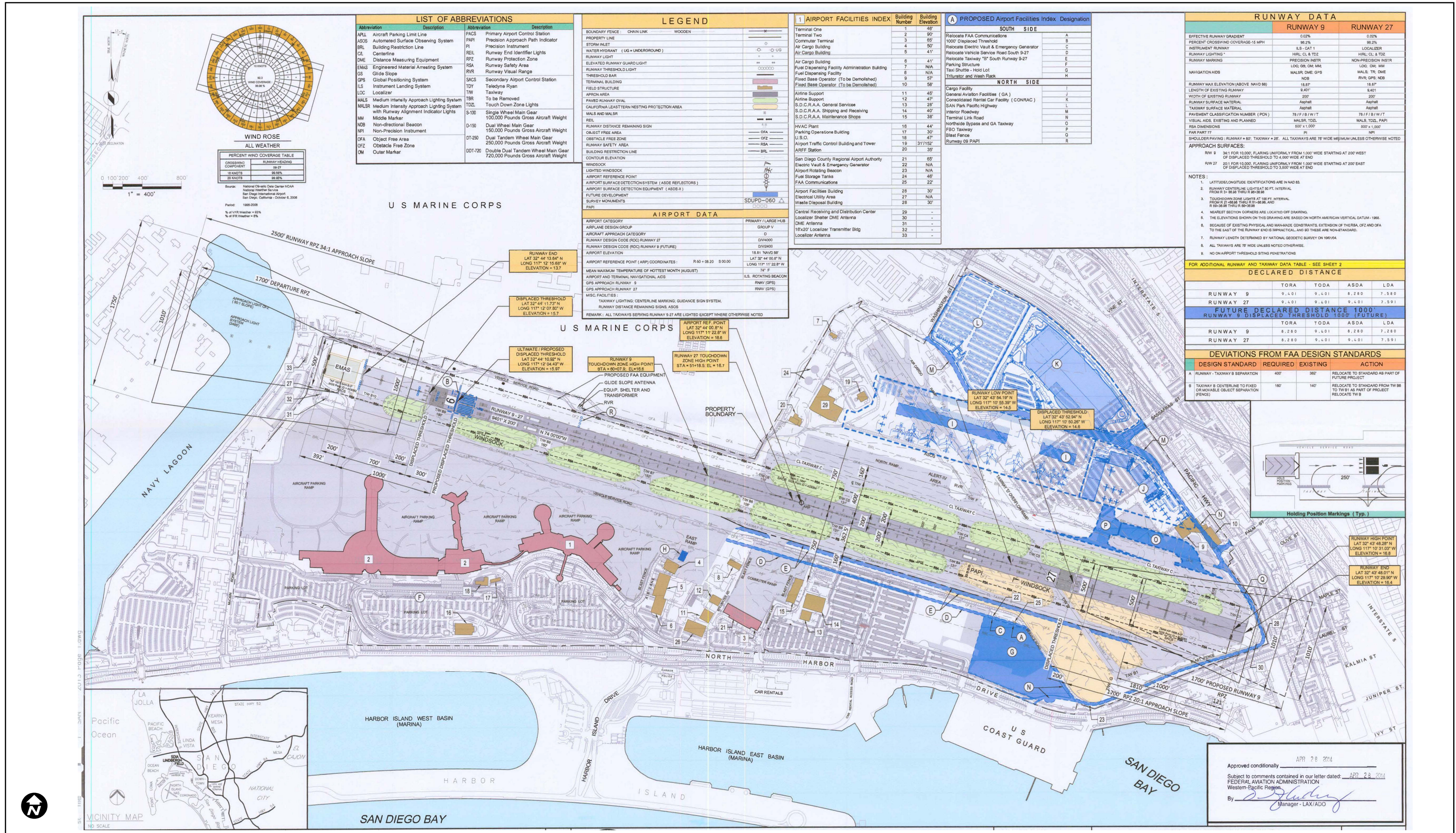
Climate Resilience Plan

The SDCRAA's Climate Resilience Plan (CRP)¹⁵ was accepted in June 2019, and provides a strategy for achieving business continuity in future climate conditions by adapting existing and future assets and operations to projected climate conditions.

¹⁵ San Diego County Regional Airport Authority. Climate Resilience Plan – A Roadmap To Maintain Business Continuity and Climate Change. Public Draft Version. May 2019. Available: https://www.san.org/Portals/0/Documents/Environmental/2019-Draft/050819_SD_Intl_Airport_Climate_Resilience_Plan-v2.pdf.



Source: Jacobsen | Daniels, 2016



Source: San Diego County Regional Airport Authority, 2018

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The CRP builds off existing initiatives such as improving storm drainage capacity in low-lying areas to collaborating with regional stakeholders to explore large-scale coastal flood protection strategies. The overarching goals of the CRP are to (1) reduce risks associated with climate change to ensure business continuity, and to maintain a quality passenger experience; (2) integrate climate resilience into Airport operations and development decisions; and (3) provide regional and industry leadership in climate resilience. The CRP evaluates various climate stressors (sea level rise and storm surge; precipitation; and extreme heat) and identifies initiatives and tactics to advance the progress of the CRP that includes a focus on governance (e.g., policy, planning, design guidelines, and regional collaboration); awareness (e.g., education, outreach, study, and on-going monitoring), and infrastructure (physical strategies to protect and accommodate.)

The CRP specifically identifies that it would help inform the further design and implementation of the ADP, and that the future development of the proposed project, specifically the new Terminal 1, presents opportunities to ensure that the design of parking lots and the dedicated on-airport access roadway prevents these assets from being exposed to future sea level rise and/or heavy rain events. Further discussion and depiction of sea level rise scenarios in the vicinity of SDIA addressed in the CRP are provided in Section 3.11.4, Environmental Setting, below.

3.11.3.1.4 Surrounding Land Use Plans and Policies

The following section describes various plans and policies governing development in areas surrounding SDIA. The plans and policies discussed below are relevant to the proposed project in terms of land use compatibility.

Airport Land Use Compatibility Plan

The Comprehensive Land Use Plan (CLUP) for SDIA was originally adopted in 1992 by SANDAG, at that time the designated Airport Land Use Commission (ALUC) for the San Diego region. As of January 1, 2003, SDCRAA has served as the County of San Diego's ALUC and is responsible for creating and updating the Airport Land Use Compatibility Plan (ALUCP) (renamed from CLUP) for all airports in the County. The current ALUCP for SDIA was adopted in May of 2014 and is consistent with the 2012 FAA approved ALP as required by state law (California Public Utilities Code Section 21675(a)), which requires that an ALUCP be based upon a long-range airport master plan or ALP.

The purpose of the ALUCP is to promote compatibility between the Airport and future land use of the surrounding area for the orderly development of the Airport and environs and to protect public health, safety, and welfare in the surrounding area. The ALUCP provides airport land use compatibility policies and standards related to noise, safety, airspace protection and overflight, to guide future development and redevelopment in the area surrounding the Airport but not at the Airport itself, unless designated as a non-aeronautical use.

The Airport Influence Area (AIA) represents the boundary of the planning and review authority of the ALUCP and is described as “[t]he area in which current and projected future airport-related noise, safety, airspace protection or overflight factors may significantly affect future land uses, necessitate restrictions on land use or warrant the disclosure of potential airport impacts to buyers

of residential property.”¹⁶ Proposed development within the AIA is subject to a determination of consistency with the ALUCP. Figure 3.11-3 shows the extent of the SDIA ALUCP AIA.

The ALUC is required by California law to review proposed airport plans for consistency with the applicable ALUCP. This requirement ensures that the ALUC is kept informed of changes in airport plans so that appropriate amendments to the ALUCP can be made. Airport projects that require ALUC review include airport master plans and amendments to an airport master plan or ALP that would modify previously adopted airport plans. Local agencies are required to make their land use plans and regulations consistent with the ALUCP and can meet this consistency requirement by incorporating ALUCP policies into the general plan, adopting the ALUCP as a standalone document, or adopting an Airport Overlay Zone that incorporates the policies and standards of the ALUCP to supplement the requirements of the zoning district. Local agencies may also overrule a portion or all of the ALUCP policies by adopting detailed findings as required by the State Aeronautics Act.

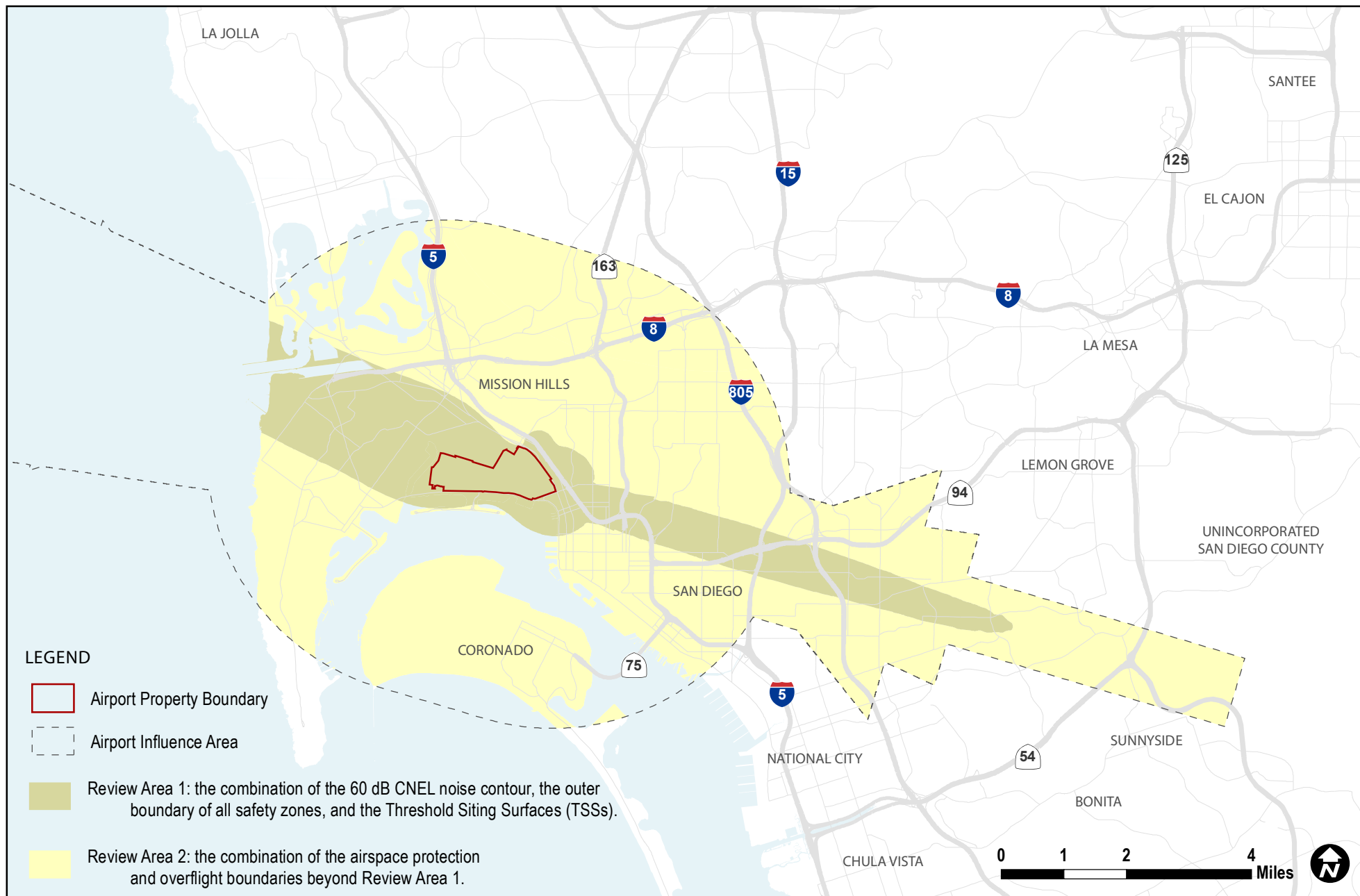
The City of San Diego implements the ALUCP through land use plans, development regulations, and zoning regulations. The City of San Diego has adopted overlay zone development regulations to implement ALUCPs for other airports within its land use jurisdiction, but has yet to adopt regulations implementing the ALUCP for SDIA. While the City of San Diego has land use plans and regulations consistent with the ALUCP, until the City adopts regulations implementing the ALUCP and the ALUC determines that those regulations are consistent with the ALUCP, the City must submit all discretionary and ministerial projects within the AIA to the ALUC for a consistency determination with the ALUCP. Similarly, the Port of San Diego must submit all amendments and updates to the Port Master Plan to the ALUC for a consistency determination until the ALUC determines that the Port Master Plan is consistent with the ALUCP.

Port Master Plan

The Port Master Plan (PMP) is the land use document governing land and water development within the Port District’s jurisdiction. It should be noted that the planning goals of the PMP apply only to the lands under the District’s jurisdiction and do not apply to SDCRAA or SDIA. Although the PMP does not provide mandatory planning goals for SDIA/SDCRAA, SDCRAA reviews and considers, where possible and practicable, these planning goals. The PMP was originally adopted by the Board of Port Commissioners in 1980 and was certified by the California Coastal Commission on January 21, 1981. The PMP is regularly updated, with the last update occurring in June 2016. The PMP serves as the governing planning document pursuant to the California Coastal Act for the land and water area within Port District jurisdiction. The coastal jurisdiction of the Port District extends from the western edge of Pacific Highway coincident with the historic mean high tide line to several hundred feet into San Diego Bay. The PMP divides the tidelands under Port District jurisdiction into ten (10) Planning Districts, or precise plans. Each Planning District is further divided into Planning Subareas, which group together tideland properties into functional units, thereby facilitating planning efforts.¹⁷

¹⁶ Airport Land Use Commission San Diego County Regional Airport Authority. San Diego International Airport - Airport Land Use Compatibility Plan. Appendix D. Page D-2. Adopted April 3, 2014. Amended May 1, 2014. Available: [http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20\(May%202014\).pdf](http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20(May%202014).pdf).

¹⁷ Port of San Diego. Port Master Plan. August 2017 [print date].



Source: Airport Land Use Commission San Diego County Regional Airport Authority, 2014.

jurisdiction into ten (10) Planning Districts, or precise plans. Each Planning District is further divided into Planning Subareas, which group together tideland properties into functional units, thereby facilitating planning efforts.¹⁸

Although the Airport property is still depicted in the certified PMP as being within Planning District 2 (Harbor Island/Lindbergh Field), the PMP and its associated land use designations are no longer applicable to SDIA pursuant to the SDCRAA Act.

As discussed previously, the Port District is currently in the process of updating the PMP (referred to as the Port Master Plan Update or “PMPU”). The Port District released a Discussion Draft of the PMPU for a 90-day public review period ending in July 2019. The Discussion Draft includes and addresses allowable uses and activities, future development, and management of water and land within the Port’s jurisdiction on and around San Diego Bay. The stated intent of the PMPU Discussion Draft is:

...to protect and promote coastal-dependent and coastal-related uses, allow for and encourage a diverse range of uses around San Diego Bay (Bay), and provide and ensure coastal access to explore and enjoy areas within the San Diego Unified Port District’s (District) jurisdiction.¹⁹

The PMPU Discussion Draft includes goals and policies to guide activities on the Port’s tidelands in the areas of ecology, economics, environmental justice, safety and resiliency, mobility, and water and land use. Development standards are provided for ten distinct planning districts.

The PMPU Discussion Draft indicates that the Harbor Island Planning District includes SDIA; however, while the Port still owns and holds the underlying land in trust, the Airport is under the jurisdiction of the SDCRAA, not the Port District. Therefore, it is excluded from the PMPU.

As addressed further in Chapter 4, Cumulative Impacts Analysis, the Port District is in the process of planning additional development on the tidelands. This includes the redevelopment on Harbor Island south of the Airport and further development in the Embarcadero Planning District that include new hotels, retail, and restaurants, as well as public areas. Improvements that have already been implemented include a public esplanade, public art, new landscaping, and visitor information and other kiosks. Additional information on the general nature and range of development being considered for the PMPU is discussed in Chapter 4, Section 4.2. As also discussed in Chapter 4, the PMPU is still being vetted through a public review process prior to Port Commissioners’ acceptance. Therefore, this analysis addresses consistency with the current Port Master Plan.

It is important to understand how the Port District’s recent and planned development on the tidelands interrelates to the SDCRAA’s efforts to reduce traffic on North Harbor Drive, a major coastal access route. As discussed further in this section, the SDCRAA eliminated vehicle trips from North Harbor Drive in connection with the opening of a Rental Car Center in 2016 and the consolidation and relocation of all rental car agencies from the East Basin of Harbor Island. This

¹⁸ Port of San Diego. Port Master Plan. August 2017 [print date].

¹⁹ Port of San Diego. Port Master Plan - Discussion Draft. April 2019. Available: <https://www.portofsandiego.org/waterfront-development/integrated-planning-port-master-plan-update>.

provided considerable relief to North Harbor Drive, as documented in the 2011 Supplemental Environmental Impact Report for Northside Improvements at San Diego International Airport.

In coordination with the region's transportation planning agencies and surrounding agencies with planning jurisdiction including the Port of San Diego and the City of San Diego, there may be future improvements to surrounding streets and intersections which share access to State tidelands and the Airport. Further the Port of San Diego Port Master Plan Update and its tenants may have additional needs and requirements that may include a Bayfront transit-only right-of-way along North Harbor Drive, enhancing transit connectivity to the Airport with a trolley extension or automated people mover that connects stations along the Bayfront, Harbor Island and the Airport, and/or adding a demand-response eastbound signal on Laurel Street to facilitate truck access to Solar Turbines. The Airport Development Plan does not preclude other agencies from advancing other mobility improvements on State Tidelands.

City of San Diego General Plan

The City of San Diego General Plan was originally adopted by the City Council on February 26, 1979. It was comprehensively updated in 2008 and has been subsequently amended several times. The General Plan outlines the City's objectives and guidelines for all phases of future development by providing a broad range of policies to guide land development and quality of life decision-making within the City. The General Plan incorporates a "City of Villages" strategy that focuses growth into mixed-use activity centers linked with a regional transit system. It is a strategy designed to sustain the economic, environmental, and social health of the City and its many communities. The General Plan is composed of a Strategic Framework and 10 major elements including Land Use and Community Planning, Mobility, Urban Design, Economic Prosperity, Public Facilities, Service and Safety, Recreation, Conservation, Noise, Historic Preservation, and Housing.

The Land Use and Community Planning Element is the central organizing element for the plan and it provides policies to guide the City of San Diego's growth and implement the City of Villages strategy. The Land Use and Community Planning Element addresses land use issues that apply to the City as a whole and provides policy direction to govern preparation of community plans, which contain the specific land use designations and proposals for future land uses and public improvements in sub-areas of the City. The Land Use and Community Planning Element also provides policy direction in areas such as zoning and policy consistency, coastal planning, airport-land use planning, and environmental justice.

SDIA is not within the General Plan planning area; however, the General Plan includes goals specific to airport-land use planning for land use planning in the areas of close proximity to SDIA, as well as other public use and military aviation facilities. The airport-specific goals identified in the General Plan address protection of the health, safety, and welfare of persons within the AIAs by minimizing the public's exposure to high levels of noise and risk of aircraft accidents, and address protection of public use airports and military air installations from the encroachment of incompatible land uses within an AIA that could unduly constrain airport operations.

City of San Diego Community Plans

To implement the General Plan's City of Villages strategy and General Plan policies at the community level, the City has divided land within its jurisdiction into over 50 Community Planning

Areas (CPA). Community Plans are developed for each CPA, allowing for refinement of the citywide goals and policies to address issues specific to each community. The Community Plans are components of the General Plan and typically include the elements such as Land Use, Transportation, Urban Design, Public Facilities and Services, Natural and Cultural Resources, and Economic Development.

Land use planning for SDIA is accomplished through the airport planning process (see Section 3.11.3.1.2), and as such, it is not regulated by a City CPA. The majority of SDIA property, as well as Harbor Island to the south, is identified by the City as “Reserve” (i.e., not located within a designated CPA). However, as shown on Figure 3.11-4, the City’s planning boundaries identify a small portion on the western edge of SDIA as being within the Peninsula Community Plan.²⁰ Additionally, a small portion in the northwest corner adjacent to the U.S. Marine Corps Recruit Depot (MCRD) San Diego is identified as “Military Facilities,” although this land is within SDIA and regulated by SDCRAA. Lands designated as “Military Facilities” by the City are not subject to the City’s land use authority.

City of San Diego Community Plans

The Peninsula Community and other CPAs local adjacent to SDIA are listed in Table 3.11-1. Following Table 3.11-1 is a short summary of the policies and designated land uses for each that are applicable to SDIA. Figure 3.11-4 shows the planning area boundaries of the planning areas listed in Table 3.11-1 as well as other planning areas in the vicinity in relation to the project site.

Table 3.11-1: SDIA Surrounding City Community Planning Areas

Community Planning Area	Community Plan	Community Plan Adopted
Midway-Pacific Highway	Midway-Pacific Highway Community Plan	September 17, 2018
Uptown	Uptown Community Plan	November 14, 2016 (last amended 2018)
Peninsula	Peninsula Community Plan and Local Coastal Program Land Use Plan	July 14, 1987 (last amended 2011)
Downtown/Centre City	San Diego Downtown Community Plan	March 14, 2006 (last amended 2016)

Source: City of San Diego Community Profiles website. Available: <https://www.sandiego.gov/planning/community/profiles>.

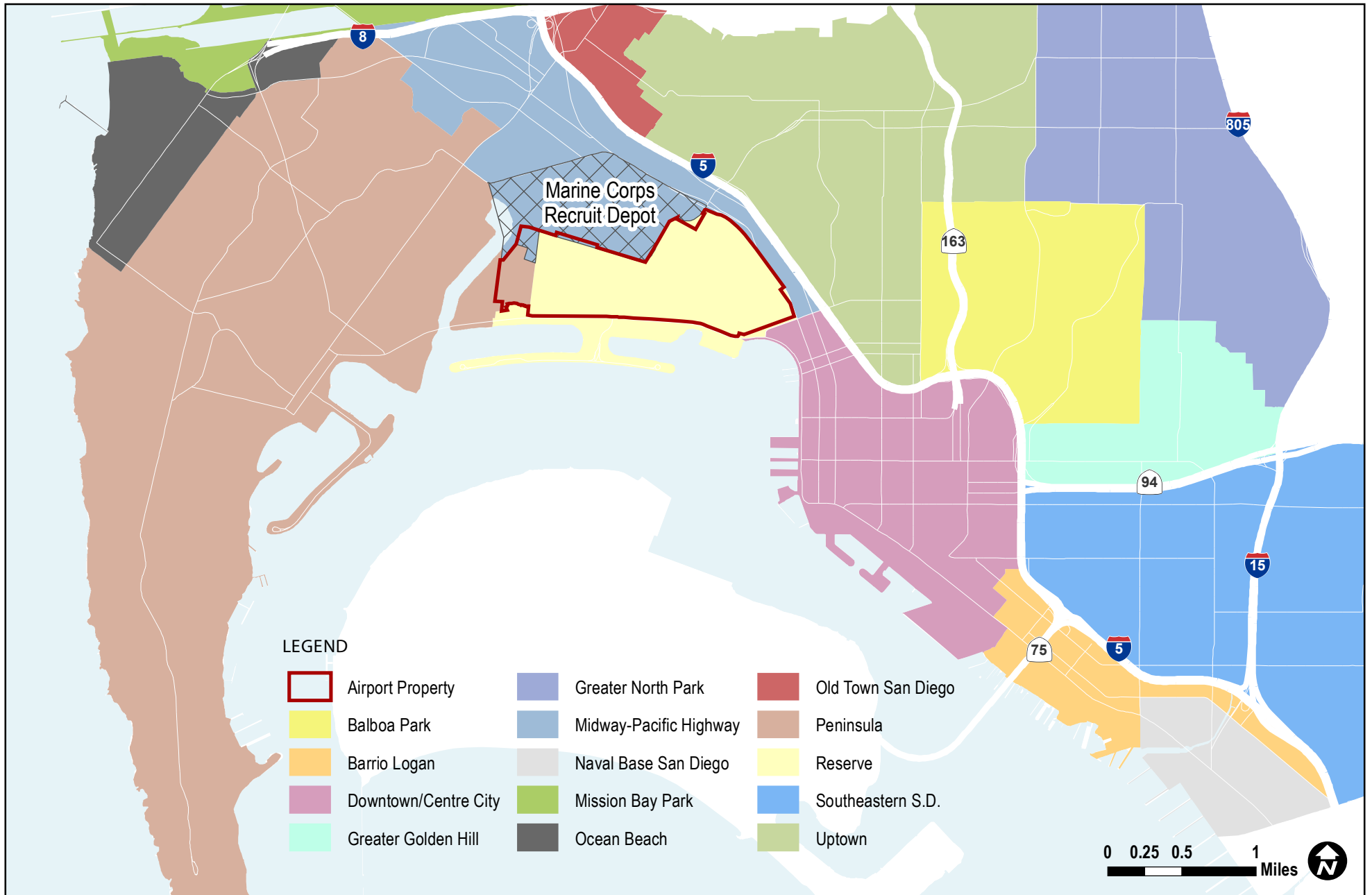
Midway-Pacific Highway

The Midway-Pacific Highway CPA is located north of the project site. The CPA consists of approximately 1,324 acres (including the 388 acre MCRD San Diego) and is bounded on the north by Interstate 8 (I-8), on the east by I-5, on the south by Laurel Street and SDIA, and on the west by Port District properties, former Naval Training Center (now Liberty Station) sites, and SDIA.

The Midway-Pacific Highway Community Plan²¹ land use map designates the area immediately adjacent to SDIA as military (MCRD San Diego) and, along the Pacific Highway Corridor (referred to as the Kettner District), as urban industrial, port properties, community commercial (including residential uses), and mixed commercial residential. The Kettner District, which is closest to SDIA,

²⁰ The portion of SDIA within the Peninsula Community Plan boundaries consists of a 52-acre parcel that was part of the former Naval Training Center and conveyed to the Port of San Diego in 2000.

²¹ City of San Diego. Midway-Pacific Highway Community Plan. September 17, 2018. Available: <https://www.sandiego.gov/planning/community/profiles>.



Source: City of San Diego, Planning Department, 2017. Data available online at <http://www.sangis.org>.

is subject to the most intense noise impacts. Pursuant to the ALUCP, this area is subject to limits on land uses, building intensities, and structural heights. MCRD San Diego and a portion of the Kettner District lies within the Coastal Zone.

The Midway-Pacific Highway Community Plan has specific policies related to SDIA that include land use planning goals to address land use compatibility with the Airport and ensure that future uses, building intensity, and structure heights in the AIA are compatible with the safety zones, noise contours, and airspace protection surfaces identified in the SDIA ALUCP. The Midway-Pacific Highway Community Plan also includes transportation-related policies that address coordination with SDCRAA and other agencies on a future ITC, improving truck access to and from SDIA and I-5, reducing congestion on community streets from vehicles traveling to and from SDIA, and improving and supplementing the existing network of street and freeway connections, pedestrian facilities, and bicycle connections to meet existing and future transportation demand.

Uptown

The Uptown CPA is located north and east of SDIA and north of the Centre City area. It is bounded on the north by steep hillsides of Mission Valley, on the east by Park Boulevard and Balboa Park, and on the west and south by Old Town San Diego and I-5. The CPA comprises approximately 2,700 acres.

The Uptown Community Plan²² designates most of the area in the vicinity of SDIA for residential uses (Mission Hills and Park West) with some commercial uses bordering I-5 (Middletown). Several public viewsheds designated within the CPA look across the project site towards San Diego Bay. Policies in the plan call for protecting and enhancing designated viewsheds.

The Uptown Community Plan has specific land use policy recommendations related to SDIA that include protecting public health by evaluating effects of noise and airport pollution from airport operations and implementing measures such as buffers and barriers where feasible and appropriate, considering noise levels and the ALUCP noise contours when making land use planning decisions, and coordinating with SANDAG to provide public transit connections to SDIA from the Uptown CPA.

Peninsula

The Peninsula CPA is located immediately west of SDIA and south of the Midway community. The Peninsula CPA is bounded on the north by the community of Ocean Beach and on the west and south by the Pacific Ocean and the east by San Diego Bay. The Peninsula CPA occupies approximately 4,409 acres. The Peninsula Community Plan and Local Coastal Program Land Use Plan (Peninsula Community Plan)²³ designates the core of the community as residential uses with commercial uses fronting San Diego Bay and military-related industrial uses bordering SDIA and the southern portion of the peninsula.

²² City of San Diego. Uptown Community Plan. November 14, 2016, as amended June 12, 2018. Available: <https://www.sandiego.gov/planning/community/profiles>.

²³ City of San Diego. Peninsula Community Plan and Local Coastal Program Land Use Plan. July 14, 1987, last amended 2011. Available: <https://www.sandiego.gov/planning/community/profiles>.

The Peninsula Community Plan identifies public view corridors within the CPA as areas that provide vistas of the San Diego Bay, Downtown San Diego, Coronado, Mission Bay, and Pacific Beach. These views are primarily from roadways. Except for views towards Downtown/San Diego Bay from Liberty Station and from certain streets within elevated portions along the western side of the peninsula²⁴ to the west of the project site, the identified views do not overlook or include SDIA.

The Peninsula Community Plan identifies reducing airport noise pollution as an overall community goal and identifies that implementing airport-related plan recommendations fall to other agencies. The Peninsula Community Plan was prepared prior to the establishment of the SDCRAA and, thus, identifies the Port of San Diego as having primary responsibility for addressing and mitigating the noise impacts from Airport operations.

Downtown/Centre City

Downtown/Centre City encompasses eight neighborhoods within the metropolitan core of the City of San Diego, located southeast of SDIA. The area is roughly bounded to the north by State Route (SR) 163 and I-5, to the south and west by San Diego Bay, and to the east by I-5 and the communities of Golden Hill, Sherman Heights, and Logan Heights. The northern end of the Centre City area extends to Laurel Street, immediately south of SDIA. This area is known as the Little Italy neighborhood, which is organized around the India Street business district (shopping, dining, and gathering). Land uses within the Little Italy neighborhood consist of restaurants/markets, commercial/office, mid-rise residential, industrial (Solar Turbines), the San Diego County Administration Center, and recreation/open space (Waterfront Park).

The San Diego Downtown Community Plan²⁵ has specific land use policy recommendations related to SDIA that include the following:

- Restricting building intensities underneath the approach path to Lindbergh Field and throughout downtown San Diego consistent with the ALUCP, policies, and regulations for airport operations established by FAA and the Airport Approach Overlay Zone;
- Use airport-related development constraints as opportunities for unique land use and development patterns within Little Italy;
- Implement a demand response shuttle system within the downtown area that includes linkages to the airport as well as other destination points;
- Provide designated shuttle stops for the publicly accessible shuttle serving the downtown area, with routing to include key destination points including the airport; and

²⁴ Panoramic viewsheds from elevated areas on certain streets of the peninsula immediately west of Liberty Station are identified in the NTC Precise Plan, discussed further in Section 3.1, Aesthetics and Visual Resources. (see Rick Planning Group et al. NTC Precise Plan and Local Coastal Program. September 2001.

²⁵ Centre City Development Corporation. San Diego Downtown Community Plan – Rising on the Pacific. Adopted April 2006, last amended 2016. Available: <http://civicsd.com/departments/planning/planning-regulatory-documents/>.

- Minimize the risk of injury, life loss, and property damage, and mitigate noise impacts that are associated with aircraft activity, including by regulating building heights, land uses, and land use intensities.

Non-Contiguous City of San Diego Community Plans and Park Plan

In addition to the CPAs described above that are located adjacent to SDIA, there are several CPAs, which while not contiguous with SDIA, are nevertheless located within the Airport's noise contours. The following identifies the CPAs and their respective Community Plans and Park Plan that could be impacted by a change in SDIA noise levels. Policies therein related to airport noise are also identified. The CPAs are shown on Figure 3.11-4.

Ocean Beach

Ocean Beach is a developed urbanized coastal community located west/northwest of SDIA, west of the Peninsula CPA. It is primarily residential with some commercial development and parks/recreation/open space. The Ocean Beach Community Plan²⁶ has a Noise Element that identifies aircraft noise and overflight of aircraft from SDIA as affecting Ocean Beach. It also identifies Ocean Beach as being within the AIA for the SDIA ALUCP. The Ocean Beach Community Plan allows residential uses in areas within the 65 CNEL aircraft noise contour consistent with the ALUCP. In addition, it states that the City's General Plan requires that future residential use located in an area within the 60 CNEL contour or greater include noise attenuation measures to ensure an interior noise level of 45 CNEL. The following specific recommendations are related to SDIA:

- 8.1.1 Work with the Airport Authority as the operator of SDIA to provide noise attenuation for older existing residential and other noise-sensitive uses in areas affected by aircraft noise above the projected 65dbA CNEL noise contour in a timely manner; and
- 8.1.2 Work with the ALUC to implement the adopted ALUCP policies and criteria affecting the Ocean Beach community including the provision of noise attenuation and avigation easements for new noise-sensitive uses.

Greater Golden Hill

Greater Golden Hill CPA is an urbanized area comprised of distinct neighborhoods located southeast of SDIA, east of Downtown/City Centre. It is predominantly residential, also with commercial and institutional uses. The Greater Golden Hill Community Plan²⁷ states that portions of the community are affected by noise from aircraft operations at SDIA. The Greater Golden Hill Community Plan has a Noise Element that identifies aircraft noise and overflight of aircraft from SDIA as impacts affecting parts of Greater Golden Hill. It also identifies Greater Golden Hill as being within the SDIA ALUCP AIA. The Greater Golden Hill Community Plan states that the City's General Plan conditionally allows residential uses in the areas above the 65 CNEL airport noise contour with implementation of noise attenuation measures. The following specific recommendations are related to SDIA:

²⁶ City of San Diego. Ocean Beach Community Plan and Local Coastal Program. November 9, 2015. Available: <https://www.sandiego.gov/planning/community/profiles>.

²⁷ City of San Diego. Greater Golden Hill Community Plan. October 2016. Available: <https://www.sandiego.gov/planning/community/profiles>.

- NE-1.1 Refer to the Community Plan and the San Diego International Airport Land Use Compatibility Plan (ALUCP) noise contours and the General Plan and ALUCP noise compatibility policies when making land use planning decisions; and
- NE-1.2 Ensure that future residential use within the 60-70 dBA CNEL aircraft noise contours include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and provide a navigation easement to the airport operator for San Diego International Airport.

Southeastern San Diego

Southeastern San Diego CPA is located southeast of SDIA, east of Downtown/City Centre and south of the Greater Golden Hills CPA. It is primarily residential, also with large-scale commercial spaces, parks, and school sites. The Southeastern San Diego Community Plan²⁸ states that portions of the community are affected by noise from aircraft operations at SDIA. Also, it indicates that planning efforts in the CPA need to address compatibility issues consistent with airport land use compatibility policies and regulations. Further, the Southeastern San Diego Community Plan identifies aircraft noise as affecting parts of the CPA and identifies Southeastern San Diego as being within the SDIA ALUCP AIA. The following specific recommendations are related to SDIA:

- P-LU-33: Review development applications within the Airport Influence Area for consistency with the adopted ALUCP.
- P-LU-47: Utilize the Community Plan and the Airport Land Use Compatibility Plan noise contours when making land use planning decisions.
- P-LU-48:
 - Reduce the effect of non-aircraft noise through the following techniques:
 - Use building setbacks to increase distance between the noise source and receiver.
 - Orient buildings to shield outdoor spaces from noise sources.
 - Locate parking lots, and other non-habitable uses between the noise source and receptor.
 - Reduce the effect of non-aircraft and aircraft noise through the following techniques:
 - Incorporate forced-air ventilation systems to allow windows and doors to be closed.
 - Use double-paned or sound rated windows.
 - Incorporate sound insulating exterior walls and roofs.
 - Use attic vents to minimize sound intrusion into structures.

²⁸ City of San Diego. Southeastern San Diego Community Plan. October 2015. Available: <https://www.sandiego.gov/planning/community/profiles>.

- P-LU-49: Ensure that future residential uses above the 60 dBA CNEL aircraft noise contour include noise attenuation measures to create an interior noise level of 45 dBA CNEL and provide an aviation easement to the airport operator for SDIA.

Balboa Park

The Balboa Park CPA is a large urban park of over 1,000 acres that includes open space areas, gardens, walking paths, museums, theaters, a sports complex, and the San Diego Zoo. The Naval Medical Center San Diego, San Diego High School, and Roosevelt Middle School are also within the CPA boundaries. Instead of a community plan, the primary planning document is the Balboa Park Master Plan²⁹ adopted in 1989 and last updated in 2012, which provides guidance on the future development of Balboa Park.³⁰ The Balboa Park Master Plan does not include any policies specifically related to noise and/or SDIA.

3.11.4 Environmental Setting

This section presents a summary of the existing land uses at the project site and surrounding area.

3.11.4.1 On-site Land Uses

The project site consists of the 661 acres of SDIA, although the project components would primarily be implemented in the southern half (approximately) of the Airport. (See Figures 2-1 in Chapter 2, Project Description.) SDIA is located north of San Diego Bay on State Tidelands³¹ in the northwest portion of the downtown area of the City of San Diego. SDIA is the major airport in San Diego County that is served directly by commercial air-carrier operations. SDIA includes the existing 9,400-foot runway with associated airfield taxiways and existing cargo and air support facilities, including the Air Traffic Control Tower, the Air Rescue/Fire Station, and general aviation services. Public access to the project site is located off North Harbor Drive.

SDIA consists of the following existing facilities: airfield, terminals, ground transportation, circulation, parking, transit plazas, air cargo, and general aviation facilities including:

- Runway 9-27 and taxiway system;
- Northside (north side of Runway 9-27): long-term and short-term parking, apron area for air cargo loading and one general aviation Fixed Base Operator, air traffic control tower (operated by the FAA), ARFF, a fuel farm, and Rental Car Center; and
- Southside (south side Runway 9-27): existing terminals, gates, parking areas, freight forwarding cargo facilities, airport maintenance facilities, and the former Commuter Terminal (current airport administration building).

²⁹ City of San Diego. Balboa Park Master Plan. July 25, 1989, last amended April 5, 2012. Available: <https://www.sandiego.gov/planning/programs/parkplanning/documents>.

³⁰ City of San Diego. Greater Golden Hill Community Plan. October 2016. Available: <https://www.sandiego.gov/planning/community/profiles>.

³¹ A thin strip of land along Pacific Highway at the northern edge of SDIA is not designated as State Tidelands.

3.11.4.2 Surrounding Land Uses and Land Use Plans

SDIA is located in a dense urbanized area that supports a diverse array of land uses, including military training and headquarters areas, mixed-use residential, commercial, and civic developments, port operations, parks, recreation and boating, single-family residential, commercial, and industrial areas. This section identifies the existing land uses on the lands contiguous to and in the SDIA ALUCP AIA.

To the north of SDIA is MCRD San Diego. To the northeast/east along Pacific Highway are industrial and commercial uses and the San Diego Unified Port District administration building within the Midway-Pacific Highway CPA. Farther to the north and east, across I-5, is the Uptown CPA consisting primarily of residential and commercial uses. To the south are aircraft-related industrial and commercial uses in the North Embarcadero area. Farther south, across North Harbor Drive, is a complex of hotels, restaurants, and marinas located on Harbor Island, the Spanish Landing Park, and the U.S. Coast Guard Office. Uses south/southwest of the Airport property and north of North Harbor Drive include the City of San Diego Sewer Pump Station No. 2 (discussed further in Section 3.15, Utilities), the Naval Information Warfare Training Command San Diego facility, and two newly constructed hotels (one 4-story and one 5-story). To the south/southeast is downtown San Diego with varied uses such as industrial and commercial development and recreational and tourist facilities. To the west on the east side of Liberty Station, east of the Navy Boat Channel and adjacent to SDIA, are former military housing, public institutional uses including the City of San Diego Police and Fire-Rescue Training Facility, the City of San Diego Public Services Department laboratory facilities, and the San Diego State University Coastal and Marine Institute Laboratory. Farther west, opposite the Navy Boat Channel, is the Liberty Station mixed-use development within the Peninsula CPA that includes residential, commercial, office, and civic uses and parks.

The surrounding land uses are described in more detail below and illustrated on Figures 3.11-5 and 3.11-6. Figure 3.11-5 presents an aerial view of the project area and calls out the locations of specific features identified below, and Figure 3.11-6 identifies the General Plan land use designations of the surrounding area.

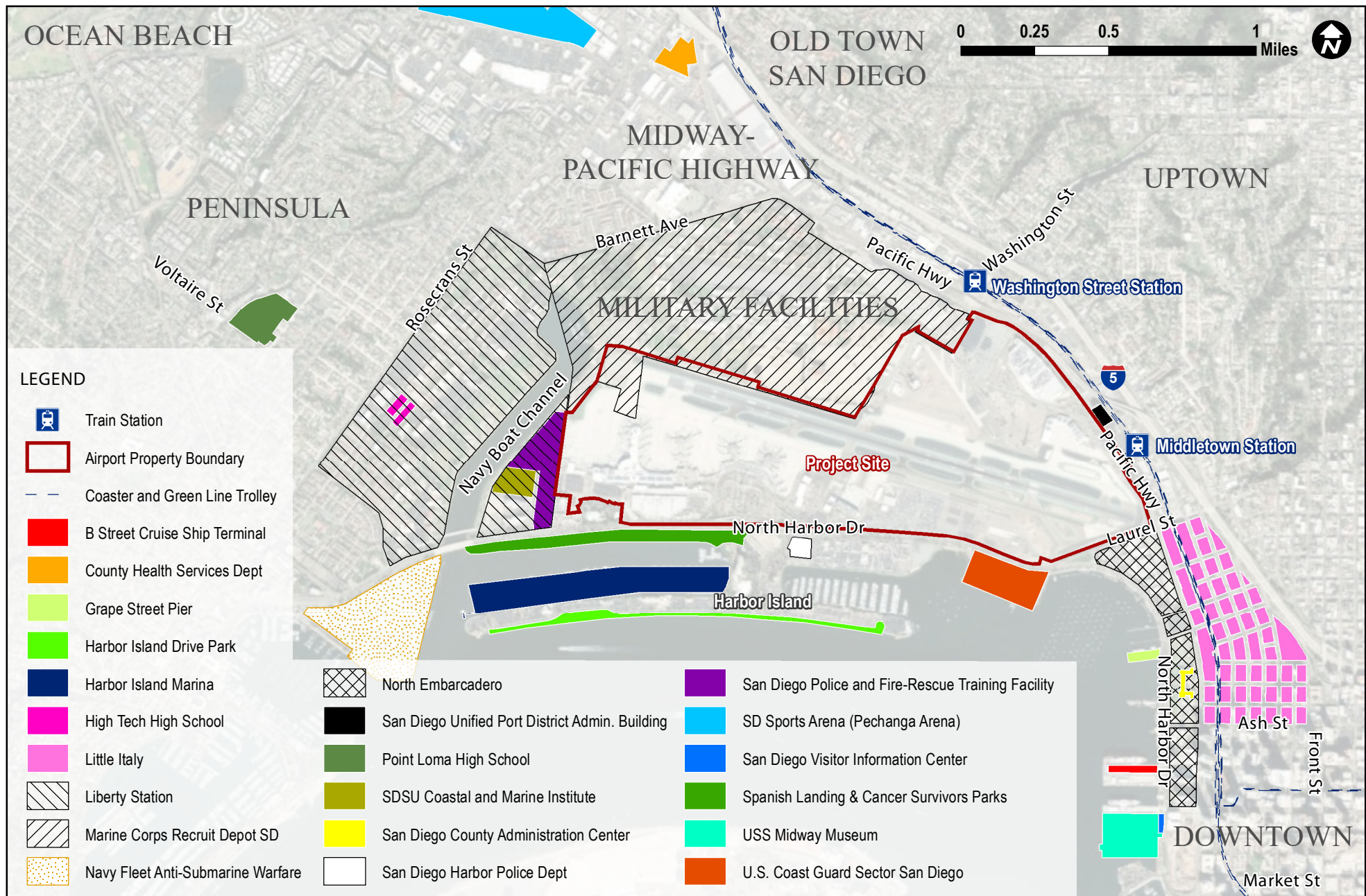
3.11.4.2.1 North/Northeast of Project Site

U.S. Marine Corps Recruit Depot San Diego

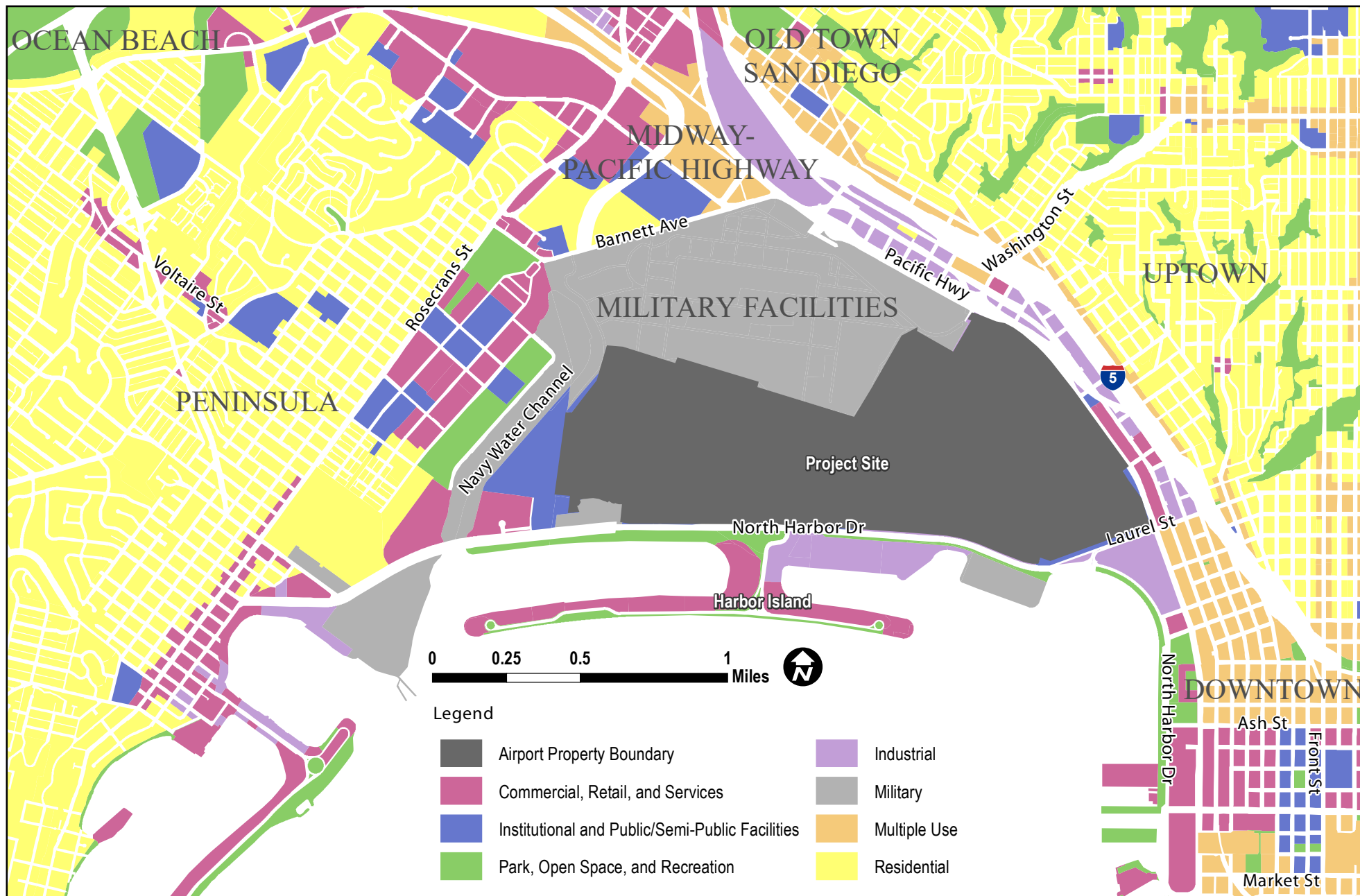
MCRD San Diego comprises 388 acres of land immediately north of and adjacent to the project site. MCRD San Diego provides recruit training for male enlisted personnel. There is also a Drill Instructor School and Recruiters School as well as a museum located on-site. MCRD San Diego has over 900 civilian employees and over 1,200 permanent military personnel. Outdoor use areas adjacent to SDIA include outdoor recreational facilities and combat skills training area.

Midway-Pacific Highway CPA

The Midway-Pacific Highway CPA includes a variety of regional-serving uses, such as the San Diego Sports Arena (Pechanga Arena), the County Health Services complex, and the offices of the San Diego Unified Port District. Other uses include commercial uses, hotels, and industrial uses. Some residential uses are located within this community. A narrow portion of the Midway-Pacific Highway CPA extends along Pacific Highway adjacent to the eastern boundary of SDIA. Existing



Source: CDM Smith, 2019. Aerial source: NAIP, 2016. Note: See Section 3.11.4.2 for additional information on land uses identified on map.



Source: City of San Diego, 2018. Data available online at <http://www.sangis.org>.

land uses in this area consist primarily of light industrial and airport-related commercial uses such as long- and short-term parking and car rentals, the Port of San Diego District offices, and the Washington Street and Middletown Trolley Stations. An area near Washington Street includes commercial/office uses (approximately 0.15 mile from the Airport property line). The Midway-Pacific Highway Community Plan identifies most of the area adjacent to SDIA as having future land uses of Light Industrial. Other uses include Transportation Related and Mixed Use.

Uptown CPA

The Uptown CPA is located farther east, opposite I-5 from SDIA, immediately north of the downtown Centre City area. The Uptown CPA is dominated by residential uses of varying densities with commercial uses bordering I-5 and other major streets. Some of these residences and businesses are located on the western slopes of hills adjacent to I-5, overlooking SDIA and the project site.

3.11.4.2.2 South/Southeast of Project Site

Downtown/Centre City CPA

The Downtown/Centre City CPA is located to the southeast of SDIA and is comprised of a financial/commercial core surrounded by well-integrated mixed-use areas, including residential neighborhoods, offices, open spaces, and commercial uses serving an urban downtown environment. The downtown neighborhood closest to SDIA is the Little Italy District, located immediately to southeast.

The Little Italy District is a medium-density residential and commercial neighborhood located between Laurel Street on the north side and Ash Street on the south, between Harbor Drive on the west and I-5 and Front Street on the east. As discussed in Section 3.11.3.1.4 above, the Little Italy District is a community of diverse uses, with industrial, mixed-use, residential, commercial, and open space/recreation land uses. The Little Italy District is also home to the San Diego County Administration Center on Harbor Drive. The portion of the Little Italy District west of the railroad and trolley tracks is known as the North Embarcadero area.

The North Embarcadero area encompasses the downtown waterfront area bounded by Laurel Street on the north, Market Street on the south, San Diego Bay on the west, and the railroad and trolley tracks on the east. The northern end of the North Embarcadero area borders the southern property boundary of SDIA at Laurel Street.

Existing land uses in the North Embarcadero area include industrial and warehousing in the northern end, visitor-serving commercial recreational, hotel, small-scale retail, and office in the central area, and the U.S. Navy and residential uses at the southern end of the area. There are also public recreation and tourist facilities in this area, including viewing and fishing piers along Harbor Drive, a waterfront promenade, the Grape Street pier, a visitor information center, USS Midway museum, and cruise ship terminal.

3.11.4.2.3 Directly South of Project Site

South Side of North Harbor Drive

Immediately south of SDIA runs North Harbor Drive. Along the south side of North Harbor Drive are the U.S. Coast Guard Station, the Harbor Police Station, and the Spanish Landing Park. Farther to the south is Harbor Island.

Spanish Landing Park and Cancer Survivors Park

Spanish Landing Park is located approximately 0.5-mile directly south of SDIA, on the south side of North Harbor Drive. Spanish Landing Park extends along the north bank of the Harbor Island West Basin, and includes a bicycle and pedestrian path along the shore of San Diego Bay. The park is developed with picnic tables, restrooms, parking, and extensive landscaping. Approximately one-mile of public access to the shore is provided by this park. The park has been designated as a California Historical Landmark that commemorates the 1769 meeting of the Gaspar DePortola and Father Junípero Serra expeditions.

Cancer Survivors Park is also located south of SDIA adjacent to Spanish Landing Park and includes a bronze sculpture and walkway.

Harbor Island

Harbor Island is a man-made peninsula south of North Harbor Drive that includes hotels, restaurants, marinas, and Harbor Island Park. Harbor Island Marina is a small craft marina located at the west end of Harbor Island south of Spanish Landing Park.

3.11.4.2.4 West of Project Site

Peninsula CPA

The Peninsula CPA, located approximately 0.5-mile west of SDIA, comprises 4,409 acres of which over 90 percent is zoned for residential use. The community is divided into 11 neighborhoods. Substantial landscaping, small winding concrete streets, vintage lamp posts, and Spanish architecture characterize portions of the west side of the CPA. Point Loma High School and the commercial districts along Rosecrans Street and Voltaire Street are prominent features of the CPA. Liberty Station is a mixed-use development comprising approximately 360 acres, located adjacent to SDIA on its west side along and across from the Navy Boat Channel. Liberty Station is at the site of the former Naval Training Center, which was redeveloped in the late 2000s. Uses include residential, commercial, office, recreational, educational (High Tech High School), and civic uses. The area directly southwest of Liberty Station is a small commercial district that includes retailers, restaurants, single-family and multifamily housing, hotels, office buildings, and a marina.

Navy Fleet Anti-Submarine Warfare Property

The Navy Fleet Anti-Submarine Warfare property is approximately one mile southwest of the project site. The Navy uses the facility for training personnel in the use of anti-submarine warfare equipment. A portion of the site is leased by the Navy from the Unified Port District of San Diego.

3.11.4.2.5 Minority and Low-Income Populations

To establish context for the environmental justice analysis, race, ethnicity (i.e., minority),³² and income characteristics of the population residing in the vicinity of SDIA were reviewed. The study area for evaluating potential environmental justice impacts consists of the census tracts within 0.5 mile of the Airport's existing baseline CNEL contours, which includes 43 census tracts. As shown in Table 3.11-2, approximately 47 percent of the population living in the study area is minority, which is lower than both San Diego County and the City of San Diego. The largest minority group in the study area is Hispanics or Latinos, accounting for 31 percent, followed by African Americans with almost seven percent, and Asian with six percent. The percent of African Americans living in the study area is higher than in San Diego County and slightly higher than the City of San Diego. This is the only minority group with a larger percentage living in the study area than the surrounding jurisdictions. The race/ethnic makeup of the study area is similar to that of the City of San Diego. Figure 3.11-7 shows the percent minority of the study area by census tract.

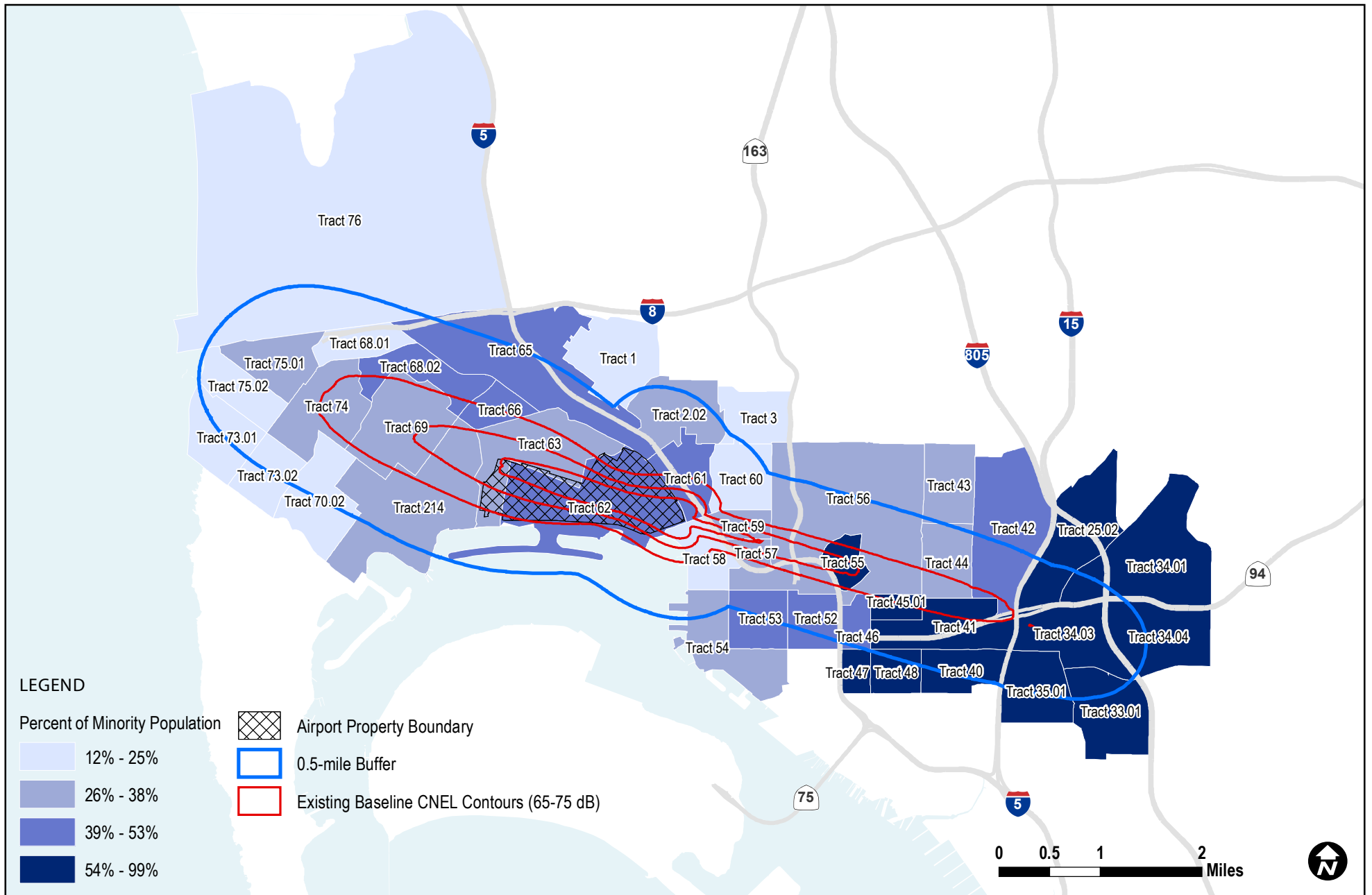
Table 3.11-2: Race/Ethnicity Characteristics

	San Diego County		City of San Diego		Study Area	
Total Population	3,283,665		1,390,966		177,036	
White	1,517,153	46.2%	599,633	43.1%	93,627	52.9%
African American	154,599	4.7%	84,367	6.1%	11,825	6.7%
American Indian or Alaskan Native	11,725	0.4%	3,086	0.2%	616	0.3%
Asian	376,669	11.5%	229,576	16.5%	10,585	6.0%
Native Hawaiian or Pacific Islander	13,122	0.4%	5,231	0.4%	489	0.3%
Some Other Race	6,531	0.2%	2,810	0.2%	297	0.2%
Two or More Races	108,408	3.3%	49,135	3.5%	4,777	2.7%
Hispanic or Latino (Any Race)	1,095,458	33.4%	417,128	30.0%	54,820	31.0%
Total Minority Population	1,766,512	53.8%	791,333	56.9%	83,409	47.1%

Source: U.S. Census Bureau. 2013-2017 American Community Survey 5-Year Estimate. Available: <https://www.census.gov/newsroom/press-kits/2018/acs-5year.html>.

The estimated median household income in the study area is \$66,666, lower than that of San Diego County and the City of San Diego. In addition, the study area has a higher percentage of its population with an income below the poverty level. Table 3.11-3 summarizes the income characteristics of the study area and the surrounding jurisdictions.

³² The U.S. Census Bureau defines race as a person's self-identification with one or more social groups. An individual can report as White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race. Survey respondents may report multiple races. Ethnicity determines whether a person is of Hispanic origin or not. Ethnicity is broken out into two categories; Hispanic or Latino, and Not Hispanic or Latino. Hispanics may report as any race. Source: U.S. Census Bureau. Race and Ethnicity. January 2017. Available: <https://www.census.gov/mso/www/training/pdf/race-ethnicity-onepager.pdf>.



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Table 3.11-3: Income Characteristics

	San Diego County	City of San Diego	Study Area
Median Household Income	\$70,588	\$71,535	\$66,666
Income Below Poverty Level	13.3%	14.5%	15.7%
Income Below 200 Percent of Poverty Level	30.7%	31.0%	34.7%

Source: U.S. Census Bureau. 2013-2017 American Community Survey 5-Year Estimate. Available: <https://www.census.gov/newsroom/press-kits/2018/acs-5year.html>.

The Center on Policy Initiatives believes that the federal poverty level fails to capture the full picture of poverty and minimizes the number of people struggling to make ends meet, especially in high cost areas such as San Diego.³³ The Center on Policy Initiatives suggests that identifying persons with a household income below 200 percent of the national poverty level better reflects the level of economic hardship in San Diego. As shown in Table 3.11-3, approximately 35 percent of the study area population has an income below 200 percent of the national poverty level. This is higher than San Diego County and the City of San Diego. Figure 3.11-8 shows the percent of the population by census tract with an income below 200 percent of the national poverty level.

3.11.4.2.6 Sea Level Rise

The SDCRAA's Climate Resilience Plan (CRP) includes maps for evaluating the Airport's potential exposure to future sea level rise and storm surge. The maps provide a high-level overview of areas at and surrounding SDIA that could be exposed to reoccurring flooding by maximum high-tide conditions and flooding by extreme storm surge events. Using the United States Geological Survey's Coastal Storm Modeling System (CoSMoS), four sea level rise scenarios were modeled and added to water levels experienced during maximum high tide and extreme (100 year) storm surge events. The available CoSMoS projections were selected to be similar to the latest California Ocean Protection Council Sea Level Rise Guidance projections that are recommended by the California Coastal Commission's 2018 Sea Level Rise Policy Guidance Science Update (see Section 3.11.3.1.1 above) as shown on Table 3.11-4 below.

Table 3.11-4: SDIA Sea Level Rise Map Scenarios

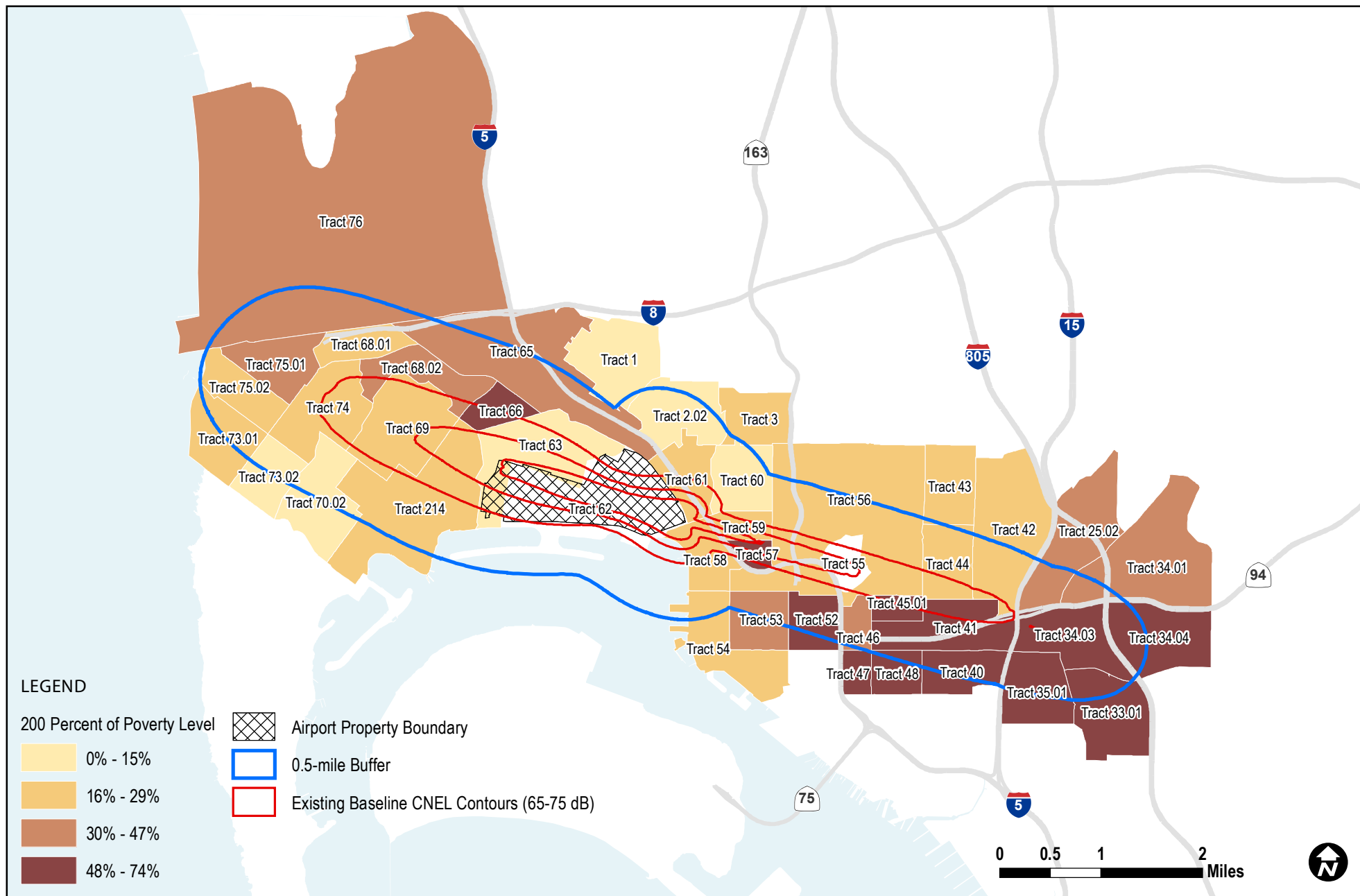
Year	Probability	OPC Guidance	SDIA SLR Maps
2030	5%	0.7 ft.	0.8 ft.
2050	5%	1.4 ft.	1.6 ft.
2100 Low	50%	2.6 ft.	2.5 ft.
2100 High	5%	4.5 ft.	4.9 ft.

Source: AECOM. Review of the H++ Scenario. Memo to Ralph Redman. October 23, 2018.

SLR amounts modeled under CoSMoS 3.0 were selected to be in close proximity to OPC guidance.

Abbreviations: ft – feet, SLR – sea level rise, OPC – Ocean Protection Council, CoSMoS – Coastal Storm Modeling system

³³ Center on Policy Initiatives. Poverty and Income in the City of San Diego - San Diegans Left Behind. September 2016.



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Figure 3.11-8

Figure 3.11-9 shows maps of potential flood extents due to the maximum high tide (indicated by blue) and the 100-year storm surge (indicated by blue-green) for four evaluated future scenarios. As indicated by the maps, when sea level rise reaches 1.6 feet, flooding begins to impact Airport property when combined with a 100-year storm surge event. The flooding begins to expose a small portion of the western side of the Airport. By 2.5 feet of sea level rise, flooding associated with a 100-year storm surge expands to also include the southeastern portion of the Airport. By 4.9 feet of sea level rise, flooding due to the maximum high tide is expected to expose the southeastern and western portions of the Airport property.

The CRP's vulnerability assessment of assets and operations identifies assets that could be impacted by storm surge and high tides at various levels of sea level rise. For example, storm surge with 4.9 feet of sea level rise (2100) impacts several transportation routes (e.g., North Harbor Drive, Vehicle Service Road, and West Laurel Street) surrounding the Airport. The CRP identifies strategies to address sea level rise that include developing climate adaptation strategies for large-scale infrastructure projects implemented at the Airport, raising the shoreline at low areas surrounding the Airport (west of Neville Road and the eastern end of North Harbor Drive), reducing stormwater runoff, and improving stormwater infiltration.

For the proposed project, additional maps were prepared to show the H++ (Extreme Risk Aversion) scenario for the lifespan of the proposed project (which falls within the year 2100 timeframe) to evaluate the vulnerability of existing and planned assets that may have a low risk tolerance. Although there is not a CoSMoS mapping scenario that directly aligns with the H++ high emissions SLR projection (10.2 ft.), a lower and upper range of CoSMoS mapping scenarios were used to capture the OPC Guidance recommendation. Figure 3.11-10 shows both a high emissions and low emissions 2100 H++ scenario. Under the high emissions scenario, the entire San Diego coastal region is vulnerable to permanent inundation.

3.11.5 Thresholds of Significance

The following significance criteria for land use and planning impacts are derived from Appendix G of the State CEQA Guidelines. Under these criteria, the proposed project would result in significant impacts associated with land use and planning if it would:

Impact 3.11-1 Physically divide an established community.

Impact 3.11-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.



Legend

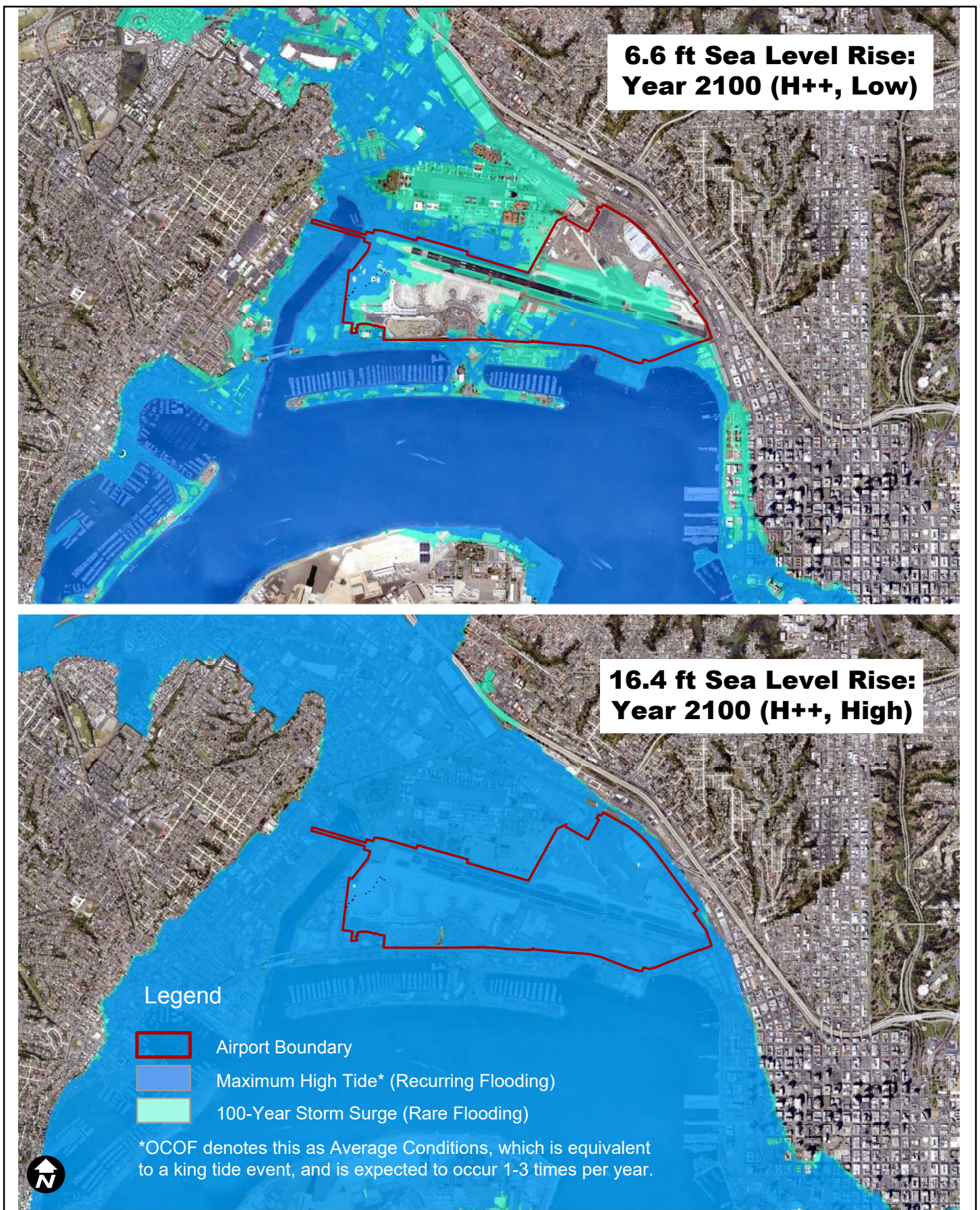
- Airport Boundary
- Maximum High Tide* (Recurring Flooding)
- 100-Year Storm Surge (Rare Flooding)

*OCOF denotes this as Average Conditions, which is equivalent to a king tide event, and is expected to occur 1-3 times per year.



Source: Cosmos; San Diego Airport; AECOM; SANDAG & SanGIS, 2019

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Source: Cosmos; San Diego Airport; AECOM; SANDAG & SanGIS, 2019

Figure 3.11-10

3.11.6 Project Impacts

3.11.6.1 Impact 3.11-1

Summary Conclusion for Impact 3.11-1: The proposed project would not physically divide an established community. As such, and as further described below, there would be a *less than significant impact* for construction and operations.

Physical divisions of an established community could include features such as construction of a major highway or roadway, construction of storm channels, closing bridges or roadways, or construction of aboveground utility transmission lines across an area of an existing community to the extent that persons are separated from other areas of the community. The proposed project improvements would occur within the existing SDIA boundaries and public rights-of-ways and would not extend into or cross through surrounding communities.

The proposed project includes a new inbound on-airport road that would establish a new airport access point at the intersection of Laurel Street and North Harbor Drive and then extend westward on airport property. The on-airport access roadway would allow west-bound vehicles to access the Airport terminals and function as a limited access roadway, similar to a freeway without intersections or crossing traffic, to reduce congestion to the Airport terminals. It would also serve to divert westbound airport traffic from North Harbor Drive, thereby helping to reduce congestion on off-airport/local roads and eliminating some merge and diverge points. It would also facilitate a more efficient flow of traffic among airport facilities. The on-airport entry roadway would improve traffic flow, occur within SDIA and a major transportation corridor, and would not physically divide an established community. Similarly, proposed bicycle and pedestrian path improvements would occur within and adjacent to SDIA and would serve to improve community connections and would not physically divide an established community.

The terminal modifications and other components of the proposed project would occur within the boundaries of SDIA and would be comparable to, and compatible with, the other airport-related uses that currently exist. Project construction and construction staging would occur within airport boundaries. Potential improvements to surrounding roadways to help mitigate and better manage airport-related traffic (see Section 3.14, Traffic and Circulation) and utility upgrades would be the only activities that would occur outside the immediate area of the Airport. These improvements would occur in or along existing roadway rights-of-way and would not create a physical barrier that could divide existing communities. Therefore, construction and operation of the proposed project would not physically divide an established community and there would be a *less than significant impact*.

3.11.6.1.1 Mitigation Measures

No mitigation is required for construction or operations.

3.11.6.1.2 Significance of Impacts After Mitigation

As indicated above, no mitigation is needed relative to this impact. The project would result in a *less than significant impact* for construction and operations.

3.11.6.2 Impact 3.11-2

Summary Conclusion for Impact 3.11-2: The proposed project would cause a significant environmental impact due to conflict with certain aspects of land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the proposed project would generate future noise and traffic impacts that are in conflict with certain community plans and policies, thus resulting in a *significant and unavoidable impact*. To the extent the proposed project would pose a conflict with the existing SDIA ALUCP, that impact would be reduced to *less than significant* with mitigation.

3.11.6.2.1 On-site Land Use Plans and Policies

This section discusses the compatibility of the proposed project with the state and regional land use plans that are applicable to the project site, as well as local SDIA-specific on-site land use plans and policies.

California Tidelands Trust

As described in Section 3.11.3.1 above, all of SDIA except for a thin strip of land along Pacific Highway is on the State Tidelands and, thus, subject to the San Diego Unified Port District Act, which addresses the San Diego Bay tidelands and submerged lands. Tidelands are held by the State of California subject to the public trust for public purposes, including “commerce, navigation, fisheries, and other recognized uses, and for preservation in their natural state.” The proposed project involves commerce and navigation and is therefore consistent with the stated purpose of the public trust.

Further, as described in Section 3.11.3.1, the tidelands on which the Airport is located were conveyed and granted in trust to the San Diego Unified Port District under the San Diego Unified Port District Act (Cal. Harb. & Nav. Code, App. 1, §§ 1, 5, 5.5, and 14). The San Diego Unified Port District Act identifies statewide purposes for uses of tide and submerged lands held in trust by the Port District, including airports and airport support facilities.

With implementation of the proposed project, the existing airport and airport-support uses at SDIA would remain consistent with the San Diego Unified Port District Act. Specifically, Section 87(a)(3) allows for the establishment and improvement of airport or aviation facilities and other buildings, facilities, and utilities incidental, necessary, or convenient for accommodating of air commerce and air navigation. The proposed project would maintain the existing airport uses, by implementing improvements that enable the Airport to meet demand through 2035. The primary improvements include replacement and modifications to the passenger terminals, consistent with the allowed use of the site as an airport. Other improvements, such as infrastructure upgrades and roadway and parking improvements, would support the airport uses and be consistent with Section 87(a)(3) which allows aviation supporting uses and facilities. It would also be consistent with Section 87(a)(4), which allows for the construction and reconstruction of streets, roadways, and parking facilities necessary or convenient for the accommodation of any of the allowed uses of the tide and submerged lands (including airport or aviation facilities).

The proposed project includes the potential establishment of a commercial development area within SDIA that consists of a non-airline revenue source of amenities to serve travelers. This may possibly include a farmers’ market, conference facilities, expanded restaurant or other visitor-serving concessions. The commercial development area would be designed specifically to serve

airport passengers and would thus be a facility “incidental...or convenient for the promotion and accommodation of air commerce and air navigation” as allowed under Section 87(a)(3) of the San Diego Unified Port District Act. Further, the commercial development area would be consistent with other allowable uses of tide and submerged lands identified in Section 87 of the San Diego Unified Port District Act. For example, Section 87(a)(2) allows all commercial uses and Section 87(a)(5) allows the construction and operation of convention centers. Therefore, the proposed project is consistent the California Tidelands Trust and is consistent with the uses allowed in the tide and submerged lands under the San Diego Unified Port District Act.

Further, as discussed in greater detail in Table 3.11-5 below, the proposed project would not interfere with the public’s access to the coast, including San Diego Bay, for navigation, fishing, boating, natural habitat protection, and other water-oriented activities protected by the public trust doctrine. The proposed project is consistent with the public trust doctrine and the impact would be less than significant.

California Coastal Act

As described in Section 3.11.3.1 above, the SDCRAA uses the standards set forth in Chapter 3 of the California Coastal Act to determine whether SDIA projects comply with the Coastal Act. Table 3.11-5 below presents the Coastal Resources Planning and Management Policies contained in Chapter 3, Article 2 through Article 6, and analyzes the proposed project’s consistency with each. As shown in Table 3.11-5, SDCRAA regards the proposed project to be consistent with each applicable policy. As such, the project-related impacts would be less than significant.

At the outset it is important to recognize that SDIA itself is both a visitor-serving and coastal support use. The Airport has been in operation since 1928, and although it has grown considerably since that time, it remains one of the most efficient ways to reach coastal resources for visitors. Proposals to move the Airport inland over the past 20+ years have been met with strong resistance and defeat by the voters of proposals to relocate. Moreover, moving the airport inland would move it away from the very reason that visitors are attracted to SDIA – easy access to the coast and population of the city center. While this type of access must, of course, be reasonably balanced against the need of the non-air traveler visitor to reach coastal resources, it can be said that the Airport contributes a significant advantage to those wishing to visit the coast.

Pressure on SDIA to perform the function of coastal access has been exacerbated by the loss of other airport opportunities. In the 1990s, the former Marine Corps Air Station (MCAS)-El Toro in southern Orange County was proposed for “reuse” as a public regional airport and, as such, would have provided relief to SDIA, especially in terms of serving north San Diego County patrons. This proposal, however, was defeated by a 2002 vote of the people in Orange County. Because John Wayne Airport, also in Orange County, is constrained by one runway that is well under the length of that at SDIA, Los Angeles International Airport (LAX) and Long Beach Airport become the only large- to medium-size commercial airport alternatives to SDIA in southern California for the coastal experience.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
Article 2 – Public Access	
Section 30210. Access; recreational opportunities; posting In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.	Consistent. The proposed project consists of improvements at an existing public airport, which has been in operation since designated in 1928 as the City/municipal airport. SDIA is located landward of the nearest public roadway to the shoreline (North Harbor Drive). The function of the project site is to serve as a public airport and is visitor-serving. While unfettered public access in the traditional sense is precluded due to operational constraints, public safety and security requirements, the SDCRAA engages in many outreach programs to acquaint the public with airport operations and enjoyment of coastal San Diego. The proposed improvements would primarily occur within the existing SDIA boundaries and would not eliminate or reduce existing coastal access and recreational opportunities nearby (i.e., San Diego Bay and Spanish Landing Park). Mitigation measures included in this EIR reduce impacts to the maximum extent feasible, including, but not limited to, on- and off-site traffic improvements, transit commitments, and outreach concerning public transit to the Airport. The Airport is public, and has no natural resources except for the nesting habitat in the airfield oval areas for the California least tern. Protections are in place for the California least terns, and they are not in an area that is accessible to the public. The proposed project would not impact private property rights nor would it expose natural resource areas to over use.
Section 30211. Development not to interfere with access Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.	Not Applicable. The proposed project consists of improvements at an existing public airport located landward of the nearest public roadway to the shoreline (North Harbor Drive). The proposed project would not involve any expansions beyond the existing SDIA boundary and adjacent public rights-of-way that could interfere with the public's right of access to the sea, dry sand, or coastal beaches. For example, the proposed project would not eliminate or block any existing public access to San Diego Bay and the Navy Boat Channel and adjacent parks (i.e., Spanish Landing and Liberty Station NTC Park) that is currently available from Harbor Drive and other local streets. To the extent that additional traffic could increase travel times on North Harbor Drive (a major coastal access point), the proposed project includes a new on-airport access roadway that would reduce westbound on-airport traffic on North Harbor Drive and mitigation measures for street improvements and transit connections that serve to reduce such impacts to the maximum extent feasible. This includes an airport shuttle service to and from the Old Town Transit Center and improvements to Bus Route 992 service to and from SDIA.
Section 30212. New development projects: (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public	Consistent. The proposed project is located at an existing public airport to the north of San Diego Bay and landward of the nearest public roadway to the shoreline (North Harbor Drive). There is no direct access to the shoreline available from the project site; however, there are existing public routes that provide indirect public access to coastal areas from SDIA via North Harbor Drive (i.e., Spanish Landing Park and Harbor Island). Routes for motorized and non-motorized traffic from the proposed new T1 and parking structure to North Harbor Drive would be provided. The existing access from North Harbor Drive to the

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
agency or private association agrees to accept responsibility for maintenance and liability of the accessway. (b) For purposes of this section, "new development" does not include: (1) Replacement of any structure pursuant to the provisions of subdivision (g) of Section 30610. (2) The demolition and reconstruction of a single-family residence; provided, that the reconstructed residence shall not exceed either the floor area, height or bulk of the former structure by more than 10 percent, and that the reconstructed residence shall be sited in the same location on the affected property as the former structure. (3) Improvements to any structure which do not change the intensity of its use, which do not increase either the floor area, height, or bulk of the structure by more than 10 percent, which do not block or impede public access, and which do not result in a seaward encroachment by the structure. (4) The reconstruction or repair of any seawall; provided, however, that the reconstructed or repaired seawall is not a seaward of the location of the former structure. (5) Any repair or maintenance activity for which the commission has determined, pursuant to Section 30610, that a coastal development permit will be required unless the commission determines that the activity will have an adverse impact on lateral public access along the beach. As used in this subdivision "bulk" means total interior cubic volume as measured from the exterior surface of the structure. (c) Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which are required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by Section 4 of Article X of the California Constitution.	coast would not be altered by the proposed project. Therefore, existing public access, including indirect access from the project site, would be maintained. Access to the coast in close vicinity to SDIA is available from North Harbor Drive. The closest coastal access points are immediately south of SDIA at Spanish Landing Park and Harbor Island, which are accessed from North Harbor Drive. Other public coastal access points are located off Harbor Drive further to the west (i.e., Liberty Station NTC Park) and east (i.e., Downtown San Diego Bayfront). Pedestrian and bicycle access to the coast are available south of SDIA via a multi-use path that extends along the San Diego Bay front and passes through Spanish Landing Park. Also, a striped bicycle lane is located along portions of Harbor Drive south of the Airport. Proposed project elements related to site access include a new on-airport entry roadway with an accompanying bicycle and pedestrian pathway that would connect to North Harbor Drive and allow westbound airport traffic to enter SDIA at a new intersection. This would reduce the amount of westbound airport traffic using North Harbor Drive and, help free up space on North Harbor Drive for a potential regional transit corridor along the waterfront in the future. This new entry way is anticipated to reduce traffic congestion on North Harbor Drive and local roadways and would not alter any existing roadway to the shoreline or otherwise impede public access (see Section 2.6.4 in Chapter 2, Project Description, for additional information on ground access improvements, including new bicycle and pedestrian connections). The new on-airport entry roadway and other on-site roadway improvements would not change the movement of motorized and non-motorized traffic along North Harbor Drive would not affect the existing access to Spanish Landing Park, Harbor Island, or coastal access points to the west and east. As described in Section 3.14, Traffic and Circulation, increases in traffic associated with the proposed project along Harbor Drive and the neighboring street system may lengthen travel times to the coast. However, the coastal access would remain available. Further, the proposed project includes a new on-airport access roadway and mitigation measures for street improvements and transit connections that serve to reduce such impacts to the maximum extent feasible (see Section 3.14). Therefore, the proposed project would not inhibit public access to the shoreline.
Section 30212.5. Public facilities; distribution Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.	Consistent. The proposed project consists of improvements to an existing public airport. The public facilities, including parking, bicycle racks, etc. are and would be distributed to provide safe and convenient public access to the Airport terminals and transportation network.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
Section 30213. Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.	Consistent to the extent applicable. The proposed project consists of improvements to an existing public airport. There are no existing or proposed recreational facilities or overnight room rentals on-site. However, the Airport is itself a visitor-serving use that brings visitors to the coastal zone in a way that is convenient in terms of access and enjoyment.
Section 30214 Implementation of public access policies; legislative intent (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following: (1) Topographic and geologic site characteristics. (2) The capacity of the site to sustain use and at what level of intensity. (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses. (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter. (b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution. (c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.	Consistent to the extent applicable. The proposed project consists of improvements at an existing public airport. Portions of the project site (i.e., public parking and public areas of the terminals) are accessible to the public subject to operational restrictions. The airfield and other portions of the site have restricted access for safety and security purposes.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
Article 3 – Recreation	
Section 30220. Protection of certain water-oriented activities Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.	Consistent. The proposed project would be developed on an existing public airport that is not adjacent to the shoreline or otherwise suitable for water-oriented recreational activities. The proposed project would not inhibit water-oriented recreational uses in San Diego Bay or other coastal waterways.
Section 30221. Oceanfront land; protection for recreational use and development Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.	Not applicable. The proposed project consists of improvements at an existing public airport. The project site is not located on oceanfront land suitable for recreational use.
Section 30222. Private lands; priority of development purposes The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.	Not applicable. The proposed project consists of improvements at an existing public airport. The project site is not located on private land suitable for recreational use.
Section 30222.5. Oceanfront lands; aquaculture facilities; priority Oceanfront land that is suitable for coastal-dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal-dependent developments or uses.	Not applicable. The proposed project consists of improvements at an existing public airport. The project site does not include oceanfront land suitable for aquaculture or other coastal-dependent development or uses.
Section 30223. Upland areas Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.	Not applicable. The proposed project consists of improvements at an existing public airport. The site is developed with existing aviation uses and is not suitable to be used for supporting coastal recreational uses. However, SDIA supports access to coastal recreational uses by providing a convenient means of traveling to the coastal zone.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
Section 30224. Recreational boating use; encouragement; facilities Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.	Not applicable. The proposed project consists of improvements at an existing public airport that is landward of the nearest public roadway to the shoreline (North Harbor Drive). The site is not suitable for boating uses or support services. The proposed project would not limit or otherwise affect recreational boating use of coastal waters.
Article 4 – Marine Environment	
Section 30230. Marine resources; maintenance Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.	Consistent. The proposed project consists of improvements at an existing public airport that is not immediately adjacent to coastal waters. No direct impacts to coastal waters would occur and biological productivity would not be affected. As discussed in Section 3.5, Biological Resources, the California least tern, a federally- and state-listed endangered species, seasonally occupies habitable areas within the airfield of SDIA during the nesting season. Various projects have obligated California least tern management efforts at SDIA and a biological opinion (BO) prepared by the U.S. Fish and Wildlife Service (USFWS) in 1993 requires reasonable and prudent measures for protecting California least terns at SDIA.³⁴ These special protections would be maintained under the proposed project. As addressed in Section 3.5, with implementation of mitigation measures, impacts to California least terns would be less than significant. The USFWS has determined that a setback of a minimum of 800 feet during nesting season for construction activities is generally sufficient. Moreover, the USFWS has determined that in the area between 800 feet and 1,200 feet from the least tern nesting ovals, that a biological monitor be present during construction. Should the biological monitor note distress or disturbance in the least tern colony, the monitor has the authority to increase the absolute buffer to 1,200 feet. This is a more refined approach to that suggested in recent communications from California Coastal Commission to SDCRAA. As the USFWS is the agency responsible for protection of the least terns, the SDCRAA will abide by its determination on buffer area management. For additional information on measures to protect the California least tern, see Section 3.5. As discussed therein, with adherence to the existing applicable measures specified in the 1993 Biological Opinion and in the 2013 and 2018 Informal Section 7 Consultations between the FAA and USFWS regarding potential effects of the SDIA Northside Improvements Project and the Taxiway B Object-Free Area Improvement Project, respectively, to avoid potential indirect impacts to California least tern during operation of the proposed project, as well as measures

³⁴ U.S. Department of the Interior, Fish and Wildlife Service, Ecological Services, Carlsbad Field Office. "Biological Opinion on the Immediate Action Program, Lindbergh Field Facilities Improvements, San Diego International Airport, San Diego, California," July 16, 1993.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
	presented in Section 3.5 (Mitigation Measure MM-BIO-2: California Least Tern: Operations Measures) to avoid potential significant indirect impacts during operation as related to perching for predatory species, impacts to California least terns would be less than significant. The proposed project would not degrade biological productivity in coastal waters. As discussed in Section 3.10, Hydrology and Water Quality, existing requirements would provide a basis for ensuring that operation of the proposed project would not result in a violation of water quality standards or discharge requirements. Additionally, the proposed project includes the expansion of the capture area of the SAN Stormwater Capture and Reuse System to divert and capture a portion of stormwater runoff for reuse instead of discharging it to San Diego Bay or the Navy Boat Channel; this would result in water quality benefits and, thus, would not degrade biological productivity in coastal waters. See Section 3.10, Hydrology and Water Quality, and Section 2.6.7.2 of Chapter 2, Project Description, for additional information on the SAN Stormwater Capture and Reuse System.
Section 30231. Biological productivity; water quality The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.	Consistent. The proposed project is a developed site in an urban area that is approximately 90 percent impervious. Although not immediately adjacent to coastal waters, the project site is north of San Diego Bay and east of the Navy Boat Channel. Under the proposed project, the amount of pervious surfaces would remain similar to existing conditions and no change in groundwater recharge or alteration of natural streams would occur. As discussed in Section 3.10, Hydrology and Water Quality, best management practices (BMPs) associated with the stormwater pollution prevention plan (SWPPP) and regulatory permits would be implemented to minimize the potential for construction-related runoff to occur. During operations, existing requirements would provide a basis for ensuring that operation of the proposed project would not result in a violation of water quality standards or discharge requirements. Additionally, the proposed project includes the expansion of the SAN Stormwater Capture and Reuse System to divert and capture a portion of stormwater runoff from over 270 acres of the Airport for treatment and reuse instead of discharging it to San Diego Bay or the Navy Boat Channel. This would result in a reduction in the amount of stormwater discharge from the Airport and would have water quality benefits. Therefore, the proposed project would not degrade water quality or biological productivity. See also Section 3.5, Biological Resources. This would be in addition to improvements that have previously been made at SDIA, including over five acres of bioswales at the Rental Car Center, and implementation of a portion of the SAN Stormwater Capture and Reuse System constructed as part of the new Terminal 2 Parking Plaza that opened in May 2018. Additionally, SDIA prepared a Water Stewardship Plan in 2016 that includes Airport-wide strategies to address water quality, as well as water conservation and flood resilience.

Table 3.11-5: Project Consistency with California Coastal Act Chapter 3

Applicable Sections	Project Consistency Determination
Section 30232. Oil and hazardous substance spills Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.	Consistent. As addressed in Section 3.9, Hazards and Hazardous Materials, construction equipment would involve the use of hazardous materials such as vehicle fuels, oils, and solvents. All handling of such materials would occur in compliance with regulations pertaining to storage, transport, use, and disposal. Inadvertent releases on construction sites are typically localized and would be cleaned up in a timely manner in compliance with requirements. As under existing conditions, during operation of the proposed project, use of fuels, oil, and other hazardous substances would also occur in compliance with applicable regulations. Additionally, the SDCRAA and many of the tenants at SDIA have established Hazardous Materials Release Response Plans in compliance with the Hazardous Materials Release Response Plans and Inventory Law of 1985. The plans include inventories of hazardous materials used and stored on-site, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures. A new facility to store, segregate, and manage hazardous waste was also recently installed at SDIA.
Section 30233. Diking, filling or dredging; continued movement of sediment and nutrients (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following: (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities. (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps. (3) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities. (4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines. (5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas. (6) Restoration purposes. (7) Nature study, aquaculture, or similar resource-dependent activities. (b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable	Consistent. The proposed project consists of improvements at an existing public airport. There are no watercourses located on-site. Further, as discussed in Section 3.5, Biological Resources, SDIA is almost entirely developed and covered with impervious materials such as concrete and asphalt. The limited undeveloped areas that do exist on the property are sparsely vegetated with species that occur in upland habitats. None of the undeveloped lands within SDIA support wetland vegetation; show signs of saturated soils; have hydrology or evidence of hydrology present; or have depressions or channels that may collect water. Rather, these areas support natural vegetation typical of disturbed uplands. No wetlands were observed to be present in the undeveloped areas of the SDIA property. There are no wetlands (i.e., jurisdictional habitats that may fall under Corps jurisdiction pursuant to Section 404 of the Clean Water Act, wetland and streambed habitats under CDFW jurisdiction pursuant to Section 1600 of the California Fish and Game Code, or wetland habitat under California Coastal Commission jurisdiction pursuant to Section 30121 of the California Coastal Act) at SDIA. No diking, filling, or dredging of open coastal waters, wetlands, estuaries, or lakes would occur. Additionally, the proposed project would not involve erosion control or flood control facilities constructed on watercourses.

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Applicable Sections	Project Consistency Determination
for beach replenishment should be transported for these purposes to appropriate beaches or into suitable longshore current systems. (c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California", shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division. For the purposes of this section, "commercial fishing facilities in Bodega Bay" means that not less than 80 percent of all boating facilities proposed to be developed or improved, where the improvement would create additional berths in Bodega Bay, shall be designed and used for commercial fishing activities. (d) Erosion control and flood control facilities constructed on watercourses can impede the movement of sediment and nutrients that would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for these purposes are the method of placement, time of year of placement, and sensitivity of the placement area.	
Section 30234. Commercial fishing and recreational boating facilities Facilities serving the commercial fishing and recreational boating industries shall be protected and, where feasible, upgraded. Existing commercial fishing and recreational boating harbor space shall not be reduced unless the demand for those facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, where feasible, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry.	Not Applicable. The proposed project consists of improvements at an existing public airport and would not affect facilities serving the commercial fishing and recreational boating industry.
Section 30234.5. Economic, commercial, and recreational importance of fishing The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.	Not Applicable. The proposed project consists of improvements at an existing public airport and would not affect economic, commercial, and recreational importance of fishing activities.

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Applicable Sections	Project Consistency Determination
Section 30235. Construction altering natural shoreline Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.	Not Applicable. The proposed project consists of improvements at an existing public airport that is not located on the shoreline. No alteration of the natural shoreline or existing marine structures would occur.
Section 30236. Water supply and flood control Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.	Not Applicable. There are no rivers or streams located at, or immediately adjacent to SDIA. No channelizations, dams, or other substantial alterations of rivers and streams would occur under the proposed project.
Article 5 – Land Resources	
Section 30240 Environmentally sensitive habitat areas; adjacent developments (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.	Consistent. The proposed project would be located on previously developed areas within SDIA that are designated for airport operations. The proposed project would not expand beyond the existing SDIA boundaries and public rights-of-way. Its siting and design would not change the existing physical relationship between SDIA and local habitat and recreational areas, such as those along the Bayfront, and would not interfere with the continued use of those areas. Construction and operation of the proposed project would not encroach into the California least tern habitat areas (i.e., “the ovals”) located in the southeastern portion of the Airport, and mitigation measures are proposed to avoid potential significant indirect impacts from project-related construction and operations activities that may occur in the vicinity of the ovals – see Section 3.5, Biological Resources, and the response to compliance with Section 30230 of the California Coastal Act, above.
Section 30241. Prime agricultural land; maintenance in agricultural production The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas’ agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following: (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses. (b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the	Not applicable. The project site is an existing airport surrounded by urban development. There is no existing agricultural land in or adjacent to the project site.

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Applicable Sections	Project Consistency Determination
conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development. (c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250. (d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands. (e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality. (f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.	
Section 30241.5. Agricultural land; determination of viability of uses; economic feasibility evaluation (a) If the viability of existing agricultural uses is an issue pursuant to subdivision (b) of Section 30241 as to any local coastal program or amendment to any certified local coastal program submitted for review and approval under this division, the determination of "viability" shall include, but not be limited to, consideration of an economic feasibility evaluation containing at least both of the following elements: (1) An analysis of the gross revenue from the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program. (2) An analysis of the operational expenses, excluding the cost of land, associated with the production of the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program. For purposes of this subdivision, "area" means a geographic area of sufficient size to provide an accurate evaluation of the economic feasibility of agricultural uses for those lands included in the local coastal program or in the proposed amendment to a certified local coastal program. (b) The economic feasibility evaluation required by subdivision (a) shall be submitted to the commission, by the local government, as part of its submittal of a local coastal program or an amendment to any local coastal program. If the local government determines that it does not have the staff with the necessary expertise to conduct the economic feasibility evaluation, the evaluation may be conducted under agreement with the local government by a consultant selected jointly by local government and the executive director of the commission.	Not applicable. The project site is an existing airport surrounded by urban development. There is no existing agricultural land in or adjacent to the project site.
Section 30242. Lands suitable for agricultural use; conversion	Not applicable. The project site is an existing airport surrounded by urban development. There is no existing agricultural land in or adjacent to the project site.

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Applicable Sections	Project Consistency Determination
All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.	
Section 30243. Productivity of soils and timberlands; conversions The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.	Not applicable. The project site is an existing airport surrounded by urban development. There are no productive soil or timberlands in or adjacent to the project site.
Section 30244. Archaeological or paleontological resources Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.	Consistent. As addressed in Section 3.6, Cultural Resources, SDIA is built on what was originally mudflats and bay that was subsequently raised to its current elevation over decades of dredging and placement of fill soils. There is no potential for paleontological resources to occur within the SDIA area near the project site. Further, the project site is fully developed and there is no record or evidence of unique archaeological resources being located at or near SDIA. Thus, the development would not adversely impact archaeological or paleontological resources. As addressed in Section 3.7, Tribal Cultural Resources, there are no known tribal cultural resources on the project site and no adverse impacts are anticipated. However, based on formal consultation with the Viejas Band of Kumeyaay Indians, ground disturbance associated with construction of the proposed project could disturb previously unidentified tribal cultural resources on the project site. To address this contingency, the SDCRAA has voluntarily agreed to implement Excavation Monitoring as part of the construction program for the proposed project. Under the agreed-upon Excavation Monitoring program, a Kumeyaay Cultural Monitor will be present onsite during ground disturbing activities that involve soils that are not previously dredged/filled materials below the airport for the proposed project. Such monitoring would serve to address the potential, if any, for tribal cultural resources to be unexpectedly encountered during project-related excavation activities.
Article 6 – Development	
Section 30250. Location; existing developed area (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside	Consistent. The proposed project is located in an urban area within SDIA's boundaries and involves the replacement and expansion of an existing terminal and other airport facilities within a developed area that is already served by existing public services and infrastructure. For example, the new T1 is a replacement of an existing terminal at an existing airport that was established in 1928. See also Section 3.13, Public Services, and Section 3.15, Utilities. The proposed project would not have a significant adverse effect on coastal resources when implemented. Further, the proposed project would not result in new hazardous industrial development or land divisions.

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Applicable Sections	Project Consistency Determination
existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas. (c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.	
Section 30251. Scenic and visual qualities The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.	Consistent. The Airport is in an urban area landward of the nearest public roadway to the shoreline (North Harbor Drive) As described in Section 3.1, Aesthetics and Visual Resources, and depicted on visual simulations provided therein, the proposed project would be compatible with the existing urban character and would not alter natural land forms or not block/disrupt existing views of San Diego Bay, the Pacific Ocean, and the Point Loma peninsula. Specifically, as discussed in Section 3.1, existing views of coastal resources from public areas/roadways surrounding the Airport would be maintained during operation of the proposed facilities; further, there would be no impact to the natural landforms of the Point Loma peninsula to the west of the Airport and the hillsides of Uptown (Middletown and Mission Hills) to the east of the Airport. The project site is not located in a highly scenic area designated in the California Coastline Preservation and Recreation Plan. In terms of visual quality, these structures are not imposing in terms of the viewer experience as multiple buildings on the Airport are either a similar height or their appearance is dissolved into the complex of buildings. The attention of travelers along Harbor Drive would likely be more focused on San Diego Bay as opposed to the Airport. Therefore, the scenic and visual qualities of the area would not be affected by the proposed project.
Section 30252. Maintenance and enhancement of public access The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.	Consistent. The proposed project would not conflict with or impact public access to existing coastal resources. Access to these coastal resources would continue from North Harbor Drive and other roadways such as Harbor Island Drive. The new on-airport entry roadway would be located within SDIA boundaries and provide a new entry point to the Airport from North Harbor Drive. This would reduce the amount of westbound airport traffic using North Harbor Drive. It would not alter any existing roadway to the shoreline, and the decrease in congestion on North Harbor Drive would benefit traffic movement in the area, including to and from the shoreline. The proposed project would provide additional parking to satisfy the on-site Airport needs. By satisfying its own parking requirements, there would be no impacts on existing parking facilities serving nearby parks or recreational areas at the bayfront. Additionally, as described in Section 2.6.4.2, the proposed project includes improvements that would enhance bicycle and pedestrian connections to SDIA. As described in Section 3.14, Mitigation Measure MM-TDM-1 includes measures specifically aimed at increasing public

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Applicable Sections	Project Consistency Determination
	transit access and use at the Airport. Therefore, the proposed project would not impede public access to the shoreline. The SDCRAA has already made a series of improvements that have removed airport-related vehicle trips from public roads, including North Harbor Drive. In 2011, commercial trips were removed with the implementation of a Receiving and Distribution Center on the north side of the Airport that shifted commercial deliveries from North Harbor Drive to the Washington Street entrance, transporting deliveries to the terminals using the on-airport vehicle service road. In 2016, the consolidated Rental Car Center and the construction of an on-airport road allowed high occupancy employee and rental car patrons to use a consolidated shuttle bus to access the northside, further removing rental car trips from North Harbor Drive, Laurel Street, and Pacific Highway. Further in 2016 transit improvements including the Trolley to Terminals shuttle bus created a second transit connection for transit users from the Middletown trolley station. The proposed 2020 launch of the Old Town Transit Center shuttle will provide a single transfer for all modes of transit (heavy rail, light rail, and bus) directly to the Airport terminals. Further pedestrian and bicycle improvements on North Harbor Drive and Pacific Highway will provide additional paths for alternative transportation for airport users.
Section 30253. Minimization of adverse impacts New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.	Consistent. The proposed project consists of improvements to an existing airport. As addressed in Section 3.8, Geology and Soils, the proposed project would comply with the latest engineering and building standards, which would minimize risk to life and property. Further, As addressed in Section 3.10, Hydrology and Water Quality, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding. The project site is not located in a high fire hazard area; regardless, design of all new facilities would comply with FAA, state, and local fire code requirements to minimize fire risks (see Section 3.13, Public Services). As also discussed in Sections 3.8 and 3.10, the proposed project would not create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area. The project site is not located along bluffs or cliff and would not alter natural landforms. As discussed previously, SDCRAA has developed the CRP to guide SDIA in adapting to projected climate conditions, including reducing risks associated with sea level rise and storm surge.
Section 30254. Public works facilities New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and	Consistent. New/upgraded utilities would be installed to meet the needs of the proposed project (see Section 3.15, Utilities). These improvements would occur at the project site and within public rights-of way. The improvements would not preclude the public's right to access the coast, nor would the proposed project preclude the provision of services to coastal-dependent land uses or essential public services and basic industries. No special districts would be formed or expanded.

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Applicable Sections	Project Consistency Determination
provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal-dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.	
30254.5. Terms or conditions on sewage treatment plant development; prohibition Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412.	Not applicable. The proposed project involves improvements to an existing public airport that is served by the City of San Diego Public Utilities Department Wastewater Branch. As addressed in Section 3.15, adequate wastewater treatment capacity is available and no new sewage treatment plant would be required.
Section 30255. Priority of coastal-dependent developments Coastal-dependent development shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited on a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.	Consistent The proposed project involves improvements to an existing public airport on a site that has previously been fully developed. No change in use or expansion of airport activities outside of the existing boundaries and public rights-of-way would occur. The proposed project would not preclude the continued existence or expansion of coastal-dependent uses located in the vicinity. Further, while the Airport is not coastal-dependent, it is coastal supporting in that it provides easy, direct access to the coast for visitors from around the world. Airports are particularly difficult facilities to locate, as amply demonstrated by the failure of a 2006 County-wide ballot measure to relocate SDIA to MCAS Miramar. The Airport could be considered coastal-dependent industrial in that the goal is to bring visitors to the coast. Moreover, pressure on SDIA has increased due to the opposition to, and eventual defeat of, a new regional a commercial airport proposed for the closed El Toro U.S. Marine Corps Air Station in Orange County. Therefore, for air travelers, the Airport is a visitor-serving facility as well as an economic driver for the area.
Article 7 - Industrial Development	
Section 30260. Coastal-dependent facilities Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.	Consistent. As previously explained, SDIA provides an easy and convenient access for visitors to the coast. Large facilities, such as airports, are difficult to locate. Ready access to the coast is possible because SDIA is not located inland. Reasonable long-term growth would occur under the proposed project, which is limited due to the fact there is only one runway at SDIA, and, therefore, only a constrained amount of operations can be accommodated (see Section 2.5.1 in Chapter 2, Project Description). The defeat of a 2006 County-wide ballot measure to relocate SDIA if a portion of MCAS Miramar became available has proven infeasible and would have been more environmentally damaging than expanding the Airport in place. It would also have damaged public welfare in the new location in the opinion of the voters who defeated the measure. Because of the mitigation proposed by the SDCRAA, impacts of the proposed project have been reduced to the maximum extent feasible.

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Applicable Sections	Project Consistency Determination
	A positive aspect of the proposed project comes from opportunities to enhance transit in this urban area of San Diego. While the Airport is constrained to only fund transit that directly serves the Airport, the SDCRAA has committed to providing that should make travel to and from the Airport via transit more attractive.
Section 30261. Tanker Facilities, Use and Design; Section 30262. Oil and Gas Development; Section 30263. Refineries or Petrochemical Facilities; Section 30264. Thermal Electric Generating Plants; Section 30265. Legislative Findings and Declarations; Offshore Oil Transportation; and Section 30265.5. Governor or Designee; Coordination of Activities Concerning Offshore Oil Transport and Refining; Duties.	Not applicable. Sections 3.2621 through 30265.5 apply to specific industrial facilities and activities, which are not applicable to proposed project.

Source: CDM Smith, 2019; Culbertson Adams and Associates, Inc., 2019.

It is difficult for SDIA to have more than one runway due to space and other constraints. The single runway limits operations to an absolute, but the number of passengers served is not necessarily limited by the number of gates or number of operations, nor is the number of gates directly related to the number of passengers. As discussed in Section 2.5.1.2 of Chapter 2, Project Description, the single runway at SDIA is the dominant constraint on aviation activity.

The additional gates provided under the proposed project, along with the associated terminal replacement/improvements, would merely provide for a better level of passenger service and more efficient terminal operations but, there too, that does not provide for greater aviation activity levels in the future than would otherwise occur without the terminal replacement/improvements.

All flights anticipated to occur in the future project horizon years (i.e., 2024, 2026, 2030, and 2035) could be successfully gated under the “no build” scenario (i.e., the No Project Alternative) as well as the proposed project and, thus, the proposed project would not result in higher aviation activity levels at SDIA in the future. However, without implementation of the proposed terminal and ground access improvements, the passenger experience will be substandard and congested.

As discussed in Section 1.2 in Chapter 1, Introduction, SDCRAA refined the proposed project and developed a new Alternative 4 in response to public comments on the 2018 Draft EIR. The proposed project refinements are discussed in detail in throughout this Recirculated Draft EIR. However, for the benefit of the reader and in order to highlight conformity with Chapter 3 policies of the California Coastal Act, and subsequent communications with the California Coastal Commission, certain project changes and improvements are called out here. The following is not an exhaustive list but rather a list of those changes that are pertinent to the consistency with California Coastal Act policies. Additional refinements incorporated into Alternative 4 are described and analyzed in Chapter 5, Alternatives Analysis.

Traffic and Transit

1. On July 2, 2019, the SDCRAA President/CEO announced a far-reaching and comprehensive agreement with the SDIA’s airline partners for addressing traffic and GHG emissions concerns. This new 10-year agreement enables the Airport to contribute over a half-billion dollars to help reduce congestion. The money made available through the new agreement will assist the Airport’s regional partners in achieving goals that may currently be unfunded. The agreement is conditional on the approval and implementation of the ADP (i.e., the proposed project or one of the “build” alternatives).

While the specific improvements are being studied and not yet approved, the agreement ensures there will be substantial funding for those improvements should the Authority and partner agencies decide to go forward with them. The contribution of over a half-billion dollars could help fund the following projects if approved:

- \$350 million for on- and potential off-airport public transportation projects in conjunction with regional partner agencies. The agreement allows the Authority to contribute up to this amount when third-parties – such as regional partner agencies – contribute funds for off-airport transportation and transit projects;

- This funding could also help pay for a new transit station on airport property that could connect to the regional system;
- An additional \$165 million – funded 100 percent by the Authority and the Airlines – could be used for multimodal mobility corridor improvements also contemplated in the ADP and, if approved, might include an inbound, on-airport access roadway adjacent to Harbor Drive and a multi-use pedestrian and bicycle path;
- If approved, the roadway would connect Laurel Street directly to the Airport, with no traffic lights. This would reduce the amount of westbound airport traffic using North Harbor Drive; and
- Additionally, the multimodal mobility corridor improvements could free up space on North Harbor Drive for potential Rapid Bus or light rail transit opportunities that could serve not only SDIA, but also Harbor Island redevelopment projects being considered by the Port of San Diego.

The proposed project includes elements as project features and mitigation measures that provide better connections for transit users, bicyclists, and pedestrians, including:

- New all-electric shuttle service to and from the Old Town Transit Center;
 - Improvements to Bus Route 992 to and from SDIA;
 - Upgraded transit amenities at the new Terminal 1 curbside, such as bus shelters, info kiosks, and electronic next-arrival signs; and
 - A new multi-use pedestrian and biking path along the inbound on-airport access roadway.
2. As required under MM-TDM-1, the SDCRAA has committed to establishing a frequent shuttle transfer between the Old Town Transit Center and the Airport terminals exclusively for transit users. The SDCRAA will work with California State Parks to ensure that the shuttle at Old Town is managed in such a way that the shuttle is reserved for transit users going to and from the Airport (either as passengers or employees), as opposed to employees or passengers who drive to Old Town and park at the State Park parking lots. The FAA restricts the SDCRAA from using airport funds for off-airport improvements unless the improvement serves airport passengers and/or employees.³⁵ Consistent with the California Coastal Act's emphasis on air quality, these shuttles will use clean fuels (See Mitigation Measure MM-TDM-1 in Section 3.14, Traffic and Circulation). Shuttle service between the Old Town Transit Center and SDIA is included in both the proposed project (as a mitigation measures) and Alternative 4 (as a project component).
 3. As discussed in Chapter 1, Introduction, the height of the proposed T1 Parking Structure has been reduced from 80 feet to 60 feet for the main deck to reduce visibility of the structure from North Harbor Drive. The elevator penthouses and lighting poles may extend up to 84 feet.

³⁵ Detailed information about the law and regulations prohibiting diversion of SDIA revenues and FAA grants is found at Appendix R-K to this Recirculated Draft EIR.

4. As discussed elsewhere in this Recirculated Draft EIR (see Chapter 1, Introduction, and Section 3.14, Traffic and Circulation), SDCRAA would work with MTS on the following measures to increase ridership by reducing the travel time along the Bus Route 992 route: (1) allow 992 buses to use the new on-airport access road including preferential locations at the terminals for bus stops; and (2) provide space for a kiosk and fare purchase station at a convenient location within each terminal (implemented in January 2016).

As discussed in Section 3.14, Traffic and Circulation, the SDCRAA has already provided a bus shuttle and stop at Palm Street for passenger/employee pick-up and drop-off to and from the terminals for transit users of the Middletown trolley. At this time, trolley users have a short walk (8 minutes) between the Middletown trolley stop and the bus pick-up which operates during airport operations. In operation since 2016, the free transit connection to the Airport has grown to approximately 900 persons per month. While it is the primary responsibility of the transportation agencies to ensure that patrons and employees have options to reach this regional facility via public transportation, the SDCRAA is a willing participant to the extent allowed by federal law. Therefore, establishing transit-only lanes on public streets surrounding the Airport can be promoted and supported by the SDCRAA, but cannot be implemented by the SDCRAA as the authority does not exist. Further, the launch of the Old Town shuttle will provide all past users of the Middletown Station (who walk one block from the MTS light rail/trolley Green Line station to board the on-airport bus shuttle) a single transfer directly from the Old Town station to the Airport terminals.

Environmental Justice

As described in Section 3.11.3.1.1 above, Section 30604(h) of the California Coastal Act authorizes the California Coastal Commission to consider environmental justice during the coastal development process. On March 8, 2019, the California Coastal Commission adopted its Environmental Justice Policy. While the vast majority of the Policy has little application to the Airport, SDCRAA's commitments to sustainable development and energy and water conservation, together with efforts in traffic reduction, helps to keep urban areas cleaner and more livable. These initiatives and policies are described in detail in Section 3.3, Greenhouse Gases and Climate Change, and Section 3.15, Utilities. In particular, see Table 3.3-6 in Section 3.3 regarding efforts that the Airport is currently implementing and additional measures that would be implemented under the proposed project, such as support for clean fuels, solid waste reduction, use of renewable energy sources, and increased transit opportunities. Additionally, the increased buses and pedestrian and bicycle path enhance alternative access to the Airport (which is a coastal supporting use as described above).

Further, as also described above in Table 3.11-5, the proposed project would not obstruct public access to San Diego Bay or otherwise reduce the public's access to coastal access and coastal recreation, nor would it subject natural resources to permanent damage. Therefore, the proposed project would not conflict with the California Coastal Commission's Environmental Justice Policy.

Sea Level Rise

As described in Section 3.11.4.2.6 and shown on Figure 3.11-9, portions of the Airport are projected to be subject to flooding associated with sea level rise due to storm surge and maximum high tide. Consistent with the California Coastal Commission's Sea Level Rise Guidance to minimize coastal hazards through planning and development standards, SDCRAA has developed the CRP to guide

SDIA in adapting to projected climate conditions, including reducing risks associated with sea level rise and storm surge. The CRP addresses risks and opportunities associated specifically with the proposed project.

Identified risks consist of the following:

- The eastern portion of the planned Taxiway A location is expected to experience temporary flooding once sea levels increase by 4.9 ft., based on the existing elevations;
- Proposed project improvements planned in locations vulnerable to ponding during heavy rain events include the new Terminal 1, remain overnight (RON) aircraft parking, and new airport administration building. Heavy rain events were defined in the CRP as those that exceed a 10-year storm average or 2.75 inches within 24 hours;
- Airline and Winship Lane (both on Airport property), which would be removed as part of the proposed project, are expected to be exposed to temporary flooding once sea levels increase by 4.9 ft., and during heavy rain events (10-year storm); and
- Sections of the planned on-airport access roadway that remain at the current grade may experience flooding from storm surge flooding and the maximum high tide once sea levels increase by 4.9 ft., and under a 10-year storm event.

As identified in the CRP, the proposed project presents an immediate opportunity to address these risks by applying adaption strategies and ensuring that the design of the replacement T1 and other facilities prevents the facilities from being exposed to future sea level rise and/or heavy rain events. Specifically, the CRP states that for large-scale infrastructure projects, such as the proposed project, SDCRAA should include a list of recommended climate adaptation strategies and include climate resilience language in relevant policy and design guidelines.

Specifically, the San Diego International Airport Terminal 1 Replacement Program – Program Definition Document (PDD)³⁶ that addresses the design and construction of the replacement T1 identifies steps to achieve sustainability and climate resilience objectives. As described therein, the Authority is in the process of developing a Sustainability Management Plan (SMP). The completed CRP was prepared as one of seven reports that will make up the larger SMP. As previously described, the CRP was prepared to address climate resilience in more detail, including adaptation measures for flood resilience, extreme heat, and drought preparedness that will be used to inform the design and implementation of the ADP. In addition, all new construction at the Airport, including the proposed project, is intended to meet third-party certification programs for sustainable design and construction, such as meeting a minimum certification of Leadership in Energy and Environmental Design (LEED) Silver³⁷ for building design and construction and being

³⁶ The Program Definition Document addresses Phase I of the proposed project. A similar document with similar requirements would be prepared for Phase 2 of the proposed project during the planning and design phase.

³⁷ Leadership in Energy and Environmental Design (LEED) is a third-party rating system devised by the United States Green Building Council (USGBC) to evaluate the environmental performance of a building and encourage sustainable design.

qualified under the Envision Rating System³⁸ for sustainable infrastructure (Envision). Many credits in LEED and Envision address climate resilience.

Requirements supportive of sustainability and climate resilience that would help to address risks associated with sea level rise identified for implementation as part of the T1 Replacement Program consist of the following:³⁹

- Address resilience, including potential climate change site vulnerabilities with adaptive strategies such as:
 - Use resilient design of pavement and subgrade materials;
 - Elevate critical infrastructure;
 - Use flood-resilient building techniques and materials;
 - Design facilities to tolerate periodic flooding at ground/subgrade level(s);
 - Install one-way valves in drainage system;
 - Design access roadways to ensure functionality in the event of severe storms;
 - Design storm infrastructure for short, high-intensity storms;
 - Develop flood attenuation and temporary water storage areas;
 - Use stormwater harvesting as a means to minimize discharges to the Bay while reducing flood risk;
 - Install green roofs and/or permeable paving to enhance on-site stormwater absorption;
 - Reduce sediments and nutrients entering the least tern nesting area, to ensure protection of habitat; and
 - Install backup power generation that does not rely on grid electricity.

Although development plans for Phase 2 of the proposed project (i.e., the proposed “Stinger” in Phase 2a, and T2-East modifications) have not yet progressed to the point of having PDDs, it is anticipated that those future PDDs will include a similar Environmental Sustainability and Compliance chapter with similar climate resilience features to those identified above for Phase 1 of the proposed project, consistent with SDIA’s CRP.

As shown in Figure 3.11-10 in Section 3.11.4.2.6, under the year 2100 H++ high emissions sea level rise scenario, the entire San Diego coastal region is vulnerable to permanent inundation. The large-

³⁸ Envision is the Institute for Sustainable Infrastructure’s rating system for infrastructure projects based on their contribution to economic, environmental, and social aspects of sustainability. Credits are offered in the area of quality of life, the natural world, leadership, climate and risk, and resource allocation.

³⁹ San Diego County Regional Airport Authority. San Diego International Airport Terminal 1 Replacement Program - Program Definition Document. Chapter E, Environmental Sustainability & Compliance (draft). January 31, 2019.

scale impacts to the region that are posed by the H++ scenario negate the usefulness of a vulnerability assessment or development of adaptation strategies at the Airport and require a collaborative regional approach. SDIA has and will continue to participate in such efforts. For example, SDCRAA was on the steering committee for the Sea Level Rise Adaptation Strategy for San Diego Bay prepared in 2012, which evaluated the impacts of sea level rise to natural and built environments around San Diego Bay. Additionally, SDIA participates in the San Diego Regional Climate Collaborative, which is a network for public agencies to advance climate change solutions that mitigate GHG emissions and adapt to the effects of climate change. One of the San Diego Regional Climate Collaborative programs is addressing coastal resiliency to prepare for sea level rise and coastal storms.

As described above, SDIA is developing adaptive strategies to minimize coastal hazards, including sea level rise through planning and development standards, using science to guide decisions. These adaptive strategies would be incorporated into the proposed project to minimize risks. Additionally, SDIA is participating in collaborative efforts to address sea level rise at a regional level. This includes currently working with the Center for Climate Change Impacts and Adaptation and Scripps Institution of Oceanography to place sea level and wave movement sensors within San Diego Bay to begin collecting data that can better inform of potential impacts. Therefore, the proposed project would not conflict with the California Coastal Commission's Sea Level Rise Policy Guidance. As such, the project-related impacts would be less than significant.

Summary

As discussed above, SDCRAA considers the proposed project consistent with Chapter 3 of the California Coastal Act, as well as the Environmental Justice Policy and Sea Level Rise Policy Guidance. As such, the proposed project is consistent with the California Coastal Act and the impact would be less than significant.

San Diego Forward: The Regional Plan

The Regional Plan identifies SDIA as providing critical infrastructure for regional mobility and goods movement. The proposed project is supportive of this role within the region. As described in Section 2.4 of Chapter 2, Project Description, the proposed project is the next phase of master-planning for SDIA, the objectives of the proposed project encompass/incorporate and build upon previous identified goals for SDIA and include providing improved access to the Airport, accommodating future activity levels, planning for an operationally efficient airfield, and providing a fiscally and environmentally sustainable plan. These project objectives are consistent with and supportive of the goals set forth in the Regional Plan that promote sustainability, economic prosperity, and quality of life. Additionally, the proposed terminal improvements and on-airport roadway improvements are consistent with the implementation action specific to airport facilities identified in the Regional Plan of maximizing the efficiency and effectiveness of the aviation facilities and improving access to and from SDIA. Therefore, the proposed project would not conflict with the Regional Plan. As such, the project-related impacts would be less than significant.

SB10 – RASP and AMAP

The proposed project is the next phase of master planning for SDIA and includes improvements that would improve performance at SDIA through upgrading facilities and infrastructure to accommodate demand and implementing on-site access improvements. These improvements

would be consistent with strategies to improve regional aviation facilities by implementing site-specific improvements and, additionally, the improvements would not hinder future implementation of strategies aimed at improving regional aviation at a site-specific or regional level. Specifically, the proposed terminal and access improvements would improve current operations at and access to the Airport, but would not preclude future site-specific and/or regional actions to implement the strategies identified in the RASP and AMAP. For example, the proposed project would primarily include actions to improve access and operations on the southside in the near future; none of the proposed project elements would limit future coordination with SANDAG on implementation of a northside ITC or related improvements, such as remote passenger processing near the ITC. Therefore, the proposed project would not conflict with the goals and strategies of the RASP and AMAP. As such, the project-related impacts would be less than significant.

Airport Master Plan

The AMP provided a guideline for carrying out the planning process at SDIA to implement specific goals and objectives, including accommodating forecast aviation demand through 2015. The proposed project is the next phase of master-planning at SDIA, providing a framework for accommodating the aviation demand beyond 2015. As the next planning phase, the proposed project accommodates and builds upon the goals and improvements identified in the AMP to implement further improvements to improve SDIA's ability to meet demand and enhance access to the Airport. Therefore, the proposed project would not conflict with the AMP. As such, the project-related impacts would be less than significant.

Airport Land Use Plan

Under the proposed project, the existing Airfield, Terminal, Ground Transportation, and Airport Support uses would be maintained at SDIA; however, the proposed site plan would alter the configuration/location of each use (i.e., the replacement T1 would extend into areas designated as "Ground Transportation" under the current plan). An amendment to adjust the boundaries of each land use designation would be required to maintain consistency with the land use designations and the updated distribution of land uses that would occur under the proposed project.

As existing uses would be maintained, the uses would remain consistent with the uses allowed under the four land use categories. The establishment of a commercial development area would also be consistent. This would include uses that are consistent with existing passenger-serving uses currently available at SDIA, such as restaurants, concessions, and passenger serving retail. Further, the expanded restaurant and other visitor-serving concessions would be designed specifically to serve airport passengers and would be consistent with the Terminal land use designation that allows "other facilities required to be housed in the terminal structure."

With approval of an amendment to the Airport Land Use Plan that revises the land use designation boundaries consistent with the proposed facilities, the proposed project would be consistent. Because such an update would be required as part of project approvals, the impact would be less than significant.

Airport Layout Plan

The proposed changes to the Airport facilities, including terminal modifications, relocation of airport support uses, and modifications to aircraft apron and taxiways, would require an update to the ALP to be processed and approved by the FAA. Because an updated ALP would be consistent with the proposed changes to Airport facilities and because an updated ALP would be required as part of the project approvals, the proposed project would be consistent with the updated ALP and the impact would be less than significant (subject to FAA review). The ALP was submitted to the FAA for review in September 2019, and approval is anticipated in 2020.

Surrounding Land Use Plans and Policies

This section discusses the compatibility of the proposed project with the land use plans and policies that govern the area surrounding the project site.

Airport Land Use Compatibility Plan

The ALUCP contains land use policies for proposed new development to protect public health and minimize the public's exposure to safety hazards and excessive noise related to the operation of SDIA. Implementation of the proposed project would not substantially change noise exposure within the AIA, the jurisdictional boundary of the ALUCP. The primary difference between the 2050 noise contours presented in Section 3.12, Noise, (the "RDEIR Contours") and the Noise Contour Map in the adopted SDIA ALUCP (the "ALUCP Contours")⁴⁰ is that the Recirculated Draft EIR Contours along the approach path from the southeast are slightly longer under the 2035 conditions than what the ALUCP Contours show under existing conditions. This is considered a significant impact requiring mitigation.

The impact would be eliminated through an update to the ALUCP. State law requires that updates to airport master plans, airport layout plans, and proposals for airport expansion be reviewed by the ALUC, and that the ALUCP be amended as necessary to reflect any updates and revisions to the airport plans. As such, the SDCRAA would request that the ALUC revise the ALUCP for SDIA as necessary to make it consistent with the updated ALP and RDEIR Contours. The basic purpose and intent of the ALUCP would still remain and there would be no changes to the existing policies of the ALUCP based on implementation of the proposed project. Rather, the proposed project would include requesting the ALUC to update the ALUCP based on the specifics of the project, including the updated noise contours. Nevertheless, unless and until the ALUCP is updated to reflect the future aircraft noise levels anticipated to occur at buildout of the proposed project in 2035, as well as in the 2050 horizon year, the future noise levels associated with the proposed project are inconsistent with, and extend beyond, the noise compatibility boundary (i.e., the 65 CNEL noise contour) delineated in the currently adopted ALUCP.

Port Master Plan

The PMP is the land use document that governs the land use plans and policies for the Port District lands, including those immediately surrounding SDIA. The proposed project would retain the same

⁴⁰ Airport Land Use Commission San Diego County Regional Airport Authority. San Diego International Airport - Airport Land Use Compatibility Plan. Exhibit 2-1. Adopted April 3, 2014. Amended May 1, 2014. Available: [http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20\(May%202014\).pdf](http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20(May%202014).pdf).

types of uses at the project site (aviation uses and a potential new commercial development area to serve airport passengers that is consistent with existing airline passenger-serving uses) and would not encroach beyond the existing SDIA boundaries or existing land uses. Further, the proposed project would not result in a change in noise exposure that could significantly affect the surrounding land uses under the Port's jurisdiction, nor would it change safety zones. Therefore, the proposed project would not result in any land use changes that would conflict with existing land uses within the Port District lands. Further, the policies in the PMP are consistent with those identified in Chapter 3 of the California Coastal Act. As identified in Table 3.11-5 above, the proposed project would not impede public access to the shoreline, reduce opportunities for coastal recreation, harm water quality or biological resources, or substantially reduce views or visual quality of the shoreline. Therefore, the proposed project would not conflict with or be incompatible with the land use portion of the PMP and land use impacts to the Port District lands would be less than significant.

The Airport was in existence in 1963 when the first Port Master Plan was prepared and it was consistent with providing public access to shoreline promenades, parks, marinas, and boat launch facilities. Further the Airport is a transportation facility connecting visitors to commerce, navigation, fisheries, and recreation of the San Diego region. For example, fresh fish is perishable and flown by air cargo; fishing boat excursions are conducted by visitors who travel to the region by air; hotels, bay excursions, tours, and fishing industries are all populated with people who fly into the San Diego region via the Airport; and the hotels on Harbor Island are used by airline flight crews. The Port's land use is visitor-serving, and visitors travel to the San Diego region primarily via SDIA. The Airport is primarily a commercial passenger origin and destination airport serving residents and visitors to the region (not a connecting hub) so passengers are either residing or visiting the San Diego region, including Port tidelands and Port land uses and facilities. The aviation industry helped improve technology and commerce in the San Diego region and the Airport serves commerce, navigation, fisheries, and recreation. The Airport use has been consistent with the Port's missions from its creation in 1963 and every subsequent adopted Port Master Plan.

City of San Diego Land Use Plans and Policies

This section discusses the compatibility of the Proposed Airport Land Use Plan with the City of San Diego land use plans and policies.

City of San Diego General Plan

A central objective of the City's General Plan is to support the economic, environmental, and social health of the City by focusing growth into mixed-use activity centers linked with a regional transit system (City of Villages strategy). The proposed project would retain the existing aviation uses and a potential new commercial development area to serve airport passengers within the existing SDIA boundaries which would not conflict with the General Plan's City of Villages strategy. Further, the proposed modernization of the existing aviation facilities would support future economic and employment growth in the City and region as a whole, thereby contributing to the ability for future development to occur as envisioned under the General Plan.

The proposed project could pose a potential conflict with the goals specific to airport-land use planning identified in the General Plan. As described in Section 3.12, Noise, the proposed project would result in a change in noise exposure that could affect some surrounding land uses, although

it would not change safety zones. Therefore, the proposed project would potentially conflict with the goal of minimizing the public's exposure to high levels of noise. The proposed project would not have any effect on the Airport boundaries or result in any changes that would directly or indirectly encourage the encroachment of incompatible land uses within the SDIA ALUCP AIA.

Based on the above, the proposed project would conflict with the policies of the General Plan related to noise exposure, and impacts related to conflicts with plans and policies would be significant and unavoidable. It should be noted for informational purposes, however, that those same future aircraft noise exposure levels would occur even if the proposed project were not implemented (i.e., future aircraft noise levels are the same for both the proposed project and the No Project Alternative).

Surrounding City of San Diego Community Plans

This section discusses the compatibility of the Proposed Airport Land Use Plan with the City of San Diego CPAs near SDIA: Midway-Pacific Highway, Uptown, Peninsula, and Downtown/Centre City. It should be noted that the discussion below focuses on operational impacts of the projects, given that construction-impacts are short-term and localized, and do not affect the long-term planning aspects of these community plans.

Midway-Pacific Highway Community Plan

As described above, the proposed project would retain the existing aviation uses along with a potential new commercial development area to serve airport passengers within the existing SDIA boundaries. Project implementation would occur on the southside of the Airport, and not in the area adjacent to the Midway-Pacific Highway CPA. Further, as can be seen in the figures presented in Section 3.12, Noise, and discussed in the associated text, the proposed project would result in a substantial change in noise exposure (i.e., impacts related to aircraft CNEL would be significant and unavoidable in all future years – 2024, 2026, 2030, 2035, and 2050) in areas around SDIA as compared to existing (2018) baseline conditions, which includes the Midway-Pacific Highway CPA; further, impacts related to aircraft-related nighttime noise changes would be significant. That future increase in aircraft noise levels would occur irrespective of the proposed project (i.e., the impact would be the same under the No Project Alternative, based on future growth in activity that would occur even if the project was not implemented). Notwithstanding, that noise impact is considered to be a significant noise impact within the Midway-Pacific Highway Community Plan Area. Implementation of the proposed project would not change safety zones associated with SDIA. As can be derived from Section 3.14, Traffic and Circulation, there would be significant traffic impacts on the roadway system near SDIA, which includes areas within the Midway-Pacific Highway CPA. Such noise and traffic impacts, which are primarily attributable to future growth that is expected to occur irrespective of the proposed project (i.e., impacts would be similar under the No Project Alternative), could be considered a disruption to the Midway-Pacific Highway Community, which could be considered to be a Plan conflict.

The Midway-Pacific Highway Community Plan includes limits on allowing new residential development in areas subject to high community noise levels. Additionally, those proposed projects located within applicable safety zones and noise contours would be required to submit project-level consistency determinations to the ALUC until the ALUC determines that the City has

incorporated the safety and noise policies and standards of the ALUCP into the Municipal Code.⁴¹ Thus, land use considerations under the updated Midway-Pacific Corridor Community Plan are consistent with the purpose and intent of the SDIA ALUCP, which also helps guide local land use decisions regarding compatibility with SDIA operations. The Midway-Pacific Highway Community Plan also includes policies to coordinate with SDCRAA, SANDAG, and other agencies on improving transportation connections to SDIA, including the ITC and improved truck access. The proposed project includes improvements to terminals and airport access on the southside and would not hinder or preclude the future development of the ITC.

Based on the above, the proposed project would be generally consistent with most of the policies of the Midway-Pacific Highway Community Plan; however, the significant noise and traffic impacts that would occur in the Plan area could be considered to conflict with plans and policies, which would be a significant impact.

Uptown Community Plan

Uptown is located north of SDIA, opposite I-5 and is over 0.5 mile or more from SDIA southside, where the proposed project activities would occur. As with the Midway-Pacific Highway Community Plan analysis above, no new uses or change in safety zones would occur that could disrupt the Uptown Community; however, impacts related to aircraft-related noise changes would be significant. As can be derived from Section 3.14, Traffic and Circulation, there would be significant traffic impacts on the roadway system near SDIA, which includes areas within the Uptown CPA. Such noise and traffic impacts, which are primarily attributable to future growth that is expected to occur irrespective of the proposed project (i.e., impacts would be similar under the No Project Alternative), could be considered a disruption to the Uptown Community, which could be considered to be a Plan conflict.

The proposed project is located within public viewsheds identified in the Uptown Community Plan. As described in Section 3.1, Aesthetics and Visual Resources, the identified views would not be significantly impacted, as residents are located at a higher elevation than the project site and able to view scenic resources over project improvements. Further, the project elements would be similar in design, height, and location to existing terminals and other buildings at SDIA and public views would not be substantially altered. Additionally, as discussed in Section 3.1, the proposed improvements would contribute new sources of lighting typical of a modern airport transportation area, which currently contains moderate to high levels of ambient lighting. The proposed project would incorporate adequate nighttime lighting throughout all of its components to ensure a safe and accessible environment for passengers. These sources of nighttime lighting include, but are not limited to, poles and fixtures along the new roadway improvements, building entrance and walkway illumination, building mounted fixtures, roof perimeter lights, security lighting, landscape lighting features, and signage lighting. Various forms of wayfinding nighttime lighting would also be provided for safe pedestrian passage and property identification, as well as to direct ground transportation circulation. Other sources of lighting would be associated with ground transportation, such as private vehicles, buses, and shuttles. Similar to existing development at SDIA, all lighting associated with the proposed facilities would be shielded and directed downward

⁴¹ City of San Diego Planning Department. Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report San Diego, California Sch #2015111013. Prepared by AECOM. May 2018.

to minimize light spillover. The shielding and focusing of lighting sources would also minimize any adverse glare effects. The proposed facilities would also utilize low-reflective materials to minimize any introduced sources of daytime or nighttime glare within the area. Coordination with FAA would occur during project design to ensure that new facilities do not pose any hazard to aircraft or air traffic controllers. While the proposed project would introduce new sources of lighting, these introduced sources of lighting would be typical of terminal, parking, and roadway facilities similar to the character of existing uses within the project area. Thus, lighting and glare impacts would be less than significant, with some additional perceived light but insignificant additional glare at nighttime. Therefore, the proposed project would not significantly alter public views from surrounding neighborhoods to the downtown skyline, San Diego Bay, or other scenic resources.

The Uptown Community Plan has land use policy recommendations that include considering airport noise when making land use planning decisions. Such land use considerations are consistent with the purpose and intent of the SDIA ALUCP, which also helps guide local land use decisions regarding compatibility with SDIA operations. The proposed project would not result in a substantial change in the CNEL noise contours to the Uptown Community; however, impacts related to aircraft-related nighttime noise change would be significant. As such, there would be an inconsistency with the Uptown Community Plan policies and land use designations related to noise. The Uptown Community Plan also includes policies specific to coordination with SANDAG on providing public transit connections to SDIA. The proposed project includes improvements to terminals and airport access on the southside, and would not hinder or preclude future public transit connections, including on the northside closest to the Uptown CPA.

Based on the above, the proposed project would be generally consistent with most of the policies of the Uptown Community Plan; however, the significant noise and traffic impacts that would occur in the Plan area could be considered to conflict with plans and policies, which would be a significant impact.

Peninsula Community Plan

As with the Midway-Pacific Highway Community Plan and Uptown Community Plan analyses above, no new uses or change in safety zones would occur that could disrupt the Peninsula Community; however, impacts related to aircraft-related noise changes would be significant. That future increase in aircraft noise levels would occur irrespective of the proposed project (i.e., the impact would be the same under the No Project Alternative, based on future growth in activity that would occur even if the project was not implemented). Notwithstanding, that noise impact is considered to be a significant noise impact within Peninsula Community Plan Area. As can be derived from Section 3.14, Traffic and Circulation, there would be significant traffic impacts on the roadway system near SDIA, which includes areas within the Peninsula CPA. Such traffic impacts, which are primarily attributable to future growth in traffic that is expected to occur irrespective of the proposed project (i.e., impacts would be similar under the No Project Alternative), could be considered a disruption to the Peninsula Community, which could be considered to be a Plan conflict.

The proposed project is located within identified public view corridors from Liberty Station and public viewsheds from certain streets within elevated portions along the western side of the

peninsula identified in the Peninsula Community Plan/NTC Precise Plan. As described in Section 3.1, Aesthetics and Visual Resources, the views from Liberty Station are limited given the flat topography. Further, the project elements would be similar in design, height, and location to existing terminals and other buildings at and adjacent to SDIA, and identified views from Liberty Station towards downtown would not be substantially altered. Additionally, as discussed in Section 3.1, lighting and glare impacts would be less than significant, with some additional perceived light but insignificant additional glare at nighttime. Therefore, the proposed project would not significantly alter public views identified in the Peninsula Community Plan

Based on the above, the proposed project would be consistent with most of the policies of the Peninsula Community Plan; however, future aircraft noise levels and traffic impacts within the Plan area are considered to be a significant impact. As noted above, however, and for informational purposes, the future aircraft noise levels and traffic impacts within the Plan area would occur even if the proposed project was not implemented (i.e., future aircraft noise levels and traffic levels are the same for both the proposed project and the No Project Alternative).

Downtown Community Plan

As with the Midway-Pacific Highway Community Plan and Uptown Community Plan analyses above, no new uses or change in safety zones would occur that could disrupt the Downtown/City Centre CPA; however, impacts related to aircraft-related noise changes would be significant. The identified future increase in aircraft noise levels would occur irrespective of the proposed project (i.e., the impact would be the same under the No Project Alternative, based on future growth in activity that would occur even if the project was not implemented). Notwithstanding, that noise impact is considered to be a significant noise impact within the Downtown/City Centre CPA. There would be no change in safety zones in the Downtown/Centre City planning area. As described in Section 3.12, Noise, there would be significant traffic noise impacts to residential uses along two segments of Grape Street, located within the Downtown/Centre City CPA. Also, as can be derived from the information in Section 3.14, Traffic and Circulation, there would be significant adverse traffic impacts on the roadway system near SDIA, which includes areas within the Downtown/Centre City CPA.

Specific policies identified in the Downtown Community Plan pertain to considering airport-related noise, safety, and building height limitations in land use planning within Downtown, and considering transportation linkages with SDIA. Such land use considerations are consistent with the purpose and intent of the SDIA ALUCP, which also helps guide local land use decisions regarding compatibility with SDIA operations. Under the proposed project, there would be some change in noise contours extending southeast from the Airport, as can be derived from the information in Section 3.12, Noise, but the associated change in noise levels would be less than significant. There would be no change in safety zones, or flight paths that would cause conflicts with land use designations or land use policies identified in the Downtown Community Plan. Further, the proposed project would improve access to the Airport by implementing the on-airport entry roadway off North Harbor Drive and would not preclude future transit or other off-airport transportation improvements.

Based on the above, the proposed project would be consistent with most of the policies of the Downtown Community Plan; however, future aircraft and roadway noise impacts and traffic

impacts within the Plan area are considered to be a significant impact. It should be noted for informational purposes, however, the future roadway noise and traffic impacts within the Plan area would occur even if the proposed project was not implemented (i.e., future traffic levels are similar for both the proposed project and the No Project Alternative).

Non-Contiguous City of San Diego Community Plans and Park Plan

Several CPAs that are not adjacent to SDIA nevertheless lie partially within the SDIA ALUCP AIA that could be affected by future aircraft noise levels. As with the CPAs surrounding SDIA discussed above, the change in noise exposure and aircraft-related nighttime noise changes in areas around SDIA as compared to existing (2018) baseline conditions in Ocean Beach, Greater Golden Hill, Southeastern San Diego, and Balboa Park would be significant. That future increase in aircraft noise levels would occur irrespective of the proposed project (i.e., the impact would be the same under the No Project Alternative, based on future growth in activity that would occur even if the project was not implemented). Notwithstanding, that noise impact is considered to be a significant noise impact within the Ocean Beach, Greater Golden Hill, Southeastern San Diego, and Balboa Park CPAs. The significant noise impacts that would occur in these Plan areas could be considered to conflict with plans and policies, which would be a significant impact.

Summary

As discussed above, the proposed project would not conflict with most aspects of the land use plans, policies, or regulations related to land use and planning (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; however, the significant impacts related to aircraft noise and to traffic around SDIA could be considered to pose a conflict. Additionally, the future aircraft noise contours projected to occur at buildout of the proposed project in 2035 are inconsistent with the noise compatibility (65 CNEL) contour delineated in the current ALUCP, which would also be a plan conflict. Therefore, implementation of the project would have a **significant impact** associated with applicable land use plans, policies, or regulations. It should be noted for informational purposes, however, that those same future aircraft noise levels that form the future 65 CNEL contour, which is inconsistent with the current ALUCP, would occur even if the proposed project was not implemented (i.e., future aircraft noise levels are the same for both the proposed project and the No Project Alternative).

3.11.6.2.2 Mitigation Measures

As described in Section 3.12, Noise, and in Section 3.14, Traffic and Circulation, there are no feasible mitigation measures for aircraft noise impacts and traffic impacts. As described in those sections, the infeasibility of potential mitigation measures for the noise and traffic impacts are based on the facts that: (1) physical improvements occurring within the City of San Diego, outside the boundaries of SDIA, are not within the jurisdiction of the SDCRAA, and the Authority cannot require the City to implement those improvements; and/or, (2) the FAA may not authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements or mitigation measures (see additional discussion in Section 3.14, Traffic and Circulation).

Relative to the significant impact associated with the future aircraft noise contours of the proposed project being inconsistent with the noise compatibility contour (i.e., the 65 CNEL) delineated in the currently adopted ALUCP, the following mitigation measure is proposed.

MM-LUP-1: Amendment of the SDIA Airport Land Use Compatibility Plan. In conjunction with updating the existing Airport Layout Plan (ALP) for SDIA, which would occur subject to approval of the proposed project (and subject to FAA approval of the ALP update), the SDCRAA shall initiate, through the Airport Land Use Commission (ALUC), the process to amend the current SDIA Airport Land Use Compatibility Plan (ALUCP - May 2014) based on the specifics of the project, including the updated noise contours. Implementation of this measure is within the jurisdiction of the SDCRAA, acting in its role as the ALUC for the County, and the ALUC is required by law to amend the ALUCP so that it is consistent with the ALP update. This measure is considered feasible.

3.11.6.2.3 Significance of Impacts After Mitigation

As indicated above, there are no feasible mitigation measures available for the noise and traffic impacts. As such, implementation of the proposed project would result in a ***significant and unavoidable impact***.

With implementation of Mitigation Measure MM-LUP-1, the impact related to the proposed project being inconsistent with the existing ALUCP would be reduced to ***less than significant***.

3.11.7 Summary of Impact Determinations

Table 3.11-6 summarizes the impact determinations of the proposed project related to Land Use and Planning, as described above in the detailed discussion in Section 3.11.6. Identified potential impacts are based on the significance criteria presented in Section 3.11.5, the information and data sources cited throughout Section 3.11, and the professional judgment of the report preparers, as applicable.

3.11.7.1 Mitigation Measures

MM-LUP-1: Amendment of the SDIA Airport Land Use Compatibility Plan. In conjunction with updating the existing Airport Layout Plan (ALP) for SDIA, which would occur subject to approval of the proposed project (and subject to FAA approval of the ALP update), the SDCRAA shall initiate, through the Airport Land Use Commission (ALUC), the process to amend the current SDIA Airport Land Use Compatibility Plan (ALUCP - May 2014) based on the specifics of the project, including the updated noise contours. Implementation of this measure is within the jurisdiction of the SDCRAA, acting in its role as the ALUC for the County, and the ALUC is required by law to amend the ALUCP so that it is consistent with the ALP update. This measure is considered feasible.

Table 3.11-6: Summary Matrix of Potential Impacts and Mitigation Measures Associated with the Proposed Project Related to Land Use and Planning

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
Impact 3.11-1: The proposed project would not physically divide an established community. As such, there would be a <i>less than significant impact</i> for construction and operations.	Construction: Less than Significant Operation: Less than Significant	No mitigation is required	Construction: Less than Significant Operation: Less than Significant
Impact 3.11-2: The proposed project would cause a significant environmental impact due to conflict with certain aspects of land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the proposed project would generate future noise and traffic impacts that are in conflict with certain community plans and policies, thus resulting in a <i>significant and unavoidable impact</i>. To the extent the proposed project would pose a conflict with the existing SDIA ALUCP, that impact would be reduced to <i>less than significant</i> with mitigation.	Construction: Less than Significant Operation: Significant Impact	Mitigation is proposed to reduce noise and traffic impacts to a less-than-significant level; however, some proposed mitigation is infeasible due to federal restrictions on use of FAA/airport funds, because the measures are within the jurisdiction/authority of the City of San Diego, not SDCRAA, and/or because they conflict with community plans. Relative to the proposed project's inconsistency with the current ALUCP, Mitigation Measure MM-LUP-1 is proposed and is feasible.	Construction: Less than Significant Operation: Noise and Traffic Impacts - Significant and Unavoidable Inconsistency with ALUCP - Less than Significant

3.11.8 Significant Unavoidable Impacts

There would be significant and unavoidable impacts to land use and planning resulting from implementation of the proposed project, specifically as related to noise and traffic impacts. It should be noted for informational purposes, that the same impacts would occur from future operations at SDIA even if the proposed project was not implemented (i.e., those impacts would be the same between the proposed project and the No Project Alternative).

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