Chapter 2
Responses to Comments

2.1 Comments Received on the Recirculated Draft EIR

The Recirculated Draft EIR was distributed for review by cooperating agencies, organizations, and the public on September 19, 2019. Comments were received through email and standard U.S. mail. The 46-day comment period concluded on November 4, 2019.

The public comment and response allows the lead agency to assess the impacts of a project based on the analysis of other responsible or concerned agencies and interested parties, and it provides an opportunity to better explain the analyses that the lead agency has undertaken to determine the potential environmental impacts of a project.

Section 15204 of the State California Environmental Quality Act (CEQA) Guidelines provides guidance to the public in reviewing CEQA documents. This section of CEQA is designed not to limit the scope of comments that can be submitted by the public but to focus comments on issues that are substantive to the environmental analysis. Commenting entities should focus on the adequacy of the document in identifying and analyzing impacts to the environment and ways in which the significant effects of the project could be avoided or mitigated. This section identifies that comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or reduce specific significant environmental effects. This section reiterates that the lead agency is bound by "reasonableness" in its analysis and that the lead agency is not required to respond to comments in the Final EIR that do not identify significant environmental issues, nor does it need to provide all information requested by reviewers as along as a good faith effort at full disclosure is made.

A total of 41 comment letters from federal/state/local agencies, organizations, community planning groups, and members of the public were submitted to the SDCRAA for review and consideration.

The format of this chapter is to provide written response to comments received on a letter by letter basis. An alphanumeric Identification (ID) Code is used to identify each correspondence submitted to SDCRAA on the Recirculated Draft EIR. The ID Code consists of an "R-" to denote that the letter was provided on the Recirculated Draft EIR, followed by a two-letter prefix, followed by sequential three-digit numbers. Federal agencies have an ID Code beginning with the letters R-AF, state agencies have an ID Code beginning with the letters R-AS, regional agencies have an ID Code beginning with the letters R-AR, local agencies have an ID Code beginning with the letters R-AL, and individuals and organizations have an ID Code beginning with R-PC. For example, five letters were received from regional agencies. The five comment letters are assigned ID Codes R-AR001 through R-AR005. Each individual comment within a letter is then assigned a corresponding sequential number. For example, Letter R-AR002 includes eight individual comments, which are designated as Comment R-AR002-1 through Comment R-AR002-8.

Table F-3 presents a list of those agencies, organizations, and individuals who commented on the Recirculated Draft EIR, with the ID Code, and the page number where the comment(s) and response(s) can be found.

Table F-3: Comment Letters Received on the Recirculated Draft EIR

ID Code	Date (date of receipt)	Agency/Organization/Individual	Page
Federal Government			
R-AF001	November 25, 2019	U.S. Fish and Wildlife Service	2-8
State Government			
R-AS001	November 4, 2019	California Department of Transportation	2-19
R-AS002	November 11, 2019	California Highway Patrol	2-26
R-AS003	November 13, 2019	State Clearinghouse	2-29
R-AS004	November 20, 2019	California Coastal Commission	2-35
Regional Government			
R-AR001	October 14, 2019	San Diego Unified Port District	2-46
R-AR002	November 4, 2019	San Diego Association of Governments (SANDAG)	2-48
R-AR003	November 4, 2019	San Diego Unified Port District	2-54
R-AR004	November 8, 2019	County of San Diego Department of General Services	2-62
R-AR005	November 12, 2019	County of San Diego Department of Environmental Health	2-68
Local Government			
R-AL001	September 23, 2019	City of San Diego Environmental Services Department	2-73
R-AL002	October 3, 2019	City of San Diego Public Utilities Department	2-75
R-AL003	October 23, 2019	Peninsula Community Planning Board	2-78
R-AL004	November 4, 2019	City of San Diego Planning Department	2-99
Public Comment/Individual			
R-PC001	September 24, 2019	Kelly Powell	2-112
R-PC002	September 26, 2019	Charlie Michael	2-116
R-PC003	September 28, 2019	Mike Tarlton	2-118
R-PC004	October 11, 2019	John Buche	2-126
R-PC005	October 15, 2019	Mary Willmont	2-131
R-PC006	October 17, 2019	Russell Moll	2-133
R-PC007	October 18, 2019	Korla Eaquinta	2-137
R-PC008	October 21, 2019	Nadia Benchabane	2-140
R-PC009	October 22, 2019	Gail Hutcheson	2-143
R-PC010	October 22, 2019	Valerie Michelotti, M.D.	2-145
R-PC011	October 24, 2019	Korla Eaquinta	2-147
R-PC012	October 23, 2019	Paul Grimes	2-152
R-PC013	October 25, 2019	Marga Fountain	2-154
R-PC014	October 26, 2019	Maggie Locke	2-156
R-PC015	October 27, 2019	Nadia Benchabane	2-160
R-PC016	October 28, 2019	Save our Heritage Organisation	2-162
R-PC017	October 30, 2019	Maggie Locke	2-164
R-PC018	October 30, 2019	Richard S. Phillips	2-167
R-PC019	October 31, 2019	Gary Wonacott	2-186
R-PC020	November 4, 2019	Quiet Skies La Jolla, Inc.	2-232
R-PC021	November 4, 2019	Shute, Mihaly & Weinberger LLP obo Cleveland National Forest Foundation	2-243

Table F-3: Comment Letters Received on the Recirculated Draft EIR

ID Code	Date (date of receipt)	Agency/Organization/Individual	Page
R-PC022	November 4, 2019	Seltzer Caplan McMahon Vitek obo the California Alliance for a Cleaner Tomorrow (CACTI)	2-289
R-PC023	November 4, 2019	Paul Grimes	2-295
R-PC024	November 4, 2019	Alan Gordon	2-331
R-PC025	November 4, 2019	Casey Schnoor	2-337
R-PC026	November 4, 2019	Vanst Law obo Sunroad Enterprises and Sunroad Harbor Hotel, Inc.	2-349
R-PC027	November 6, 2019	Gary Wonacott	2-351

Notes: Grey shading indicates comments that were received after the close of the comment period.

The letter name and page numbers are hyperlinks in the electronic file that if clicked on, will take the reader directly to the first page of the comment letter.

2.2 Responses to Comments Received on the Recirculated Draft EIR

Consistent with State CEQA Guidelines Section 15088, written responses have been prepared associated with environmental issues raised in the comments. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the proposed project is provided. In each case, SDCRAA has expended a good faith effort, supported by reasoned analysis, to respond to comments. As required by the State CEQA Guidelines, the focus of the responses to comments is on the "disposition of significant environmental issues raised" and detailed responses are not provided on the merits of the proposed project or on other topics that do not relate to environmental issues.

This section includes responses to the written comments received during the 46-day public review period of the Recirculated Draft EIR, as well as some comments received up until 3 weeks following the close of the public comment period (November 4, 2019). Some comments have prompted revisions to the text of the Recirculated Draft EIR, which are referenced in the response to comment and listed in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Presented herein is each correspondence received identified with the assigned alphanumeric ID code (as shown in Table F-3). Individual comments within each correspondence are bracketed and numbered. Each correspondence is followed by the responses identified by the corresponding alphanumeric code and individual comment number. ***The brackets in the comment letters and the response to comment headings are hyperlinks, which allow readers of the electronic file to toggle back and forth between a bracketed comment and the corresponding response.*** Two comment letters, from the California Coastal Commission and Shute, Mihaly & Weinberger LLP on behalf of the Cleveland National Forest Foundation, included referenced attachments; those attachments are provided as Attachment 4 and Attachment 5 of this Final EIR, respectively.

All of the comments received and the responses to those comments will be considered by the decision-makers prior to taking any action on the proposed project.

The responses to comments consist of both a topical response and individual responses. The topical response was prepared to provide a comprehensive discussion of one area that was

identified in numerous comments – health effects of aircraft noise. The topical response is provided below, followed by the comment letters and responses.

2.2.1 Topical Response: Health Effects of Noise

Because a number of the comments received had similar concerns regarding health effects of noise, a topical response was developed. The following is the topical response:

TR-NOI-1	HEALTH EFFECTS OF NOISE

Health Effects of Noise on Humans

As described in Section 3.12.2.2 of the Recirculated Draft EIR, noise or unwanted sound is known to have several adverse effects on humans, such as hearing loss, communication and sleep interference, physiological responses, annoyance, and learning interference.

Hearing loss is not generally associated with community noise problems, even very near a major airport or a major freeway. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dBA for 8 hours per day to protect from hearing loss in occupational settings (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud to cause hearing loss.

Communication interference includes speech interference and interference with activities such as watching television. Normal conversational speech is in the range of 60 to 65 dBA and any noise in this range or louder may interfere with speech. There are specific methods of describing speech interference as a function of distance between speaker and listener and voice level.

Sleep disturbance is another cause of annoyance due to noise. Noise can make it difficult to fall asleep and create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages. Noise may even cause awakening, which a person may or may not be able to recall. Extensive research has been conducted on the effect of noise on sleep disturbance. An introductory overview of related research and studies completed relative to noise-related sleep disturbance is detailed on pages 3.12-6 through 3.12-9 of the Recirculated Draft EIR. Additional discussion regarding how such research and studies related to the SDCRAA's determination of a significance threshold for potential sleep disturbance impacts associated with the proposed project is provided in Section 3.12.3.4.2.

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, etc. While such effects can be induced and observed, the extent is not known to which these physiological responses cause harm or are a sign of harm. Generally, physiological responses are a reaction to a loud short-term noise such as a rifle shot or a very loud jet overflight. As described on pages 3.12-9 through 3.12-11 of the Recirculated Draft EIR, health effects from noise, if they exist, are associated with a wide variety of other environmental stressors as well and isolating the effects of aircraft noise alone as a source of long-

term physiological change has proved nearly impossible. It has not been possible for research to conclude causal relations between health disorders and noise exposure.[1]

Cardiovascular refers to effects on the heart and blood vessels. As described on page 3.12-10 and 3.12-11, two studies have identified a correlation linking noise to cardiovascular diseases, but due to limitations in the studies and the potential for alternative explanations of causal associations, both studies recommended that further research be done to better understand and strengthen the causal interpretation of the relationship between aircraft noise and cardiovascular disease. Neither study provided a definitive noise dose and response relationship that defines at what noise level cardiovascular health effects occur and the rate of increase in response as noise level increases.

Annoyance is a major effect associated with aviation noise. As further described on page 3.12-15, the level of annoyance varies considerably from person to person, based on individual tolerance, attitude, and sensitivity, as well as characteristics of the noise and level of activity interference. There is no current research to suggest that there is a better metric than DNL (or CNEL)[2] to relate to annoyance.

Interference from aircraft noise related to classroom activities and learning is an important consideration and the subject of much research. Studies from around the world indicate that vehicle traffic, railroad, and aircraft noise can have adverse effects on reading ability, concentration, motivation, and long-term learning retention. Ongoing research is evaluating impacts to the learning ability of children due to aircraft noise exposure; however, none of the research has resulted in an accepted methodology or threshold of significance, as further described on pages 3.12-16 and 3.12-17 of the Recirculated Draft EIR.

WHO Noise Guidelines for the European Region

The 2018 *Environmental Noise Guidelines for the European Region,* as issued by the World Health Organization (WHO) Regional Office for Europe, are discussed on pages 3.12-11 through 3.12-14. This document includes guidelines not only related to transportation noise sources, but also personal electronic devices, toys, and wind turbines. Guidelines are intended to assist European Union (EU) member states to implement requirements of *European Union Directive 2002/49/EC* relating to the assessment and management of environmental noise.[3] To develop the guidelines, teams of researchers conducted assessments of the relationship between environmental noise and the following health outcomes: cardiovascular and metabolic effects; annoyance; effects on sleep; cognitive impairment; hearing impairment and tinnitus; adverse birth outcomes; and quality of life, mental health, and well-being, based on existing literature.

---

[1]Transportation Research Board of the National Academies. Airport Cooperative Research Program (ACRP) Synthesis 9, Effects of Aircraft Noise: Research Update on Selected Topics. 2008.

[2] As discussed in Section 3.12.2.1, Noise Descriptors, of the Recirculated Draft EIR, Day-Night Average Sound Level **(**DNL) is widely accepted as the best available method to describe aircraft noise exposure and is the noise descriptor required for aircraft noise exposure analyses and land use compatibility planning under FAR Part 150 and for environmental assessments for airport improvement projects (FAA Order 10501.F). The FAA guidelines allow for the use of the Community Noise Equivalent Level (CNEL) metric as a substitute to DNL.

[3]Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise, Official Journal L 189, 18/07/2002 P. 0012 – 0026. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32002L0049.

Guideline development and suggested guidelines for aircraft noise are described in more detail in the document. The implication of these guidelines is that they suggest that daytime aircraft noise should not exceed 45 dB L_{den} (approximately equivalent to Day-Night Average Sound Level, DNL), and nighttime noise should not exceed 40 dB L_{night}. Further, the WHO's guidance that the strength of these recommendations is "strong" suggests that the recommendation could be adopted as policy in EU states without further stakeholder engagement. The Recirculated Draft EIR includes a summary of criticisms of the WHO guidelines, specifically regarding the study methodology, from both the scientific and aviation industries.

ICAO Aviation Noise Impacts White Paper

In 2019, the International Civil Aviation Organization (ICAO), which is a specialized agency of the United Nations, published its 2019 Environmental Report, *Aviation and Environment.*[4] Chapter 2 of the report discusses the Aviation Noise Impacts White Paper, which provides an overview of the state of the science related to aviation noise impacts as of 2019. It covers community noise annoyance, sleep disturbance, health impacts, children's learning, helicopter noise, en-route noise from supersonic aircraft, Urban Air Mobility (UAM)/ Unmanned Aerial Systems (UAS) noise, and the economic costs of aviation noise. Some findings included in the White Paper are outlined below:

- The best epidemiological evidence for health effects of aircraft noise relates to cardiovascular disease, and in particular for new cases of ischemic heart disease. These findings are consistent with findings of heart disease from road traffic noise.
- Evidence exists to support the likelihood that the association between aircraft noise and heart disease observed in epidemiological studies is causal; however, the exact magnitude of the exposure-response estimate varies between studies, and estimates are likely to change as further studies are completed.
- There are important gaps in the evidence for other health outcomes. Few studies have been conducted in relation to aircraft noise and mental health, or maternal health and birth outcomes.
- Most health studies have used cumulative metrics (e.g., DNL/CNEL) as these have been used extensively. However, there is a need to examine other noise metrics that may be more relevant to health outcomes.

Summary

As indicated above, and as described on page 3.12-15 in Section 3.12, Noise, of the Recirculated Draft EIR, the current studies regarding the physiological effects of noise provide more correlation linking noise to cardiovascular disease, but still fall short of providing the definitive noise dose and the response relationship that defines at what noise level these effects start and what is the rate of increase in response as noise level increases. Similarly, the WHO Environmental Noise Guidelines provide recommendations relating to the assessment and management of environmental noise; however, there are substantial questions and debate within the scientific community and aviation industry regarding those guidelines. As such, no applicable regulatory agency has established standards specific to physiological response for the purpose of the California Environmental

[4] International Civil Aviation Organization. 2019 Environmental Report Aviation and Environment: Destination Green The Next Chapter. 2019. Available: https://www.icao.int/environmental-protection/pages/envrep2019.aspx.

Quality Act (CEQA), the National Environmental Policy Act (NEPA), or any other environmental compliance/assessment law. The absence of such regulations can be attributed, at least in part, to the uncertainty of the science. Section 15145 of the State CEQA Guidelines directs Lead Agencies, who find a particular impact too speculative after a thorough investigation, to note this conclusion and terminate discussion of the impact. The discussion above shows that, at this time, the effects of noise on cardiovascular health at noise levels below 65 CNEL are too speculative for further evaluation in this CEQA document.

Regarding sleep disturbance, as described on page 3.12-40 in Section 3.12, Noise, of the Recirculated Draft EIR, based on review of published studies described above and in the Recirculated Draft EIR, the threshold of significance applied to the Airport Development Plan utilizes the 1997 FICAN curve as the basis of evaluating the potential for populations around SDIA to be awakened due to a specific aircraft noise event. By using Sound Exposure Level (SEL), which is essentially equivalent to the Single Event Noise Exposure Level (SENEL) metric, the methodology can account for the total sound energy during the duration of a nighttime event (as opposed to a maximum sound level measure, without consideration of duration).

As described on page 3-12-40 in Section 3.12, Noise, of the Recirculated Draft EIR, based on review of current studies described above and in the Recirculated Draft EIR, the impacts analysis for the Airport Development Plan calculates the amount of time during which noise levels exceed a specified range (i.e., TA levels) due to aircraft operations at SDIA, for each year of analysis (i.e., 2024, 2026, 2030, 2035, and 2050), in order to identify impacts related to interference from aircraft noise related to classroom activities and learning. Then, assessment and comparison of this quantitative TA level data are used to determine if there would be a substantial change from existing (2018) conditions that would reasonably constitute a significant impact. As indicated above in Section 3.12.3.3.2, speech interference typically begins at 65 dBA, which is the level of normal conversation, and for the purposes of this EIR, is considered to be the sound level above which learning within a classroom setting could be adversely affected. As also indicated in Section 3.12.3.3.2, standard construction provides approximately 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation, and standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Based on that, interior noise levels above 65 DBA would occur with exterior noise levels of 80 dB with windows open or 85 to 90 dBA with windows closed. For the purposes of this study, a significant impact to schools would be a substantial increase in the amount of time that aircraft-induced noise of 80 dB or greater would affect classroom learning.

2.2.2 Federal Agency Comments

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

In Reply Refer to:
FWS-SDG-17B0117-20CPA0036

November 25, 2019
Sent Electronically

Mr. Ted Anasis
Manager, Airport Planning
San Diego International Airport
3225 North Harbor Drive
San Diego, California 92101

Attention: Richard Gilb, Environmental Protection Specialist

Subject: Comments on Recirculated Draft Environmental Impact Report, San Diego International Airport, Airport Development Plan

Dear Mr. Anasis:

The U.S. Fish and Wildlife Service (Service) has reviewed the Recirculated Draft Environmental Impact Report San Diego International Airport - Airport Development Plan (DEIR) dated September 2019. The project details provided herein are based on the information provided in the DEIR and associated documents, and previous consultations (Service 1993, 2013, 2018). In 2017, the Service previously commented on the notice of preparation (NOP) for the DEIR (Service 2017). We offer the following comments and recommendations on the DEIR to assist the San Diego County Airport Authority (Airport Authority) in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources and to ensure that the Airport Development Plan (ADP) is consistent with previous consultations and discussions with the Service for San Diego International Airport (SDIA).

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

The 660-acre SDIA is primarily developed, but is close to San Diego Bay, and supports a nesting area for the endangered California least tern [*Sternula antillarum browni* (*Sterna a. b.*); least tern] that was established and is protected per previous consultations with the Service (Service 1993, 2013 and 2018). The SDIA least tern nesting area includes Oval 1-South (O-1S), Oval 2-South (O-2S), Oval 3-South (O-3S), and Oval 4-South (O-4S). The SDIA least tern nesting area is one of two nesting areas in and around north San Diego Bay, and is important for the long-term conservation of the least tern.

R-AF001-1

The ADP would reconfigure SDIA, demolish various structures, and replace and/or relocate structures and functions within the SDIA footprint. The ADP would support anticipated increase in flight frequency and use of the airport, and include several projects that would occur in close proximity to the least tern nesting area. Implementation of the ADP would occur in two phases, each subdivided into two sub-phases (i.e., Phase 1a and Phase 1b, and Phase 2a and Phase 2b), beginning in 2024 and ending in 2035.

The Service's main concern about the ADP is potential impacts to the least tern and its SDIA nesting area. The ADP would install a storm water capture and re-use system that would include a 3 million-gallon infiltration basin (infiltration basin) on 3.6 acres of the least tern nesting area within O-3S (Figure 2-21c of the DEIR). This project would directly impact the least tern nesting habitat by excavating to the water table (approximately 5 feet below the surface) and installing a supporting structure that would lie above the soft-bottom infiltration basin. The infiltration basin and other segments of O-3S would then be capped with approximately 2 feet of sand to encourage continued use by least terns. The infiltration basin footprint is within the part of O-3S that is farthest from Taxiway B, and most frequently used by nesting least terns. For example, in 2018, 78 percent of the least tern nests at SDIA (i.e., 14 of 18 nests) were within the proposed footprint for the infiltration basin.

It is unclear how least terns would respond to this modification of the nesting area. For example, we do not know if the suitability and stability of the site would be altered in a manner that is detectable by least terns, or if least terns would detect sound or vibrations from the infiltration basin under the nesting area. While it is possible that least terns would continue to nest on the surface of the infiltration basin, nesting frequency and productivity may also be negatively impacted. We are also concerned about potential impacts from scheduled and/or emergency maintenance of the infiltration basin, especially during the least tern nesting season.

Our NOP comment letter stated that the DEIR should identify potential direct and indirect impacts to the least tern and its SDIA nesting area, and include alternatives that avoid and minimize these impacts consistent with previous consultations. While the DEIR does include minimization measures consistent with previous consultations, it does not identify potential impacts to the least tern from the infiltration basin nor include an alternative that avoids impacts to the least tern nesting area.

We now recommend that the infiltration basin be located at another location at the SDIA to avoid direct impacts to the least tern nesting area and that this be included in the preferred alternative in the FEIR. For example, the infiltration basin could be located adjacent to O-3S within the former Teledyne Ryan footprint, which currently supports a taxi-hold lot and bus station. This would be consistent with our previous recommendation to evaluate the potential for reconfiguration of O-3S to encompass portions of the Teledyne Ryan site (Service 2013, 2017, 2018). If this option is pursued, we further recommend that the infiltration basin and existing O-3S be capped with beach quality sand/shell to encourage least tern nesting. If least terns nest on top of the capped infiltration basin, O-3S could be reconfigured to include the capped infiltration basin. If this option is not possible, we recommend that the infiltration basin be installed in 0-4S

R-AF001-1 Cont'd

R-AF001-2

or the northern section of O-3S where fewer least terns typically nest than in the southern section of O-3S.

South Side Support Area

Table 2-3 of the DEIR identifies multiple buildings or facilities that would be demolished, with their function relocated to the "south side support area", or the "consolidated Airline Facility Support Building on the south side (east of the new T1) to be developed separate from the proposed project." Based on the description of the location of the south side support area and consolidated Airline Facility Support Building, actions in these areas may be in close proximity to the least tern nesting area and potentially impact least terns. We recommend that the south side support area and the consolidated Airline Facility Support Building, and potential impacts to the least tern, be addressed in the DEIR, since demolition of some facilities and functions addressed in the ADP depend on the availability of these areas.

Lighting and Signage

The ADP would include new lighting and illuminated signage in close proximity to the least tern nesting area and may impact least terns. Overall, we recommend that the ADP incorporate design features and measures to reduce over-illumination of all outdoor areas (e.g. parking areas, pedestrian pathways, etc.) to reduce the potential for impacts to least terns and other migrating birds. We are particularly interested in maintaining dark night time conditions and in reducing elevated structures and predator perches in close proximity to the least tern nesting area. We recommend that lighting and illuminated signage depicted in Figure 3.5-2 be relocated either to the east or west of the location proposed to: a) reduce illumination in the vicinity of the least tern nesting area, b) reduce the potential of predator perches, and c) maintain the obstruction-free connectivity between the least tern nesting site and San Diego Bay (to the south of O-3S).

On-Airport Entry Roadway

The DEIR describes the proposed airport entry roadway, which incorporates a raised overpass that begins its elevation above grade approximately 195 feet to the west and southwest of O-3S, and reaches its top height of approximately 23 feet above grade approximately 300 feet to the west of the nesting oval. Least terns travel between the nest site and San Diego Bay to obtain food. The DEIR anticipates that the changes in roadway elevation would not affect least tern flight patterns directly to and from San Diego Bay to the southeast and south of the least tern nest site, but the elevated roadway would be visible and may affect least tern flight patterns to the west and southwest of the least tern nest site. We recommend that lighting fixtures and signs be avoided on this elevated road segment, if possible, to reduce the potential for visual and illumination impacts to the nearby least tern nesting area.

Multi-Use Path

The proposed multi-use path would be on the far side of the existing Terminal Link Roadway and would be used by pedestrians and bicycles. This path would be located approximately 62 feet from the nesting area. The DEIR concludes that no visual or noise impacts are anticipated

R-AF 001-2 Cont'd
R-AF001-3
R-AF001-4
R-AF001-5
R-AF001-6

because this path would be used by pedestrians and bicycles, would be further from the nesting area than the buses using the Terminal Link Roadway, and would be shielded from view by two 8-foot-tall chain-link fences. We note that the chain-link fences would provide an effective physical barrier between the least tern nest site and the multi-use path to prevent human access, but question their ability to shield the path from view by nesting least terns. We recommend that the multi-use path be positioned as far as possible from the nesting area (i.e. father than the proposed distance of 62 feet, if possible), and no lighting be installed on the path segment that is to the south and southwest of the least tern nesting area. We are interested in coordinating with the Airport Authority regarding the final design of the multi-use path, to assure that the potential for impacts is minimized, and opportunities for public outreach are maximized.

Because of potential impacts from the infiltration basin and other projects discussed above, we concur with the DEIR that the ADP poses significant or potentially significant impacts to least terns, but do not concur that potential impacts to least terns would be reduced to a level of insignificance. Potential impacts to the least tern may be addressed through section 7 (if there is a federal nexus) or section 10 of the Act.

We appreciate the opportunity to comment on the DEIR and request a meeting with the Airport Authority to discuss our concerns about the ADP. If you have any questions regarding this letter, please contact Sandy Vissman at 760-431-9440, extension 274.

Sincerely,

DAVID ZOUTENDYK

Digitally signed by DAVID ZOUTENDYK
Date: 2019.11.25 06:35:19 -08'00'

for Jonathan Snyder
Acting Assistant Field Supervisor

R-AF001-6 Cont'd

R-AF001-7

R-AF001-8

LITERATURE CITED

[Service] U.S. Fish and Wildlife Service. 1993. Biological Opinion 1-6-93-F-29. Lindberg Field Facilities Improvements. 25 pages.

[Service] U.S. Fish and Wildlife Service. 2013. *Informal Section 7 Consultation for San Diego International Airport Northside Improvements Project, San Diego County, California.* FWS-SDG-11B0105-13I0384. 9 pages.

[Service] U.S. Fish and Wildlife Service. 2017. *Notice of Preparation of a Draft Environmental Impact Report for the San Diego International Airport - Airport Development Plan, San Diego, California.* 17B0117-17CPA0099. 3 pages.

[Service] U.S. Fish and Wildlife Service. 2018. *Informal Section 7 Consultation for Taxiway B Object-Free Area Improvement Project, San Diego International Airport, San Diego County, California.* FWS-SDG-17B0117-17I1290. 10 pages.

COMMENT LETTER NO. R-AF001 U.S. Fish and Wildlife Service November 25, 2019

Response to Comment R-AF001-1

The SDCRAA thanks the U.S. Fish and Wildlife Service (USFWS) for their comments on the ADP Recirculated Draft EIR. SDCRAA is committed to continuing to work with the USFWS to protect the on-airport habitat for the endangered California least tern and implement measures to avoid and minimize impacts to California least tern (CLT). Please see Responses to Comments R-AF001-2 through R-AF001-8 below.

Please note that as described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4: T1 Replacement and Transportation Improvements would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4 instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. Alternative 4 would substantially reduce the construction period otherwise required for the proposed project. The SDCRAA would implement Alternative 4 over one phase, within two sub-phases (Phase 1a and Phase 1b). Completion of the ADP improvements under Alternative 4 would occur by 2026, as compared to 2035 for the proposed project.

Response to Comment R-AF001-2

SDCRAA and its expert consulting biologist have reviewed and considered USFWS's comments, re-assessed the Stormwater Capture and Reuse System in light of these comments, and stands by the conclusion of the Recirculated Draft EIR that construction and operation of the currently proposed Stormwater Capture and Reuse System, with implementation of the mitigation measures set forth in the Recirculated Draft EIR, would not result in significant impacts to CLT.

Evaluation of potential impacts associated with construction of the proposed Stormwater Capture and Reuse System, accounts for the fact that construction of the overall system would require excavation of approximately 22,000 cubic yards of soil to allow for the construction of the 3.4-million-gallon underground storage tank along with approximately 44,000 cubic yards of soil to allow for construction of the 3-million gallon underground storage/infiltration area. The system would also require the installation of approximately 20,000 linear feet of storm drain pipe, the largest pipes being 24 inches in diameter. The underground storage/infiltration area would be constructed under 3.6 acres of the most southeastern portion of the CLT nesting habitat, specifically, nesting oval O-3S. The underground storage area is actually a series of hollow chambers with open bottoms to allow water percolation into the soil. As the water table below the nesting area is approximately five feet below ground, the chambers would be placed just above this level. The approximate 34-inch tall chambers would allow about 24-26 inches, or more, of sand and other material to be placed above them.

Currently, the substrate in the CLT breeding ovals is composed primarily of poorly-graded sand, gravel, and old cracked asphalt, with a mix of sand and gravel forming a matrix between the asphalt cracks. The CLT place their nests in these sand and gravel areas and the sandy areas within the asphalt cracks; however, sizeable portions of the site are unsuitable for nest placement due to the amount of asphalt present. Implementation of the ADP proposes that, after the removal of the existing substrate across 3.6 acres of nesting oval O3-S during the construction of the Stormwater

Capture and Reuse System, the construction area would be capped with high quality beach sand/shell, to the extent possible without impacting safe aircraft operations, providing a much more suitable nesting substrate in this area. It is not clear if the number of breeding pairs of CLT nesting on SDIA are currently limited by the amount of suitable nesting substrate or other extrinsic factors, such as the availability of forage fish suitable for feeding chicks in nearby foraging areas in San Diego Bay. However, increasing the amount of suitable nesting substrate would increase the opportunities for nest placement and potentially decrease competition for nesting sites by CLT pairs.

Construction of the Stormwater Capture and Reuse System would occur outside of the CLT breeding season, April 1-September 15. There would be no scheduled maintenance needs during the nesting season. In fact, a project intended solely to replace the existing cracked asphalt surface with a substrate more suitable for CLT nesting would be designed in much the same way, with several feet of material removed during the non-breeding season and one to two feet of beach sand/shell material replaced before the beginning of the following breeding season. Such projects to improve CLT breeding substrates have been undertaken at many nesting sites throughout their range. Regarding the potential for emergency maintenance of the infiltration basin needing to occur during the CLT breeding season, it is not anticipated that such a need would arise given that April to September is typically the time of year with relatively few and only light rain events and the operational needs for stormwater infiltration during those months would be minimal. In the unlikely event that emergency maintenance is needed during the CLT breeding season, SDCRAA would consult and coordinate with USFWS, as appropriate.

In the comment letter, USFWS recommends relocating the infiltration basin to an adjacent site within the former Teledyne Ryan footprint and further states "[i]f this option is pursued, we further recommend that the infiltration basin and existing O-3S be capped with beach quality sand/shell to encourage least tern nesting." It is important to note the recommended ground treatment (i.e., cap with beach quality sand/shell to encourage least tern nesting) is precisely what is currently being proposed for the project; to recap O-3S with beach quality sand/shell.

Regarding reference to USFWS's NOP comment letter indicating that the Draft EIR should identify potential direct and indirect impacts to the least tern and its SDIA nesting area, and include alternatives that avoid and minimize impacts consistent with previous consultations, the analysis presented in Section 3.5, Biological Resources, and in Appendix R-E2, Biological Resources, of the Recirculated Draft EIR provide a comprehensive evaluation and disclosure of such impacts. It should be noted that during the development of that evaluation, certain refinements to, and construction and design requirements for, the proposed project were identified specifically to reduce the potential for impacts to CLT. Such refinements included, but were not limited to: replacement of existing soils at 0-3S with beach sand suitable for CLT nesting; shifting the point where the proposed on-airport access road's overpass begins to rise in elevation in order to reduce potential obstructions to CLT transiting between the nesting areas and foraging areas in San Diego Bay nearby; minimizing, where possible, the number and heights of new lighting poles along portions of the new roadway in proximity to the nesting ovals; and, requiring the installation of Nixalite or equivalent on the tops of light poles as predator deterrents. The formulation of these refinements and improvements to the originally proposed project features included coordination with USFWS. With the application of these improvements, as well as implementation of mitigation

measures identified in Section 3.5.6.1.3 of the Recirculated Draft EIR, it was concluded that implementation of the proposed project would not result in significant impacts to CLT. It is also important to note that those mitigation measures include the CLT protection measures that have been agreed upon between USFWS, FAA, and the SDCRAA in the consultations and ongoing coordination that have occurred over the past 25+ years, including measures specified in the 1993 Biological Opinion, measures set forth in the 2013 Informal Section 7 Consultation between the FAA and USFWS regarding potential effects of the SDIA Northside Improvements Project, and measures set forth in the 2018 Informal Section 7 Consultation between the FAA and USFWS regarding potential effects of the SDIA Taxiway B Object-Free Area Improvement Project.

Based on the above, SDCRAA and their expert consulting biologist concluded that implementation of the proposed project would not result in a significant impact to CLT. As such, it was not, and is still not, necessary for the EIR to evaluate alternative sites for the proposed infiltration basin. Notwithstanding, the SDCRAA will further consider the possibility of an alternative site later, as may occur in conjunction with the Section 7 Consultation process to be undertaken between USFWS and FAA during review of the ADP under the National Environmental Policy Act (NEPA).

Response to Comment R-AF001-3

The "South Side Support Area" was evaluated in the Recirculated Draft EIR in Chapter 4, Cumulative Impacts Analysis (Sections 4.3.3.2 Airport Support Facilities and 4.5.5 Biological Resources). The airport support facilities to be relocated to the south side of the airfield include buildings involved with aircraft belly cargo, aircraft provisioning, ground support equipment maintenance, solid waste/recycled materials, the relocation of Air Operations Gate P-18, and modifications to the existing Rental Car Center Bus Parking Facility. All of these structures will be located from over 300 feet to over 800 feet from the northwestern corner of nesting oval O-3S. The implementation of mitigation measures associated with these projects, including the restriction of construction activities to outside the breeding season, and the implementation of predator deterrents (i.e., Nixalite) on the finished buildings, will reduce the impacts of these proposed facilities to less than significant.

Response to Comment R-AF001-4

SDCRAA agrees with the recommendation that lighting features and associated illumination should be restricted as much as possible adjacent to the tern nesting areas, and the current design of the proposed project that is presented in the Recirculated Draft EIR is already responsive to that recommendation. Elevated structures, such as light poles, provide attractive perches for predators of CLT adults, chicks, and eggs. As noted in the Recirculated Draft EIR, there are currently a large number of existing light poles and signs adjacent to the nest sites. These include a 25-foot-tall light pole and a 50-foot-tall beacon within 80 feet of the nesting area, another light pole and one sign structure within approximately 200 feet, and at least eight light poles within 200 feet to the west of the nesting ovals. The closest proposed new light poles adjacent to the airport access road would be at distances of 88, 108, and 230 feet at their closest point to the nesting ovals. Therefore, the total number of light poles or beacons within 200 feet of the nesting ovals would change from 11 to 13. As with the current light poles, these would be topped with predator deterrents such as Naxalite. All proposed lighting adjacent to the nesting ovals would be shielded to prevent any direct illumination of the breeding area. The existing sign structure (25 foot-tall) that is

approximately 205 feet to the southwest of the oval O-3S would be replaced with a similar sign structure approximately 222 feet to the southeast of the oval O-3S.

The potential additive illumination as a result of increasing the number of light poles from 11 to 13 within 200 feet of the nesting area is offset by the elimination of illumination from vehicle headlights at the existing unofficial public-airfield-observation parking lot directly south of the nesting oval and east of the Laurel Street and North Harbor Drive Y-intersection. This parking area is also used by many drivers waiting for arriving airport passengers as opposed to using the cell phone waiting lot. Much of the vehicle headlight illumination from vehicle traffic and parked vehicles in the lot faces the nesting area. While the average illumination level in the nesting area is difficult to measure due to the dynamic nature of the vehicle use within this lot, it is likely there would be a net reduction in overall illumination due to its proposed elimination as part of the ADP. Therefore, no significant impacts from illumination of the nesting area are anticipated.

Response to Comment R-AF001-5

SDCRAA understands the concern that nesting CLTs should have unimpeded access to foraging areas throughout northern San Diego Bay, and the currently proposed design of the project, as addressed in the Recirculated Draft EIR, was substantially revised from the earlier original concept in order to provide for such access. Specifically, substantial design modifications were made to the originally proposed elevated roadway in order to push it as far west as possible within the constraints of the site. The elevated roadway would gradually increase in height from at-grade to approximately 23 feet above-grade at a point over 300 feet to the west of the nesting oval O-3S. This height is shorter than most of the existing trees, including palm trees, lining North Harbor Drive, and is significantly shorter than the existing U.S. Coast Guard hangars to the southwest of the nesting ovals that the terns must pass over on a regular basis.

The shortest distance from the nesting ovals to San Diego Bay for CLTs commuting between the two sites is to the south and southeast of oval O-3S, as close as 280 feet away. In this area, the proposed on-airport roadway is at-grade, and no new structures taller than the existing eight foot fences are proposed. Commuting terns would have no additional impediments in transiting this area between foraging bouts.

As noted on pages 3.5-24 and 3.5-28 in Section 3.5, Biological Resources, of the Recirculated Draft EIR, other CLT colonies are located adjacent to significant structures. The CLT colony at Venice Beach in Los Angeles County is approximately 160 feet to the west of an intensely developed residential area composed of three and four-story apartment buildings. The terns at this site have access to close foraging areas to the south and west, but also routinely commute over the buildings to the east in order to access foraging areas in Marina Del Rey. They also return with prey items frequently by flying over these buildings on their approach to the colony. Just across the bay from SDIA, Naval Air Station North Island supports an approximately twenty acre CLT breeding colony (the "MAT site") that is surrounded by numerous buildings of various sizes and an active airfield. It is also more isolated from foraging areas than the nesting ovals at SDIA as it is approximately one-half mile from the nearest foraging areas on San Diego Bay. These two examples show that CLT are adaptable to human modified landscapes and can successfully breed despite needing to navigate significant vertical structures between their breeding and foraging areas. It should be

noted that these two sites are the exceptions, however, as most CLT breeding colonies are located on flat, sandy coastal locations with immediate access to foraging areas.

Response to Comment R-AF001-6

As noted in the comment, the proposed multi-use path would be positioned as close as 62 feet away from the CLT nesting area on the far side of the existing Terminal Link Road. This path would be used by pedestrians and bicycles and would be shielded from view by two eight-foot fences.

The existing use in this area is an unofficial public-airfield-observation parking lot that is also used by many drivers waiting for arriving airport passengers (as opposed to using the cell phone waiting lot). Vehicles pull into the lot, with headlights directed toward the nesting area, and find a parking space, the majority of which are pointed to the north into the nesting area. With many of the drivers waiting for arriving airport passengers, many cars are not turned off, and continue to idle and shine their headlights into the nesting area. The existing distance from publicly accessible areas in the existing parking lot to the nesting oval is as close as 57 feet, and generally varies from 57 to 63 feet. There is also an existing public bike and pedestrian path in this area that is located from 70-78 feet south of the nesting area.

With the removal of the short-term lot and all parking in this area, the multi-use path would result in a net reduction in the amount of noise, disturbance, and illumination of the CLT nesting area compared to the existing conditions.

SDCRAA agrees with the suggestion that opportunities for public outreach along this path should be maximized, and will consider such potential opportunities during detailed design of the path.

Response to Comment R-AF001-7

Based on the above responses to the specific concerns raised in the comment letter, along with the information presented in Section 3.5, Biological Resources, and Appendix R-E2, ADP Effects Analysis, of the Recirculated Draft EIR, the SDCRAA and its CLT expert biologist stand by the conclusion of the Recirculated Draft EIR that potential impacts to the CLT associated with implementation of the proposed project would, with application of Mitigation Measures MM-BIO-1, California Least Tern: Construction Measures, and MM-BIO-2, California Least Tern: Operations Measures, be less than significant.

Implementation of the proposed project is subject to an approval action(s) by the Federal Aviation Administration (FAA) that will require environmental review under the National Environmental Policy Act (NEPA), at which time it is anticipated that the FAA will consult with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the federal Endangered Species Act regarding potential impacts related to CLT.

Response to Comment R-AF001-8

The SDCRAA values the good working relationship with the USFWS that has been maintained over the past 10+ years with regard to the ongoing successful management and protection of the CLT nesting areas at SDIA. SDCRAA appreciates the comments provided by USFWS on the Recirculated Draft EIR and the additional input received from Sandy Vissman in the follow-up meeting with Ms. Vissman that was conducted by SDCRAA and their biologists on December 7, 2019, which was requested in this comment.

2.2.3 State Agency Comments

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-3137
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

RECEIVED
NOV 04 2019
BY: .....

Making Conservation a California Way of Life.

November 4, 2019

11-SD-5
San Diego International Airport Development Plan
Recirculated DEIR SCH# 2017011053

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

Dear Mr. Anasis:

Thank you for including the California Department of Transportation (Caltrans) in environmental review process for the San Diego International Airport Development Plan. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic

Section ES.10.5 "Summary of Traffic and Circulation Mitigation measures and Significant and Unavoidable Impacts":

- Starting on page ES-81, please provide exhibits for the mitigation measures described. Striping and bike lane configurations may need clarification by means of providing an exhibit.

- MM-TR-I-4b "Improve the Intersection of Grape Street at State Street/I-5 Southbound Ramps": Caltrans involvement should be discussed in the description of this mitigation. Construction of ramps at Laurel Street under this mitigation measure may be required, so stating there are no changes to existing roadways may not be correct. Please clarify.

- MM-TR-RS-4a: "Improve Palm Street from Pacific Highway to Kettner Boulevard": This mitigation measure implies directing traffic to Southbound

R-AS001-1
R-AS001-2
R-AS001-3
R-AS001-4

I-5 via Laurel Street to Pacific Highway to Palm Ave and should be discussed with Caltrans. Additional mitigation measures may be needed if the additional traffic requires ramp improvements at the Kettner SB On-ramp. Caltrans involvement should be discussed in the description of the mitigation measure.

The Draft EIR states that "any proposed freeway mitigation measure is not considered feasible, because there are no planned freeway improvement projects in the San Diego Regional Transportation Plan or Caltrans Interstate 8 (I-8) and I-5 Transportation Concept Report for this segment or other applicable Interstate or Highway segment plans." The reasoning that there are no freeway improvement projects currently identified in the vicinity is not justification to be exempt from mitigation for the project's direct impacts. Other means of mitigation need to be implemented. The San Diego International Airport serves both the San Diego and Imperial County Regions. Limiting mitigation measures to just the vicinity of the airport should be reconsidered, and other regional mitigation measures explored.

The Draft EIR needs to identify the regional impacts and how to improve regional methods to efficiently transport passengers to and from the airport. Appendix R-K "Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures" includes a letter (dated Aug. 27, 2019) to the Federal Aviation Administration (FAA) requesting San Diego County Regional Airport Authority (SDCRAA) funds to be used for roadway and intersection improvements for a specific list of projects that are referred to in Exhibit C, attached to the referenced letter. Exhibit C attached to that letter identifies $1,371, 000 in Roadway Mitigation Costs and $6,096,700 in Intersection Mitigation Costs.

In section "3.14.6 Project Impacts" the DEIR states, " SDCRAA has submitted specific requests to the FAA for it to allow funding of off-Airport mitigation measures" and "SDCRAA's funding contributions of up to $350 million, could be utilized along with other regional agencies' investments in potential off-Airport transportation and transit projects that improve access to the Airport, pending approval of the Airport Development Plan and its environmental review." Please discuss the difference between the $7,467,000 in specific off-airport improvements requested of the FAA and the "funding contributions of up to $350 million". SDCRAA should request additional FAA approval for the use of

R-AS001-4 Cont'd

R-AS001-5

R-AS001-6

airport funds for off-site transportation projects that mitigate significant project impacts.

3.14 Traffic and Circulation: Please consider alternate language for transportation mitigation measures that are currently identified as infeasible. SDCRAA is awaiting a FAA decision on the current request for off-airport transportation mitigation identified in Exhibit C of the Aug. 27, 2019 letter to FAA and should consider requesting additional funds for other identified significantly impacted transportation facilities. Given that funds can be requested from FAA for additional off-airport transportation mitigations, any locations or roadway and freeway segments that are significantly impacted by the project should not be considered as infeasible to mitigate as indicated throughout Section 3.14 of the DEIR. "Fair share" contributions to future local, regional, or state projects should also be considered.

R-AS001-6 Cont'd

Regional Transportation Plan (RTP 2019) – San Diego Forward

The San Diego International Airport Intermodal Transit Facility and I-5 Direct Connector Ramps project are identified in the SANDAG Regional Transportation Plan (RTP). This project is currently unfunded. Based on the overall magnitude of impacts identified in the DEIR to transportation facilities, it is recommended that a "fair share" contribution towards the advancement of this project or other future projects that connect I-5 to a future Intermodal Transportation Center, Grand Central Station, or the San Diego International Airport be considered. Other strategies to assist in developing these projects can include potentially acquiring right-of-way to facilitate the construction of such projects.

R-AS001-7

Additionally, local stakeholders and Caltrans are currently working on a Comprehensive Multimodal Corridor Plan (CMCP) that may include airport access improvements. SDCRAA should also consider a "fair share" towards this study.

R-AS001-8

Multimodal/Complete Streets

Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and vehicle miles traveled associated with distinct traffic generators. Caltrans supports appropriate measures to avoid, minimize, or mitigate transportation impacts on and off the State Highway System to reduce vehicle miles traveled to and from the San Diego International Airport. Caltrans

R-AS001-9

supports SDCRAA's consideration to encourage airport users to use alternative modes of transportation such as transit, rail, shared vehicle rides, and shuttles to reduce vehicle miles traveled per capita to and from San Diego International Airport.

Caltrans supports Transportation Demand Management (TDM) strategies like those identified in Mitigation Measure MM-TDM-1.

Right-of-Way

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Caltrans appreciates the opportunity to continue coordination efforts with the SDCRAA and looks forward to continuing our collaboration efforts.

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

Sincerely,

Maurice Eaton, Branch Chief
Local Development and Intergovernmental Review Branch

R-AS001-9 Cont'd

R-AS001-10

R-AS001-11

COMMENT LETTER NO. R-AS001 California Department of Transportation November 4, 2019

Response to Comment R-AS001-1

The SDCRAA thanks Caltrans for their comments on the ADP Recirculated Draft EIR. Please see Responses to Comments R-AS001-2 through R-AS001-11 below.

Response to Comment R-AS001-2

The descriptions of traffic mitigation measures presented on pages ES-81 through ES-87 of the Recirculated Draft EIR identify the basic characteristics of intersection and roadway segment improvements recommended to address the significant impacts of the proposed project. That level of information is sufficient to evaluate the effectiveness of the improvements in mitigating significant impacts, as presented in detail in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR. Exhibits detailing the specifics of those improvements, such as striping and bike lane configurations, are not necessary to evaluate the effectiveness of mitigation measures. Final striping and bike lane configurations will, however, be coordinated with the appropriate jurisdiction(s), as part of the permitting processes, using the existing roadway at that time.

Response to Comment R-AS001-3

Mitigation Measure MM-TR-I-4b: Improve the Intersection of Grape Street at State Street / I-5 SB Ramps, first presented on pages ES-85 to ES-86 (Executive Summary) of the Recirculated Draft EIR, would not require Caltrans involvement, since the measure only includes directional signage to be placed outside Caltrans right-of-way and signal timing modifications to the City's signal at the intersection of Grape Street and State Street. However, as a courtesy, the proposed improvements can be shared with Caltrans prior to implementation.

Regarding the rerouting of vehicles exiting the Airport from Grape Street to W. Laurel Street, SDCRAA concurs that this could shift traffic to other Caltrans' ramps. The analyses for 2035 and 2050 conditions indicate that roads and intersections connecting SDIA to I-5 will become impacted. This supports the need for further regional studies to improve airport access to the regional transportation system. The Airport Connectivity Subcommittee is evaluating new ramp connections to I-5 at W. Laurel Street. SDCRAA will continue to partner with Caltrans and other Subcommittee members in identifying and implementing improvements that address I-5 access to SDIA.

Response to Comment R-AS001-4

The improvements outlined in Mitigation Measure MM-TR-RS-4a: Improve Palm Street from Pacific Highway to Kettner Boulevard, first presented on page ES-86 (Executive Summary) of the Recirculated Draft EIR, were shown to and discussed with Caltrans during meetings on July 2, 2019 and July 19, 2019. During these meetings, the improvements related to the rerouting of traffic were discussed. This improvement will add traffic volumes to Caltrans' I-5 southbound entry ramp from Kettner Boulevard south of Palm Street. SDCRAA agrees that Caltrans should review the design of improvements identified in Mitigation Measure MM-TR-RS-4a, as well as Mitigation Measure MM-TR-I-1e: Improve the Intersection of Kettner Boulevard at Palm Street. Should modifications to these mitigation measures result in improvements to a Caltrans's operated facility, SDCRAA will obtain the necessary Caltrans permits.

Response to Comment R-AS001-5

SDCRAA concurs that regional access solutions are needed, which are being evaluated through a multi-agency planning effort being conducted by the SANDAG Airport Connectivity Subcommittee. Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, commits SDCRAA to continued participation in the planning and implementation of regional transportation improvements. The intent of this mitigation is to identify feasible improvements to provide regional access to SDIA and to request FAA funding for those improvements.

SDCRAA disagrees that this Recirculated Draft EIR study needs to identify additional improvements to regional facilities within the SDIA service area (San Diego and Imperial Counties). SDIA is a component of SANDAG's Regional Transportation Plan and regional airport access is the responsibility of the region, which includes all partners in the region, including SDCRAA.

Response to Comment R-AS001-6

As noted, up to $350 million in future funding has been committed by SDCRAA and the Airline Industry, subject to FAA concurrence. The FAA requires that all off-airport improvements provide a direct benefit to air passenger travelers.

SDCRAA has formally requested the FAA's approval to allow SDCRAA to fund the mitigation of direct and cumulatively considerable impacts to roadways and intersections providing access to SDIA (estimated at approximately $7.7 million). The remainder of the $350 Million commitment could be used to fund other improvements, such as those being identified through SANDAG's Airport Connectivity Subcommittee, if approved by FAA. Mitigation Measures MM-TR-LRP-1 and MM-TR-LRP-2, discussed in Response to Comment R-AS001-5 above, provide the mechanism for SDCRAA's participation in the Airport Connectivity Study, further design of transportation solutions, and a second request to FAA to allow SDCRAA funds to implement these solutions (once their specific scope is more firmly determined), including access to I-5 and connections to the regional transit system.

As noted in SDCRAA's August 27, 2019 letter to the FAA and SDCRAA's November 27, 2019 letter to the FAA (included as an Addendum to Appendix R-K—see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, and Attachment 1 of this Final EIR), and as discussed in Appendix R-K, FAA funding approval for off-Airport roadway and intersection improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. Other specific potential off-Airport roadway and intersection improvement items listed as possible mitigation measures in Section 3.14 (for the proposed project) and Appendix R-H1 (for Alternative 4) of the Recirculated Draft EIR either would not meet this FAA funding requirement, or have not been approved or supported by the City of San Diego, which has jurisdiction over the improvement items. Accordingly, no change to the feasibility determinations stated in Section 3.14 or Appendix R-H1 of the Recirculated Draft EIR is required. Note also that, as described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR,

Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Response to Comment R-AS001-7

Mitigation Measures MM-TR-LRP-1 (for the proposed project) and MM-TR-LRP-2 (for Alternative 4) commit SDCRAA to continued participation in the planning and implementation of regional transportation improvements and payment of a fair share, based on FAA's review and approval, of the cost of I-5 access to SDIA and a Central Mobility Hub at NAVWAR or the ITC site, transit connections, and other regional improvements providing a direct benefit to air passenger travelers.

Response to Comment R-AS001-8

SDCRAA understands that Caltrans is initiating a Comprehensive Multimodal Corridor Plan (CMCP) for I-5 to identify corridor improvements that may be eligible for SB-1 funding. SDCRAA welcomes the opportunity to meet with Caltrans to discuss its participation in the CMCP, including planning and potential funding (subject to FAA review and approval). Ideally, this effort would complement or supplement the Airport Connectivity Subcommittee. SDCRAA's commitment to regional transportation solutions is included in Mitigation Measures MM-TR-LRP-1 (for the proposed project) and MM-TR-LRP-2 (for Alternative 4).

Response to Comment R-AS001-9

SDCRAA supports TDM measures that support complete streets that benefit all travelers. Through coordination with the City of San Diego, several project features and mitigation measures implement proposed active transportation measures from surrounding community plans. Alternative 4 provides transit improvements, as well as reserving property for a future transit station located between the two terminals.

SDCRAA appreciates Caltrans' support for TDM measures outlined in Mitigation Measure MM-TDM-1: TDM and Transit Measures first presented on pages ES-80 and ES-81 (Executive Summary) of the Recirculated Draft EIR.

Response to Comment R-AS001-10

SDCRAA acknowledges the requirements for work performed within the Caltrans' Right-of-Way.

Response to Comment R-AS001-11

The SDCRAA also looks forward to continued collaboration with Caltrans on this and other matters at the Airport.

From: Adams, Richard E@CHP <RAdams@chp.ca.gov>
Sent: Monday, November 11, 2019 10:11 AM
To: Dobson, Denise@CHP
Cc: Airport Planning
Subject: RE: 063 – D.D. Environmental Document Review – SCH # 2017011053 - Due to Lead Agency by 11/05/2019

No impact to _Border Division Thermal Air Operations (617)_ Area's local operations and/or public safety by SCH# _2017011053_ was identified.

Sgt. Richard Adams
Border Division, Thermal Air Ops
56-855 Liberator Lane
Thermal, CA 92274
(760) 984-5300
E-mail: radams@chp.ca.gov

RECEIVED
NOV 1 1 2019
BY: .....

No impact to _Border Division Thermal Air Operations (617)_ Area's local operations and/or public safety by SCH# _2017011053_ was identified," by the designated SCH due date to the SPS analyst listed on the Environmental Document Review and Response memorandum.

R-AS002-1

From: Dobson, Denise@CHP
Sent: Thursday, October 31, 2019 3:44 PM
To: Adams, Richard E@CHP <RAdams@chp.ca.gov>
Cc: Waughan, Brian@CHP <BWaughan@chp.ca.gov>; Sedam, Michael@CHP <MSedam@chp.ca.gov>
Subject: 063 – D.D. Environmental Document Review – SCH # 2017011053 - Due to Lead Agency by 11/05/2019

Good Afternoon,

Special Projects Section (SPS) recently received the referenced "Notice of Completion" environmental impact document from the State Clearinghouse outlined in the attached files (memorandum, checklist, and project file) and/or Web site.

We apologize for the short turnaround. Due to the project's possible impact to the Border Division Air Operations Unit, please use the attached checklist to assess its potential impact to local Area/Section operations and public safety.

Feel free to call or e-mail me if you have any questions.

Thank you,

Denise (Dee Dee) Dobson
Staff Services Manager I
California Highway Patrol
Special Projects Section
916-843-3375 (direct)
916-843-3370

COMMENT LETTER NO. R-AS002 California Highway Patrol November 11, 2019

Response to Comment R-AS002-1

It is noted that the California Highway Patrol determined that the ADP would have no impact on Border Division Thermal Air Operations (617)_Area's local operations and/or public safety.

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

Gavin Newsom
Governor

Kate Gordon
Director

November 7, 2019

RECEIVED
NOV 13 2019
BY: .....

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

Subject: San Diego International Airport Development Plan
SCH#: 2017011053

Dear Ted Anasis:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 11/4/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2017011053/3 . Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

R-AS003-1

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-3137
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

Governor's Office of Planning & Research

NOV 04 2019

STATE CLEARINGHOUSE

November 4, 2019

11-SD-5
San Diego International Airport Development Plan
Recirculated DEIR SCH# 2017011053

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

Dear Mr. Anasis:

Thank you for including the California Department of Transportation (Caltrans) in environmental review process for the San Diego International Airport Development Plan. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic

Section ES.10.5 "Summary of Traffic and Circulation Mitigation measures and Significant and Unavoidable Impacts":

- Starting on page ES-81, please provide exhibits for the mitigation measures described. Striping and bike lane configurations may need clarification by means of providing an exhibit.

- MM-TR-I-4b "Improve the Intersection of Grape Street at State Street/I-5 Southbound Ramps": Caltrans involvement should be discussed in the description of this mitigation. Construction of ramps at Laurel Street under this mitigation measure may be required, so stating there are no changes to existing roadways may not be correct. Please clarify.

- MM-TR-RS-4a: "Improve Palm Street from Pacific Highway to Kettner Boulevard": This mitigation measure implies directing traffic to Southbound

I-5 via Laurel Street to Pacific Highway to Palm Ave and should be discussed with Caltrans. Additional mitigation measures may be needed if the additional traffic requires ramp improvements at the Kettner SB On-ramp. Caltrans involvement should be discussed in the description of the mitigation measure.

The Draft EIR states that "any proposed freeway mitigation measure is not considered feasible, because there are no planned freeway improvement projects in the San Diego Regional Transportation Plan or Caltrans Interstate 8 (I-8) and I-5 Transportation Concept Report for this segment or other applicable Interstate or Highway segment plans." The reasoning that there are no freeway improvement projects currently identified in the vicinity is not justification to be exempt from mitigation for the project's direct impacts. Other means of mitigation need to be implemented. The San Diego International Airport serves both the San Diego and Imperial County Regions. Limiting mitigation measures to just the vicinity of the airport should be reconsidered, and other regional mitigation measures explored.

The Draft EIR needs to identify the regional impacts and how to improve regional methods to efficiently transport passengers to and from the airport. Appendix R-K "Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures" includes a letter (dated Aug. 27, 2019) to the Federal Aviation Administration (FAA) requesting San Diego County Regional Airport Authority (SDCRAA) funds to be used for roadway and intersection improvements for a specific list of projects that are referred to in Exhibit C, attached to the referenced letter. Exhibit C attached to that letter identifies $1,371, 000 in Roadway Mitigation Costs and $6,096,700 in Intersection Mitigation Costs.

In section "3.14.6 Project Impacts" the DEIR states, " SDCRAA has submitted specific requests to the FAA for it to allow funding of off-Airport mitigation measures" and "SDCRAA's funding contributions of up to $350 million, could be utilized along with other regional agencies' investments in potential off-Airport transportation and transit projects that improve access to the Airport, pending approval of the Airport Development Plan and its environmental review." Please discuss the difference between the $7,467,000 in specific off-airport improvements requested of the FAA and the "funding contributions of up to $350 million". SDCRAA should request additional FAA approval for the use of

airport funds for off-site transportation projects that mitigate significant project impacts.

3.14 Traffic and Circulation: Please consider alternate language for transportation mitigation measures that are currently identified as infeasible. SDCRAA is awaiting a FAA decision on the current request for off-airport transportation mitigation identified in Exhibit C of the Aug. 27, 2019 letter to FAA and should consider requesting additional funds for other identified significantly impacted transportation facilities. Given that funds can be requested from FAA for additional off-airport transportation mitigations, any locations or roadway and freeway segments that are significantly impacted by the project should not be considered as infeasible to mitigate as indicated throughout Section 3.14 of the DEIR. "Fair share" contributions to future local, regional, or state projects should also be considered.

Regional Transportation Plan (RTP 2019) – San Diego Forward

The San Diego International Airport Intermodal Transit Facility and I-5 Direct Connector Ramps project are identified in the SANDAG Regional Transportation Plan (RTP). This project is currently unfunded. Based on the overall magnitude of impacts identified in the DEIR to transportation facilities, it is recommended that a "fair share" contribution towards the advancement of this project or other future projects that connect I-5 to a future Intermodal Transportation Center, Grand Central Station, or the San Diego International Airport be considered. Other strategies to assist in developing these projects can include potentially acquiring right-of-way to facilitate the construction of such projects.

Additionally, local stakeholders and Caltrans are currently working on a Comprehensive Multimodal Corridor Plan (CMCP) that may include airport access improvements. SDCRAA should also consider a "fair share" towards this study.

Multimodal/Complete Streets

Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and vehicle miles traveled associated with distinct traffic generators. Caltrans supports appropriate measures to avoid, minimize, or mitigate transportation impacts on and off the State Highway System to reduce vehicle miles traveled to and from the San Diego International Airport. Caltrans

supports SDCRAA's consideration to encourage airport users to use alternative modes of transportation such as transit, rail, shared vehicle rides, and shuttles to reduce vehicle miles traveled per capita to and from San Diego International Airport.

Caltrans supports Transportation Demand Management (TDM) strategies like those identified in Mitigation Measure MM-TDM-1.

Right-of-Way

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Caltrans appreciates the opportunity to continue coordination efforts with the SDCRAA and looks forward to continuing our collaboration efforts.

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

Sincerely,

Maurice Eaton, Branch Chief
Local Development and Intergovernmental Review Branch

COMMENT LETTER NO. R-AS003	State Clearinghouse	November 13, 2019

Response to Comment R-AS003-1

This comment is noted. The comment letter attached to the State Clearinghouse's November 7, 2019 letter is a duplicate of the November 4, 2019 comment letter from Caltrans sent directly to SDCRAA and received on November 4, 2019. Caltrans' November 4, 2019 comment letter is identified in this Final EIR as R-AS001.

In addition, two other State agencies submitted comment letters directly to SDCRAA. The California Highway Patrol (CHP) submitted a letter on November 11, 2019, that is identified in this Final EIR as R-AS002. The California Coastal Commission submitted a letter on November 20, 2019, that is identified in this Final EIR as R-AS004.

STATE OF CALIFORNIA -- THE NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

CALIFORNIA COASTAL COMMISSION
SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4421
(619) 767-2370

November 4, 2019

Ms. April Boling, Board Chairman
Ms. Kim Becker, President/CEO
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138

RECEIVED
NOV 20 2019
BY: .....

Re: Comments on the Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan

Dear Ms. Boling and Ms. Becker:

Thank you for the second opportunity to review and comment on the Recirculated Draft Environmental Impact Report (RDEIR), prepared by the San Diego County Regional Airport Authority (Airport Authority) and received by our San Diego District Office in September 2019, for the Airport Development Plan (ADP) at the San Diego International Airport (SDIA or airport). In response to comments received on the 2018 DEIR, the Airport Authority made the following changes in the RDEIR: (1) updated the aviation activity forecast using 2018 as the base year to avoid underestimating future passenger growth through 2035, (2) revised building heights, and (3) developed a new alternative (Alternative 4 – T1 Replacement and Transportation Improvements), which is identified as the Environmentally Superior Alternative.

The SDIA was previously under the coastal permit jurisdiction of the San Diego Unified Port District (Port) and the standard of review was the certified Port Master Plan; however, state legislation transferred authority over the airport and prospective improvements to the newly created Airport Authority in January 2003. Thus, the airport is now within the Coastal Commission's (Commission) permit jurisdiction. As such, the subject project will require a coastal development permit and the standard of review is the Chapter 3 policies of the Coastal Act. Accordingly, any airport improvements should be designed to be consistent with those policies, which require the protection of public access and recreation, water quality, air quality, sensitive species, scenic and visual qualities of coastal areas; the minimization of energy consumption and vehicle miles traveled; assuring the potential for public transit for high intensity uses; and minimizing risks in areas subject to coastal hazards (e.g., flooding, sea level rise). The airport is also subject to the Public Trust Doctrine since it is located on public tidelands. The Public Trust Doctrine guarantees the public's right of access and use of California's waterways, including San Diego Bay, for navigation, fishing, boating, natural habitat protection and other water oriented activities.

R-AS004-1

Alternative 4 would focus only on the replacement of the existing Terminal 1 and forego the addition to Terminal 2 West and the replacement of the existing Terminal 2 East. In addition, Alternative 4 includes near-term transit service improvements, including an airport shuttle service to and from the Old Town Transit Center, which is an intermodal transit station with connections for commuter and inter-city rail service (Amtrak, North County Transit District's Coaster), light rail service (Metropolitan Transit System's trolley), and MTS bus lines. The Airport Authority would also work with MTS to upgrade Bus Route 992 transit service between downtown and SDIA, including the connection to the Santa Fe Depot. Alternative 4 would designate an area mid-way between the new Terminal 1 and the existing Terminal 2 for a potential transit station that would connect SDIA directly to future off-airport transit system improvements in-lieu of the previously proposed 400,000 sq.ft. of commercial development. Future development of off-airport transit system improvements would be part of a separate comprehensive transit system infrastructure planning program. Alternative 4 would retain the previously proposed project's new on-airport, three-lane access road to reduce airport-related traffic traveling west on North Harbor Drive and would reserve right-of-way for a future three-lane roadway for outbound traffic traveling east on North Harbor Drive. One of the outbound lanes on airport property would be enacted in the first phase to allow high occupancy vehicles, such as rental car center buses and Old Town Transit Center shuttles to avoid city streets. Finally, Alternative 4 would reduce the number of parking spaces in a new parking structure at Terminal 1 from 7,500 to 5,500 and the square footage from 2,780,000 to 2,250,000.

The reduction of parking and inclusion of an airport shuttle to and from the Old Town Transit Center is a significant benefit of the RDEIR's new Alternative 4. The implementation of an airport shuttle to the Old Town Transit Center is an important first step to improving public access to the airport via alternative transportation given that it will connect rail passengers from north San Diego County, trolley passengers from east San Diego County, and bus passengers from around the County to the airport. In addition, the Commission has approved several SANDAG projects to double-track the LOSSAN rail corridor, which will increase the frequency of rail service to the Old Town Transit Center. Finally, the Mid-Coast Corridor project will extend trolley service from Old Town Transit Center to UCSD and UTC, and will connect passengers to the airport shuttle at the Old Town Transit Center once construction is completed at the end of 2021.

In general, Commission staff is supportive of Alternative 4 given that it avoids or reduces the significant environmental impacts of the ADP. We also appreciate its emphasis on improving transit connections to the airport; however, the focus of the proposed transit connections is on near-term improvements, including a dedicated shuttle service to and from the Old Town Transit Center and the potential conversion of Bus Route 992 to a rapid bus service, rather than long-term improvements. We encourage the Airport Authority to continue working with the San Diego Association of Governments (SANDAG), the City of San Diego, Port, MTS, Caltrans, and other stakeholders on the development of a long-range transportation solution, including a transit connection (e.g., automated people mover, trolley extension) to a future off-airport intermodal transit

R-AS004-1 Cont'd

center, which would significantly improve public transit to the airport, resulting in a reduction in traffic congestion and associated greenhouse gas emissions. Please note that Commission staff request to be included in future planning efforts related to an intermodal transit center or central mobility hub, as well as the associated transportation infrastructure options.

It is unclear whether the potential transit station included in Alternative 4 and located in an area mid-way between the new Terminal 1 and the existing Terminal 2 is large enough to accommodate a future transit extension (e.g., automated people mover, trolley extension) from a future intermodal transit center. The RDEIR should address this issue and identify whether the parking structure at Terminal 1 could be modified in the future to accommodate a larger transit station, if necessary.

Alternative 4 would reserve right-of-way for a future three-lane roadway for outbound traffic to reduce airport-related traffic traveling east on North Harbor Drive. The connection point for new outbound roadway lanes would occur off of airport property and, therefore, requires further planning and approval from the City of San Diego, Caltrans, Port, and the Commission. North Harbor Drive is a major coastal accessway that serves as a primary access route not only to the airport but to and along the San Diego Bay, the shoreline promenade, Harbor Island, Shelter Island, Cabrillo Monument, Point Loma, parks, sports fishing interests, marinas, boat launch facilities and many other coastal destinations. As such, enough right-of-way should be maintained on North Harbor Drive for the general public to walk, recreate, bicycle, drive and take transit along the shoreline. Again, we encourage the Airport Authority to coordinate with the Commission and other stakeholders to determine the need and specific designs for an outbound roadway dedicated for airport use only.

Project lighting has the potential to impact sensitive biological species such as the California least tern colony located onsite. Specifically, light emitting diode (LED) lighting has the potential to disrupt natural circadian rhythms leading to disruption in behaviors (e.g., breeding, foraging) and sleep due to the high blue light frequencies in LED lights. Environmental studies recommend a correlated color temperature (CCT) of 3,000 Kelvin or less, a range that contains less blue light. Commission staff recommends that the maximum CCT of project lighting be limited to 3,000 Kelvin, to the greatest extent feasible. In addition, lighting should be analyzed to ensure that is the minimum necessary in terms of number of lights and that the operating characteristics are designed to minimize impacts of lighting (e.g., directed/shielded to avoid light spillover, sensors to turn off rooftop parking lot lights when no motion is detected).

Similarly, project signage has the potential to impact visual resources along a major coastal accessway – North Harbor Drive. Commission staff recommends the avoidance of digital/electronic message signs, as well as overly large signage, to preserve the scenic and visual qualities of this area, consistent with Section 30251 of the Coastal Act. In past projects, the Airport Authority has minimized visual resource impacts by screening

R-AS004-1 Cont'd
R-AS004-2
R-AS004-3
R-AS004-4
R-AS004-5

development with landscaping, and we encourage the continued use of landscape screening as part of the ADP.

Finally, we appreciate the changes that have been made in the recirculated DEIR to address our preliminary comments; however, some of the issues from our original comment letter (see attachment) have yet to be addressed and should be included as part of the Final EIR.

Thank you again for the opportunity to review and comment on the proposed ADP. We look forward to continuing to coordinate with the Airport Authority to help advance public transit to and from the airport as part of future redevelopment in collaboration with our State, regional and local agency partners. If you have any questions or require further clarification, please do not hesitate to contact Melody Lasiter or myself at the above office.

Sincerely,

Kanani Leslie

Kanani Leslie
Senior Coastal Planner

CC (copies sent via e-mail):
Karl Schwing, Deputy Director (CCC)
Deborah Lee, District Manager (CCC)
Melody Lasiter, Coastal Program Analyst (CCC)
Ted Anasis, Airport Planning Manager (Airport Authority)

R-AS004-5 Cont'd
R-AS004-6
R-AS004-7

COMMENT LETTER NO. R-AS004 California Coastal Commission November 20, 2019

Response to Comment R-AS004-1

The SDCRAA thanks the California Coastal Commission (Coastal Commission) for their letter. The Coastal Commission's support of Alternative 4 is so noted. As described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

As discussed in Section 2.3.5 of the Recirculated Draft EIR, SDCRAA, SANDAG, MTS, Caltrans, the City of San Diego, and the Port have formed the Airport Connectivity Subcommittee. The Subcommittee is studying and developing concepts for implementation of transit improvements for the region, such as a central mobility hub. SDCRAA's commitment to continued collaboration with the members of the Subcommittee is demonstrated in Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

The SDCRAA welcomes the Coastal Commission's participation in future planning efforts related to an intermodal transit center or central mobility hub, as well as the associated transportation infrastructure options.

Response to Comment R-AS004-2

The Designated Transit Ready Area included in Alternative 4, as shown on Figures 5-2 and 5-3 of the Recirculated Draft EIR, is being reserved for a potential future transit station at SDIA; however, the Airport Connectivity Subcommittee has not yet determined: (1) the nature of the future transit system connection to the Airport, such as whether it would be an automated people mover, a trolley extension, or some other system; (2) the connection point(s) of the system (i.e., future Intermodal Transit Center shown on Figures 5-2 and 5-3 or one of the Central Mobility Hubs being considered in the SANDAG Airport Connectivity Analysis from September 2019); (3) the system route; and (4) whether the system would be elevated or at-grade or a combination of the two. Nonetheless, the Designated Transit Ready Area was generally sized to accommodate the anticipated transit connection types based on reviewing local transit infrastructure requirements and automated people mover (APM) connections at other airports in the United States and abroad. As reflected by Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, SDCRAA remains committed to participating in regional efforts to develop

a long-range transportation solution for accessing the Airport, especially as related to a transit system that connects directly to the Airport.

Response to Comment R-AS004-3

As indicated in the first bullet in Section 5.5.4.3 on page 5-23 of the Recirculated Draft EIR, the nature, extent, and timing of the subject off-airport roadway system improvements would be determined through the involvement of, and subject to approvals by, several agencies beyond the SDCRAA – most notably the California Coastal Commission, the City of San Diego, and the FAA. In response to this comment, the subject paragraph is hereby revised as follows, to specifically acknowledge the involvement of the California Coastal Commission, with the added language shown as underlined italicized text.

- Under Alternative 4, space is reserved within the on-airport roadway to accommodate a 42-foot wide eastbound egress route on the north side of North Harbor Drive between Winship Lane and Terminal Link Road/Coast Guard. This egress route would tie into future off-airport roadway system improvements that would serve to improve access to and from SDIA. The location of that future right-of-way is shown on Figures 5-2 and 5-3. The nature, extent, and timing of such off-airport roadway system improvements would be determined through the involvement of, and subject to approvals by, several agencies beyond the SDCRAA, including *the California Coastal Commission,* SANDAG, MTS, the County of San Diego, the City of San Diego, the Port of San Diego, and the California Department of Transportation (Caltrans). *In addition, any contribution of Airport funds to the off-airport roadway system would be subject to FAA approval.*

This modification is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-AS004-4

As discussed on page 3.5-28 in Section 3.5, Biological Resources, of the Recirculated Draft EIR, all proposed lighting adjacent to the nesting ovals would be shielded to prevent any direct illumination of the breeding area.

In addition, Mitigation Measure MM-BIO-1 California Least Tern: Construction Measures includes the following to minimize lighting impacts on California least tern during construction activities:

- Night lighting for project construction occurring between 800 feet to 1,200 feet from the SDIA least tern nesting area will be kept to a minimum during the tern nesting season (April 1- September 15), and will not be used unless active construction or other essential work is occurring. Should such nighttime construction or other essential work be conducted, all lighting associated with the work will be shielded from or directed away from the least tern nesting area.
- Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.

Mitigation Measure MM-BIO-2 California Least Tern: Operations Measures includes a similar component to minimize lighting impacts to California least tern during operations:

- Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.

SDCRAA will limit all lighting of proposed facilities within the vicinity of the nesting ovals, to the extent feasible, while not affecting the safety and security of the Airport and surrounding roadways.

Response to Comment R-AS004-5

As with past projects at SDIA, SDCRAA will ensure that the scenic and visual qualities along North Harbor Drive will be maintained and will prepare a signage program that does not affect the views to coastal resources. SDCRAA will prepare and submit for California Coastal Commission review a signage plan consistent with the California Coastal Act policies. SDCRAA will include landscaping to screen the proposed new facilities. Any new landscaping in the vicinity of the California least tern ovals will be limited to plant species and materials that are not conducive to perching by predators.

Response to Comment R-AS004-6

The SDCRAA also notes that the Coastal Commission attached to its transmittal email the comment letter, dated September 7, 2018, that it submitted on the now-withdrawn 2018 Draft EIR for the ADP project. The Coastal Commission's transmittal email, dated November 19, 2019, does not request that SDCRAA respond to the September 7, 2018 comment letter. Although Comment R-AS004-6 references the Coastal Commission's earlier letter (i.e., the September 2018 letter), it only indicates that "some of the issues from our original comment letter (see attachment) have yet to be addressed and should be included as part of the Final EIR." The subject comment does not provide any indication as to what those issues are. Therefore, the SDCRAA is not in a position to respond to any specific comment in the Coastal Commission's September 7, 2018 letter. As indicated in Section 1.7, Availability of the Recirculated Draft EIR, on page 1-15 of the Recirculated Draft EIR: "The Recirculated Draft EIR replaces the 2018 Draft EIR in its entirety and includes a full statutory public review and comment period; therefore, all comments should address the Recirculated Draft EIR, not the 2018 Draft EIR or any portion thereof. While comments submitted on the 2018 Draft EIR will be included in the administrative record for the project, the SDCRAA will prepare written responses only to the comments submitted on the Recirculated Draft EIR."

To reiterate, the 2018 Draft EIR has been entirely superseded by the Recirculated Draft EIR. The Recirculated Draft EIR is a complete reassessment of the ADP project; it is not a partial recirculation. Moreover, the project has been revised since the 2018 Draft EIR was withdrawn. In addition, the Recirculated Draft EIR includes a new alternative – Alternative 4 – that SDRAA staff are recommending the SDCRAA Board approve. This alternative was not part of the 2018 Draft EIR and, thus, the Coastal Commission's September 7, 2018 letter did not address it. Note also that the Recirculated Draft EIR includes new analyses and new data, including updated passenger forecast numbers, which affect the CEQA "existing conditions" baseline as well as many of the key impact assessments, such as traffic, air quality, greenhouse gas emissions, and noise. Because the Recirculated Draft EIR is a completely new CEQA document and does not rely on the withdrawn 2018 Draft EIR, it is impossible to translate the Coastal Commission's comments on the latter into comments on the former.

It is likely that the Coastal Commission's concerns regarding the 2018 Draft EIR have been addressed by the new information and analyses set forth in the 2019 Recirculated Draft EIR. To

assist the Coastal Commission (and others) in locating where the Recirculated Draft EIR provides new information and analyses relevant to Coastal Commission's issues of concern, SDCRAA provides the following guidance.

- Coastal Act Consistency: The updated analysis of the project's Coastal Act consistency is set forth in Section 3.11.6.2.1 of the Recirculated Draft EIR.

- Traffic/Transit Impacts: The updated traffic impacts analysis is set forth in Section 3.14 of the Recirculated Draft EIR. The new traffic studies prepared by Kimley-Horn are attached as technical Appendices R-H1, R-H2, R-H3, R-H4, R-H5, and R-J to the EIR. In addition, SDCRAA has prepared responses to comments that address traffic-related issues, including mitigation. Such responses are identified in the table below.

- Visual Impacts: The updated visual impacts analysis is set forth in Section 3.1, Aesthetics and Visual Resources, of the Recirculated Draft EIR. In addition, SDCRAA has prepared a response to the Coastal Commission's comment regarding impacts to visual resources that is presented in the November 4, 2019 comment letter – see Response to Comment R-AS004-5 below.

- Greenhouse Gas/Climate Change Impacts (Including Sea Level Rise): The updated greenhouse gas/climate change impacts analysis is set forth in Section 3.3 of the Recirculated Draft EIR. The new Air Quality/Greenhouse Gas technical study prepared by KB Environmental Sciences is attached as Appendix R-C to the EIR. In addition, SDCRAA has prepared responses to comments that address greenhouse gas-related issues, including mitigation. Such responses are identified in the table below. Also, Section 3.11, Land Use and Planning, of the Recirculated Draft EIR provides a detailed discussion of sea level rise, as related to the proposed project.

- Parking: The updated parking analysis is set forth in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR. In addition, SDCRAA has prepared responses to comments that address traffic, circulation, and parking-related issues. Such responses are identified in the table below.

- Construction-related Impacts: Construction-related impacts are addressed for each of the environmental topics presented in Chapter 3, Environmental Analysis, of the Recirculated Draft EIR.

- Environmental Justice: The updated discussion of environmental justice impacts is set forth in Section 3.11, Land Use and Planning, of the Recirculated Draft EIR.

- Passenger Growth (including Potential Increases in Numbers of Gates): The updated passenger growth forecast for SDIA is presented in Section 2.5.1, Aviation Activity Forecasts, of the Recirculated Draft EIR. A delineation of the increased number of gates associated with the proposed project is provided in Section 2.6, Project Characteristics, of the Recirculated Draft EIR, and a delineation of the increased number of gates associated with Alternative 4, which is recommend by SDCRAA staff for approval by the SDCRAA Board instead of the proposed project, is provided in Section 5.5.4, Alternative 4: T1 Replacement and Transportation Improvements, of the Recirculated Draft EIR. In addition, SDCRAA has

prepared responses to comments that address passenger growth/gate issues. Such responses are identified in the table below.

- Biological Resources: The updated biological resources analysis is set forth in Section 3.5, Biological Resources, of the Recirculated Draft EIR. In addition, SDCRAA has prepared responses to comments that address issues related to biological resources. Such responses are identified in the table below.

Responses Related to Topics of Concern in Comment R-AS004-6

Topic	Related Response to Comment	
Traffic, Circulation, and Parking		
	R-PC023	47
	R-AR003	3
	R-PC021	12
	R-AL004	3
	R-AR002	4
	R-AR002	5
	R-AR004	4
	R-AR004	5
	R-AS001	2
	R-AS001	3
	R-AS001	4
	R-AS001	5
	R-AS001	6
	R-AS001	7
	R-AS001	8
	R-AS001	9
	R-PC021	5
	R-PC021	6
	R-PC023	51
	R-PC023	52
	R-PC023	53
	R-PC023	54
	R-PC023	55
	R-PC021	13
	R-PC021	14
	R-PC022	2
	R-AL004	4
	R-AL004	5
	R-AL004	16
	R-AL004	17
	R-AL004	18
	R-AR002	6
	R-PC023	49
	R-PC002	1
	R-AS001	10
	R-PC023	50
	R-AR004	3
	R-AL004	6
	R-PC026	1
	R-PC023	46
	R-PC023	18
	R-PC023	35
	R-PC023	48

Responses Related to Topics of Concern in Comment R-AS004-6

Topic	Related Response to Comment	
	R-PC021	11
Greenhouse Gases		
	R-PC018	2
	R-AR004	6
	R-PC014	2
	R-AL003	8
	R-PC020	4
	R-PC024	5
	R-PC025	12
	R-PC021	19
	R-PC021	20
	R-AL004	2
Project Description (Including relationship between gates and passenger growth)		
	R-AL003	2
	R-AL003	3
	R-AL003	6
	R-PC003	5
	R-PC019	22
	R-PC019	27
	R-PC019	28
	R-PC019	32
	R-PC019	34
	R-PC019	35
	R-PC021	8
	R-PC003	6
	R-PC019	1
	R-PC019	2
	R-PC019	3
	R-PC019	4
	R-PC019	7
	R-PC019	8
	R-PC019	9
	R-PC019	10
	R-PC019	11
	R-PC019	12
	R-PC019	13
	R-PC019	14
	R-PC019	15
	R-PC019	29
	R-PC019	45
	R-PC021	9
	R-PC023	15
	R-PC023	16
	R-PC023	17
	R-PC023	40
	R-PC023	41
	R-PC023	42
	R-PC023	45
	R-PC027	1
	R-PC003	7
	R-PC023	4
	R-PC023	13
	R-PC021	7
	R-AS004	3

Responses Related to Topics of Concern in Comment R-AS004-6

Topic	Related Response to Comment	
	R-AR004	2
	R-PC020	2
	R-PC025	2
	R-PC025	24
	R-PC023	14
	R-PC023	10
	R-PC023	11
	R-AR002	2
	R-AR002	7
Biological Resources		
	R-AS004	4
	R-AF001	2
	R-AF001	3
	R-AF001	4
	R-AF001	5
	R-AF001	6
	R-AF001	7

Response to Comment R-AS004-7

The SDCRAA thanks the Coastal Commission for their comments on the ADP Recirculated Draft EIR. The SDCRAA also looks forward to continued collaboration with the Coastal Commission on this and other matters at the Airport.

2.2.4 Regional Agency Comments

PORT of SAN DIEGO

RECEIVED
OCT 14 2019
BY: .....

VIA EMAIL TO: planning@san.org

October 14, 2019

San Diego County Regional Airport Authority
Attn: Ted Anasis, Airport Planning Manager
P.O. Box 82766
San Diego, CA 92138-2776

Subject: **Request for Extension of Public Review Period for the Recirculated Draft Environmental Impact Report – San Diego International Airport's Airport Development Plan (SCH No. 2017011053; SDCRAA #EIR-18-01)**

Dear Mr. Anasis:

The San Diego Unified Port District (District) appreciates the opportunity to review and comment on the Recirculated Draft Environmental Impact Report (EIR) prepared for the San Diego International Airport's (SDIA) Airport Development Plan.

Due to the scope, technical nature and complexity of the project, and to allow for additional time to discuss options with the SDIA prior to submitting our comment letter, the District requests an additional 15 days for public review.

R-AR001-1

A response to this request at your earliest convenience is greatly appreciated.

Sincerely,

Lesley Nishihira
Director, Planning
San Diego Unified Port District

cc: Brendan Reed
Dennis Probst
Randa Coniglio
Jason Giffen
Job Nelson
Thomas Russell
Rebecca Harrington

Port of San Diego, 3165 Pacific Highway, San Diego, CA 92101
portofsandiego.org

COMMENT LETTER NO. R-AR001 San Diego Unified Port District October 14, 2019

Response to Comment R-AR001-1

The SDCRAA thanks the Port of San Diego (Port) for their letter. Since publication of the Recirculated Draft EIR (RDEIR) on September 19, 2019, SDCRAA met with Port staff on numerous occasions to discuss the RDEIR's changes to the Draft EIR published in July 2018, including the RDEIR's inclusion of a new alternative, Alternative 4: T1 Replacement and Transportation Improvements. The SDCRAA appreciates the Port's subsequent comment letter on the Recirculated Draft EIR received on November 4, 2019, which is included in this Final EIR as comment letter R-AR003.

SANDAG

401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

RECEIVED
NOV 04 2019
BY: .....

November 4, 2019

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

RE: Recirculated Draft Environmental Impact Report for the San Diego International Airport Development Plan Project (SCH NO. 2017011053 – SDCRAA # EIR-18-01)

MEMBER AGENCIES
Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS
Imperial County
California Department of Transportation
Metropolitan Transit System
North County Transit District
United States Department of Defense
San Diego Unified Port District
San Diego County Water Authority
Southern California Tribal Chairmen's Association
Mexico

Dear Mr. Anasis:

Thank you for the opportunity to comment on the proposed Airport Development Plan (ADP) Project and its Recirculated Draft Environmental Impact Report (RDEIR) for the San Diego International Airport (SDIA), which would be undertaken by the San Diego County Regional Airport Authority (SDCRAA). In the spirit of mutual cooperation, this letter conveys recommendations from the San Diego Association of Governments (SANDAG) concerning issues germane to our agency's statutory responsibility arising from our services and facilities likely to be affected by the ADP.

Over the past year as part of SANDAG Airport Connectivity Subcommittee, SANDAG and SDCRAA have worked closely to identify future transportation solutions for improved transit connectivity and roadway access plans to the SDIA. With the help of this Subcommittee, SANDAG identified several viable airport transit connectivity concepts for a new Central Mobility Hub. Two of these concepts call for redeveloping the Naval Information Warfare Systems Command (NAVWAR) site, while the third concept calls for development of the Intermodal Transportation Center previously identified in the Regional Transportation Plan. SANDAG also studied a San Diego Trolley line extension to SDIA spurring from either Laurel Street or Hawthorn Street.

SANDAG appreciates the ongoing partnership with the SDCRAA and the unprecedented commitment to work together to develop a world-class, environmentally friendly transportation connection to SDIA. Notably, SANDAG thanks the SDCRAA for its announcement made on July 2, 2019, to preserve land for a future transit connection at SDIA. Furthermore, SANDAG also appreciates the SDCRAA's efforts to achieve an agreement with its airline partners to spend approximately $515 million for both on and off-airport transportation infrastructure projects.

Because SANDAG will be refining the Airport Connectivity Project concepts and preparing alternatives analysis, while also advancing project alternatives and environmental analysis as well as project delivery strategies over the next year, it is imperative that SANDAG and the SDCRAA continue to work closely together. The successful completion of the ADP and the proposed Airport Connectivity Project requires that both agencies continue to collaborate and coordinate to ensure success for the San Diego region. This includes alignment on planning assumptions, coordination of design and construction, as well as agreement on potential roadway improvements, utility relocations, and other new accommodations for the

R-AR002-1

potential future Airport People Mover (APM) stations, APM guideways or Trolley line should it be extended to the airport.

To ensure continued coordination and communication between the two agencies, SANDAG is providing the following comments on the SDCRAA's ADP RDEIR:

- The SDCRAA should more clearly identify and commit to the preservation of transit-ready areas to allow for potential Automated People Mover or Trolley stations and related transportation improvements being considered by SANDAG's Airport Connectivity Study. The transit-ready areas should be located between Terminals 1 and 2, and adjacent to the SDIA Consolidated Rental Car Facility. SDCRAA should also preserve rights-of-way for APM guideways or key roadway improvements, including outbound on-Airport roadways. While these preservation areas are noted in the Plan's Alternative 4, these areas should be specifically identified in the Project Description, Final EIR, and associated technical documents and exhibits.

- SANDAG recommends that SDCRAA select Alternative 4 as its Approved Project. Alternative 4 contains the Transit-Ready area and page 5-105 of the RDEIR states that under Alternative 4 proposed transit improvements are anticipated to reduce the number of daily trips to and from SDIA as compared to the proposed project (prior to the implementation of mitigation) and page 5-110 acknowledges that transit features would decrease trip generation.

- SANDAG recommends that SDCRAA consider policies to divert traffic away from key airport access roadways and toward the planned Central Mobility Hub, which can be analyzed, considered, and implemented over time as traffic conditions warrant. Given forecasted regional growth and anticipated increases in activity at and around SDIA, to increase transit ridership to SDIA SANDAG urges that SDCRAA consider potential future related airport policy initiatives, such as congestion management policies, curb management strategies, congestion pricing, , as well as enhanced transit demand management strategies for SDIA and airline tenant employees.

- SANDAG requests that SDCRAA work with FAA to generally secure FAA recognition that the on-airport transit project and related transportation improvements that directly enhance SDIA passenger service levels and mitigate the environmental impacts of operations at SDIA are permitted uses of SDIA revenue consistent with FAA Policies. In particular, SANDAG believes the Plan's Alternative 4 should be deemed feasible mitigation of identified traffic and circulation impacts and, therefore, eligible for use of SDIA revenue to an extent that should be formally established with FAA.

- SANDAG recognizes and appreciates that the ADP RDEIR Alternative 4 would reserve space with the on-airport roadway to accommodate a 42-foot wide eastbound egress route on the north side of North Harbor Drive between Winship Lane and Terminal Link Road/Coast Guard. Both agencies need to coordinate on the funding, design, and construction of the eastbound egress, and ensure its compatibility with the selected SANDAG's Airport Connectivity preferred concept that will advance for further environmental review pursuant to CEQA and NEPA.

R-AR002-1 Cont'd

R-AR002-2

R-AR002-3

R-AR002-4

R-AR002-5

R-AR002-6

- Design/Engineering Coordination of the ADP Project: As a continuation of current coordination activities, SANDAG and SDIA are striving to develop a mutually agreeable design that seamlessly connects passengers between the transit and airport facilities. Both agencies need to ensure that the respective design efforts of the SDIA ADP and SANDAG's Airport Connectivity Study continue to be coordinated.

- Revisions to the RDEIR text:

    - Figures 5-2 and 5-3 indicate a Designated Transit Ready Area. While the design concepts for this area are in early phases of development, SANDAG suggests these figures be updated to indicate direct causeway connections between the Designated Transit Ready Area and the terminals.

San Diego International Airport is the only major airport on the West Coast and one of the few airports of its size in the country without a substantial connection to the region's transit network. SANDAG believes it is now time to establish a robust airport transit connection to address anticipated growth and congestion, meet environmental mandates, and address the mobility needs of airport travelers today and for generations to come.

SANDAG looks forward to continuing our cooperative, working relationship with the SDCRAA on our respective projects. SANDAG reserves its rights to comment further throughout the ADP administrative proceedings, and hopes these constructive suggestions assist the Airport Authority. If you have any questions regarding this response, please contact me at (619) 699-1944 or coleen.clementson@sandag.org. SANDAG looks forward to reviewing the Final EIR.

Please send it to the following address:

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Sincerely,

COLEEN CLEMENTSON
Director of Regional Planning

R-AR002-8
R-AR002-7
R-AR 002-6 Cont'd

COMMENT LETTER NO. R-AR002 San Diego Association of Governments (SANDAG) November 4, 2019

Response to Comment R-AR002-1

The SDCRAA thanks SANDAG for their comments on the ADP Recirculated Draft EIR. SDCRAA is committed to working with SANDAG to provide transportation solutions for improved transit connectivity and roadway access to SDIA. Please see Responses to Comments R-AR002-2 through R-AR002-8 below.

Response to Comment R-AR002-2

As described in Section 5.5.4 of the Recirculated Draft EIR, Alternative 4: T1 Replacement and Transportation Improvements, includes a transit-ready area located between Terminals 1 and 2. It also provides for the preservation of right-of-way on airport property to accommodate a potential future outbound access road. Although Alternative 4 does not include preservation of a transit-ready area adjacent to the existing SDIA Consolidated Rental Car facility or preservation of rights-of-way for automated people mover (APM) guideways as requested in the comment, Mitigation Measure MM-TR-LRP-2, Airport Regional Connections (see Appendix R-H1 – Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR) provides for SDCRAA's participation in regional efforts to develop a long-range transportation solution for accessing the Airport, which specifically includes participation in the regional planning efforts led by SANDAG (Airport Connections Study). In the Airport Connectivity Analysis recently completed by SANDAG,[5] several preliminary concepts for a regional airport connection are identified. All of the preliminary concepts include the transit-ready area located between Terminals 1 and 2, as proposed under Alternative 4; however, variations in those concepts relative to the location of a Central Mobility Hub and the route and nature of the connection between that Hub and the Airport transit-ready area render preservation of a transit-ready area adjacent to the existing SDIA Consolidated Rental Car facility or preservation of rights-of-way for automated people mover (APM) guideways premature at this time. It is anticipated that SDCRAA's preservation of additional areas and rights-of-way related to a regional transportation solution for the Airport would occur in conjunction with the additional planning efforts occurring as part of Mitigation Measure MM-TR-LRP-2.

Response to Comment R-AR002-3

SANDAG's support of Alternative 4 is so noted. As described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Response to Comment R-AR002-4

SDCRAA will continue to partner with SANDAG in identifying options for creating the planned Central Mobility Hub. As indicated in Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary)

[5] San Diego Association of Governments. Airport Connectivity Analysis-Evaluation of Concepts for Improved Transit and Roadway Connectivity to San Diego International Airport. October 1, 2019. Available: https://www.sandag.org/uploads/projectid/projectid_577_26642.pdf.

of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, SDCRAA has been, and plans to continue to serve as an active partner in developing policy initiatives for improving regional transportation connections to SDIA and participating with implementation of feasible traffic mitigation by SDCRAA and its funding sources.

SDCRAA will continue to be an active partner for the Central Mobility Hub and associated implementation strategies once the studies have been completed and a site has been approved.

Response to Comment R-AR002-5

SDCRAA acknowledges SANDAG'S support of Alternative 4 as a feasible mitigation. A formal request has been submitted to the FAA to allow for the use of airport revenues to implement roadway and intersection mitigation. A copy of the request letter, dated August 27, 2019, is provided in Appendix R-K, Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures, of the Recirculated Draft EIR. SDCRAA's November 27, 2019 follow-up letter to the FAA is included as an Addendum to Appendix R-K (see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, and Attachment 1 of this Final EIR).

SDCRAA also will continue to partner with the Airport Connectivity Subcommittee to identify feasible transit and freeway connections. As indicated in Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), SDCRAA will continue to seek FAA approval for additional funding of improvements that will provide benefits to air passengers traveling to and from SDIA.

Response to Comment R-AR002-6

Implementing the airport egress road in the future will require regional partnership and approvals. Alternative 4 would reserve the required right-of-way, so as to not preclude this future outbound roadway connection. When completed, the Airport Connectivity Analysis recommendations will identify the preferred concept. Once a preferred concept is approved, SDCRAA will continue to participate in the Airport Connectivity Subcommittee jointly with SANDAG, the City of San Diego, the Port, and Caltrans, and participate in development of design, funding, and environmental studies associated with the egress roadway and associated connections to I-5. The San Diego Unified Port District has suggested, and SDCRAA has concurred, that Mitigation Measure MM-TR-LRP-2: Airport Regional Connections be modified to provide more specificity regarding implementation of the egress roadway and transit improvements (see Response to Comment R-AR003-3).

Response to Comment R-AR002-7

The specific provisions for connecting Terminals 1 and 2 with the transit-ready area, should the SDCRAA Board approve Alternative 4 for implementation, would be developed in conjunction with more detailed planning and design for long-term airport regional transit connections, as proposed under MM-TR-LRP-2. Ensuring transit users' efficient and safe access to the terminals would be addressed as part of this future planning and design process.

Response to Comment R-AR002-8

The SDCRAA thanks SANDAG for their comments on the ADP Recirculated Draft EIR. The SDCRAA also looks forward to continued collaboration with SANDAG on this and other matters at the Airport.

PORT of SAN DIEGO

VIA EMAIL TO: planning@san.org

RECEIVED
NOV 04 2019
BY: .....

November 4, 2019

San Diego County Regional Airport Authority
Attn: Ted Anasis, Airport Planning Manager
P.O. Box 82766
San Diego, CA 92138-2776

Subject: **Comments regarding the Recirculated Draft Environmental Impact Report for the San Diego International Airport's Airport Development Plan (SCH No. 2017011053; SDCRAA #EIR-18-01)**

Dear Mr. Anasis:

The San Diego Unified Port District (Port) appreciates the opportunity to review the Recirculated Draft Environmental Impact Report (RDEIR) (SDCRAA# EIR-18-01; State Clearinghouse No. 2017011053) for the Airport Development Plan (ADP) at the San Diego International Airport (SDIA). As the trustee and lessor of the Tidelands where the SDIA is located, an abutting jurisdiction to the SDIA and a California Environmental Quality Act (CEQA) responsible agency for the RDEIR,[1] the Port has a unique interest in development that occurs at the SDIA, including the ADP, and environmental issues associated with such development and how it may impact the surrounding areas – especially Tidelands.

The Port has partnered with the San Diego County Regional Airport Authority (Airport) and other agency stakeholders, including the San Diego Association of Governments (SANDAG), the City of San Diego (City), the Metropolitan Transit System (MTS), the North County Transit District (NCTD), the County of San Diego (County), the California Department of Transportation (Caltrans), and others to collaboratively identify solutions that would significantly broaden opportunities to fulfill the region's transit vision. SANDAG is taking a leadership role in collaborating with regional partners to study concepts for improved regional airport connectivity. One of the goals of this effort is to improve SDIA passenger access to transit through a variety of options to reduce congestion and provide additional environmental benefit. The Port is very supportive of SANDAG's effort and continues to be a part of the solution.

R-AR003-1

Alternative 4 – T1 Replacement and Transportation Improvements

The Port is grateful for the inclusion of the RDEIR's new Alternative 4 – T1 Replacement and Transportation Improvements (Alternative 4) and its contribution to the region's transit vision. Key components of Alternative 4 include:

- The set aside of land for a transit stop at SDIA (in-lieu of 400,000 square feet of commercial development);

R-AR003-2

[1] The Airport will need a long-terms lease(s) or easement(s) for the construction and operation of parts of proposed inbound roadway and the multi-use path from the Port.

- A multi-use path to and from the airport for pedestrians and bicyclists;
- The inbound roadway that will take traffic off North Harbor Drive;
- A dedicated shuttle service between the Old Town Transit Center and SDIA;
- The potential creation of a rapid bus line to/from SDIA;
- A future connection to a potential future intermodal transit center;
- A reduced parking garage;
- The set aside of 42-foot wide right-of-way for a three-lane outbound roadway that if constructed would further reduce vehicular traffic on North Harbor Drive; and
- Construction of one of the lanes of the outbound roadway for use by high occupancy vehicles such as Rental Car Center buses and the Old Town Transit Center shuttle.

Providing transit to and from SDIA is a key component to meeting the region's collective greenhouse gas emissions (GHG) reduction and transportation goals. Alternative 4 takes an initial step towards these goals. The Port requests that the Airport continue to work with SANDAG, the City, the Port and other stakeholders on this issue.

Specific Comments

As the Airport is aware (through several conversations between Port, Airport, City and SANDAG staff), the Port's vision for North Harbor Drive includes dedicated transit lanes, as well as bicycle and pedestrian facilities and connections. The vision would enable the visitors and residents to walk, bike and take transit around and through the Embarcadero, with an emphasis on expanding transit opportunities from Harbor Island to the San Diego Convention Center.[2] Additional increased development intensity on East Harbor Island and in the Embarcadero may also occur in the future. The outbound roadway may be needed to reduce future congestion along North Harbor Drive and RDEIR recognizes that the operation of the outbound roadway would reduce airport-related traffic traveling eastbound on North Harbor Drive (see page ES-4 of the RDEIR). Accordingly, the Port is proposing the Airport continue to work with the Port and other agencies on the design, routing and if/when needed, the development of the outbound roadway.

Below is a revised MM-TR-LRP-1[3], which will facilitate transit to and from the SDIA. The Port's changes to that mitigation measure are shown in bold, underline and strikeout text. Additionally, the Port believes both SANDAG's long-range transportation solution and the outbound roadway will be physically feasible and request this change be made to MM-TR-LRP-1.

> "**MM-TR-LRP-1: Airport Regional Connections: Prior to 2035, ~~T~~t**he SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: 1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; ~~and~~ 2. Participate in the implementation of improvements and strategies identified in the Airport Connections Study~~.~~**; and 3. Study and design the outbound roadway and coordinate with SANDAG, the City of San Diego, the Port of San Diego and other**

[2] The vision would likely be implemented through the proposed Port Master Plan Update (PMPU), and while the PMPU has not been approved, it is a cumulative project in the RDEIR.

[3] Mitigation measure MM-TR-LRP-1, found on pages 3.14-177 to 3.14-178 of the DEIR, addresses a long-range transportation planning study to address Year 2035 cumulative impacts.

R-AR003-2 Cont'd

R-AR003-3

agencies, as applicable, to entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed.

A. SDCRAA staff are fully engaged as stakeholders in SANDAG's committee and subcommittees which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.

B. **SDCRAA understands that the outbound Airport roadway is an important component to the region's vision for transit and SDCRAA staff shall be fully engaged in studying, designing, entitling and if the outbound roadway is needed, implementing the outbound roadway. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego.**

C. SDCRAA will fund its fair share of agreed to improvement to implement long-term regional solutions identified by SANDAG's Airport Connections Study**, and the outbound roadway, if and when needed,** subject to FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented and is presently ***not considered feasible*** because parts of the Mitigation Measure are within the control of other agencies or jurisdictions, and would require FAA approval of funding. Portions of Mitigation Measure MM-TR-LRP-1 require physical improvements to facilities and/or VMT reduction items and are within the jurisdiction of other public agencies or departments and are ***~~not~~ considered physically feasible***. SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs **or the street and intersection connections for the outbound roadway.** SDCRAA will, however, continue to collaborate with the other public agencies and departments to implement any improvement items and/or VMT reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented an is presently ***not considered feasible*** because 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, programs to reduce VMT**, connections for the outbound roadway** or other mitigation measures. As discussed in Section 3.14.6 above, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for the as yet unidentified off-Airport improvement or VMT reduction items **and as of yet unidentified street and intersection connections for the outbound roadway once designed**. If the funding is granted (and other agencies agree to implement **or give approval to the SDCRAA to implement**) then the Mitigation Measure would be feasible. If the FAA does not approve the funding then the Measure would be infeasible."

The Port requests that the revised MM-TR-LRP-1 be adopted and applied to Alternative 4 and/or the following project features be added to Alternative 4:

- SDRCAA will study the outbound roadway and design it, including the portions on and off Airport property.
- SDRCAA will coordinate with SANDAG, the City of San Diego, the Port and other agencies (collectively, Stakeholder Agencies), as applicable, on the outbound roadway design and study.

R-AR003-3 Cont'd

R-AR003-4 R-AR 003-3 Cont'd

- SDRCAA will coordinate with the stakeholder Agencies to the entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed.

Subject to the foregoing, the Port supports Alternative 4[4] and looks forward to continued collaboration with the Airport.[5]

If you would like to discuss any of these comments further, please contact me at (619) 686-6473 or Lesley Nishihira, Planning Director, at (619) 686-6469.

Sincerely,

Jason H. Giffen
Vice President
Planning, Environment & Government Relations

cc: Brendan Reed
Dennis Probst
Randa Coniglio
Jason Giffen
Job Nelson
Thomas Russell
Rebecca Harrington

[4] A robust environmental analysis was conducted for Alternative 4 in the RDEIR. Additionally, Alternative 4 avoids and substantially lessens the significant environmental impacts of the proposed ADP project, meets the basic project objectives and is actually feasible (to the Port's knowledge there is no information or evidence that Alternative 4 is potentially or actually infeasible). Consequently, the Port believes the Airport Board should adopt Alternative 4 with appropriate mitigation measures.

[5] The Port reserves all its rights, including without limitation, commenting on the Final Environmental Impact Report, and this comment letter does not constitute a waiver of any of those rights.

COMMENT LETTER NO. R-AR003 San Diego Unified Port District November 4, 2019

Response to Comment R-AR003-1

The SDCRAA thanks the Port of San Diego (Port) for their comments on the ADP Recirculated Draft EIR. SDCRAA is committed to working with the Port, SANDAG, and other regional stakeholders to provide transportation solutions for improved transit connectivity to SDIA. That commitment to such ongoing collaboration is reflected in Mitigation Measure MM-TR-LRP-2, Airport Regional Connections, of the Recirculated Draft EIR. Please also see Responses to Comments R-AR003-2 through R-AR003-4 below.

Response to Comment R-AR003-2

The key components of Alternative 4 are described in Section 5.5.4 of the Recirculated Draft EIR. The commenter's description of those key components generally reflects that of the Recirculated Draft EIR, with the following exceptions and clarifications:

- Alternative 4 does not provide for the potential creation of a rapid bus line to/from SDIA, as the establishment of such a line is completely within the jurisdiction of the San Diego Metropolitan Transit System, over which SDCRAA has no authority; and,

- Alternative 4 includes the preservation of right-of-way on airport property to accommodate a 42-foot-wide eastbound egress route on the north side of North Harbor Drive between Winship Lane and Terminal Link Road/Coast Guard. As indicated on page 5-23 of the Recirculated Draft EIR, the nature, extent, and timing of the related off-airport roadway system improvements would be determined through the involvement of, and subject to approvals by, several agencies beyond the SDCRAA. The specific configuration and anticipated use of the lanes in that outbound roadway system would be determined as part of that joint planning effort.

As reflected in Mitigation Measure MM-TR-LRP-2, Airport Regional Connections (see Appendix R-H1 – Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR), SDCRAA is committed to participating in regional efforts to develop a long-range transportation solution for accessing the Airport, which includes continuing to work with SANDAG, the City, the Port, and other stakeholders on that issue.

Response to Comment R-AR003-3

SDCRAA appreciates the Port's commitment developing transportation solutions in the North Harbor Drive corridor that support the Port's vision, Airport needs, and multimodal mobility for this corridor. SDCRAA has considered the Port's suggestions for adding specificity to the text of Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR; as such, Mitigation Measure MM-TR-LRP-1 has been revised to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text. The text of Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4, which includes reserving right-of-way for a future three-lane roadway for outbound traffic), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, has also been revised as shown below. Please also note that as described

in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. Should the SDCRAA Board approve Alternative 4, Mitigation Measure MM-TR-LRP-2, as revised below, will be included in the Mitigation Monitoring and Reporting Program for the Airport Development Plan.

These revisions are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, for all instances in which the text of Mitigation Measures MM-TR-LRP-1 and MM-LRP-2 are presented.

MM-TR-LRP-1: **Airport Regional Connections**. *Prior to 2035,* ~~T~~*t*he SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: 1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; and 2. Participate in the implementation of improvements and strategies identified in the Airport Connections Study. *To the extent that either of the two measures described above requires funding that must be pre-approved by the FAA, SDCRAA will request and make best efforts to secure such approval.*

1. SDCRAA ~~staff are~~ *is* fully engaged ~~as~~*with other* stakeholders in SANDAG's committee and subcommittees, which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.

2. SDCRAA will fund its fair share of agreed-to improvements to implement long-term regional solutions identified by SANDAG's Airport Connections Study, subject to a FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented and is presently ***not considered feasible,*** because ~~parts of~~ the Mitigation Measure *would be* ~~are~~ within the control of other agencies or jurisdictions, and would require FAA approval of funding. *For example, p*~~P~~ortions of Mitigation Measure MM-TR-LRP-1 require physical improvements to facilities and/or VMT reduction items *that would be located* ~~and are~~ within the jurisdictions of*, or must be implemented by,* other public agencies or departments*. Although these improvements and VMT reduction items may prove to be* ~~and are **not**~~ ***considered physically feasible.*** SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs. SDCRAA will, however, continue to collaborate with the other

public agencies and departments to implement any *agreed-upon* improvement items and/or VMT reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented and is presently ***not considered feasible,*** because the FAA may *decide* not *to* authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements, programs to reduce VMT, or other mitigation measures. As discussed in Section 3.14.6 ~~above~~, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for the as yet unidentified off-Airport improvement or VMT reduction items. If the funding is granted (and the other agencies agree to implement *or give approval to the SDCRAA to implement*), then the Mitigation Measure would be feasible. If the FAA does not approve the funding, then the Measure would be infeasible.

MM-TR-LRP-2: **Airport Regional Connections**. *Prior to 2035,* ~~T~~*t*he SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: 1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; 2. Preserve space within Airport property to accommodate a transit station located near the terminals and an on-Airport exit roadway; ~~and~~ 3. *Study and design the outbound roadway and coordinate with SANDAG, the City of San Diego, the Port of San Diego, and other agencies, as applicable, to entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed; and 4.* Participate in the implementation of improvements and strategies identified in the Airport Connections Study. *To the extent that any of the four measures described above requires funding that must be pre-approved by the FAA, SDCRAA will request and make best efforts to secure such approval.*

1. SDCRAA ~~staff are~~ *is* fully engaged ~~as~~*with other* stakeholders in SANDAG's committee and subcommittees, which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.

2. The ADP has allocated a site to accommodate a potential transit station within Airport property in proximity to passenger terminals. The ADP also preserves space for an exit roadway on Airport property that could be built in conjunction with new freeway access ramps and enhanced capacity within the Laurel Street corridor.

3. SDCRAA understands that the outbound Airport roadway is an important component to the region's vision for transit and SDCRAA shall be fully

engaged with other stakeholders in studying, designing, entitling and, if and when the outbound roadway is needed, implementing the outbound roadway. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. If any of these measures described above requires FAA funding approval, then SDCRAA will request such funding and make best efforts to secure such approval.

~~3~~4. SDCRAA will fund its fair share of agreed-to improvements to implement long-term regional solutions identified by SANDAG's Airport Connections Study, *and the outbound roadway, if and when needed,* subject to a FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently ***not considered feasible,*** because ~~parts of~~ the Mitigation Measure *would be* ~~are~~ within the control of other agencies or jurisdictions, and would require FAA approval of funding. *For example, p*~~P~~portions of Mitigation Measure MM-TR-LRP-2 require physical improvements to facilities and/or VMT reduction items *that would be located* ~~and are~~ within the jurisdictions of*, or must be implemented by,* other public agencies or departments*. Although these improvements and VMT reduction items may prove to be* ~~and are **not** considered physically feasible.~~, SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs *or the street and intersection connections for the outbound roadway*. SDCRAA will, however, continue to collaborate with the other public agencies and departments to implement any *agreed-upon* improvement items and/or VMT reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently ***not considered feasible,*** because the FAA may *decide* not *to* authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements, programs to reduce VMT, *connections for the outbound roadway,* or other mitigation measures. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for the as yet unidentified off-Airport improvement or VMT reduction items *and as of yet unidentified street and intersection connections for the outbound roadway once designed*. If the funding is granted (and the other agencies agree to implement *or give approval to the SDCRAA to implement*), then the Mitigation Measure would be feasible. If the FAA does not approve the funding, then the Measure would be infeasible.

Response to Comment R-AR003-4

The Port's support of Alternative 4 is so noted. The SDCRAA also looks forward to continued collaboration with the Port on this and other matters at the Airport.

County of San Diego

MARKO MEDVED, PE, CEM
DIRECTOR
(858) 694-2527

DEPARTMENT OF GENERAL SERVICES
5560 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123

NICOLE J. ALEJANDRE
ASSISTANT DIRECTOR
(858) 694-3885

November 5, 2019

RECEIVED
NOV 08 2019
BY: .....

Ted Anasis, Manager, Airport Planning
San Diego International Airport
3225 North Harbor Drive, 3rd Fl
San Diego, CA 92101

Dear Mr. Anasis:

COUNTY OF SAN DIEGO COMMENTS ON RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

The County of San Diego (County) has reviewed the Recirculated Draft EIR for the San Diego International Airport (SDIA)-Airport Development Plan (SCH No. 2017011053-SDCRAA # EIR-18-01) and provides comments below. These comments are in addition to those provided by the County in its September 7, 2018 letter to the Airport.

R-AR004-1

As described in the Recirculated Draft EIR, the project would provide a development framework to implement improvements that would enable the Airport to accommodate future demand for air travel anticipated to occur at SDIA. The primary elements of the new Airport Development Plan would include: (1) replacement of Terminal 1 with a new terminal of up to 30-gates; (2) development of circulation and roadway improvements to enhance vehicle travel to the existing and proposed terminals from North Harbor Drive, including a new airport entry road for inbound vehicle traffic; (3) modifications to Terminal 2, including the addition of a new west concourse and replacement of Terminal 2 East with a linear concourse connector between Terminal 2 West and the new Terminal 1; (4) airfield taxiway improvements and new remain overnight (RON) aircraft parking areas; (5) a potential commercial development opportunity to complement the terminal function of the replacement Terminal 1 facility; (6) development of a five-story, 7,500-space parking structure adjacent to the new Terminal 1; and, (7) other related improvements, such as replacement of the Airport Authority's administrative offices that would be displaced by the new Terminal 1, and various infrastructure improvements.

R-AR004-2

The County requests that the Airport revise the Recirculated Draft EIR based on the following:

1. The San Diego International Airport as identified in the Airport Development Plan (ADP) Draft Environmental Impact Analysis (EIR) will cause numerous unmitigated significant traffic impacts to local intersection and roadways. The DEIR should expand its proposed mitigation beyond just local roadways and intersections. The DEIR should include

R-AR004-3

improvements to regionally significant facilities like the I-5 direct connector ramps because the airport generates traffic and creates impacts on a regional level.

2. In Section ES.10 (Table ES-3, Section 3.14 Traffic Circulation), the Recirculated Draft EIR states there are "Significant and Unavoidable" Impacts after Mitigation in each yearly scenario from Existing to 2050. The summary table further states that "there are several measures that are physically feasible, but are not feasible from a funding standpoint, are located outside of SDIA (i.e., not within the jurisdiction of SDCRAA), and/or because they conflict with existing community plans." The ADP should include mitigation that will reduce impacts to a less-than-significant level that the Federal Aviation Administration (FAA) will authorize.

3. The Recirculated Draft EIR fails to explain why off-airport traffic mitigation is infeasible for its project. Airport offsite traffic impacts can be mitigated and may be funded through implementation of FAA policies. The County notes in Exhibit K to the DEIR that the SDIA identifies FAA policies that address the use of SDIA revenue for traffic mitigation. FAA policy allows for the payment of traffic impact fees but does require that the fees be used only for the mitigation of airport project impacts. (See, for example, FAA Order 5190.6B, p. 15-10 & 18-7.) To ensure that impact fees are not diverted to non-airport purposes, the FAA generally instructs airport sponsors to use fees to reimburse for project costs rather than pay for anticipated mitigation. (FAA, Policy and Procedure Concerning the Use of Airport Revenue, February 16, 1999, p. 7708.) The FAA may, however, "permit a prepayment of estimated impact fees at the commencement of a mitigation project, if the funds are necessary to permit the mitigation project to go forward, so long as there is a reconciliation process that assures the airport is reimbursed for any overpayments, based on actual project costs, plus interest." (Id.) In any event, "...where airport development causes a government agency to take an action, such as constructing a new highway interchange in the vicinity of the airport, airport revenues may be used equal to the prorated share of the cost." (Id., emphasis added.) Indeed, the County has successfully mitigated offsite traffic impacts caused by its airport projects. This mitigation was accomplished with careful planning, recognizing there are limits to what the FAA will fund. As such, the County requests that the Airport Authority delay certification of the Final Environmental Impact Report until such time that the Airport Authority resolve the funding issue for off-site improvements to mitigate significant traffic impacts.

4. While the SDIA is located outside the jurisdiction of the County's Climate Action Plan (CAP), the County recommends close coordination with the City of San Diego and Port of San Diego to ensure compatibility with each agency's CAP.

5. The County's Waterfront Park provides for passive and active recreation opportunities and is located in between the 60dB CNEL and 65 dB CNEL noise contours (2016 Baseline conditions) of the Airport. According to the Airport Land Use Compatibility Comprehensive Plan Noise Compatibility Standards, uses such as Park, Open Space, Recreational uses would be considered compatible up to a noise environment of 75 dB CNEL. The analysis indicates that project implementation (year 2022) would result in noise contours slightly expanding, but the park would still fall within the 60 dB CNEL and 65 dB CNEL contours. The future noise environment (year 2030) would effectively be the same because the analysis indicates a slight adjustment to the contours but would still place the park within the 60-65 dB CNEL contours. If future conditions change that would increase impacts to County property by increasing the noise contours, including advancements in aviation or

R-AR 004-3 Cont'd
R-AR004-4
R-AR004-5
R-AR 004-6
R-AR004-7

R-AR 004-7 Cont'd

flight paths, the County requests that the Airport Authority consult with the County regarding potential noise impacts to County property.

If the County can be of further assistance or answer any questions that arise, please contact Marc Cass, Project Manager, at 858-694-2047 or Marc.Cass@sdcounty.ca.gov.

Sincerely,

MARKO MEDVED, PE CEM, Director
Department of General Services

cc: Aimee Faucett, Chief of Staff, Office of Mayor, City of San Diego
Kris Mitchell, Chief Operating Officer, City of San Diego
Randa Coniglio, Chief Executive Officer/President, Port of San Diego
Kim Kawada, Chief Deputy Executive Director, SANDAG
Cory Binns, District Director, District 11, Caltrans
Paul Jablonski, Chief Executive Officer, MTS
Sharon Cooney, Chief of Staff, MTS
Helen Robbins-Meyer, Chief Administrative Officer

COMMENT LETTER NO. R-AR004	County of San Diego Department of General Services	November 8, 2019

Response to Comment R-AR004-1

As indicated in Section 1.7, Availability of the Recirculated Draft EIR, on page 1-15 of the Recirculated Draft EIR: "The Recirculated Draft EIR replaces the 2018 Draft EIR in its entirety and includes a full statutory public review and comment period; therefore, all comments should address the Recirculated Draft EIR, not the 2018 Draft EIR or any portion thereof. While comments submitted on the 2018 Draft EIR will be included in the administrative record for the project, the SDCRAA will prepare written responses only to the comments submitted on the Recirculated Draft EIR."

Response to Comment R-AR004-2

The comment accurately reflects the description of the proposed project presented in Section 2.6, Project Characteristics, of the Recirculated Draft EIR.

It should be noted that, based on the alternatives analysis presented in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. As summarized in Section ES.10.4, Environmentally Superior Alternative, and Section 5.8, Environmentally Superior Alternative, of the Recirculated Draft EIR, the environmental impacts associated with Alternative 4 would be less than those of the proposed project, and Alternative 4 meets all of the project objectives.

Response to Comment R-AR004-3

Improvements to connect to the regional transit system and area highways require interagency cooperation and a variety of funding sources. SDCRAA has partnered with SANDAG, Caltrans, MTS, the City of San Diego, and the Port to form the Airport Connectivity Subcommittee. Led by SANDAG, the committee is assessing options to better connect SDIA to the regional transit system, to provide a Central Mobility Hub to lessen traffic at SDIA, and to identify improved connections to regional freeways. Through Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, SDCRAA is demonstrating its commitment to continued collaboration in developing regional access and funding solutions that benefit air passengers by improving access to SDIA.

As noted in SDCRAA's August 27, 2019 letter to the FAA and SDCRAA's November 27, 2019 letter to the FAA (included as an Addendum to Appendix R-K—see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, and Attachment 1 of this Final EIR), and as discussed further in Appendix R-K, FAA funding approval for off-Airport traffic improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. No I-5 direct connector ramps near the Airport are currently part of any

Caltrans or other agency improvement plans or programs and, therefore, were not included as possible traffic mitigation measure items or in the funding request to the FAA.

Response to Comment R-AR004-4

The identification of mitigation measures included discussion with the owner of the transportation facility to determine what SDCRAA would be allowed to construct. Since the City of San Diego owns and operates most roadways and intersections surrounding SDIA, SDCRAA regularly met with City staff throughout preparation of the traffic analysis for the Recirculated Draft EIR. The result of this vetting process was confirmation of the mitigation measures that the City would permit SDCRAA to implement, and those improvements that would not be permitted due to inconsistencies with Community Plan recommendations for street configuration and bicycle facility improvements. Where stated in the Recirculated Draft EIR that an improvement is inconsistent with a community plan, this was based on concurrence from the City of San Diego. This collaborative effort resulted in the proposed mitigation measures provided in both Section 3.14, Traffic and Circulation, and Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

The SDCRAA will continue to coordinate with the FAA regarding the potential funding of the transportation system improvements reflected in the mitigation measures of the Recirculated Draft EIR. A formal request has been submitted to the FAA to allow for the use of airport revenues to implement roadway and intersection mitigation. A copy of the request letter, dated August 27, 2019, and a November 27, 2019 follow-up letter to the FAA (included as an Addendum to Appendix R-K—see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, and Attachment 1 of this Final EIR), are provided in Appendix R-K, Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures, of the Recirculated Draft EIR. As noted in the August 27, 2019 letter to the FAA, and as discussed in Appendix R-K, FAA funding approval for off-Airport roadway and intersection improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. Other specific potential off-Airport roadway and intersection improvement items listed as possible mitigation measures in Section 3.14 and Appendix R-H1 of the Recirculated Draft EIR either would not meet this FAA funding requirement, or have not been approved or supported by the City of San Diego, which has jurisdiction over the improvement items.

Response to Comment R-AR004-5

The references to FAA policy regarding the use of airport revenues for traffic impact mitigation are acknowledged. As discussed in Appendix R-K to the Recirculated Draft EIR, Airport revenues may legally be used for the capital or operating costs of: (1) the airport; (2) the local airport system; or (3) other local facilities owned and operated by the airport owner or operator and directly and substantially related to the air transportation of passengers or property. (49 U.S.C. § 46301(a)(3); see also FAA Order 5190.6B, p. 15-4; FAA Policy and Procedure Concerning the Use of Airport Revenue, Feb. 16, 1999, p. 7705.) To satisfy the "directly and substantially related to the air transportation" prong, the access way should be the primary means of ground access to the airport, and in this case, funding is limited to the portion of the road from the airport to the nearest line of mass capacity. (FAA Order 5190.6B, p. 15-6.) This general rule prohibits the use of airport revenues for off-site projects that are not owned or operated by the airport and are not directly or

substantially related to air transportation. (See FAA Order 5100.38D, p. C-5.) In addition, if portions of the project will be used by both airport and non-airport passengers, airport funds must be pro-rated so that they are proportional to expected airport patrons' use. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA (included in Appendix R-K) are understood by the SDCRAA to satisfy the legal standards for FAA funding approval.

SDCRAA has formally requested the FAA's authorization for use of airport funds to mitigate traffic impacts, pursuant to applicable federal laws, Orders, and policies. The impacts were documented as not considered feasible, because of this reliance on FAA approval. Delay of certification of the Final EIR to wait for FAA approval to use airport funds to mitigate traffic impacts would not change the conclusions of the analysis and, if FAA approval is granted, would improve upon the determinations made in the Final EIR. Therefore, the comment to delay certification is acknowledged, but not pursued.

Response to Comment R-AR004-6

The San Diego County Climate Action Plan, City of San Diego Climate Action Plan, and Port of San Diego Climate Action Plan are described in Section 3.3, Greenhouse Gases and Climate Change, specifically, Section 3.3.4.5, Local, of the Recirculated Draft EIR. Table 3.3-7 in Section 3.3 describes the proposed project's relationship to, and consistency with, those climate action plans, as well as with other plans, policies, and regulations adopted to reduce greenhouse gas emissions. As indicated in that table, the proposed project includes features comparable to measures in those Climate Action Plans and implementation of the proposed project would not conflict with those plans.

The comment expresses concurrence with the Recirculated Draft EIR's finding that the San Diego County Climate Action Plan is not directly applicable to SDIA. As for the commenter's recommendation that SDCRAA closely coordinate with the City of San Diego and Port of San Diego relative to Climate Action Plan consistency, SDCRAA has consulted and is continuing to consult with those agencies over the course of the ADP development and environmental review processes.

Response to Comment R-AR004-7

As indicated by the aircraft noise contours shown in the Recirculated Draft EIR, specifically, Figure 3.12-5, CNEL Contours (60-75 dB) for Existing (2018) Baseline Conditions and Figure 3.12-12, 2050 CNEL Contours (60-75 dB), the County Waterfront Park is, or would be, exposed to aircraft noise levels of between 60 and 65 CNEL for both existing (2018) baseline conditions and long-term future horizon year (2050) conditions, respectively. The current and future aircraft noise exposure levels at the Park would be well within the acceptable compatibility level for that land use (i.e., 75 dB). Notwithstanding that significant noise impacts to the Park are not anticipated to occur in the near-term or long-term, the SDCRAA will continue to communicate with the County regarding Airport-related environmental issues, as appropriate.

County of San Diego

ELISE ROTHSCHILD
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6786
www.sdcdeh.org

AMY HARBERT
ASSISTANT DIRECTOR

November 4, 2019

RECEIVED
NOV 12 2019
BY: .....

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

Sent via e-mail to: planning@san.org

COMMENTS: Recirculated Draft Environmental Impact Report, San Diego International Airport, Airport Development Plan, Sch. No. 2017011053, SDCRAA #EIR-18-01

Dear Mr. Anasis:

Thank you for the opportunity to comment on the referenced project. The County of San Diego Hazardous Materials Division (HMD) is responsible for the protection of public health and the environment by ensuring hazardous materials, hazardous waste, medical waste and underground storage tanks are properly managed. The HMD has completed their review and has the following comments regarding the project.

The proposed project would include the following components as stated in the Notice of Availability:
The primary elements of the Airport Development Plan (ADP) include 1) replacement of Terminal 1 with a new terminal; 2) circulation and roadway improvements including entries for inbound vehicles, and multi-use pedestrian and bicycle pathways; 3) replacement of the existing east concourse and addition of a new west concourse at Terminal 2, plus a concourse connector between Terminal 2 West and the new Terminal 1; 4) airfield taxiway and overnight aircraft parking area improvements; 5) potential commercial development of the new Terminal 1; 6) development of a five-story parking structure at Terminal 1; and, 7) replacement of displaced administrative offices and other various infrastructure improvements.

R-AR005-1

Mr. Ted Anasis
November 4, 2019
San Diego International Airport (SDIA)

The Proposed Project at SDIA comprises a wide scope with multiple environmental impacts summarized in Table ES-3 of the Executive Summary. Potential impacts pertaining to HMD regulated programs are identified as:

1. Updates and changes to any hazardous materials handled and stored above Hazardous Materials Business Plan (HMBP) thresholds, as well as site map changes, must be submitted to the California Environmental Reporting System (CERS) within thirty days of the change occurring. For new installations, tenant improvements, and retrofits, the facility operator is also required to submit a Hazardous Materials Questionnaire to the HMD and complete an HMD Hazardous Materials Plan Check review prior to issuance of a certificate of occupancy by a Building Department. For your reference, information regarding the HMD plan check requirement can be reviewed at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html

2. A proper waste determination is required for any and all construction-related wastes including, but not limited to, scrap metal, fuels, greases, used oil, soil exports, and debris. Each waste must be classified, labeled, handled, stored, and disposed of in compliance with state and county regulations. In addition, all hazardous waste must be managed in a manner that prevents a release to the environment. Any hazardous waste generated by the Proposed Project must be properly classified, labeled, stored, and disposed of by a California registered hazardous waste hauler. A Unified Program Facility Permit may also be required for the accumulation and storage of these wastes. Additional information is available at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazwaste.html

3. Be advised that the facility is subject to the requirements of the Aboveground Petroleum Storage Act (APSA) and has petroleum storage shell capacity of 1,320 gallons or greater. Additional tanks, containers, or equipment storing petroleum will require an updated SPCC plan that includes all aboveground storage tanks (ASTs) and any tanks in an underground area (TIUGAs). More information about APSA is available at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_apsa.html

4. If soil and/or groundwater contamination containing a hazardous substance is discovered or encountered, the SDCRAA shall investigate the contamination and report the release to the HMD and applicable state or federal agency. Some environmental assessment and/or remediation work may involve several regulatory oversight agencies. If a release of hazardous waste is discovered as part of this project, timely reporting of the release in writing to the county and state oversight agencies may be required pursuant to state laws. More information is available at: https://www.waterboards.ca.gov/sandiego/water_issues/programs/smc/scp.html

5. Underground storage tanks (USTs) and piping associated with USTs discovered during site work that previously held a hazardous substance, and SDCRAA intends to remove, will require the SDCRAA to apply for a UST removal permit before removing the tank and connected piping. Information about the permitting process can be found at: https://www.sandiegocounty.gov/deh/hazmat/ust/hmd_ust_construction.html

R-AR005-1 Cont'd
R-AR005-2
R-AR005-3
R-AR005-4
R-AR005-5

6. Additionally, installation of a UST system or underground sump/vault to collect and/or store a hazardous substance will require a UST installation permit before construction of the system. Information about this permitting process and laws is found at the weblink listed in #5 above.

7. If a fueling rack with a fuel recovery, fuel drainage/collection tank, or spill tank is installed underground, the State UST regulations for underground tank systems may be applicable and should be addressed. Furthermore, please be advised that underground piping associated with an airport hydrant system (AHS) and connected to above-ground fuel storage tanks may be regulated as an underground storage tank (UST) system. If ten percent or more of the total storage capacity is underground, then the AHS meets the definition of a regulated UST system. The calculation must include all aboveground and underground tanks storing aircraft fuel and all underground piping. More information on regulating AHS including examples to assist in performing the calculation is found at: https://www.epa.gov/sites/production/files/2017-10/documents/fct-ahs-10-4-17-final508.pdf

8. Please note, the SDCRAA is currently being regulated by HMD for storage of hazardous materials, generation of hazardous wastes, and the Aboveground Petroleum Storage Act. Anytime during construction and after completion of the Proposed Project, the HMD has the authority pursuant to state law and County Code to regulate SDCRAA and any additional activities at this locationthat handle or store hazardous materials, and/or generate or treat hazardous waste. Additional regulatory guidance information can be found on our website at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html.

R-AR005-6
R-AR005-7
R-AR005-8

The HMD appreciates the opportunity to participate in the environmental review process for the Project. If you have any questions regarding the above comments, please contact Sharon Preece at (858) 495-5213 or by e-mail at sharon.preece@sdcounty.ca.gov

Sincerely,

Sharon Preece, Supervising Environmental Health Specialist
Hazardous Materials Division

Email Ecc: Mary Bennett, DEH
Ryan Forsyth, DEH-HMD
Sande Pence, DEH-HMD

COMMENT LETTER NO. R-AR005	County of San Diego Department of Environmental Health	November 12, 2019

Response to Comment R-AR005-1

The comment does not address the environmental analysis presented in the Recirculated Draft EIR. However, requirements regarding Hazardous Materials Business Plan (HMBP) thresholds and HMD Hazardous Materials Plan Check review are noted and will be complied with, as applicable.

Response to Comment R-AR005-2

Requirements regarding a waste determination of construction waste and handing of hazardous waste are noted. Additionally, see Section 3.9, Hazards and Hazardous Materials, of the Recirculated Draft EIR, for a discussion of the rules and regulations that project contractors would comply with when handling hazardous materials/waste during construction. These include compliance with the Hazardous Waste Control Law that regulates the generation, transportation, treatment, storage, and disposal of hazardous waste and establishes criteria for identifying, packaging, and labeling hazardous wastes.

Response to Comment R-AR005-3

The comment does not address the environmental analysis presented in the Recirculated Draft EIR. However, SDCRAA would comply with the Aboveground Petroleum Storage Act requirements, as applicable. A short description of the Aboveground Petroleum Storage Act has been added to the summary of regulations/policies applicable to hazards and hazardous materials in Section 3.9.3, Regulatory Framework, in Section 3.9, Hazards and Hazardous Materials, of the Recirculated Draft EIR.

The following paragraph has been added to the end of Section 3.9.3.2 on page 3.9-9 of the Recirculated Draft EIR to reflect this modification, which is shown in underlined italicized (new) text.

> ***Aboveground Petroleum Storage Act***
>
> *The Aboveground Petroleum Storage Act (APSA) regulates facilities with aggregate aboveground petroleum storage capacities of 1,320 gallons or more stored in aboveground storage containers, oil-filled equipment, or tanks with petroleum storage capacities of 55 gallons or more. Unless exempted, a facility in the APSA Program must prepare and implement a Spill Prevention, Control, and Countermeasures (SPCC) Plan, which is intended for the prevention of, preparedness for, and response to petroleum discharges and identifies procedures, methods, and equipment at the facility to prevent such discharges. SDIA has an aggregate aboveground petroleum storage capacity of 1,320 gallons or more, and is regulated under the APSA.*

This revision is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-AR005-4

The comment is noted. Section 3.9.3, Regulatory Framework, of the Recirculated Draft EIR provides a summary of the various requirements and oversight agencies related to hazardous materials. Existing known/potential areas of groundwater and/or soil contamination on, or in the vicinity of, the project site are identified in Section 3.9.4, Environmental Setting, of the Recirculated Draft EIR. As discussed in Section 3.9.6, Project Impacts, of the Recirculated Draft EIR, SDCRAA would comply with all existing regulatory requirements for the remediation, treatment, handling, and disposal of any contaminated soils and/or groundwater that may be encountered during construction. In addition, as discussed in Section 3.9.6.1.3, Mitigation Measures, of the Recirculated Draft EIR, SDCRAA has included a number of mitigation measures to ensure that potential impacts associated with any contamination that may be encountered would be reduced to a level less than significant.

Response to Comment R-AR005-5

Requirements regarding removal of underground storage tanks (UST) and associated piping are noted and will be complied with. Additionally, see Section 3.9, Hazards and Hazardous Materials, of the Recirculated Draft EIR, for a discussion of rules and regulations that would be complied with during construction to address any discovery, removal, or abatement of hazardous or potentially hazardous materials.

Response to Comment R-AR005-6

The comment does not address the environmental analysis presented in the Recirculated Draft EIR. However, requirements regarding installation of a UST system or underground sump/vault are noted and will be complied with, as applicable.

Response to Comment R-AR005-7

The UST monitoring and response program is identified in the summary of regulations/policies applicable to hazards and hazardous materials in Section 3.9.3, Regulatory Framework, in Section 3.9, Hazards and Hazardous Materials, of the Recirculated Draft EIR. The SDCRAA will comply with all applicable federal, state, and local regulations regarding the construction and operation of the proposed project, including compliance with state UST requirements.

Response to Comment R-AR005-8

The comment is so noted.

2.2.5 Local Agency Comments

From: Wood, Lisa <LFWood@sandiego.gov>
Sent: Monday, September 23, 2019 4:22 PM
To: Airport Planning
Subject: Draft Environmental Impact Report sch no 2017011053

Thank you for sending the notice of the recirculated draft EIR to the Environmental Services Department of the City of San Diego. This department manages waste for the City of San Diego, and operates the Miramar Landfill. In disclosing impacts in the EIR, it would be helpful to know how much and what type of solid waste will be generated by this project, how it will be managed, if State and local waste management plans will be followed, and if waste diversion targets will be met. Additionally, if waste is intended to be delivered to the Miramar Landfill, an approximate timeline, with types and quantities, may be needed, depending on the quantity. If you have any questions about these comments, please contact me at 858-573-1236. R-AL001-1

Lisa Wood

RECEIVED
SEP 23 2019
BY: .....

COMMENT LETTER NO. R-AL001	City of San Diego Environmental Services Department	September 23, 2019

Response to Comment R-AL001-1

Please see Section 3.15, Utilities, of the Recirculated Draft EIR for a discussion of solid waste. In particular, see Section 3.15.3, which addresses requirements and policies to which the proposed project would adhere, and Section 3.15.6.4, which provides estimated quantities of solid waste that would be generated during construction and operation of the proposed project and identifies required minimum waste diversion rates. Recycling, reduction, and waste diversion strategies that currently occur at SDIA and that would be expanded/continued under the proposed project are addressed in Section 3.15.4.3.1 and Section 3.15.6.4. This includes compliance with state- and county-mandated requirements and additional programs and policies implemented at SDIA that exceed the requirements.

As identified in Section 3.15.6.4, solid waste accumulated during construction and operation may be deposited at Miramar Landfill and/or other local landfills (i.e., Sycamore Landfill and/or Otay Landfill). It is acknowledged that, depending on the quantity of materials to be deposited, Miramar Landfill may require advance notification.

From: Shah, Khuram <KHShah@sandiego.gov>
Sent: Thursday, October 3, 2019 11:27 AM
To: Airport Planning; Anasis Ted; Stevens, Richard
Cc: Tabatabaii, Elham; Wilson, Leonard
Subject: NOA for SDCRAA # EIR-18-01
Attachments: WSA for RDEIR.pdf; 20_SAN_ADP_2019_RDEIR_3.15_UTL_Sept_2019.pdf

The San Diego Public Utilities Department is in receipt of the Notice of Availability and comments period for above referenced RDEIR (www.san.org/plan).

On review of the applicable Utility and Water Supply Assessment sections, we had two comments to provide and follow up on before the Nov. 4th deadline.

1) Water Supply Assessment Appendix R-I currently includes an unsigned draft. A signed document (10/2/2019) is provided as an attachment to this email for use.
2) Please clarify if the Utility coordination described in Water Supply Assessment, "Availability of Sufficient Supplies" is considered in highlighted sections below. Will there be any water lines abandoned in place or will there be any meter relocations? Fig. 3.15-5 pasted below was not noted as a cross reference for these sections and we were not sure if it was current based on the latest PUD and SDCRAA discussions. We are able to assist if needed in order to develop any updated information.

R-AL002-2 R-AL 002-1

Reference Sections:

3.15.3.2 – State (including CWC and Lead Agency identification)
3.15.4.1 - Potable Water (regional agreements and City/County UWMPs)
3.15.6.2.2 – Operations (including WSA and water line information)
3.15.4.1.1 - Water Supply Assessment (background)
3.15.4.1.2 – SDIA Water Use and Conservation
3.15.7 - Summary of Impact Determinations (including impacts matrix)

RECEIVED
OCT 0 3 2019
BY: .....

COMMENT LETTER NO. R-AL002 City of San Diego Public Utilities Department October 3, 2019

Response to Comment R-AL002-1

The SDCRAA appreciates the City's completion of the Water Supply Assessment for the Airport Development Plan. Appendix R-I, Water Supply Assessment, of the Recirculated Draft EIR has been revised to replace the Water Supply Assessment dated August 2019 with the signed copy dated October 2019.

The first sentence of Section 3.15.1.1.1, Water Supply Assessment, on page 3.15-11 of the Recirculated Draft EIR has been revised to reflect this modification, which is shown in strike-through (deleted) and underlined italicized (new) text.

> As explained in Section 3.15.3.2, while not required for the proposed project, a WSA was prepared for the proposed project in ~~August~~*October* 2019 by the PUD (Appendix R-I).

This revision is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR. The October 2019 Water Supply Assessment is included as Attachment 2 of this Final EIR.

Response to Comment R-AL002-2

The Recirculated Draft EIR contemplates that SDCRAA will coordinate with service providers, including PUD, on improvements to utilities associated with the proposed project, as noted in the Water Supply Assessment. (See Recirculated Draft EIR, Section 3.15, Utilities, analysis of construction and operation of utility improvements.)

The third sentence under the heading *Water Facilities* on page 3.15-26 in Section 3.15, Utilities, of the Recirculated Draft EIR has been revised to reflect the following modification, as shown in underlined italicized (new) text.

> This would include establishing connections to existing lines along North Harbor Drive and Airport Terminal Road *in coordination with the City of San Diego* to connect to the new construction.

This revision is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Regarding abandonment of water lines, the project would remove water lines that would no longer be used within the project's construction footprint and abandon in place water lines that would no longer be used outside of the limits of construction. The project would likely relocate some meters, but the specific water meter removal, modifications, and relocations would be identified and reviewed during the building permit plan review process with the City of San Diego and to the satisfaction of the Public Utilities Engineer. All existing water utilities and related existing water meters to be relocated would be moved to locations that would allow PUD to read and service the water meters.

Regarding Figure 3.15-5 in Section 3.15, Utilities, of the Recirculated Draft EIR, this figure shows the conceptual plan for the water distribution system at the time the Recirculated Draft EIR was released. This plan will be refined as necessary during the project design phase to reflect the

detailed engineering plans, as well as coordination with PUD. Regardless, while some additional piping may be removed associated with Taxiway A and B improvements, the general piping layout is not expected to substantially change from that shown on Figure 3.15-5 as a result of detailed engineering and further discussions with PUD. A cross reference to this figure has been added to page 3.15-43 in Section 3.15.6.2.2.

A final sentence added to the first paragraph following Table 3.15-4 on page 3.15-43 in Section 3.15, Utilities, of the Recirculated Draft EIR has been added to reflect the following modification, as shown in underlined italicized (new) text.

> Therefore, it is expected that the new facilities associated with the proposed project would achieve a reduction in water use rates as compared to the existing water use rates. *Figure 3.15-5 provided in Section 3.15.6.1 above, identifies proposed Phase I modifications to the water distribution system.*

This revision is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Peninsula Community Planning Board

October 17, 2019

RECEIVED
OCT 23 2019
BY: .....

SDCRAA
Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276
E-mail: planning@san.org

Re: Peninsula Community Planning Board's ("PCPB") comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR")

Dear Mr. Anasis:

This letter is to provide the Peninsula Community Planning Board's ("PCPB") comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR"). These comments are being provided on behalf of the residents of Point Loma. In general, we object to the DEIR as all the benefits of the Airport expansion go to the Airport Authority and the airlines. However, the burdens of increased noise and pollution all unfairly fall on the residents of Point Loma, and other surrounding communities, such as Ocean Beach. The Airport's position in the DEIR is that these issues of noise and pollution are "significant but unavoidable harm" to the human health of Point Loma residents. This is offensive and unacceptable. As outlined below, there are procedures in place to address these human health issues. This should be done first. Thus, the DEIR should not be approved or move forward until real harms to human health are properly addressed. R-AL003-1

Below are more detailed comments on our objections to the DEIR and our request for the Airport Authority to follow the proper order of actions, which places human health concerns first, and before Airport and airline profits.

PCPB Comments and Objections to DEIR

The San Diego County Regional Airport Authority ("SDCRAA") and the FAA have forecasted airport operations will increase by 15% through 2026, to a rate of one arrival or departure every 86 seconds, 17 hours a day, 365 days a year, regardless of whether the Airport Development Plan ("ADP") is built or not. Thus, the SDCRAA is promoting a $3 Billion ADP proposal which includes: R-AL003-2

1. 11 additional gates and additional "Remain Overnight" aircraft parking places that will increase air traffic arrivals late into the night and stretch the morning departures well into mid-morning

2. A new office building for their management, staff and Directors

3. New restaurants, bars and seating for passengers

… all "to improve the passenger experience"—without regard to the impact on our Point Loma community

Unfortunately, the DEIR does not commit any moneys to protect the health of persons in Point Loma or in other affected communities. Instead, the ADP will significantly accelerate the airport's growth rate to reach operational capacity within several years, resulting in:

• 3 times current noise impacts by 2026 (according to SDCRAA data)

• Human health consequences for cardiac, stress, sleep disturbances, cancer and cognitive learning, as documented by the World Health Organization

• Greater safety risks from increased Missed Approaches

• Increased evening and nighttime arrivals and departures, especially with the additional "Remain Overnight" aircraft parking places. Early morning noise impacts will adversely harm the health of Point Loma residents

• Increased pollution and climate impacts from increased aircraft operations

• More and louder, low flying wide body aircraft

The SDCRAA, FAA, and the airlines are focused on increasing their revenues and profits at the expense of our impacted communities. They want more flight operations to handle more passengers, but without regard for the impacts on those affected. This is particularly troubling in light of the ongoing Flight Path & Procedure and Part 150 Studies, which are scheduled to be completed by 2021, resulting in recommendations to mitigate jet noise. The significant and harmful impacts of the SDCRAA's proposed ADP and associated growth will be borne by the surrounding communities and the tens of thousands of residents and small businesses in Point Loma, and other affected communities, including Mission Hills, South Park, Golden Hill, Mission Beach, Ocean Beach, Pacific Beach, and La Jolla.

In fact, the SDCRAA has not undertaken any efforts to monitor or analyze the annual accumulation of hydrocarbon residue on Point Loma residents.

Moreover, these unmitigated impacts, as represented by the AA data and in the DEIR, are in direct conflict with:

R-AL003-2 Cont'd
R-AL003-3
R-AL003-4
R-AL 003-5
R-AL003-6
R-AL 003-7
R-AL003-8
R-AL003-9
R-AL003-10
R-AL 003-11
R-AL 003-12

Peninsula Community Planning Board

a) The FAA's Reauthorization Act of 2018, requiring studies to be conducted on human health issues, implicitly before expansion projects resulting in more noise are undertaken;

b) The SDCRAA's CEO commitment to "[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation" and;

c) The intent and purpose of Title 21 of the Cal. Code of Regulations, which provides regulations designed to cause SDCAA to work to (1) "diminish" noise problems; (2) hold SDCRAA responsible for "controlling and reducing the noise impact area in communities; and (3) to "protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors."

Therefore, the PCPB demands that SDCRAA withdraw and suspend the Revised Draft Environmental Impact Report, and instead do things in the proper order, as follows:

1. Complete the already pending Flight Path & Procedure and Part 150 Studies, assessing commercial jet and airport operation noise mitigation measures;

2. Gather and assess the medical evidence regarding the human health risks of the proposed SDIA airport expansion and the associated substantial increase in flight operations, including cardiac, stress, cancer, sleep disturbances, and cognitive learning;

3. Conduct a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents, and analyze the toxicity of the hydrocarbon residue on human health; and

4. Only after steps 1, 2 & 3 are completed, consider the proposed ADP expansion plan which will increase flight operations and impact the surrounding communities; and in that context (a) consider realistic alternatives to reduce the project scope, (b) reduce or eliminate the additional jet "Remain Overnight" parking places, (c) require quieter Stage 4 & 5 jet engines during morning and evening operations, and (d) provide funding for meaningful noise and pollution mitigation programs.

Thank you for consideration of this information.

Sincerely, Robert A. Goldyn

Bob Goldyn, Chairman (PCPB)

Approved by an Action of the Peninsula Community Planning Board on 17 October 2019.

Peninsula Community Planning Board
1220 Rosecrans Street. PMB 549, San Diego, CA 92106
www.pcpb.net
pcpbsd@gmail.com

R-AL003-15
R-AL003-14
R-AL 003-13
R-AL 003-12 Cont'd

COMMENT LETTER NO. R-AL003 Peninsula Community Planning Board October 23, 2019

Response to Comment R-AL003-1

Pursuant to the California Environmental Quality Act (CEQA), the Recirculated Draft Environmental Impact Report (EIR) evaluates and discloses the potential environmental impacts of the proposed San Diego International Airport (SDIA) Airport Development Plan (ADP), identifies those impacts determined to be significant, evaluates potential mitigation measures and alternatives that could avoid or reduce those significant impacts, and provides conclusions regarding levels of significance after mitigation. The comment asserts that "[t]he Airport's position in the DEIR is that these issues of noise and pollutant are 'significant but unavoidable harm' to the human health of Point Loma residents." The comment is incorrect. As stated in Section 3.4.8, page 3.4-24, of the Recirculated Draft EIR, "[t]here would not be significant and unavoidable impacts to human health risk associated with construction and operation of the proposed project." That conclusion is applicable to Point Loma as well as other areas around SDIA.

Regarding the commenter's reference to other concerns expressed in the comment letter, please see Responses to Comments R-AL003-2 through R-AL003-15 below.

Response to Comment R-AL003-2

Airline activity schedules and passenger demand dictate the night arrivals at SDIA and the volume of morning departures. The hourly volume of these operations is already limited by the single-runway capacity and the departures curfew from 11:30 p.m. to 6:30 a.m. The existing gates and "remain overnight" (RON) positions can accommodate current and forecast demand as demonstrated in the No Project Alternative Design Day Flight Schedule (DDFS) gating (See Appendix R-B2: Gated Schedules of the Recirculated Draft EIR). In the No Project Alternative, RON aircraft parking positions would be used to board and deplane passengers directly on the airfield apron via shuttle bus service from the existing terminal areas. This boarding process - called "hardstanding" - is used at airports throughout the United States and many airports around the world. For larger airports, hardstanding is sometimes used as an interim gate accommodation during construction of new facilities. At other airports, it is the preferred solution for gate flexibility, particularly during periods of rapid growth. The former commuter terminal at SDIA operated exclusively as a hardstand operation.

As background, the future required gates and RON aircraft parking positions at SDIA were determined through the planning process for the Airport Development Plan (ADP). Gate requirements through a master planning process are customarily based on two factors: (i) the forecast of enplaned passenger traffic, notably during the peak hour of the design day and (ii) the need to provide an acceptable level-of-service for the departing passengers.

The forecast of passenger traffic volumes is driven by expected growth in air travel by the regional population and is factored for a broad range of economic drivers such as: population, per capita personal income, disposable income, employment, economic vitality and, to a lesser extent, access to destination markets, mobility, and supporting infrastructure. Airlines, over time, respond to evolving demand by initiating service to markets (cities) and growing the number of available seats in those markets over time based on near-term demand growth. Airlines are able to gradually increase available seats in a market through a number of methods, namely by adding flight

frequency to a particular destination or by increasing the aircraft size in a market (i.e., replacing a 140-seat Boeing 737-300 with a 177-seat Boeing 737-900 or an even larger 200-seat Boeing 757-200). Depending on the substituted aircraft, this can increase seat capacity from 25-50 percent on a single departing flight, thereby allowing an airline to accommodate substantial increases in passenger traffic without increasing the number of actual departures. The aviation demand forecasts completed for the ADP are provided in Appendix R-B1 of the Recirculated Draft EIR.

In the case of SDIA, operating with a single-runway configuration adds an operational constraint that restricts the number of peak hour departures and arrivals. As the number of peak hour scheduled operations approach this constraint level, impacts to ground movements in the form of gradual increases in delays, which ultimately result in a plateauing or leveling-off on aircraft operations to avoid substantial delays and resulting non-productive delay costs that are not sustainable from an airline's perspective. As operations reach this peak hour capacity, airlines will consider increasing the aircraft size and number of available seats to serve the growing demand by the traveling public. The single-runway configuration at SDIA constrains operational activity, but growth in regional travel demand requires each airline to consider options to serve their customers. These changes in peak hour activity, aircraft activity at each gate, and the size of aircraft utilized, all impact the planned number of gates and their sizing.

The planned number of gates is determined by the volume of passenger traffic in the market during peak hour; these volumes are translated to interior building space requirements. Terminal space requirements are based on widely accepted principles of area-per-passenger estimates based on both U.S. and international standards associated with acceptable levels-of-service, closely related to passenger comfort. As peak hour passenger volumes increase, a corresponding increase in concourse departure lounge areas (also known as gate holdrooms) also increase, along with the need for more restrooms, concessions, and circulation space. Without these corresponding facility upgrades, passenger activity would become more congested, delayed, and uncomfortable for all travelers. Those impacted the most would be the disabled, elderly, and families flying with small children. Therefore, as passenger traffic increases over time, and as the airlines respond by increasing aircraft frequency at the gate or aircraft size, the volumes of terminal space must also increase accordingly. These increases are reflected in the planned functional space requirements for terminal and concourse operations calculated in ADP planning.

Historic and future gate utilization characteristics for each airline, the anticipated passenger volumes, and departure lounge requirements are factored to ultimately determine the number of gates needed to accommodate future passenger levels. The resulting gate requirements consider arrival/departure frequency, time to unload, service and load aircraft, and movements on/off each gate position, to ultimately calculate operations per gate within an acceptable range. Airlines strive to improve utilization of a gate by decreasing the amount of idle time at a gate; this optimization allows for reduced costs on a per departure basis, but more importantly allows more passengers to be accommodated. The overall gate utilization varies by airline and was carefully considered in the ADP planning to arrive at the recommended number of gates in the future, while maintaining an acceptable level-of-service. Sacrificing level-of-service will increase delays to the airlines and passengers and will erode overall travel experience satisfaction. The ADP requires gates associated with forecast passenger growth over the ensuing 20-year period. The table below indicates the current number of aircraft gates, by terminal, at SDIA, and the future number of gates by

implementation phase, based on approval of Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Aircraft Gates and Remain Overnight (RON) Aircraft Parking Positions at SDIA[1]

Terminal	Existing	Phase 1a	Phase 1b
Aircraft Gates			
Existing T1	19	0	0
Replacement T1(a)	-	19	19
Replacement T1(b)	-	0	11
Existing T2-West	19	19[2]	19[2]
Existing T2-East	13	13	13
Total Gates	**51**	**51**	**62**
Remote RON Aircraft Parking			
RON Positions	**28**	**22**	**22**

Source: LeighFisher, 2019.

Notes:

1. Based on Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR
2. Four widebody gate positions west of existing T2-West would operate as six narrowbody gate positions in Phases 1a and 1b.

RON requirements are associated with the need to provide aircraft parking at an airport as airlines transition from scheduled operations day-to-day. This inactive period typically occurs over the nighttime hours when flights stop due to departure curfews and limited or non-existent passenger travel. RON parking may take place at the terminal gates or may occur off the gates in a separate, remote area, and is determined by each airline's operational schedule. RON positions are not associated with providing additional runway departure or arrival capacity; rather they provide temporary storage for aircraft as airlines stage for the loading and unloading of passengers, thereby increasing gate utilization.

In the case of SDIA, overnight parking is a necessary activity to support the terminal operations and it takes place at both the terminal gates and remote locations. The need for RON positions is influenced by a combination of factors: (1) the existing nighttime departure restrictions which impact runway activity from 11:30 pm to 6:30 am; (2) the west coast nature of the Airport and the traveling public's desire to depart early for east coast travel as well as other destinations; (3) the intensity of apron activity resulting from a concentration of aircraft gates south of Runway 9-27; and (4) the growing need to optimize the utilization of gates caused by both the runway capacity constraints and the limited land area for terminal and gate development. Currently, SDIA has the capability to support 28 remote RON positions, which are located east of Terminal 1, west and adjacent to Terminal 2, and north of Runway 9-27, and are utilized on an as-needed basis to accommodate airline scheduling.

The table above indicates the current number of RON aircraft parking positions at SDIA and the future number of RON aircraft parking positions, by implementation phase, based on approval of Alternative 4. As shown, implementation of Alternative 4 would result in a loss of six (6) RON aircraft parking positions at SDIA, compared to current conditions.

Utilizing a combination of gate optimization and airfield simulation software, the ADP planning determined the necessary RON positions utilizing gate capacities available throughout the 20-year planning period and based on an estimate of future airline schedules and fleet composition. This analysis confirmed that the Airport is capable of supporting the future travel demand and related airline activity, through a combination of future gates and available RON positions. In the future, full use of existing and future gates for RON parking is anticipated along with the use of remote RON positions to a lesser degree. The gate and airfield simulation tools indicate a growing need for RON positions over time, which is illustrated in the table below. Under the No Project scenario (i.e., no new gates added at SDIA), the growth in aviation activity that is projected to occur over time, regardless of the proposed project, would result in the need to maximize the use of current RON aircraft parking positions (up to 28 total positions, 24 narrowbody and 4 widebody positions) by 2035. Under Alternative 4, the future growth in aviation activity at SDIA and presence of more aircraft would be partially accommodated by the additional aircraft gates, therefore reducing the need for more RON (remote) aircraft parking positions. It should be noted that although development of Alternative 4 would provide for more RON positions than actually needed (i.e., 22 RON positions provided, per table above, but only 18 RON positions required, per table below), the four excess RON positions would simply provide more flexibility and efficiency in RON operations, but would not result in causing more late night flights or early/mid-morning departures; the RON positions have no bearing on late or early flights.

It should be noted that the future need for RON positions is based on future theoretical airline schedules and assumptions about gate usage in an effort to optimize operations. Actual operations over time are anticipated to vary in terms of actual schedule, aircraft type, gate assignments by airline, and airline performance characteristics. Additionally, the actual use of RON positions may vary on any given day based on irregular operations resulting from aircraft mechanical issues, weather, airfield or gate maintenance, etc.

Future Remote RON Aircraft Position Requirements at SDIA

Year	No Build	Alternative 4
2018	8	-
2024	20	21
2026	22	11
2030	26	15
2035	28 / 4	18 / 3

Source: LeighFisher, 2019.
Notes: In 2035,

- No Build layout provides 28 narrowbody RONs, 4 of which are widebody positions
- Alternative 4 provides 18 narrowbody RONs, 3 of which are widebody positions

Please also see the Responses to Comments R-AL003-3 through R-AL003-15 below which address the commenter's concern regarding impacts to the Point Loma community. As indicated in Response to Comment R-AL003-13, SDCRAA is committed to being a good neighbor to surrounding communities, including Point Loma.

Response to Comment R-AL003-3

The ADP project would accommodate the demand for air service that is generated by economic activity in the San Diego Region and would not accelerate the Airport's growth rate by its implementation. See Response to Comment R-AL003-2 for additional background on the ways in which airport improvements accommodate the demand for air service. Please also see Response to Comment R-AL003-13 related to SDCRAA's commitment to being a good neighbor to surrounding communities, including Point Loma.

Response to Comment R-AL003-4

It is unclear as to how the commenter is measuring "3 times current noise impacts by 2026." Given that the other bullet points near the subject comments pertain to aircraft operations, Table 3.12-8 and Table 3.12-9 on pages 3.12-43 and 3.12-44, respectively, of the Recirculated Draft EIR provide a quantification of aircraft noise impacts associated with the proposed project. As can be derived from Table 3.12-8, the projected total increases in exposure to aircraft noise levels of between 60 CNEL and 75+ CNEL in 2026 are as follows:

- Population: Approximately 0.3 times greater than current conditions (94,974 people in 2026 compared to 72,610 in 2018)
- Housing Units: Approximately 0.3 times greater than current conditions (43,415 housing units in 2026 compared to 32,130 in 2018)
- Acreage: Approximately 0.5 times greater than current conditions (10,634 acres in 2026 compared to 7,064 acres in 2018)

These increases are between 6- and 10-fold *less* than the "3 times current noise impacts by 2026" suggested in the comment. Similarly, the increases in other noise-sensitive uses identified in Table 3.12-9 exposed to aircraft noise levels of between 60 CNEL and 75+ CNEL in 2026, compared to current (2018) conditions, are all just a fraction of what is suggested by the comment (i.e., the increases in 2026 would be between approximately 0.3 times greater and 0.5 times greater than current conditions).

Recognizing that it is unclear as to how and why the commenter suggests that implementation of the proposed project would result in "3 times current noise impacts by 2026," and by what measure, the following summarizes the noise impacts analysis presented in Section 3.12, Noise, of the Recirculated Draft EIR and indicates the metrics used in evaluating impacts.

As discussed in Section 3.12, Noise, of the Recirculated Draft EIR, even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, noise impacts associated with operation of the proposed project would be significant and unavoidable.

Section 3.12.3.4 of the Recirculated Draft EIR identifies the thresholds of significance for evaluating aircraft noise impacts. As discussed, the proposed project would result in significant impacts related to aircraft noise if it would:

- Generate aircraft noise that would increase noise levels at exterior use areas of residences, schools, or places of worship to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition (Impact 3.12-1).

- Cause a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater, as compared to the existing (2018) baseline condition (Impact 3.12-2).
- Cause a 3.0 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, as compared to the existing (2018) baseline condition (Impact 3.12-3).
- Cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to the existing (2018) baseline condition (Impact 3.12-4).
- Cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population, as compared to the existing (2018) baseline condition (Impact 3.12-5).

Concerning Impact 3.12-1, airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition. Mitigation through soundproofing could reduce this impact, but it is uncertain whether all of the affected uses would qualify for soundproofing. As such, and as further described in Section 3.12.3.5.2 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.2.1 and Section 3.12.3.5.2.2 of the Recirculated Draft EIR, respectively.

Concerning Impact 3.12-2, there would be a 1.5 dB or more increase in noise sensitive areas being exposed to 65 CNEL or greater in 2024, 2026, 2030, 2035, and 2050 as a result of airport operations, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.3 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. As noted in this section of Recirculated Draft EIR, and for informational purposes only and not for purposes of making a significance determination, the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.3.1 and 3.12.3.5.3.2 of the Recirculated Draft EIR, respectively.

Related to Impact 3.12-3, implementation of the proposed project would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.4 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without

implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.4.1 and 3.12.3.5.4.2 of the Recirculated Draft EIR, respectively.

Concerning Impact 3.12-4, implementation of the proposed project would not cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.5 of the Recirculated Draft EIR, this would be a less than significant impact. As noted in this section of Recirculated Draft EIR, and for informational purposes only and not for purposes of making a significance determination, the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. No mitigation is required relative to this impact since the project would result in a less than significant impact.

Related to Impact 3.12-5, implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.6 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.6.1 and 3.12.3.5.6.2 of the Recirculated Draft EIR, respectively.

In conclusion, as stated in Section 3.12.7 of the Recirculated Draft EIR, noise impacts associated with operation of the proposed project would be significant and unavoidable although there would be no significant and unavoidable noise impacts associated with construction of the proposed project. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the significant and unavoidable aircraft noise and roadway noise impacts associated with airport operations in the future would also occur even if the project was not implemented (i.e., there is no difference in operations-related noise impacts between the proposed project and the No Project Alternative).

Response to Comment R-AL003-5

Regarding the bullet point on "human health consequences for cardiac, stress, sleep disturbances, cancer and cognitive learning", please refer to Topical Response TR-NOI-1: Health Effects of Noise.

Response to Comment R-AL003-6

There is no correlation between hourly operations and missed approaches. Missed approaches are a safety procedure executed by pilots, when they decide that a safe and stabilized approach and

landing is not feasible due to wind, weather, visibility, other air traffic and as final approach circumstances dictate. Missed approaches are also a safety procedure directed by air traffic controllers, when there is a loss of required horizontal separation between successive landing aircraft or landing aircraft trailing departing aircraft. These procedures can be employed on any approach to a runway at any time with no regard for the volume of operations to ensure that each approach and landing is safe. Please also see Response to Comment R-PC003-3 for additional discussion of missed approaches.

Response to Comment R-AL003-7

Please see Response to Comment R-AL003-2.

Response to Comment R-AL003-8

Project impacts related to air quality pollutants and climate change are addressed in the Recirculated Draft EIR; specifically, in Section 3.2, Air Quality, and Section 3.3, Greenhouse Gases and Climate Change. As the comment offers no specific critique of the subject analyses provided in the Recirculated Draft EIR, no further response is required.

Response to Comment R-AL003-9

Please see Responses to Comments R-AL003-2 and R-PC023-8.

Response to Comment R-AL003-10

As discussed in Section 3.12.3.2 of the Recirculated Draft EIR, the federal regulatory framework related to aircraft noise includes those regulations codified under Title 14 Code of Federal Regulations Part 150 (14 CFR Part 150 or simply Part 150), "Airport Noise Compatibility Planning."[6] Part 150 establishes the average annual DNL (CNEL in California)[7] to determine cumulative noise exposure from airports. In Part 150, the FAA established compatibility guidelines[8] for aircraft noise exposure levels with land uses in the vicinity of an airport. These guidelines consider all land uses to be compatible with noise levels less than 65 DNL (CNEL in California). Some land uses, such as residences, schools, hospitals, and places of worship, are considered to be noise-sensitive and non-compatible with aircraft noise exposure levels at and above 65 DNL (CNEL in California). Governmental services, transportation, parking, and some outdoor recreational uses are considered compatible with noise levels up to 70 DNL (CNEL in California). However, the FAA guidelines indicate that ultimately "the responsibility for determining the acceptability and permissible land uses remains with the local authorities."

As noted on page 3.12-21 of the Recirculated Draft EIR, in light of recent changes in aircraft operations, changes in aircraft fleet mix, and local community concerns, the SDCRAA will be updating the existing Airport Noise Compatibility Study, which will include updates to the Noise

[6] 14 CFR Part 150. Airport Noise Compatibility Planning. Available: https://www.ecfr.gov/cgi-bin/text-idx?SID=f8e6df268e3dad2edb848f61b9a0fb51&mc=true&node=pt14.3.150&rgn=div5.

[7] As discussed in Section 3.12.2.1, Noise Descriptors, of the Recirculated Draft EIR, Day-Night Average Sound Level (DNL) is widely accepted as the best available method to describe aircraft noise exposure and is the noise descriptor required for aircraft noise exposure analyses and land use compatibility planning under FAR Part 150 and for environmental assessments for airport improvement projects (FAA Order 10501.F). The FAA guidelines allow for the use of the Community Noise Equivalent Level (CNEL) metric as a substitute to DNL.

[8] 14 CFR Part 150. Airport Noise Compatibility Planning Appendix A to Part 150—Noise Exposure Maps, Table 1—Land Use Compatibility with Yearly Day-Night Average Sound Levels. Available: https://www.ecfr.gov/cgi-bin/text-idx?SID=f8e6df268e3dad2edb848f61b9a0fb51&mc=true&node=pt14.3.150&rgn=div5.

Exposure Maps (NEMs) and Noise Compatibility Program (NCP) for SDIA. The SDCRAA started this effort in the Fall of 2018 and it is expected to run through 2020. Details regarding the ongoing study do not pertain to or affect the aircraft noise impact analysis of the proposed project. Additional information is, however, available at https://sannoisestudy.com/project-overview, including a study timeline and contact email address.

It is important to note that the evaluation of aircraft noise impacts associated with the proposed project, as presented in Section 3.12 of the Recirculated Draft EIR, is not dependent upon the Flight Procedure Evaluation and Part 150 Studies for SDIA, nor is the preparation and completion of those Studies dependent upon the conclusions of the Recirculated Draft EIR or on the approval or disapproval of the ADP. Section 3.12.3, Aircraft Noise, of the Recirculated Draft EIR includes mitigation measures applicable to aircraft noise impacts (see Mitigation Measures MM-NOI-1 through MM-NOI-5 in Section 3.12.3.5.2.1). In the event that additional noise management measures or changes in flight procedures result from the subject Studies, they would be applicable to aircraft operations at SDIA independent from approval or disapproval of the ADP.

It should also be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

Response to Comment R-AL003-11

Deposition of particles and soot is a common occurrence in urban and suburban areas. Though often thought to be associated with airports and aircraft, various studies of deposition have not found any such link. Several of these studies are listed below with a summary of each study's findings.

> - *San Diego International* – In November 2015, concerns were raised regarding possible aircraft-generated fallout. Petri dishes were placed in the Point Loma community by the San Diego County Air Pollution Control District (APCD). In December 2015, the sample plates were collected and analyzed under a microscope. No diesel soot, fuel residues, or other such materials were found. Dust amounts from samples were typical of the normal background dust that would collect on any exposed surface during the sampling time period.[9]
>
> - *Boston-Logan* - The first of these studies took place in and near Logan International Airport and involved the collection of atmospheric fallout at multiple sites located both on the airport and in nearby communities.[10] Chemical analyses of the samples were also

[9] Personal communication: E-mail from William C. Brick, CCM, Chief-Department Operations, Monitoring and Technical Services Division, San Diego Air Pollution Control District to Brendan Reed, CEM, LEED-AP, Director, Planning and Environmental Affairs, San Diego County Regional Airport Authority. January 11, 2016.

[10] Massport, 1996, Logan Airport Soot Deposition Study, prepared by KM Chng.; Massport 1997, Soot Deposition Study: Logan Airport & Surrounding Communities, prepared by TRC Environmental.

conducted in an attempt to identify the source(s) of the material. The findings suggest that deposition in the vicinity of Logan International Airport results from the combined effects of many urban-related sources (including motor vehicles, marine aerosols, and wind-blown dust) and that the contribution from the airport is indistinguishable from background levels.

- *Charlotte-Douglas International* - Another study was conducted around Douglas International Airport in Charlotte, North Carolina.[11] Deposition particles were collected at both ends of the primary (north-south) runway, and at three locations in the community - north, south, and east of the airport. An advanced chemical fingerprinting (ACF) analysis was performed on the collected samples. The samples were compared to Jet A fuel samples, engine exhaust wipe samples, and a 'typical' urban dust sample from the National Institute of Science and Technology (NIST). The analysis focused on the comparison of saturated hydrocarbons, overall distribution of polycyclic aromatic hydrocarbons (PAH), ratios of selected homologues in the PAHs, and the presence of trace biomarkers called triterpanes and steranes. The results indicated that community samples and runway samples of saturated hydrocarbons, PAHs, and trace biomarkers were all similar to the NIST urban dust sample, and noticeably different than the jet fuel and engine wipe samples indicating that jet fuel and jet engine exhaust from the airport did not contribute significantly to the soot deposition samples analyzed.

- *Chicago-O'Hare* - A similar study was conducted in the vicinity of O'Hare International Airport involving the collection of soot/particulate matter and "chemical fingerprinting" of the material.[12] The results indicate that the samples bore little resemblance to either unburned jet fuel or soot from jet exhaust and concluded that the fallout is most likely from regional pollution (i.e., not attributable to distinct sources).

- *LAX (SCAQMD)* - Air monitoring studies were also performed in the vicinity of LAX by the South Coast Air Quality Management District.[13] For these studies, samples of atmospheric fallout were collected adjacent to the airport and at numerous residences located in the communities of El Segundo, Inglewood, Lennox, and Hawthorne. While soot particles were present in all the samples and generally in greater abundance than at other locations in the South Coast Air Basin, the studies concluded that there was "no discernable pattern of fallout material under LAX's flight path which would indicate a predominate influence from aircraft."

- *LAX (LAWA)* - A study commissioned by LAWA in 1998 that collected and evaluated atmospheric deposition samples at six sites surrounding LAX arrived at similar conclusions as the SCAQMD study listed above.[14]

[11] City of Charlotte, 1998, Charlotte/Douglas International Airport - Soot Deposition Study, prepared by KM Chng.

[12] City of Chicago, 1999, Findings Regarding Source Contribution to Soot Deposition, O'Hare International Airport and Surrounding Communities, prepared by KM Chng.

[13] SCAQMD, 2000, Inglewood Particulate Fallout Study Under and Near the Flight Path to Los Angeles International Airport.

[14] LAX Master Plan Final EIR, April 2004, Technical Report 4, Attachment Y, prepared by Camp Dresser & McKee, Planning Consultants Research, and AeroVironment Environmental Services.

- *Ft. Lauderdale International (FLL)* – Citizens living near FLL in Broward County Florida have complained about a buildup of particulate matter (PM) being deposited on their homes, cars, boats, and lawn furniture. Many residents have identified aircraft flying in and out of FLL as the likely source of the PM. In 2006, an investigation of air emission impacts from aircraft operations was performed.[15] Sample collection sites included both ends of the main runway at FLL, residential and public facilities under active flight paths, and a public facility away from most aircraft activity. The samples were tested for physical and chemical composition. The results of the analysis found no evidence that aircraft are contributing PM to the material being deposited in nearby areas.

In addition, researchers studying the deposition of particulate matter and trace metals to Santa Monica Bay and the bay watershed determined that the bulk of material being deposited was in particle size categories greater than 10 micrometers in diameter, meaning greater than PM_{10}.[16] Particles of this size are not emitted by aircraft, nor do the aircraft emitted particles ever coagulate/aggregate into particles larger than approximately 0.05 micrometers in diameter.[17] Particles of this size do not settle out by gravity (referred to as sedimentation), but are carried downwind for large distances before being removed through rainout/washout or dry deposition.[18]

Based on the findings of all of these studies, atmospheric deposition of soot, dust, and other forms of particulate matter occurs in measurable quantities in the vicinities of these large metropolitan airports. However, because air pollution in urban areas is generated by many different sources (both natural and man-made) and because many of the constituents are petroleum-based (e.g., burned and unburned fossil fuels), it is difficult to isolate and attribute the full impact of airports and aircraft on atmospheric deposition in urban areas. To date, the research results indicate that aircraft do not contribute substantially to deposition.

Additionally, it is important to note that certain analyses in the Recirculated Draft EIR consider aerial deposition. The human health risk calculation methodology utilized in the Recirculated Draft EIR analysis is consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines for evaluation of human health impacts. As discussed in Section 3.4.2.3.2, Exposure Assessment, of the Recirculated Draft EIR, this includes the evaluation of the combined effects of all potentially applicable exposure pathways to toxic air contaminants, including inhalation, dermal exposure to deposited materials, incidental soil ingestion of deposited materials, and ingestion via mother's milk. And as described in Section 3.4.6.1.6, Summary of Impacts, of the Recirculated Draft EIR, acute and chronic non-cancer health hazards of the proposed project would be less then significant for all potentially exposed populations. Section 3.4.6.1.10, Significance of Impact After Mitigation, also reports that cancer risks associated with the proposed project would be reduced to a level that is less than significant with implementation of Mitigation Measure MM-

[15] Broward County Florida, 2006, Task 5: Investigating Air Emission Impacts on the Community, Particle Deposition from Airport Activities.

[16] Stolzenbach, et al., 2001, Measuring and Modeling of Atmospheric Deposition on Santa Monica Bay and the Santa Monica Bay Watershed, prepared by UCLA and the Southern California Coastal Water Research Project.

[17] Kinsey, 2009, Characterization of Emissions from Commercial Aircraft Engines during the Aircraft Particle Emissions eXperiment (APEX) 1 to 3, USEPA; and Whitefield, et al., 2008, Summarizing and Interpreting Aircraft Gaseous and Particulate Emissions Data, Transportation Research Board.

[18] Friedlander, 2000, Smoke, Dust, and Haze - Fundamentals of Aerosol Dynamics, Second Edition, Oxford University Press, New York.

AQ/GHG-1, Ground Support Equipment Conversion, which would reduce operational emissions of toxic air contaminants associated with ground support equipment activity at SDIA. As indicated in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of the Final EIR, Mitigation Measure MM-AQ/GHG-1 has been refined since publication of this Recirculated Draft EIR. The subject refinement to Mitigation Measure MM-AQ/GHG-1 accelerates the proposed conversion of certain types of GSE to hybrid electric or alternative fuel vehicles. Such refinement does not alter the conclusion that cancer risks associated with the proposed project would be reduced to a level that is less than significant.

Response to Comment R-AL003-12

Section 3.12.2.2, Effects of Noise on Humans, of the Recirculated Draft EIR, specifically page 3.12-14, provides additional context regarding the Federal Aviation Administration (FAA) Reauthorization Act of 2018 as related to this comment. The Act reauthorizes the FAA and other programs until the end of fiscal year 2023. The Reauthorization Act, which was passed and signed into law in October 2018, includes Subtitle D that pertains to "Airport Noise and Environmental Streamlining." Among the 22 provisions enacted by Subtitle D, 14 deal directly or indirectly with aircraft noise, including requirements for noise studies. Sections 173, 187, and 188 of Subtitle D require the FAA to conduct or complete studies regarding aircraft noise effects and/or resulting policy, including the FAA's noise annoyance survey. Section 189 of Subtitle D requires a health impacts study related to several airports (Boston, Chicago, the District of Columbia, New York, the Northern California Metroplex, Phoenix, the Southern California Metroplex, Seattle, or such other area as may be identified by the FAA). Section 186 of Subtitle D requires the U.S. Government Accountability Office to conduct a study evaluating the potential phase out of Stage 3 aircraft. This provision also requires consultation with airports and community stakeholders. Section 179 requires FAA to conduct a study to review and evaluate the relationship between jet aircraft approach and takeoff speeds and corresponding noise impacts on communities surrounding airports.

As stated in Section 3.12.3.5, Project Impacts, of the Recirculated Draft EIR, operation of the proposed project would result in significant aircraft-related noise impacts. One of the mitigation measures identified in order to address aircraft-related noise impacts is to assess the findings of the 2018 FAA Reauthorization Act-related noise studies, once they become available. As discussed above, the 2018 FAA Reauthorization Act includes a requirement for the FAA, not airport operators such as SDCRAA, to complete various studies related to aircraft noise impacts. SDCRAA will review those studies, once completed, to help inform and update SDIA's noise management programs and policies. Similarly, the Authority is committed to utilizing the latest research findings and policy guidance coming from the FAA Reauthorization Act to update noise programs, if applicable. This is described under Mitigation Measure MM-NOI-4 and it is considered as a feasible mitigation measure for aircraft-related noise impacts.

It should be noted, for informational purposes only and not for purposes of a significance determination, that approval and implementation of the proposed project would not result in greater or different aircraft noise levels in the future than what would otherwise occur without the project. Please see Section 5.6, Alternatives Impacts Analysis, of the Recirculated Draft EIR, relative to the impacts of the No Project Alternative compared to the impacts of the proposed project. Also, the formulation and implementation of aircraft noise abatement measures that may result from

studies completed under the 2018 FAA Reauthorization Act would not be limited by the approval and implementation of the proposed project, or of Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

It should also be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

Response to Comment R-AL003-13

SDCRAA is committed to being a good neighbor to surrounding communities related to aircraft noise management. As summarized in Section 3.12.3.2.3 of the Recirculated Draft EIR, the SDCRAA implements numerous measures and programs relative to the management of aircraft noise at SDIA and efforts to reduce noise impacts to the surrounding communities. Such measures include, but are not limited to:

- Continued enforcement of the curfew established in the Airport Use Regulations, restricting departures between the hours of 11:30 p.m. and 6:30 a.m. and restricting above-idle engine run-ups between those same hours. This curfew is grandfathered under the Airport Noise and Capacity Act of 1990 (ANCA).
- Continued implementation of the residential sound attenuation program (Quieter Home Program).
- Continued meetings of the Airport Noise Advisory Committee (ANAC), where Authority staff provides regular updates on noise complaints, early turns, missed approaches, aircraft fleet mix, aircraft operations, and any other as-needed reporting as required.
- Maintenance of a noise monitoring system and remote monitoring sites, as certified by the State of California.
- Provision of quarterly and annual noise reports containing information on changes in the Noise Impact Area (NIA), noise levels at remote monitoring sites, aircraft operational information, and updates on Noise Office efforts.
- Maintenance of a website that provides the public with information on airport noise issues, current updates on noise information, posting of meeting agendas and information, quarterly noise report historical information, a method for the public to view their own residence in relation to the noise contours, and other enhancements such as web-based flight tracking.

Pages 3.12-30 through 3.12-34 of the Recirculated Draft EIR include further descriptions of Noise Office efforts to mitigate aircraft noise, as follows: Airport Noise and Operations Monitoring System (ANOMS), Airport Noise Advisory Committee (ANAC), Departure Curfew and Curfew Violation

Review Panel, Collaboration with Industry Stakeholders, Quieter Home Program, and the Fly Quiet Program.

Response to Comment R-AL003-14

Section 3.12.3.2.2 of the Recirculated Draft EIR describes the state of California's regulatory framework related to aircraft noise, as applicable to SDIA and the proposed project. Title 21 of the California Code of Regulations, Subchapter 6 (also known as the California Airport Noise Standards) defines incompatible noise levels as exposure of nearby communities to noise levels of 65 CNEL or greater. Land use incompatibility is most likely to occur for most types of noise-sensitive uses when they are within the 65 CNEL noise contour. The 65 CNEL standard is also referenced in the California Department of Transportation (Caltrans) *California Airport Land Use Planning Handbook* (Caltrans Handbook) [19] as the basic limit of acceptable noise levels for residential and other noise-sensitive uses within an urban area.

As described on page 3.12-30, the Airport Noise Mitigation Office (Noise Office) within the SDCRAA has a responsibility to meet the standards that are set forth in California Airport Noise Standards (i.e., Title 21), which are described above. As noted, Title 21 defines the basis for the acceptable level of aircraft noise for persons living in the vicinity of an airport, which is using a CNEL of 65 dB. In addition, Title 21 states that no proprietor of a "noise problem" airport shall operate an airport with a Noise Impact Area (N.I.A.) of 65 dB CNEL or more unless the operator has applied for and received a Variance from Caltrans, Division of Aeronautics (Title 21 § 5012).

SDIA is one of ten California airports subject to the "noise problem airport" requirements. These regulations establish 65 dB CNEL as a N.I.A. within which there shall be no incompatible land uses (i.e., residential homes, schools, places of worship, etc.). SDIA has received 12 such variances since the late 1970s, with the most recent variance being issued by the State of California in September 2019. As of June 2019, the SDIA N.I.A. contains approximately 6,790 dwelling units (3,918 have been sound insulated) and 13,316 persons (9,795 persons within dwelling units that have been sound insulated). The variance establishes stipulations with which the SDCRAA must comply, including, but not limited to:

- Continued enforcement of the curfew established in the Airport Use Regulations, restricting departures between the hours of 11:30 p.m. and 6:30 a.m. and restricting above-idle engine run-ups between those same hours.
- Implementation of the residential sound attenuation program (Quieter Home Program).
- Continued meetings of the Airport Noise Advisory Committee (ANAC), where Authority staff provides regular updates on noise complaints, early turns, missed approaches, aircraft fleet mix, aircraft operations, and any other as-needed reporting as required.
- Maintenance of a noise monitoring system and remote monitoring sites, as certified by the State of California.

[19] California Department of Transportation, Division of Aeronautics. California Airport Land Use Planning Handbook. October 2011. Available: http://www.dot.ca.gov/hq/planning/aeronaut/documents/alucp/AirportLandUsePlanningHandbook.pdf.

- Provision of quarterly and annual noise reports containing information on changes in the N.I.A., noise levels at remote monitoring sites, aircraft operational information, and updates on Noise Office efforts.
- Maintenance of a website that provides the public with information on airport noise issues, current updates on noise information, posting of meeting agendas and information, quarterly noise report historical information, a method for the public to view their own residence in relation to the noise contours, and other enhancements such as web-based flight tracking.

Response to Comment R-AL003-15

With respect to the commenter's demand that SDCRAA withdraw and suspend the Revised (Recirculated) Draft EIR based on the four main points that follow, please see below.

1. Flight Path & Procedure[20] and Part 150 Studies: The comment states that SDCRAA should withdraw the "Revised Draft Environmental Impact Report [sic]" until the Flight Path & Procedure and Part 150 studies are completed. The SDCRAA sees no reason to withdraw the Recirculated Draft EIR, whose sole purpose is to addresses the potential environmental impacts of the proposed SDIA Airport Development Plan (ADP). The evaluation of those impacts is not dependent upon the Flight Path & Procedure and Part 150 Studies for SDIA; nor is the preparation and completion of those Studies dependent upon the conclusions of the Recirculated Draft EIR or on the approval or disapproval of the ADP. Section 3.12.3, Aircraft Noise, of the Recirculated Draft EIR includes mitigation measures applicable to aircraft noise impacts (see Mitigation Measures MM-NOI-1 through MM-NOI-5 in Section 3.12.3.5.2.1). In the event that additional noise management measures or changes in flight paths and/or procedures result from the subject Studies, they would be fully applicable to aircraft operations associated with implementation of the ADP.

2. Human Health Risks: The comment states that SDCRAA should withdraw the "Revised Draft Environmental Impact Report [sic]" until SDCRAA gathers medical evidence regarding the human health risks associated with the proposed ADP. The SDCRAA disagrees. Human health risk impacts, including potential cancer risks and non-cancer health risks, associated with implementation of the proposed project are addressed in Section 3.4, Human Health Risk, of the Recirculated Draft EIR. As indicated in Section 3.4.8 on page 3.4-24 of the Recirculated Draft EIR, "[t]here would not be significant and unavoidable impacts to human health risk associated with construction and operation of the proposed project." The criteria that form the basis for determining significant human health impacts are presented in Section 3.4.5 of the Recirculated Draft EIR.

   Potential impacts related to cognitive learning and sleep disturbance that could result from increases in aircraft operations are addressed in Section 3.12, Noise, of the Recirculated Draft EIR; specifically, in Section 3.12.3.5.5 and Section 3.12.3.5.6, respectively. Section 3.12 of the Recirculated Draft EIR, specifically, Section 3.12.2.2, also includes a discussion of other potential effects of noise on humans including, but not limited to, the relationship

[20] Although the commenter referenced a "Flight Path & Procedure" study related to SDIA, the actual name of the study is the "Flight Procedure Evaluation," which is available for review at www.sannoisestudy.com.

between aircraft noise and cardiovascular disease and the relationship between noise and annoyance.

As indicated in the discussion on page 3.12-15 of the Recirculated Draft EIR, various British and U.S. studies regarding the physiological effects of noise provide more correlation between noise and cardiovascular disease, but still fall short of providing the definitive noise dose and the response relationship that identify the noise level at which these effects start and the rate at which these physiological effects intensify as noise level increases. Similarly, the World Health Organization (WHO) Environmental Noise Guidelines provide recommendations relating to the assessment and management of environmental noise; however, there are substantial questions and debate within the scientific community and aviation industry regarding those guidelines. As such, no applicable regulatory agency has established standards specific to physiological response for the purpose of the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA), or any other environmental compliance/assessment law. The absence of such regulations can be attributed, at least in part, to the uncertainty of the science. Pursuant to Section 15145 of the State CEQA Guidelines, Lead Agencies, when encountering a particular impact that is too speculative to analyze or assess for significance, must note this conclusion and terminate discussion of the impact. The discussion in the Recirculated Draft EIR shows that the effects of noise on cardiovascular health at noise levels below 65 CNEL are too speculative for further evaluation in this CEQA document. Please also see Topical Response TR-NOI-1: Health Effects of Noise.

As also indicated on page 3.12-15, annoyance is an individual characteristic and can vary widely from person to person. What one person considers tolerable can be quite unbearable to another of equal hearing capability. The level of annoyance, of course, depends on the characteristics of the noise (i.e., loudness, frequency, time, and duration), and how much activity interference (e.g., speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that 2 to 10 percent of the population is highly susceptible to annoyance from any noise not of their own making, while approximately 20 percent are unaffected by noise. Attitudes are affected by the relationship between the person and the noise source (e.g., is it our dog barking or the neighbor's dog?). Whether we believe that someone is trying to abate the noise will also affect our level of annoyance.

There is no current research to suggest that there is a better metric than Day-Night Average Sound Level (DNL), which is comparable to Community Noise Equivalent Level (CNEL) to relate to annoyance. DNL and CNEL are described on pages 3.12-4 and 3.12-5 of the Recirculated Draft EIR. Figure 3.12-4 on page 3.12-16 of the Recirculated Draft EIR relates DNL noise levels to community response from the surveys described in that section. One of the survey curves presented in Figure 3.12-4 is the well-known Schultz Curve. It displays the percent of a populace that can be expected to be annoyed by various DNL values for residential land use with outdoor activity areas. At 65 DNL, the Schultz Curve predicts approximately 14 percent of the exposed population reporting themselves to be "highly annoyed." At 60 DNL, this decreases to approximately 8 percent of the population. The

noise impacts analysis in the Recirculated Draft EIR uses 65 CNEL (comparable to 65 DNL) as the threshold of significance.

In summary, the Recirculated Draft EIR provides a sufficient level of information and analysis to evaluate the potential health impacts of the project.

3. Hydrocarbon Residue Associated with Aircraft Operations: The comment states that SDCRAA should withdraw the "Revised Draft Environmental Impact Report [sic]" until SDCRAA conducts a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents and analyze the toxicity of the hydrocarbon residue on human health. The SDCRAA disagrees. Please see Response to Comment R-AL003-11.

4. Next Steps: The comment states that SDCRAA should withdraw the "Revised Draft Environmental Impact Report [sic]" until SDCRAA completes the three steps described above and considers (a) alternative to reduce project scope, (b) reduction or elimination of jet "Remain Overnight" parking spaces, (c) requiring quieter Stage 4 and 5 jet engines during morning and evening flight operations, and (d) providing funding for noise and pollution mitigation programs. Please see above regarding responses to "steps 1, 2, and 3" indicated in the comment. Regarding other issues raised in point 4 of the comment, please see below:

    a. Alternatives to Reduce the Project Scope – Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR identifies and evaluates potential alternatives to the proposed project, including two alternatives that reduce the project scope. Specifically, Alternative 2: Reduced Scale of Development proposes a terminal improvement scenario that would result in approximately 25 percent less terminal area than the proposed project. As described in Section 5.8 of the Recirculated Draft EIR, Alternative 2 would not meet most of the project objectives. Alternative 4: T1 Replacement and Transportation Improvements proposes only the replacement of Terminal 1, and no additions to Terminal 2-West, or replacement of Terminal 2-East, and provides for transit improvements. Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

    b. Aircraft Remain Overnight (RON) Parking - Please see Response to Comment R-AL003-2 above, which shows that implementation of the proposed project, as well as Alternative 4, would result in a reduction in remote aircraft remain overnight parking positions compared to existing conditions.

    c. Requiring Use of Quieter Jet Engines – Neither SDCRAA nor any commercial airport operator has authority over what type aircraft engines, including as related to the stage of jet aircraft noise standards, are allowed to operate at the airport. Please see Response to Comment R-PC023-5 for further explanation.

d. Noise and Pollution Mitigation – Section 3.12, Noise, and Sections 3.2, Air Quality, and 3.3, Greenhouse Gases and Climate Change, provide mitigation measures related to noise and pollution, respectively.

It should be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."

The City of SAN DIEGO
Planning Department

RECEIVED
NOV 04 2019
BY: .....

November 4, 2019

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

SUBJECT: CITY OF SAN DIEGO COMMENTS ON THE SAN DIEGO INTERNATIONAL AIRPORT – AIRPORT DEVELOPMENT PLAN RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (SCH No. 2017011053 / SDCRAA # EIR-18-01)

Dear Mr. Anasis:

The City of San Diego ("City") has received and reviewed the Recirculated Draft Environmental Impact Report (Draft EIR or DEIR) prepared by the San Diego County Regional Airport Authority (Airport Authority or SDCRAA) for the San Diego International Airport (SDIA or Airport) Airport Development Plan (ADP). The City, in coordination with partner agencies of the San Diego Port Authority, County of San Diego, Caltrans, Metropolitan Transit System, and San Diego Association of Governments, concur that the proposed airport terminal and onsite improvements to accommodate future air travel for our region's one major international airport are necessary, and must be coordinated with land use, surface transportation, and regional mobility and access options for our residents and visitors alike. It is essential that the plan and implementation of improvements be a multi-jurisdictional coordinated effort to ensure integrated circulation, comprehensive funding, streamlined implementation, and long-term success of our regional airport.

The City appreciates the coordination of the Airport Authority over the last year to incorporate feedback provided by Mayor Kevin Faulconer, City Departments, and the SANDAG Airport Connectivity Subcommittee, to develop the new Alternative 4 as described and analyzed within the Draft EIR. The City has noted that SDCAA reduced the size, scope, and construction period of the proposed project, as well as included more transit-related improvements to reduce the project's traffic and air quality impacts. Based on the City's review, Alternative 4 largely addressed our concerns with the 2018 Draft EIR. The City supports the adoption of Alternative 4, with the revisions necessary to respond to the additional focused comments, recommended edits, and clarifications provided as an attachment to this letter. The City of San Diego acknowledges the Airport Authority's efforts to work with the Federal Aviation Administration, their airline tenants, and other permitting jurisdictions surrounding the SDIA and is in support of their desired goal of committing to

R-AL004-1

9485 Aero Drive, MS 413
San Diego, CA 92123

T (619) 235-5200
sandiego.gov/planning/

finance and construct their "fair-share" of both short and long term regional transportation improvements.

The future of SDIA is extremely important to our region as a major international airport and critical component of our business and tourism industry. We look forward to the future improvements related to this project, and our ongoing coordination to realize this major infrastructure investment for our region. Please contact Alyssa Muto, at amuto@sandiego.gov, if you have any questions on this letter or the comments contained within the attachment.

R-AL004-1 Cont'd

Sincerely,

Mike Hansen, Planning Director
Planning Department

MH/rm

Attachment A: CITY OF SAN DIEGO COMMENTS ON THE SAN DIEGO INTERNATIONAL AIRPORT – AIRPORT DEVELOPMENT PLAN RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (SCH NO. 2017011053 / SDCRAA NO. EIR-18-01)

Cc (via email):
Aimee Faucett, Chief of Staff, Office of Mayor Kevin Faulconer City of San Diego
Kris Michell, Chief Operating Officer, City of San Diego
Mara Elliott, City Attorney, Office of the City Attorney, City of San Diego
Erik Caldwell, Deputy Chief Operating Officer, City of San Diego
Randa Coniglio, Chief Executive Officer/President, Port of San Diego
Hasan Ikhrata, Executive Director, SANDAG
Gustavo Dallarda, Acting District Director, District 11, Caltrans
Paul Jablonski, Chief Executive Officer, San Diego Metropolitan Transit System
Sharon Cooney, Chief of Staff, San Diego Metropolitan Transit System
Helen Robbins-Meyer, Chief Administrative Officer, County of San Diego
Planning Department Interjurisdictional Review File

The City of SAN DIEGO
Planning Department

ATTACHMENT A:
CITY OF SAN DIEGO COMMENTS ON THE SAN DIEGO INTERNATIONAL AIRPORT – AIRPORT DEVELOPMENT PLAN RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (SCH NO. 2017011053 / SDCRAA NO. EIR-18-01)

A. Rebecca Malone, AICP – Senior Planner
Planning Department – Environment and Mobility Planning Division

1. The mitigation for Greenhouse Gases and Climate Change impacts (MM-AQ/GHG-1 through MM-AQ/GHG-10) includes measures similar to those in the City of San Diego CAP Consistency Checklist. Measures were included that address cool/green roofs (MM-AQ/GHG-3), electric vehicle charging (MM-AQ/GHG-6), bicycle parking spaces (MM-AQ/GHG-9), designated parking spaces (MM-AQ/GHG-5), and transportation demand management programs (MM-AQ/GHG-10). There were no measures addressing plumbing fixtures and fittings (CAP Checklist Step 2, Question 2) or shower facilities (CAP Checklist Step 2, Question 5). City staff recommends adding mitigation measures or project design features within the Mitigation Monitoring and Reporting Program (MMRP) that include these features to further demonstrate the proposed ADP's consistency with adopted local greenhouse gas reduction plans.

2. The City of San Diego's September 7, 2018, letter on the Draft EIR included a comment from Tait Galloway, Program Manager, Planning Department – Community Planning and Implementation Division, that the DEIR failed to specifically address the City's following NOP comment:

   "The DEIR should include alternatives that provide direct vehicular access connection(s) from the Airport to Interstate 5."

   Please revise the proposed ADP and associated analysis within the Draft EIR to include effective and feasible improvements that can address this comment.

R-AL004-2

R-AL004-3

B. Maureen Gardiner – Senior Engineer
Planning Department – Environment & Mobility Planning

The City of San Diego appreciates the Airport Authority working with the City and the significant effort put forward over the last year in order to address our concerns and comments related the ADP DEIR through the inclusion of the new Alternative 4.

1. With respect to the environmental determination of significance of impacts and associated mitigation measures proposed, the City recommends the follow language for all mitigation determined to be physically feasible:

   MM-XX: Improve the... The mitigation measure is physically feasible because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance.

R-AL004-4

The improvements contemplated by Mitigation Measure MM-TR-I-1b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego ("City"). Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not use airport revenues for off-airport improvements, including those described in MM-TR-I-1b, without FAA approval. Thus, the SDCRAA's ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Plan (MMRP) for the project, with the caveat that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested. As discussed in Section 3.14.6 above, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for this off-Airport improvement item.

2. In addition to the above recommended language, the City recommends that the Airport Authority include, where appropriate, general right-of-way width necessary for the improvements. This further substantiates this determination within the environmental documentation.

C. Mark G. Stephens – Associate Planner
Transportation & Storm Water Department – Storm Water Division

1. Executive Summary - Under ES.10.5 Summary of Traffic and Circulation Mitigation Measures and Significant and Unavoidable Impacts (and in Section 3.14 Traffic and Circulation). For various proposed traffic improvements within City of San Diego intersections described, identify if any existing infrastructure will be impacted or upgraded to address increased surface runoff resulting from proposed improvements. In several instances, lanes are proposed to be added, which could increase storm water runoff that would need to be accommodated by the City of San Diego municipal separate storm sewer system (MS4). Assure any such potential impacts from proposed roadway and right-of-way improvements are identified and addressed.

2. Section 3.10 Hydrology and Water Quality - Under 3.10.4.4 Surface Water, on page 3.10-20, the last paragraph states, "The Airport currently has 15 outfalls, only two of which discharge stormwater exclusively from the airport and are owned by the Authority; the remaining 13 outfalls discharge runoff that comingles with runoff from other jurisdictions, who also own those outfalls." Figure 3.10-1 on the following page appears to only show 14 outfalls. Please address this potential inconsistency.

3. On page 3.10-21, please provide symbology on Figure 3.10-1 or a separate figure illustrating the proposed new and expanded storm water infrastructure changes. Please also provide additional cross-referencing with text and figures in the Project Description

R-AL004-4 Cont'd
R-AL004-5
R-AL004-6
R-AL004-7
R-AL 004-8

(2.6.7.2 Stormwater Capture and Reuse System and Figures 2.21a through 2.21c and Figure 2-22).

4. On page 3.10-54, thank you for identifying the 2018 Strategic Stormwater Master Plan, Capture and Reuse Project and providing a footnote as requested in prior comments. Please identify how the document can be accessed.

5. Ensuing text on page 3.10-54 states, "Additionally, with completion of the final project design and engineering plan, a drainage study would be completed as part of the building permit process." Previous comments made (on the Notice of Preparation and the prior Draft Environmental Impact Report) called for a drainage study to be prepared to identify hydrologic and hydraulic capacity based on modifications that would be made by the proposed project in comparison to current conditions. The drainage study could also assist in predicting changes in pollutant loads. Describe how the City's request for drainage study information can be reconciled with anticipated study timing to follow final project engineering and design.

6. Please ensure the following comment previously transmitted (on the Notice of Preparation and the prior Draft Environmental Impact Report) is addressed where City storm water infrastructure is potentially affected. Access to enter and/or exit any existing, new, and/or modified storm water infrastructure for future maintenance must be provided so that proper maintenance can be conducted in accordance with the Storm Water Design Manual.

7. Section 3.15 Utilities - Any temporary storm water conveyance systems impacting the City Right-of-Way (ROW) or existing infrastructure during any of the construction phases of the project must be in compliance with all City of San Diego standard manuals (e.g., "The Greenbook" Standard Specifications for Public Works Construction, "The Whitebook" City Supplement to Standard Specifications for Public Works Construction, City Storm Water Standards Manual, etc.) and discussed with the City prior to construction.

D. Lisa Wood – Senior Planner
Environmental Services Department

1. It would be helpful to know how much and what type of solid waste will be generated by this project, how it will be managed, if State and local waste management plans will be followed, and if waste diversion targets will be met. Additionally, if waste is intended to be delivered to the Miramar Landfill, an approximate timeline, with types and quantities, may be needed, depending on the quantity.

E. Khuram Shah, MSCE – Associate Civil Engineer
Public Utilities Department

1. Please clarify if the utility coordination described in Water Supply Assessment, "Availability of Sufficient Supplies" is considered in Section 3.15.6.2.2 – Operations

R-AL 004-8 Cont'd
R-AL 004-9
R-AL004-10
R-AL004-11
R-AL004-12
R-AL004-13
R-AL 004-14

(including WSA and water line information) and Section 3.15.7 – Summary of Impact Determinations (including impacts matrix).

2. Figure 3.15-5 was not noted as a cross reference for the sections mentioned above. Is this figure current based on the latest Public Utilities Department (PUD) and SDCRAA discussions? PUD is able to assist if needed in order to develop any updated information.

R-AL 004-14 Cont'd

R-AL 004-15

F. Everett Hauser, AICP, PTP – Mobility Program Manager
Transportation & Storm Water Department – Transportation Engineering Operations Division

1. On pages H-10 and H-217 of Appendix R-H, Traffic and Circulation, MM-TR-I-1b should be revised to read "Upgrade from Class II bicycle lanes to Class IV Cycle Tracks on Pacific Highway and provide protected ***intersection features such as corner islands***, ***and dedicated*** traffic signal phasing for bicycles on Pacific Highway.

R-AL004-16

2. On page H-11 and H-217 on Appendix H, MM-TR-I-5c should be revised to include "removal of parking from north side to install a one-way Class IV cycle track from North Harbor Drive to State Street" to align with 1b, 1c & 1d.

R-AL 004-17

3. In Table H-32, #27 Kettner Blvd at W Grape St is missing description of adding Class IV cycle track, and #28 India St at W Grape St is missing description of adding Class IV cycle track.

R-AL 004-18

COMMENT LETTER NO. R-AL004 City of San Diego Planning Department November 4, 2019

Response to Comment R-AL004-1

The City of San Diego's support of Alternative 4 is so noted. The SDCRAA also looks forward to continued collaboration with the City of San Diego on this and other matters at the Airport. Please see Responses to Comments R-AL004-2 through R-AL004-18 below which address the specific comments contained in the attachment to the City of San Diego's comment letter.

Response to Comment R-AL004-2

As noted in the comment, many of the measures in Mitigation Measures MM-AQ/GHG-1 through MM-AQ/GHG-10 of the Recirculated Draft EIR are similar to those in the City of San Diego Climate Action Plan (CAP) Consistency Checklist. Regarding the request to add a measure addressing plumbing fixtures and fittings, MM-AQ/GHG-4 calls for all new major facilities developed as part of the project to achieve at least LEED Silver certification and water efficiency is a key element of the certification process, which provides the basis for incorporating plumbing fixtures and fittings as well as efficiencies for outdoor water use and Central Utility Plant water use that are functionally equivalent to the water efficiency measures in the CAP Consistency Checklist. As more specifically shown in the LEED v4 for Building Design & Construction: New Construction and Major Renovation Checklist, "Water Efficiency" is a component of LEED certification. Three water efficiency-related strategies are required: outdoor water use reduction, indoor water use reduction, and building-level water metering. (The referenced checklist is publicly available online at https://www.usgbc.org/resources/leed-v4-building-design-and-construction-checklist.)

Regarding the request to add a measure for shower facilities, MM-AQ/GHG-9 already calls for the installation of shower stalls and lockers in the new Airport Administration Building and in the new terminal building. The referenced Mitigation Measures will be included in the Mitigation Monitoring and Reporting Program as required by State CEQA Guidelines Sections 15091(d) and 15097.

Response to Comment R-AL004-3

The I-5 Connection concept has evolved throughout the ADP EIR process. Originally, direct connectors were studied by SANDAG and Caltrans that would connect I-5 northbound and I-5 southbound to Pacific Highway north of Sassafras Street. This concept was developed in response to a potential Intermodal Transportation Center (ITC) north of Sassafras Street. See Appendix R-J, Harbor Drive Mobility Study, pages 221-224, of the Recirculated Draft EIR for these concepts.

SANDAG and Caltrans are now assessing options for improved I-5 connectors at Laurel Street, which would more directly benefit the Airport and its proposed entry roadway and potential future egress roadway. SANDAG is also assessing the ITC site as well as a site at NAVWAR in the Midway community that could serve as a Central Mobility Hub providing access to SDIA and the regional transit system. The NAVWAR and ITC sites would have associated access improvements to I-5.

Due to the numerous options for improving access to I-5, SDCRAA conferred with SANDAG, Caltrans, and the City of San Diego and determined that the I-5 access options would be evaluated in SANDAG's Airport Connectivity Subcommittee studies, with SDCRAA agreeing to participate in these studies, including providing funding, where appropriate. Mitigation Measure MM-TR-LRP-1:

Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, were developed to address long-term impacts that could be mitigated through improved transit and regional access improvements.

Response to Comment R-AL004-4

SDCRAA appreciates the City's partnership in developing transportation solutions that support the City's vision, Airport needs, and multimodal mobility options. SDCRAA has considered the City's suggestions to mitigation measure language and will make changes as shown below. These changes are included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

The language on page 3.14-41 of the Recirculated Draft EIR has been revised as follows:

Proposed Mitigation Measure

MM-TR-I-1a: **Improve the Intersection of Laurel Street at North Harbor Drive**. Prior to passenger air travel exceeding 32.0 million annual passengers (MAP), SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Add a third Eastbound left-turn lane and remove an Eastbound through lane. Proposed Mitigation Measure MM-TR-I-1a ~~presently~~ is ***presently not considered fully feasible,*** because *the improvements described in* ~~the~~ Mitigation Measure *MM-TR-I-1a are* ~~is~~ within the City of San Diego jurisdiction and would require FAA approval of funding. ~~While the mitigation measure is ***physically feasible*** because there is enough space in the existing roadway widths, SDCRAA could not require the City to implement this improvement. SDCRAA will, however, continue to collaborate with the City to implement this Mitigation Measure, and the City has stated that it approves the Measure. In addition, SDCRAA has requested FAA funding approval of the Mitigation Measure, and if the funding is granted then the Mitigation Measure is feasible. If the FAA does not approve the funding then the Measure is infeasible. The FAA has not yet responded to SDCRAA's request and for that reason the Mitigation Measure is not feasible at this time. As discussed in Section 3.14.6 above, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for this off-Airport improvement item.~~ *The mitigation measure is **physically feasible,** because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport*

revenues for off-airport improvements, including those described in MM-TR-I-1a, without FAA approval. Thus, the SDCRAA's ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 above, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for this off-Airport improvement item.

Response to Comment R-AL004-5

SDCRAA has coordinated with the City of San Diego over the last year to identify proposed traffic improvement mitigation measures that are physically feasible to implement, because there is enough space in the existing roadway widths to accommodate a subject improvement item. Such proposed traffic improvement mitigation measures are identified in Section 3.14.7.1 (starting on page 3.14-271) of the Recirculated Draft EIR as MM-TR-I-1a, MM-TR-I-1b, MM-TR-I-1c, MM-TR-I-1e, MM-TR-RS-1a, MM-TR-RS-1b, MM-TR-RS-1c, MM-TR-RS-1d, MM-TR-RS-4a, MM-TR-I-5a, MM-TR-I-5b, and MM-TR-I-5c, which improvements propose to modify travel lanes, but would not change the existing roadway widths. Based on SDCRAA's discussions with the City, proposed traffic improvement mitigation measures that would require additional roadway widths or right-of-way would not be supported or implemented by the City. The commenter's request that SDCRAA include additional right-of-way related to proposed traffic improvement mitigation measures is therefore inconsistent with SDCRAA's previous discussions with the City. Nonetheless, SDCRAA will continue to coordinate with the City to implement feasible proposed traffic improvement mitigation measures supported by the City, and to seek FAA funding for those off-Airport improvements that provide improvements to direct access routes to the Airport.

Response to Comment R-AL004-6

As stated in Section 3.14.7.1 (starting on page 3.14-271) of the Recirculated Draft EIR, the proposed traffic improvements MM-TR-I-1a, MM-TR-I-1b, MM-TR-I-1c, MM-TR-I-1e, MM-TR-RS-1a, MM-TR-RS-1b, MM-TR-RS-1c, MM-TR-RS-1d, MM-TR-RS-4a, MM-TR-I-5a, MM-TR-I-5b, and MM-TR-I-5c propose to modify travel lanes, but would not change the existing roadway width. In each case, the intersection or roadway would be modified by striping or delineator changes within the existing roadway. These improvements would not substantially widen any roadway or intersection and, therefore, would not substantially increase the roadway surface area that would result in increased surface runoff. All other traffic improvements identified are operational changes that would not increase roadway surface area. Accordingly, potential impacts to stormwater from surface runoff are not anticipated and would be confirmed during final design and implementation of the mitigation measures.

Response to Comment R-AL004-7

The comment suggests that the Recirculated Draft Environmental Impact Report provides inconsistent information regarding the number of stormwater outfalls at the Airport. According to

the comment, the text on page 3.10-20 identifies 15 outfalls, whereas Figure 3.10-1 identifies only 14. There is, however, no inconsistency. Fifteen outfalls are depicted on Figure 3.10-1 on page 3.10-21 of the Recirculated Draft EIR. Two of the outfalls that discharge into the Navy Boat Channel west of the Marine Corps Recruit Depot boat and vehicle storage lot west of Neville Road are very close to each other and the symbols shown on Figure 3.10-1 overlap. Therefore, the number of outfalls identified in the text and depicted on Figure 3.10-1 are consistent and no modifications to the Recirculated Draft EIR are necessary.

Response to Comment R-AL004-8

The commenter suggests (a) revising Section 3.10, Hydrology and Water Quality, of the Recirculated Draft EIR to show proposed changes to the stormwater infrastructure on Figure 3.10-1 on page 3.10-21, or (b) providing a new figure. The comment also asks that the Final Recirculated EIR provide "additional cross-referencing with text and figures in the Project Description (2.6.7.2 Stormwater Capture and Reuse System and Figures 2.21a through 2.21c and Figure 2-22.)" The figures in Chapter 2 show the information requested by the commenter. A cross reference to the figures in Chapter 2 has been added to Section 3.10 of the Recirculated Draft EIR as identified below and, therefore, no new figure or modifications to Figure 3.10-1 are necessary.

The third sentence of the first paragraph under the heading *Operations* on page 3.10-51 of the Recirculated Draft EIR has been revised to reflect the following correction, and a new subsequent sentence has been added. The modifications are shown in underlined italicized (new) text.

> In addition *to* rerouting and resizing existing storm drain lines, which is typical when new structures are added to an existing site, the proposed project would enhance and enlarge the Airport's existing SAN Stormwater Capture and Reuse System. *See Figures 2-21a through 2-21c in Chapter 2, Project Description, for the proposed Phase I trench and storm drain plan. The same figures and additional information on the proposed storm drain system modifications are also provided in Section 3.15, Utilities (see Figures 3.15-7a through 3.15-7c). Additionally, see Figure 2-22 in Chapter 2 for the Phase I SAN Stormwater Capture and Reuse System concept plan.*

These modifications are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-AL004-9

This comment asks how one can access the 2018 Strategic Stormwater Master Plan, Capture and Reuse Project. As stated on page 1-15 in Chapter 1, Introduction, of the Recirculated Draft EIR, all documents cited in the EIR are available for public inspection in electronic format from 8:00 AM to 5:00 PM at the Airport Authority Administration Building located at 3225 North Harbor Drive, 3rd Floor, San Diego, California 92101.

Response to Comment R-AL004-10

The information provided in the Recirculated Draft EIR is sufficient for disclosing the impacts of the project and for decision-making purposes. As indicated in Section 15204(a) of the State CEQA Guidelines, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters" on a Draft EIR. It is anticipated that the drainage study completed as part of the design and engineering plans (as

identified on page 3.10-54 of the Recirculated Draft EIR in Section 3.10, Hydrology and Water Quality), would be provided to the City (if required) as part of documentation submitted during the City building permit process (to the extent applicable).

Response to Comment R-AL004-11

The comment requests that the Final Recirculated Draft EIR expressly recognize that SDCRAA must permit the City access to enter and/or exit any City-owned stormwater infrastructure for purposes of conducting maintenance. As stated on page 3.10-51 in Section 3.10, Hydrology and Water Quality, of the Recirculated Draft EIR, modifications to the storm drains would comply with the City of San Diego Storm Water Standards to the extent they apply. The City of San Diego Storm Water Standards include recommendations and requirements to ensure facilities and Best Management Practices (BMPs) are accessible for inspection and maintenance. Therefore, compliance with the City of San Diego Storm Water Standards regulations, where they apply, would include meeting access requirements for inspection and maintenance. No modifications to the Recirculated Draft EIR are required.

Response to Comment R-AL004-12

Comment noted. The need for temporary stormwater conveyance to comply with regulatory programs, including the City of San Diego Storm Water Standards to the extent they apply, is stated on page 3.10-53 in Section 3.10, Hydrology and Water Quality, of the Recirculated Draft EIR.

Response to Comment R-AL004-13

This comment is virtually identical to Comment R-AL001-1. Please see Response to Comment R-AL001-1.

Response to Comment R-AL004-14

The content of this comment is similar to Comment R-AL002-2. Please see Response to Comment R-AL002-2.

Response to Comment R-AL004-15

The content of this comment is similar to Comment R-AL002-2. Please see Response to Comment R-AL002-2.

Response to Comment R-AL004-16

The comment is noted. The second sentence of Mitigation Measure MM-TR-I-1b: Improve the Intersection of Pacific Highway at West Laurel Street on pages H-10 and H-217 in Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR has been revised to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text.

> Upgrade from Class II bicycle lanes to Class IV Cycle Tracks on Pacific Highway and provide *feasible intersection features, such as corner islands and dedicated* ~~protected~~ traffic signal phasing for bicycles on Pacific Highway.

These revisions are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, for all instances in which the text of Mitigation Measure MM-TR-I-1b is presented.

Response to Comment R-AL004-17

The comment is noted. The first sentence of Mitigation Measure MM-TR-I-5c: Improve the Intersection of India Street at W Grape Street on pages H-124 and H-220 in Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR has been revised to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text.

> Remove parking ~~from the south~~ *on both* side*s of Grape Street from North Harbor Drive to State Street, to* ~~and~~ add a 4th travel lane *on the south side of the road and install a Class IV Cycle Track along the north side.* ~~from North Harbor Drive to State Street and r~~*R*etime signals along Grape Street.

These revisions are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, for all instances in which the text of Mitigation Measure MM-TR-I-5c is presented.

Response to Comment R-AL004-18

The comment is noted. The mitigation descriptions in the last column of Table H-32 on pages H-160 and H-161 in Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR have been revised for Intersections 27, 28, 29, and 30, to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text.

- Remove parking ~~from the south~~ *on both* side*s of Grape Street from North Harbor Drive to State Street, to* ~~and~~ add a 4th travel lane *on the south side of the road and install a Class IV Cycle Track along the north side* ~~from North Harbor Drive to State Street~~
- Retime signals along Grape Street

This text/similar text also appears in the last column of the following tables of the Recirculated Draft EIR:

- Page 3.14-156 (Table 3.14-34) – Intersections 28, 29, and 30
- Pages 3.14-196 and 3.14-197 (Table 3.14-40) – Intersections 27, 28, 29, and 30 (text differs somewhat in wording and will be revised to match the exact wording of the text, as modified, provided above)
- Pages H-122 (Table H-26) – Intersections 28, 29, and 30

These revisions are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, for all instances in which such text is presented.

Please see Response to Comment R-AL004-17 for modifications to the text of Mitigation Measure MM-TR-I-5c: Improve the Intersection of India Street at W Grape Street.

2.2.6 Public Comments – Individuals/Organizations

From: kellyppowell <kellyppowell@aol.com>
Sent: Tuesday, September 24, 2019 7:25 PM
To: Airport Planning
Subject: Comments on Recirculated Draft EIR

Attn: Ted Anasis

Thank you for providing the Recirculated Draft EIR. In general, I find much of the plan (e.g. modernizing Terminal 1, improved parking, new multi-use pedestrian & bike paths, etc.) to be in keeping with the improvements necessary to maintain San Diego's status as America's Finest City.

That said, my concern - it's a major concern - has to do with increased noise across the Point Loma peninsula. As the plan states, there will be an increase in noise, which has already been on the rise with more flights as well as the use of larger plans. I believe the peninsula community has already been quite vocal about the problems this creates but there have been no attempts to address the growing noise issue.

The WHO guidelines for aircraft noise strongly recommends reducing noise levels produced by aircraft below 40-45 dB as aircraft noise above this level is associated with adverse health effects. Clearly, significant portion of the peninsula is already impacted by noise in excess of this recommendation. If we are going to see increased traffic, we also need to have the airport be a good citizen and help its neighbors by requiring airplanes the use SAN to utilize state of the art quiet-engine technology (and commit to working on continued improvement of this technology.) There will still only be one runway, so require the largest, heaviest planes to fly towards the South Mission Jetty over less densely populated areas, and stop expanding the flight path. One one plane can land and take off at a time - use the most community-friendly path over the South Mission Jetty. Require planes to reach higher elevations more quickly. Employ many of the strategies that the John Wayne airport uses to mitigate noise for their neighbors. In a nutshell, I'm sure that there are a number of things that can be done to address the noise issue, but the plan need to allocate time, money, resources, political clout, etc. to make that happen; otherwise, its obvious that SAN is not simply unable to solve this problem, but unwilling to do so.

R-PC001-1

It seems that San Diego and the airport can achieve most of their goals **AND** work to significantly reduce noise pollution. This doesn't need to be a zero-sum game - please don't ignore the adverse health effects airport noise has on our community. Please be a good neighbor, and you'll get much better support from your neighbors.

Sincerely,
Your neighbor, Kelly Powell
4662 Coronado Ave
858-449-2048

RECEIVED
SEP 24 2019
BY: .....

COMMENT LETTER NO. R-PC001 Kelly Powell September 24, 2019

Response to Comment R-PC001-1

SDCRAA is committed to being a good neighbor to surrounding communities related to aircraft noise management. As summarized in Section 3.12.3.2.3 of the Recirculated Draft EIR, the SDCRAA implements numerous measures and programs relative to the management of aircraft noise at SDIA and efforts to reduce noise impacts to the surrounding communities. Such measures include, but are not limited to:

- Continued enforcement of the curfew established in the Airport Use Regulations, restricting departures between the hours of 11:30 p.m. and 6:30 a.m. and restricting above-idle engine run-ups between those same hours.
- Continued implementation of the residential sound attenuation program (Quieter Home Program).
- Continued meetings of the Airport Noise Advisory Committee (ANAC), where Authority staff provides regular updates on noise complaints, early turns, missed approaches, aircraft fleet mix, aircraft operations, and any other as-needed reporting as required.
- Maintenance of a noise monitoring system and remote monitoring sites, as certified by the State of California.
- Provision of quarterly and annual noise reports containing information on changes in the N.I.A., noise levels at remote monitoring sites, aircraft operational information, and updates on Noise Office efforts.
- Maintenance of a website that provides the public with information on airport noise issues, current updates on noise information, posting of meeting agendas and information, quarterly noise report historical information, a method for the public to view their own residence in relation to the noise contours, and other enhancements such as web-based flight tracking.

Pages 3.12-30 through 3.12-34 of the Recirculated Draft EIR include further descriptions of Noise Office efforts to manage aircraft noise and work with local neighborhoods, as follows: Airport Noise and Operations Monitoring System (ANOMS), Airport Noise Advisory Committee (ANAC), Departure Curfew and Curfew Violation Review Panel, Collaboration with Industry Stakeholders, Quieter Home Program, and the Fly Quiet Program.

SDCRAA coordinates regularly with local neighborhoods that are impacted by SDIA aircraft noise through the ANAC, which serves as an important advisor. In accordance with SDCRAA Board Policy 9.20, ANAC provides a forum for resident and community input and involvement on aircraft noise issues. ANAC is composed of 18 voting members, providing a balanced forum for collaborative discussion and an evaluation of airport noise impacts around SDIA. Committee members consist of individuals from aviation stakeholders, community groups, and professional associations.

As described in Section 3.12.2.2 of the Recirculated Draft EIR and Topical Response TR-NOI-1: Health Effects of Noise, noise or unwanted sound is known to have several adverse effects on humans, such as communication and sleep interference, physiological responses, annoyance, and learning interference. The 2018 *Environmental Noise Guidelines for the European Region,* as issued

by the World Health Organization (WHO) Regional Office for Europe, are discussed on pages 3.12-11 through 3.12-14 of the Recirculated Draft EIR. Guideline development and suggested guidelines for aircraft noise in the European Region are described, as well as criticisms of the WHO guidelines, specifically regarding the study methodology, from both the scientific and aviation industries.

As documented in Section 3.12, Noise, of the Recirculated Draft EIR, aircraft-related noise levels associated with operations at the Airport will increase in the future as a result of projected increases in aircraft activity levels; however, it is important to note for informational purposes only and not for purposes of making significance determinations, such future noise levels would be the same with or without the proposed project. Table 3.12-8 of the Recirculated Draft EIR presents the estimated population, housing counts, and acreage for existing and future conditions for exposure to aircraft noise between 60 dBA Community Noise Equivalent Level (CNEL) and 75+ CNEL. As indicated in the table, the aircraft noise exposure levels in the future horizon years of 2024, 2026, 2030, 2035, and 2050 (i.e., the estimated completion years for the four main phases of the ADP, plus a long-term planning horizon year) would be greater than those of existing (2018) baseline conditions; however, as indicated in Section 5.6.1.12 in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, and for informational purposes only and not for purposes of making significance determinations, there are no differences between the proposed project and the no project scenarios relative to aircraft noise exposure levels. That is also the case in Table 3.12-9 relative to aircraft noise exposure levels for other noise-sensitive uses (i.e., churches [places of worship], schools, libraries, hospitals, colleges, and historic uses), and Table 3.12-10 relative to the time-above metric for exterior noise levels at schools in the local area.

The reasons why there are no differences in aircraft noise levels for future conditions with and without the proposed project is that the same number, timing, and nature of scheduled passenger flights would occur under either scenario, and the flight paths would not change due to the proposed project. Section 2.5 of the Recirculated Draft EIR describes the Airport Development Plan (ADP) process that involved preparation of an aviation activity planning forecast for SDIA, which included aircraft operations projections, development of design day future schedules, and gate assignments. The aviation activity projected to occur at the Airport in the future could be accommodated with or without the improvements associated with the proposed project; consequently, there would be no difference in the number and nature of aircraft operations occurring on a daily basis.

Implementation of the proposed project would not alter flight path procedures at the Airport. Flight path procedures are dictated by the FAA, taking into account considerations of operational, safety, and air traffic control procedures. An airport operator, which in this case is the SDCRAA, has no authority to regulate flight paths. Therefore, although an airport may advocate for certain noise abatement flight paths to reduce noise, the request must be investigated for its impact on the National Airspace System Plan (NASP). Any new flight path procedures are implemented at the discretion of individual airlines after approval by the FAA. Additionally, the FAA, by law, has the sole authority to manage the Air Traffic Control (ATC) system and the navigable airspace in the United States; therefore, the SDCRAA cannot restrict access to "noisier" aircraft or dictate departure routes. At SDIA and all commercial airports, from the time an aircraft departs the terminal and enters the taxiway and runway system, and throughout its flight to, and arrival at the gate of the destination airport, the aircraft moves only by instruction and permission of the FAA,

and pursuant to the direction of FAA (not airport) personnel. Based on the above, the geographic characteristics of aircraft noise exposure levels around SDIA in the future (i.e., future noise levels in the various communities around the Airport), as presented in Figures 3.12-8 through 3.12-22 of the Recirculated Draft EIR, would be the same with or without the proposed project (i.e., future noise impacts would be the same even if the proposed project was not implemented).

From: Charlie Michael <charlie.michael0219@gmail.com>
Sent: Thursday, September 26, 2019 9:00 PM
To: Becker Kimberly; Airport Planning
Subject: Comment on SAN ADP

Dear Ms. Kim Becker and the San Diego County Airport Authority,

My name is Charlie Michael, and I am from La Jolla. I am currently twenty one years old, so the airport terminal that gets built now will be the one that my generation lives with for decades to come. I love our city, and I love our airport. But there are some aspects of the ADP that I believe are off-target.

I am writing today about the proposed parking structure that the SCRAA is including in the revised ADP.

I would like to call into question why the Airport Authority is still building a 1000+ space parking garage when the future of mobility is changing — shifting away from human-operated cars to self-driving cars and ride share services, leaving parking increasingly irrelevant.

I would like to encourage the Airport Authority to consider shrinking the parking structure once more, or eliminating it entirely, and allocating the additional space to the terminal building. This will allow SAN to better adapt to future passenger needs: fewer passengers will be driving and more passengers will be looking forward to having a pleasant and spacious experience inside the airport terminal.

With such a small parcel of land, the Airport's land is valuable.
Why spend it on parked cars rather than the people using the terminal complex?

Thank you for listening to my opinion. I look forward to hearing back from you and providing additional comments on this topic as the discussion continues.

Best,
Charlie Michael

R-PC002-1

RECEIVED
SEP 26 2019
BY: .....

COMMENT LETTER NO. R-PC002	Charlie Michael	September 26, 2019

Response to Comment R-PC002-1

It is acknowledged that future parking demands at the Airport may be affected by advances in technology in Transportation Network Companies (TNC), driverless vehicles, and electric vehicles. The parking analyses presented in on pages 3.14-237 through 3.14-240 in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR were based on the assumption of increased use of TNC operations. While the proposed project could build up to 7,500 parking spaces at the proposed Terminal 1 parking structure ("plaza"), only 5,000 spaces would be built initially (Phase 1). When considering the loss of surface parking to accommodate the ADP, this would result in a net increase of 250 parking spaces for airline passengers at opening day (Year 2024). Should parking demand continue to decline, SDCRAA would not need to expand the parking supply at the Terminal 1 parking plaza.

Alternative 4: T1 Replacement and Transportation Improvements would reduce the area dedicated to parking to preserve space for a future airport transit station. Alternative 4 would be limited to 5,500 parking spaces in the Terminal 1 parking plaza, as described on pages H-198 through H-201 in Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

Given that SDIA has limited space to accommodate airport-serving functions, any excess parking areas in the existing Terminal 2 and proposed Terminal 1 parking plazas could be repurposed in the future to accommodate queuing areas for TNC or driverless vehicles waiting to pick-up passengers, electric vehicle charging stations, cell phone lots, carpool and vanpool parking, and/or close-in employee parking.

Regarding the commenter's suggestion to reduce the size of the proposed parking structure and instead allocate the net additional space to the terminal building, the mix of improvements associated with the proposed project and with Alternative 4 seeks to balance a variety of needs and objectives, as well as, in the case of Alternative 4, respond to comments on the originally proposed project. The replacement of Terminal 1 under both development scenarios will provide for an efficient, pleasant, and spacious experience in the airport terminal, as sought by the commenter. As indicated in Section 2.6, Project Characteristics, of the Recirculated Draft EIR, the existing Terminal 1 consists of two levels with a total of 336,000 square feet of floor area and 19 aircraft gates. As indicated in Section 2.6 and in Section 5.5.4, Alternative 4: T1 Replacement and Transportation Improvements, the replacement Terminal 1 would have three levels with a total of 1,210,000 square feet of floor area and 30 aircraft gates (under both the proposed project and Alternative 4). The provision of a new parking structure nearby is also proposed to support a positive experience for passengers using the replacement terminal and, in the case of Alternative 4, SDCRAA's desire to support passenger experience, as well as respond to the regional desire for improved transit access/service at SDIA, calls for the reduction in the size of the originally proposed parking structure in favor of dedicating a nearby area for future transit improvements. Implementation of the proposed project or Alternative 4 would serve to address a variety of objectives and needs, as well as public comments; however, in either case, there would be a substantial improvement in the passenger experience at the Airport.

From: Mike Tarlton <michael.f.tarlton@gmail.com>
Sent: Saturday, September 28, 2019 8:13 AM
To: Airport Planning
Subject: Pubic Comment on SDCRAA Draft EIR

RECEIVED
SEP 28 2019
BY: .....

Sir:

As a longtime resident of Ocean Beach, and a current member of both the Citizen Advisory Committee (CAC) and the Technical Advisory Committee (TAC) studying airport noise and quality of life impacts on the residents of San Diego, I am submitting this "public comment" on the SDCRAA EIR. I believe it is fundamentally flawed, will waste billions of tax payer dollars, and result is severely degraded quality of life for residence in close proximity to the San Diego Airport.

Based upon our many years of direct involvement and personal interaction with the offices of Senator Feinstein and Boxer, Congressman Peters, Mayor Faulconer, City councilmember Zapf, Supervisor Cox, and others, my sincere intent is to offer, facts, guidance, and community input in an effort to apprise our political representation and the public of the numerous issues and severe current and pending impacts on our communities resulting from San Diego International Airport (SAN") operations, the San Diego County Regional Airport Authority ("AA"), the FAA and the Airport Development Plan ("ADP").

These issues fall into separate but overlapping categories as summarized below:

Arrival and Departure flight routes: Route issues have been under community\agency review for several years, resulting in the recent Flight Procedure Analysis ("FPA") recommendations and the pending Part 150 study. These efforts are ongoing however impactful results have been severely hampered by AA and FAA constraints.

- Modest changes in flight routes have been proposed to FAA, more under consideration within the Part 150

Day to Day FAA\Air Traffic ("TRACON") operations: These issues are monitored by the AA's Airport Noise Advisory Committee ("ANAC") where it has been consistently demonstrated that is has no ability to: a) implement material favorable impacts to the continuation of increasing noise in our communities, nor b) reinforce consistent conformance by FAA\TRACON to established noise abatement procedures nor reduce safety risks.

- Missed Approach events ('go arounds"), resulting from an immanent safety risk of unacceptable proximity of aircraft due to TRACON or pilot error have returned to peak levels; these will only increase with the push towards increased operational capacity

ADP: The impacts from the growth of SAN, particularly as a result of the ADP and its unmitigated impacts will be severe, affecting tens of thousands of residents in the communities of Ocean Beach, Point Loma, Mission Hills as wells as the surrounding communities of Mission Beach, Pacific Beach, Bird Rock, La Jolla, La Mesa, etc. These unmitigated impacts, as represented by the AA data and the ADP EIR, are in direct conflict with the AA's CEO commitment to "[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation". The negative impacts of this expansion fall directly onto the shoulders of our community residents and small business' while the positives go to others, all to "***improve the passenger experience***" (source: AA, ADP EIR).

- SAN is already at operational capacity during many hours of the day and will reach significant capacity limitations within 3 to 6 years (at or just after completion of the ADP)
- FAA\AA's conservative forecast for total operations in 2026 total 259,000 annual arrivals and departures, up 15% from 2018 and equate to 41.7 flights per hour or ***one flight every 86 seconds, 17 hours a day, 365 days a year***
- A source for payment of the ADP's desire to improve the passenger experience at an estimated cost of over $3Billion has yet to be identified by the AA
- Alternatives with a reduced scale, cost and negative impact are not being given serious consideration

ADP EIR:

The Revised Draft ADP EIR ("RDEIR") was released on September 19, 2019. The review and written comment period expires on November 4, 2019.

R-PC003-1
R-PC003-2
R-PC003-3
R-PC003-4
R-PC 003-5
R-PC 003-6
R-PC 003-7
R-PC 003-8
R-PC 003-9

- According to the ADP website, no public presentations of the EIR findings nor opportunity for public comments are scheduled. An AA public workshop covering the ADP is scheduled for November 21, 2019, well after the close of comment period
- The AA website offers a variety of glossy ADP descriptions and summaries, however, nowhere does it disclose (except deep within the EIR and in ANAC documentation) the significant and drastic impacts of the forecasted airport operational growth
- The April 2019 Aviation Activity Forecast Update as summarized in an AA ANAC presentation indicates that by 2026, if not sooner, 15,000 residents in the FAA defined communities (65dB CNEL or greater) surrounding the airport will experience an aircraft noise impact equivalent to an increase over their current experience of flights by a factor of 3 times the number of flights.
- The proposed ADP scope includes the addition of 11 gates and a brand-new office building for the AA, but insists that the additional gates will not impact operational growth nor the race to full operational capacity
- CEQA guidelines require the RDEIR to offer alternatives to avoid the significant impacts. The RDEIR's Alternative 2 does offer some reductions but adds 12 new growth inducing gates and retains the office building
- Title 21 of the California Code of Regulations, provides "Airport Noise Standards" governing the operation of SAN under its Title 21 permit issued by CALTRANS. "The regulations are designed to cause the airport proprietor (AA), airport operator (AA), local governments, pilots, and the department to work cooperatively to diminish noise problems and to holding airport proprietor\operator (AA) responsible for "controlling and reducing the noise impact area in communities in the vicinity of airports" and to "promote its underlying purposes which are to protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors"
    - However, the ADP simply accommodates and reinforces the expansion of the 65 CNEL noise area while the RDEIR remains silent as to the goals, objectives and obligations of Title 21, all at the expense of those Title 21 is intended to protect
    - ANAC, with its heavy Agency and Government weighted committee, has been unwilling or unable to accomplish any material noise mitigation

R-PC 003-9 Cont'd
R-PC 003-10
R-PC 003-11
R-PC 003-12
R-PC 003-13
R-PC003-14
R-PC 003-15
R-PC003-16

Based upon the many omissions and inaccurate conclusions in the current EIR, I urge the SDCRAA to consider my inputs before proceeding with the current plan. I believe the SDCRAA needs to focus on the citizens of San Diego, the time-constrained realities of flying out of a single runway airport, and the large and unwarranted bill to San Diego tax payers that will come with this ill-advised airport expansion plan. There are many ways to improve upon the San Diego International Airport – 11 new gate at terminal 1 is notthe answer.

Thank you for your consideration.

Mike Tarlton
4439 Muir Ave
San Diego, CA 92107

c:\EIR\Current SAN issues 9 2019

COMMENT LETTER NO. R-PC003 Mike Tarlton September 28, 2019

Response to Comment R-PC003-1

The comment is noted. Please see Responses to Comments R-PC003-2 through R-PC003-16 below, which address each of the concerns identified by the commenter.

Response to Comment R-PC003-2

Please see Response to Comment R-AL003-10.

Response to Comment R-PC003-3

A missed approach, also commonly referred to as a "go-around," occurs when an aircraft cannot complete its landing and is required to go around attempting to land again. Some of the reasons aircraft might need to execute a missed approach are listed below. Please note that this list is not inclusive.

- A departing aircraft is exiting the airspace/runway slower than an arriving aircraft is entering the airspace/runway. In an effort to ensure safe separation of each aircraft, a missed approach is executed.
- A change in weather conditions has reduced minimums to the point that the pilot must terminate the descent and execute a missed approach.
- A pilot is approaching the field at a speed or altitude that would not permit the aircraft to touch down at a reasonable distance past the displaced threshold (landing line) and still have enough runway remaining for braking and/or reverse thrust.
- Operations have been halted, because foreign object debris (FOD) has been spotted on the runway and must be removed prior to resuming operations.
- Slow flow of departures and/or arrivals.

Implementation of the proposed project would not alter flight path procedures at the Airport. Flight path procedures are dictated by the FAA, taking into account considerations of operational, safety, and air traffic control procedures. An airport operator, which in this case is the SDCRAA, has no authority to regulate flight paths. Moreover, (1) for informational purposes only and not for purposes of making significance determinations, implementation of the proposed project will not result in more operations in the future than would otherwise occur even if the project is not implemented, as explained on page 2-25 of the Recirculated Draft EIR, and (2) the assertion that missed approaches "will only increase with the push towards increased operational capacity" is speculative by, and lacks supporting evidence from, the commenter.

Historical missed approach data can be accessed publicly by going to https://www.san.org/airport-noise and clicking on the button labeled "Monthly Noise Statistics."

Response to Comment R-PC003-4

Please see Response to Comment R-AL003-13.

Response to Comment R-PC003-5

One of the purposes of the proposed project is to accommodate the air service needs of the San Diego region. While SDIA is forecast to be operating at or near the capacity of its single runway in

the foreseeable future, the need for improved terminal facilities for passenger comfort and convenience exists now and will continue into the future.

Capacity of the Airport can be expressed for many components – e.g., the airfield (runway, taxiway system, and apron areas), the terminal and gates, and the landside (roads, curbs, and parking). The purpose of the multi-billion dollar capital improvement program is to focus on improving each of these components to accommodate the growing regional demand by: (1) ensuring current industry standards are met, given the nature of the SDIA operation, (2) providing facilities that enhance the customer experience and expectations of a world class airport, (3) providing optimized facilities that allow for operational flexibility by both tenants and patrons, and (4) enhancing the interconnectivity with regional infrastructure. As demand continues to increase from regional growth, delays are expected, resulting in added operating costs to the airlines and significant passenger inconvenience. It is correct that the improvements to the airfield do not add capacity; rather they provide much needed operational flexibility for aircraft on the ground, while adhering to established FAA standards. Likewise, the improvements planned for the terminal and gate areas do not add capacity for the number of hourly aircraft operations, but they do provide much needed interior functional spaces and new common-use gates, which afford the carriers and passengers additional operational areas to eliminate delays and improve the air travel experience. Finally, the improvements identified for the landside components, much like the terminal building areas, target expected delays and passenger inconvenience. Enhancements to the access roadways, curb areas, and parking are intended to add much needed movement areas, queuing space, and to enhance the operational flexibility of each element.

Response to Comment R-PC003-6

The forecast for aviation activity as identified in Appendix R-B1, Aviation Activity Forecast, of the Recirculated Draft EIR shows significant growth in demand pressure in the San Diego region through 2033 and beyond. Operational growth is expected to continue throughout the forecasted period (i.e., through 2050), but the rate of growth does decline as the throughput capacity of SDIA's single runway is approached, especially after 2030. As identified in Appendix D of Appendix R-B1, the single runway throughput capacity will likely accelerate the growth of increased seat capacity aircraft and push average load factors to the levels experienced during peak travel seasons currently. Additional aircraft operations, combined with improved aircraft metering, spacing, and sequencing tools currently being deployed by the FAA, will allow the single runway to sustain throughput rates of 50 to 52 operations per hour throughout the operational day.[21] SDIA already experiences this throughput rate during a few hours each morning, and this level of throughput will likely become the norm during most of the 17-hour operating day. The departures curfew from 11:30 p.m. to 6:30 a.m. will remain in place to reduce the community noise impacts during nighttime hours.

Existing gates and remain overnight (RON) positions can accommodate existing and forecast demand, as demonstrated in the No Project Alternative Design Day Flight Schedule (DDFS) gating and SIMMOD[22] simulation analysis (See Appendix R-B2: Gated Schedules, and Attachment 3:

[21] https://www.faa.gov/airports/planning_capacity/profiles/media/SAN-Airport-Capacity-Profile-2014.pdf.

[22] SIMMOD is an airspace and airfield simulation model developed, refined and validated by the FAA and ATAC Corporation for use in airport planning and analysis. The model is used to estimate capacity, travel time, delay and fuel consumption resulting

Airfield/Airspace Simulation Analysis, of this Final EIR). The SIMMOD analysis also demonstrates that airspace and runway capacity combined can adequately serve the forecasted increase in arrival and departure demand during most weather conditions. The exception is during instrument meteorological conditions (IMC), when this rate is reduced to approximately 38 to 42 operations per hour depending on the height of clouds in the airport vicinity. These weather conditions occur in San Diego between 2.1 and 5.0 percent of the time each year.

Response to Comment R-PC003-7

The California Environmental Quality Act (CEQA) does not require an analysis of cost or project funding in an EIR. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, the following is provided for information purposes. Improvements for the Airport Development Plan would be funded with a combination of FAA Airport Improvement Program grants, Transportation Security Administration (TSA) funds, passenger facility charges, general airport revenue bonds, and other state/federal grants. No general tax dollars would be used to pay for any of the proposed improvement. General airport revenue bonds are repaid from airport revenues generated from airport users.

Also, as indicated in Section 3.2, Air Quality, and Section 3.3, Greenhouse Gases and Climate Change, of the Recirculated Draft EIR, the SDCRAA entered into a 10-year agreement with various airlines operating at SDIA that allows for the contribution of over a half-billion dollars for improvements related to transportation and transit systems serving the Airport – subject to all applicable federal, state, and local approvals. The SDCRAA will continue to seek other available funding related to transit serving SDIA. Please see Responses to Comments R-AR002-5, R-AS001-5, and R-AS001-6 regarding further discussion of funding of off-airport transportation improvements.

Response to Comment R-PC003-8

The comment states that the Recirculated Draft EIR does not give "serious consideration" to alternatives that are smaller in terms of scale, cost, and negative impacts. SDCRAA disagrees. Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR identifies and evaluates potential alternatives to the proposed project, including two alternatives that reduce the project scope. Specifically, Alternative 2: Reduced Scale of Development proposes a terminal improvement scenario that would result in approximately 25 percent less terminal area than the proposed project. As described in Section 5.8 of the Recirculated Draft EIR, Alternative 2 would not meet most of the project objectives. Alternative 4: T1 Replacement and Transportation Improvements proposes only the replacement of Terminal 1, and no additions to Terminal 2-West, or replacement of Terminal 2-East, and provides for transit improvements. Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

from aircraft operations. It is used to investigate causal relationships between airport facility improvements, air traffic control procedures and their effect on aircraft operations while measuring aircraft delay.

Response to Comment R-PC003-9

The comment makes general statements about opportunities for the public to provide input on the ADP EIR. As indicated on Section 1.7, Availability of the Recirculated Draft EIR, the Recirculated Draft EIR for the Airport Development Plan (ADP) was distributed directly to agencies, organizations, and interested groups and persons for comment during the formal review period in accordance with Sections 15085, 15086, and 15087 of the State CEQA Guidelines. A Notice of Availability of the Recirculated Draft EIR was published in two local newspapers on September 19, 2019 – the San Diego Union-Tribune and the Daily Transcript. Additionally, during the 46-day public review period, which began on September 19, 2019 and ended on November 4, 2019 at 5:00 PM, the Recirculated Draft EIR was available for general public review on the website www.san.org (under link to Airport Projects/Environmental Affairs/CEQA & NEPA) or www.san.org/plan and at the San Diego International Airport, Airport Authority Administration Building, 3225 N. Harbor Drive, 3rd Floor, San Diego, CA 92101 and local libraries (San Diego Central Library, Point Loma/Hervey Library, Mission Hills Branch Library, and Ocean Beach Branch Library). The opportunity to submit comments on the Recirculated Draft EIR during the public review period was provided by SDCRAA via the following options:

- Mail to the Authority offices at SDCRAA, P.O. Box 82776, San Diego, CA 92138-2776 (these comments must be postmarked by November 4, 2019).
- Delivery to the Authority offices at San Diego International Airport, 3225 N. Harbor Drive, 3rd Floor, San Diego, CA 92101, or faxed to (619) 400-2459 by 5:00 p.m. on November 4, 2019.
- E-mail to the Authority offices at planning@san.org. The Airport Authority will accept comments via e-mail received by 5:00 p.m. on November 4, 2019.

Per Section 15087(i) of the State CEQA Guidelines, "[p]ublic hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. *Public hearings are encouraged, but not required* [emphasis added] as an element of the CEQA process." During the 46-day public review period, SDCRAA staff attended the public community hearings/meetings listed in the table below and provided presentations on the Airport Development Plan, the deadline to receive public comments on the Recirculated Draft EIR, and the website address, where the environmental review documents could be accessed.

Public Community Hearings/Meetings During the Recirculated Draft EIR Public Review Period

Presentation Date	Community Group/Organization
September 19, 2019	Peninsula Community Planning Board
September 19, 2019	Point Loma Association
September 26, 2019	City of San Diego Economic Development and Intergovernmental Relations Committee
October 15, 2019	Mission Beach Town Council
October 16, 2019	Midway-Pacific Highway Community Planning Group
October 23, 2019	Caltrans District 11 Small Business Council Meeting

The November 21, 2019, public workshop that the commenter references was not a meeting on the proposed ADP; rather that workshop is specific to the ongoing Part 150 study, which is a separate study from the ADP. As noted on page 3.12-21 of the Recirculated Draft EIR, in light of recent changes in aircraft operations, changes in aircraft fleet mix, and local community concerns, the SDCRAA will be updating the existing Airport Noise Compatibility Study, which will include updates to the Noise Exposure Maps (NEMs) and Noise Compatibility Program (NCP) for SDIA. The SDCRAA started this effort in the Fall of 2018 and it is expected to run through 2020. Details regarding the ongoing Part 150 study do not pertain to or affect the aircraft noise impact analysis of the proposed ADP. Additional information is, however, available at https://sannoisestudy.com/project-overview, including a study timeline and contact email address.

Response to Comment R-PC003-10

The comment states that the SDCRAA's webpage does not adequately disclose the adverse impacts of the forecasted airport operational growth. The comment does not raise any issue or identify any defect in the Recirculated Draft EIR; therefore, no further response is required. Nevertheless, in an effort to address the comment, the SDCRAA provides the following information: The SDCRAA's main webpage for the proposed Airport Development Plan (ADP) [https://san.org/Airport-ADP] clearly states in large print the availability of the Recirculated Draft EIR for review and comment and includes a link to the document. The Recirculated Draft EIR serves to inform decision-makers and the public about the environmental effects of the proposed project and has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). The Executive Summary of the Recirculated Draft EIR provides an overview of the proposed project and summarizes the analysis of significant impacts, proposed mitigation measures, environmental impacts after mitigation (if any), and alternatives to the project that reduce or avoid significant effects on the environment. Detailed analyses of the proposed project's impacts on the environment are contained in Chapter 3 of the document, cumulative impacts resulting from the combination of the proposed project and other development projects are addressed in Chapter 4, and identification and evaluation of potential alternatives to the proposed project are provided in Chapter 5.

Response to Comment R-PC003-11

Please see Response to Comment R-AL003-4.

Response to Comment R-PC003-12

Please see Response to Comment R-AL003-2.

Response to Comment R-PC003-13

The comment appears to object to Alternative 2 on grounds that it adds gates – which the commenter characterizes as growth inducing – and retains the office building. The comment does not identify any defect in the Recirculated Draft EIR's analysis; therefore, no further response is required. Nevertheless, in an effort to address the comment, SDCRAA provides the following information: Please see Response to Comment R-PC003-8 above. Additionally, it should be noted that the addition of new aircraft gates is not growth inducing (see Responses to Comments R-PC003-5 and R-PC0003-6, which address the capacity analysis for the SDIA single runway using

SIMMOD[23] analysis). As described in Chapter 2, Project Description, of the Recirculated Draft EIR, future activity levels at SDIA will be constrained by the limitations of the single runway (see Section 2.5.1.2) and the aircraft flights projected to occur in the future phases of the proposed ADP (i.e., 2024, 2026, 2030, and 2035) could be accommodated with or without additional gates (see discussion on page 2-25 of the Recirculated Draft EIR under "Gate Assignments" and Response to Comment R-PC019-12). This fact is demonstrated by the fact that the 2035 No Project Alternative is capable of gating the entire Design Day Flight Schedule (DDFS) as shown in Appendix R-B2: Gated Schedules.

Response to Comment R-PC003-14

Please see Response to Comment R-AL003-14.

Response to Comment R-PC003-15

Please see Response to Comment R-AL003-13.

Response to Comment R-PC003-16

The comment makes general statements alleging the Recirculated Draft EIR is incomplete and inaccurate. The comment is noted. Please see Responses to Comments R-PC003-2 through R-PC003-15 above. In accordance with Section 15088 of the State CEQA Guidelines, the SDCRAA prepared written responses to comments received on the ADP Recirculated Draft EIR during the public review period. The responses to comments on the Recirculated Draft EIR are included in the Final EIR and will be forwarded to the decision-makers for their review and consideration prior to taking any action on the SDIA ADP.

[23] SIMMOD is an airspace and airfield simulation model developed, refined and validated by the FAA and ATAC Corporation for use in airport planning and analysis. The model is used to estimate capacity, travel time, delay and fuel consumption resulting from aircraft operations. It is used to investigate causal relationships between airport facility improvements, air traffic control procedures and their effect on aircraft operations while measuring aircraft delay. Attachment 3, Airfield/Airspace Simulation Analysis, of this Final EIR was used in the Recirculated Draft EIR to determine the aircraft operational throughput capacity of each alternative for each horizon year of the proposed Airport Development Plan.

From: John Buche <jbuche@buchelaw.com>
Sent: Friday, October 11, 2019 3:03 PM
To: Airport Planning
Subject: comment to your Recirculated Draft Enviro Impact Report (EIR)

RECEIVED
OCT 11 2019
BY: .....

Dear SDIA,

This is my comment to your Recirculated Draft Enviro Impact Report (EIR). Please confirm receipt.

My wife and I reside at 5676 Taft in Bird Rock. This part of La Jolla is seriously affected by the airport noise. We are squarely in the engine sound fan from all the north bound flights coming out of the airport. Every single commercial jet airplane traveling north hits us with 2-3 minutes of jet noise, which noise did not exist prior to the change of flight paths that the FAA and others snuck through without proper notice or due process to the residents. We learned of the flight path changes after-the-fact only by reason of the sudden noise intrusion into our previously quiet neighborhood, and visually seeing the airplanes which now closely hug the coast.

Contrary to the assertions by the FAA and the authors of this report, and the private interests who favor saving a few dollars on fuel costs, the environmental effect is not insignificant. I am personally woken daily, not by an alarm clock, but by the sound of commercial jets that start up around 6:30am. Some days climactic conditions make it worse than others. We think this report is a sham to the extent it concludes the environmental impacts are not real.

My wife and I vehemently disagree with these statements in the report, and the notion that the FAA flight paths and airport construction can be treated in a vacuum or separated conceptually:

"The Southern California Metroplex Project is completely separate from the proposed project and is not within the control of the SDCRAA…."

"In summary, the FAA Southern California Metroplex Project does not affect, nor would it be affected by, implementation of the SDIA ADP."

The SDIA ADP must consider the FAA flight paths and not pretend they are separate issues, because without adjustment to the flight paths, expansion of the airport will further harm residents with more aggravation on the existing flight paths. The expansion will increase the nuisance to the neighbors. Every single plane intrudes on the quiet enjoyment of private property. Every single plane, and additional plane that flies over angers us, and increases the nuisance. It is a reminder that we were not consulted, or considered, and that the airlines and FAA (and now the airport expansion cohort) value dollars over the health and safety of neighbors. It's also a reminder that all of the do-nothing committees that have been formed to appease and placate the neighbors have in fact, *done nothing* to eradicate nuisance, when all the FAA would have to do is move the damn flight paths out a few miles—a simple solution that could be executed practically overnight were it not for all the red tape and mindless bureaucracy. The reports admit that it is possible with cooperation of the airlines:

"Any new flight path procedures are implemented at the discretion of individual airlines after approval by the FAA."

Making a bigger airport to accommodate more flights will only double down on the scam that allowed the re-routing of planes so near to our homes in the first place.

Accordingly, we strenuously object to your efforts to expand the airport capacity, and any junk-science that concludes the opposite of the environmental nuisance we all see and hear right in front of our faces. We would reconsider our objection to the expansion of the airport if proper consideration would be given to moving the existing flight paths. By

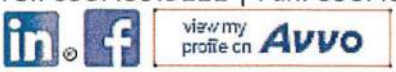
R-PC004-1

R-PC 004-1 Cont'd

not making and encouraging those changes with the FAA and airlines, the SDIA is only ensuring its own culpability in damaging the community.

Sincerely,
John Buche, Esq.

John K. Buche | Buche & Associates, P.C.
875 Prospect, Suite 305 | La Jolla, California 92037
Tel: 858.459.9111 | Fax: 858.459.9120 | www.buchelaw.com



1201 Shepherd Drive | Houston, Texas 77007
Tel: 713.589.2214 | Fax: 713.583.9644

2029 Century Park East, Suite 400N | Los Angeles, California 90067
Tel: 310.593.4193 | Fax: 858.459.9120

San Diego Los Angeles Houston

Confidentiality Notice. This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521 and is legally privileged. This e-mail is the property of Buche & Associates, P.C. and contains confidential and/or privileged information. This e-mail is intended to be received and reviewed only by the individual named above. Any review, use, dissemination, disclosure or copying of this e-mail or any attachments is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender at jbuche@buchelaw.com and delete all copies of the e-mail and any attachments. Thank you for your cooperation and assistance.

COMMENT LETTER NO. R-PC004	John Buche	October 11, 2019

Response to Comment R-PC004-1

As discussed on page 3.12-23 in Section 3.12, Noise, of the Recirculated Draft EIR, the Next Generation Air Transportation System (NextGen) is the FAA's plan to modernize the National Airspace System (NAS) through 2025. Through NextGen, the FAA is addressing the impact of air traffic growth by increasing NAS capacity and efficiency while simultaneously improving safety, reducing environmental impacts, and increasing user access to the NAS.

To achieve its NextGen goals, FAA is implementing new Performance-Based Navigation (PBN) routes and procedures that leverage emerging technologies and aircraft navigation capabilities, which include satellite-based navigation systems that replace the traditional, ground-based systems. The intended result of PBN is more accurate and predictable flight paths.

The two main components of PBN are Area Navigation (RNAV) and Required Navigation Performance (RNP). RNAV enables aircraft to fly on any desired flight path within the coverage of ground- or space-based navigation aids, or within the limits of the capability of aircraft navigation systems, or a combination of both. By using RNAV, aircraft can adhere to a desired flight path with smaller deviations than traditional technology allows. In order to utilize RNAV procedures, aircraft need onboard systems called Flight Management Systems (FMS). The FMS monitors the position, altitude, and speed of the aircraft and alerts the flight crew if the requirements are not met during operation. RNP specifies the performance criteria of the navigation equipment in terms of required accuracy.

According to the FAA, implementation of RNAV procedures generally reduces the dispersion or "fanning" of flight paths but will not result in a single path. Therefore, aircraft flight path dispersion will continue to be noticeable to communities under SDIA's arrival and departure corridors.

NextGen Southern California Metroplex is completely separate from the SDIA Airport Development Plan (ADP) and is not within the control of the San Diego County Regional Airport Authority (SDCRAA). Additional information regarding implementation of Southern California Metroplex as related to SDIA and its impacts to surrounding areas is available at https://www.faa.gov/nextgen/snapshots/metroplexes/?locationId=18. The FAA Southern California Metroplex program does not affect, nor would it be affected by, implementation of the SDIA ADP.

As documented in Section 3.12, Noise, of the Recirculated Draft EIR for the SDIA ADP, aircraft-related noise levels associated with operations at the Airport will increase in the future as a result of projected increases in aircraft activity levels; however, for informational purposes only and not for purposes of making significance determinations, such future noise levels would be the same with or without the proposed project. Table 3.12-8 of the Recirculated Draft EIR presents the estimated population, housing counts, and acreage for existing and future conditions for exposure to aircraft noise between 60 dBA Community Noise Equivalent Level (CNEL) and 75+ CNEL. As indicated in the table, the aircraft noise exposure levels in the future horizon years of 2024, 2026, 2030, 2035, and 2050 (i.e., the estimated completion years for the four main phases of the ADP, plus a long-term planning horizon year) would be greater than those of existing (2018) baseline conditions. This analysis is utilized for purposes of making significance determinations. However, as indicated in Section 5.6.1.12 in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR,

there are no differences between the proposed project and the no project scenarios relative to aircraft noise exposure levels. That is also the case in Table 3.12-9 relative to aircraft noise exposure levels for other noise-sensitive uses (i.e., churches, schools, libraries, hospitals, colleges, and historic uses), and Table 3.12-10 relative to the time-above metric for exterior noise levels at schools in the local area.

The reasons why there are no differences in aircraft noise levels for future conditions with and without the proposed project is that the same number, timing, and nature of scheduled passenger flights would occur under either scenario, and the flight paths would not change due to the proposed project. Section 2.5 of the Recirculated Draft EIR describes the ADP process that involved preparation of an aviation activity planning forecast for SDIA, which included aircraft operations projections, development of design day future schedules, and gate assignments. The aviation activity projected to occur at the Airport in the future could be accommodated with or without the improvements associated with the proposed project; consequently, there would be no difference in the number and nature of aircraft operations occurring on a daily basis. As described in Response to Comment R-AL003-2, the same number of operations would be accommodated in the No Project Alternative without additional terminal contact gates, because the additional flights would be handled by hardstanding and shuttling passengers to the existing terminals.

Implementation of the proposed project would not alter flight path procedures at the Airport. Flight path procedures are dictated by the FAA, taking into account considerations of operational, safety, and air traffic control procedures. An airport operator, which in this case is the SDCRAA, has no authority to regulate flight paths. Any new flight path procedures are implemented at the discretion of individual airlines after approval by the FAA. Additionally, the FAA, by law, has the sole authority to manage the Air Traffic Control (ATC) system and the navigable airspace in the United States; therefore, the SDCRAA cannot restrict access to "noisier" aircraft or dictate departure routes. At SDIA and all commercial airports, from the time an aircraft departs the terminal and enters the taxiway and runway system, and throughout its flight to, and arrival at the gate of the destination airport, the aircraft moves only by instruction and permission of the FAA, and pursuant to the direction of FAA (not airport) personnel. Based on the above, the geographic characteristics of aircraft noise exposure levels around SDIA in the future (i.e., future noise levels in the various communities around the Airport), as presented in Figures 3.12-8 through 3.12-22 of the Recirculated Draft EIR, would be the same with or without the proposed project (i.e., future noise impacts would be the same even if the proposed project was not implemented).

In summary, the commenters' objection to the changes in aircraft noise exposure levels associated with the FAA Southern California Metroplex program is so noted; however, that program is completely separate from the proposed project and is not within the control of the SDCRAA. The Recirculated Draft EIR addresses the impacts of future aircraft noise levels, specifically in 2024, 2026, 2030, 2035, and 2050, compared to existing (2018) baseline conditions, and concludes that the resultant impacts would be significant and unavoidable. The Recirculated Draft EIR also discloses, for informational purposes only and not for purposes of making significance determinations, that the aircraft noise levels in those future years with implementation of the proposed project would be the same in those future years even if the proposed project was not implemented (i.e., the no project scenario).

Notwithstanding the above, it is important to note that the SDCRAA implements numerous measures and programs relative to the management of aircraft noise at SDIA and efforts to reduce noise impacts to the surrounding communities, as described in Section 3.12.3.2.3 of the Recirculated Draft EIR.

ATTENTION MS. ASHLEY MARTINEX

I have lived in South Mission Beach since 1958. During that time, I lived on Anacapa Ct for 6 years and the next court south, Aspin Ct. 53 years as a property owner. When I first moved here, the airplanes from Lindberg field where only a minor noise irritant. Over the years it has escalated to becoming a major deterrent to the quality of life for people living in or visiting South Mission Beach. My court is the last one on Mission Blvd and is approximately 200 feet from the jetty. Here is what I deal with from the current flight patterns.

6:15 to 8:30 a.m. there are continuous flights directly over my property.

3 pm to 5 p.m. it is almost the same as the above mentioned flights

10 pm to 11:30 there are continuous flights.

During the day there are less but many direct flights over my property.

Here is what I feel as do many of us who live in SMB.

1. **We are overburdened with the number of flights being sent over our area compared to all other areas except the portion of Pt Loma where the high school is located because they are the first to receive the same flights that come over our area**
2. **We also feel that the people who represent us in SMB seem to be reluctant to stand up for us and voice our problems with the FAA at their meetings.**
3. **We also feel as though the FAA and the Mayor and City Council are more in allegiance with business, some of which are the airlines and the others the ones profiting from tourism, than they are the residents who support the city of San Diego.**

Mary Willmont

RECEIVED
OCT 15 2019

BY: .....

R-PC005-1

COMMENT LETTER NO. R-PC005	Mary Willmont	October 15, 2019

Response to Comment R-PC005-1

As documented in Section 3.12, Noise, of the Recirculated Draft EIR for the SDIA ADP, aircraft-related noise levels associated with operations at the Airport will increase in the future as a result of projected increases in aircraft activity levels; however, such future noise levels would be the same with or without the proposed project. Implementation of the proposed project would not alter flight path procedures at the Airport. Flight path procedures are dictated by the FAA, taking into account considerations of operational, safety, and air traffic control procedures.

Please see Responses to Comments R-PC004-1 and R-AL003-13.

RECEIVED
OCT 17 2019
BY: .....

October 17, 2019

To: San Diego County Regional Airport Authority
Attention: Ted Anasis

Re: Comments on the Recirculated Draft Environmental Impact Report
San Diego International Airport – Airport Development Plan

From: Russell Moll
La Jolla, CA

Thank you for providing the opportunity to comment on the Recirculated Draft Environmental Impact Report (DEIR) in regard to the Airport Development Plan (ADP).

It is evident that the DEIR is a very extensive effort that covers many facets of the proposed airport development. It is clear that a long list of impressive experts contributed to the DEIR and have produced a massive document filled with extensive information.

My view of the DEIR and the proposed airport development is that the justification for the project is weak and the permanent human health and environmental impacts substantial. While improving the "passenger experience" from a new terminal would be very nice, it is totally unclear why additional gates are needed and the 29 overnight aircraft parking places. What is clear is that such an expansion will add more flights, more pollution, more noise and more human health impacts to our community.

I wish to focus my comments on two topics in relation to airport expansion and the DIER – human health and aircraft noise. These are two related issues that have been addressed in the DIER that labels each with "significant and unavoidable" impacts from expanded airport operations.

Human health will be impacted from noise and pollutants from aircraft engines. Those impacts will cover a very large area within San Diego County and not just the small footprint shown in many of the maps of the DEIR. The same DEIR goes on to demonstrate that additional diseases, including cancer, will result from expanded airport operations. No suggestions to mitigate these health impacts were provided.

In a similar fashion, disturbance from noise from expanded airport operations will cause stress and distress in a larger amount of our community living under takeoff and approach flight paths. The DEIR shows the footprint of loud (>65 db) noise will substantially expand and the number of over-flights outside of the loud noise zone will ratchet upward. Worse yet, the addition of 29 overnight aircraft parking places is bound to entail more late night flight arrivals and more early morning departures. The DEIR sees the impact of noise from the expanded operations of more gates as

R-PC006-1
R-PC006-2
R-PC006-3
R-PC006-4

"significant and unavoidable." That is no comfort to those of us who live under flight paths.

I could not find any mention of the ongoing Part 150 noise studies for the SDIA. It certainly makes sense to await the results of those studies before any effort is taken to proceed to consider an expanded airport and increased operations.

Finally, to paraphrase a thoughtful review of the DEIR and proposed airport development, the order of effort seems backward. That review suggests the order of effort for the ADP should be: wait for the Part 150 study results, implement noise reduction proposals from the Part 150 studies, provide a much deeper review of possible human health impacts, and then give consideration to a better justified airport development and expansion.

Thank you.

R-PC006-6
R-PC006-5
R-PC 006-4 Cont'd

COMMENT LETTER NO. R-PC006	Russell Moll	October 17, 2019

Response to Comment R-PC006-1

The comment is noted. Please see Response to Comment R-AL003-2.

Response to Comment R-PC006-2

The comment states that the commenter wishes to focus his statements on two topics: noise and human health. Please see Responses to Comments R-PC006-3 through R-PC006-6 below which address the concerns identified by the commenter.

Response to Comment R-PC006-3

The human health risk calculation methodology utilized in the Recirculated Draft EIR analysis is consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines for evaluation of human health impacts. As discussed in Section 3.4.2.2, Exposure Locations, of the Recirculated Draft EIR, localized concentrations of toxic air contaminants were estimated at the same project fence-line locations and identified sensitive receptors as presented in Section 3.2, Air Quality. These modeled concentrations were used to estimate change in risk of adverse health effects. The magnitude of the change in risk determines the significance of health impacts associated with the proposed project. Because fence-line locations are used to represent residents and workers that live and work at locations that are much farther from the Airport, the risk results are extremely conservative (i.e., much higher than actual exposure risks).

As described in Section 3.4.6.1.6, Summary of Impacts, of the Recirculated Draft EIR, acute and chronic non-cancer health hazards of the proposed project would be less then significant for all potentially exposed populations; therefore, mitigation for non-cancer health hazards is not required. As reported in Section 3.4.6.1.10, Significance of Impact After Mitigation, cancer risks associated with the proposed project would be reduced to a level that is less than significant with implementation of Mitigation Measure MM-AQ/GHG-1, Ground Support Equipment Conversion, which would reduce operational emissions of toxic air contaminants associated with ground support equipment activity at SDIA. As discussed in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of the Final EIR, Mitigation Measure MM-AQ/GHG-1 has been refined since publication of the Recirculated Draft EIR. The subject refinement to Mitigation Measure MM-AQ/GHG-1 accelerates the proposed conversion of certain types of GSE to hybrid electric or alternative fuel vehicles. Such refinement does not alter the conclusion that cancer risks associated with the proposed project would be reduced to a level that is less than significant.

Response to Comment R-PC006-4

Please see Responses to Comments R-AL003-14 and R-AL003-2.

As documented in Section 3.12, Noise, of the Recirculated Draft EIR for the SDIA ADP, aircraft-related noise levels associated with operations at the Airport will increase in the future as a result of projected increases in aircraft activity levels; however, it is important to note for informational purposes only and not for purposes of making significance determinations, such future noise levels would be the same with or without the proposed project. Section 3.12.3.5 describes project impacts related to overall changes in aircraft noise levels.

Response to Comment R-PC006-5

Please see Response to Comment R-AL003-10.

Response to Comment R-PC006-6

The comment recommends that the SDCRAA Board postpone certification of the Recirculated Draft EIR until the Part 150 studies are complete and after SDCRAA has conducted a "deeper review of possible human health impacts . . ." This comment is virtually identical to Comment R-AL003-15. Therefore, please see Response to Comment R-AL003-15.

From: Korla Eaquinta <korlajane@icloud.com>
Sent: Friday, October 18, 2019 8:46 AM
To: Airport Planning
Subject: Atten: Ted Anasis

RECEIVED
OCT 18 2019
BY: .....

SDCRAA
Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276 E-mail: planning@san.org

Re: Comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR")

Dear Mr. Anasis:

I object to the DEIR as all the benefits of the Airport expansion go to the Airport Authority and the airlines. However, the burdens of increased noise and pollution all unfairly fall on the residents of Point Loma. The Airport's position in the DEIR is that these issues of noise and pollution are "significant but unavoidable harm" to the human health of Point Loma residents. **This is offensive and unacceptable.** There are procedures in place to address these human health issues that should be followed first. Thus, the DEIR should not be approved or move forward until real harms to human health are properly addressed. R-PC007-1

The $3 Billion ADP does not commit any moneys to protect the health of persons in Point Loma or in other affected communities. Instead, the ADP will significantly accelerate the airport's growth rate to reach operational capacity within several years, resulting in: 3 times the current noise, human health consequences as documented by the World Health Organization; Greater risks of missed approaches; Increased pollution and climate impacts from increased aircraft operations. R-PC007-2

Increased evening and nighttime arrivals and departures, especially with the additional "Remain Overnight" aircraft parking places will cause early morning noise impacts that will adversely harm the health of Point Loma residents. The heavily loaded freight plane that lands each morning in the 5 AM hour testifies to this. This plane wakes me daily instead of the allowed 6:30 AM takeoffs! R-PC007-3

The FAA's Reauthorization Act of 2018, requiring studies to be conducted on human health issues, implicitly before expansion projects resulting in more noise are undertaken are not being considered. R-PC 007-4

The intent and purpose of Title 21 of the Cal. Code of Regulations, which provides regulations designed to cause SDCAA to work to (1) "diminish" noise problems; (2) hold SDCRAA responsible for "controlling and reducing the controlling and reducing the noise impact area in communities; and (3) to "protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors" is not being considered. R-PC007-5

Therefore, I demand that SDCRAA withdraw and suspend the Revised Draft Environmental Impact Report, and instead do things in the proper order, as follows:

1. Complete the already pending Flight Path & Procedure and Part 150 Studies, assessing commercial jet and airport operation noise mitigation measures;

2. Gather and assess the medical evidence regarding the human health risks of the proposed SDIA airport expansion and the associated substantial increase in flight operations, including cardiac, stress, cancer, sleep disturbances, and cognitive learning; R-PC007-6

3. Conduct a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents, and analyze the toxicity of the hydrocarbon residue on human health; and

4. Only after steps 1, 2 & 3 are completed, consider the proposed ADP expansion plan which will increase flight operations and impact the surrounding communities; and in that context (a) consider realistic alternatives to reduce the project scope, (b) reduce or eliminate the additional jet "Remain Overnight" parking places, (c) require quieter Stage 4 & 5 jet engines during morning and evening operations, and (d) provide funding for meaningful noise and pollution mitigation programs.

R-PC007-6 Cont'd

Thank you for consideration of this information.

Korla Eaquinta 33 year Roseville resident

3112 Byron St

619-222-1579

korlajane@icloud.com

Korla Eaquinta
korlajane@icloud.com

COMMENT LETTER NO. R-PC007	Korla Eaquinta	October 18, 2019

Response to Comment R-PC007-1

The content of this comment is similar to Comment R-AL003-1; please see Response to Comment R-AL003-1.

Response to Comment R-PC007-2

See Response to Comments R-AL003-2, R-AL003-3, R-AL003-4, R-AL003-6, and Topical Response TR-NOI-1: Health Effects of Noise. Please also see Response to Comment R-AL003-13 related to SDCRAA's commitment to being a good neighbor to surrounding communities, including Point Loma.

Response to Comment R-PC007-3

As described in Section 2.5.1.2 of the Recirculated Draft EIR, operational constraints at SDIA affect aviation activity forecasts. SDIA's Airport Use Regulation restricts departures by any aircraft between the hours of 11:30 p.m. and 6:30 a.m. and published departure times between the hours of 11:15 p.m. and 6:15 a.m. There is no restriction on arrivals.

Please also see Response to Comment R-AL003-2.

Response to Comment R-PC007-4

Please see Response to Comment R-AL003-12.

Response to Comment R-PC007-5

Please see Response to Comment R-AL003-14.

Response to Comment R-PC007-6

The content of this comment is the same as Comment R-AL003-15; please see Response to Comment R-AL003-15.

From: Nadia <nadia.benchabane@gmail.com>
Sent: Monday, October 21, 2019 8:02 PM
To: Airport Planning
Subject: Attn Ted Anasus

Public comment:

I am writing because I am deeply concerned about my children's health living in Point Loma. I heard the airport is planning to add more flights and this is concerning mainly because of the pollution the jet fuel drops when flying over. The noise is also a major problem but my main concern is the black soot I find all over my porch and patio and I don't even live under the flight path. There are also schools and sports fields directly under the path. I feel like this is a health hazard for younger generations and it must be stopped. My suggestions are to move the airport to Miramar where there is more open space or put a limit on the number of aircraft allowed. I know there is a demand for more flights but health is more important. There are other airport options in the area for people to use. My family has considered moving out of the area but we can't due to jobs and family. When we bought this home it was not nearly as bad. Now we are constantly cleaning up black soot and getting poor sleep thanks to the planes. Please do not make this problem worse it is unacceptable. R-PC008-1 R-PC008-2

Thank you for reading.

Sent from my iPhone

RECEIVED
OCT 21 2019
BY: .....

COMMENT LETTER NO. R-PC008	Nadia Benchabane	October 21, 2019

Response to Comment R-PC008-1

The comment is noted. The human health risk calculation methodology utilized in the Recirculated Draft EIR is consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines for evaluation of human health impacts. As indicated in Section 3.4.2.3.2, Exposure Assessment, of the Recirculated Draft EIR, this includes the evaluation of the combined effects of all potentially applicable exposure pathways to toxic air contaminants, including inhalation, dermal exposure to deposited materials, incidental soil ingestion of deposited materials, and ingestion via mother's milk.

- As described in Section 3.4.4.1.2, Exposed Populations, of the Recirculated Draft EIR, the exposed population within the vicinity of the project site includes workers, residents, and sensitive receptors, such as individuals present at schools, hospitals, and nursing facilities. The Airport is bounded to the north, east, and west by residential areas. This population includes particularly sensitive individuals such as children, the elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases). As indicated in Section 3.4.4.1.2, sensitive land uses in close proximity to the project site include uses in the Loma Portal and Roseville – Fleetridge neighborhoods within Point Loma.

As reported in Section 3.4.6.1.6, Summary of Impacts, of the Recirculated Draft EIR, acute and chronic non-cancer health hazards of the proposed project would be less then significant for all potentially exposed populations. As disclosed in Section 3.4.6.1.10, Significance of Impact After Mitigation, cancer risks associated with the proposed project would be reduced to a level less than significant with implementation of Mitigation Measure MM-AQ/GHG-1, Ground Support Equipment Conversion, which would reduce operational emissions of toxic air contaminants associated with ground support equipment activity at SDIA. As discussed in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, Mitigation Measure MM-AQ/GHG-1 has been refined since publication of the Recirculated Draft EIR. The subject refinement to Mitigation Measure MM-AQ/GHG-1 accelerates the proposed conversion of certain types of GSE to hybrid electric or alternative fuel vehicles. Such refinement does not alter the conclusion that cancer risks associated with the proposed project would be reduced to a level less than significant.

Please also see Response to Comment R-AL003-11 which addresses the occurrence of atmospheric deposition in general, and the potential contribution from aircraft, in particular.

Response to Comment R-PC008-2

The comment suggests that SDCRAA move the airport to Miramar. As discussed in Section 5.4.1, Alternative Location, of the Recirculated Draft EIR, consideration has been previously given to the possibility of developing a new commercial airport facility elsewhere within the San Diego region to accommodate future demand for air travel that would otherwise be directed to SDIA. Implementation of the currently proposed Airport Development Plan (ADP) would provide for improvements at SDIA to help accommodate projected future regional demand for air travel. The need for those improvements and the associated environmental impacts at and around SDIA, as addressed in the SDIA ADP Recirculated Draft EIR, could be avoided or substantially reduced by accommodating future demand for air travel at an airport facility developed at an alternative

location, recognizing that such a scenario does not completely eliminate the impacts, but rather shifts certain impacts to the alternative location.

The idea of developing a new airport facility at an alternative location is not new to San Diego and was comprehensively studied by the SDCRAA between 2003 to November 7, 2006. As part of the San Diego Airport Site Selection Program, the SDCRAA was required to have a county-wide advisory ballot measure with an airport recommendation. The advisory ballot measure was identified as San Diego County Measure A in the November 7, 2006 election, and identified a portion of MCAS Miramar as the location for a proposed new commercial airport to provide for San Diego's long-term air transportation needs. The final decision was made by the voters of San Diego County and the measure did not pass in a final result of 61.83 percent No and 38.17 percent Yes (County of San Diego, Election Results 2006). In light of the San Diego Airport Site Selection Program experience and results, development of airport improvements at an alternative location is not considered to be feasible and was rejected from further consideration.

The comment also provides information about the commenter's family health problems and how they are associated with the Airport. This information does not raise a CEQA issue nor identify any defect in the Recirculated Draft EIR; therefore, no further response is required.

From: Gail Hutcheson <gailhutch@cox.net>
Sent: Tuesday, October 22, 2019 4:53 PM
To: Airport Planning
Subject: Eir comment

Why do we keep pouring hundreds of millions of dollars into an airport with one runway?
Can we not take a page out of Los Angeles solutions and make SAN our John Wayne and find a place where we can have more than one runway?
At least move the heavy cargo planes and leave commuter flights here.
It's crazy enough that we use waterfront property for an airport that affects so many homeowners.
This airport is never going to meet a growing San Diego's needs.
sincerely,
Gail Hutcheson

R-PC009-1

RECEIVED
OCT 22 2019
BY: .....

COMMENT LETTER NO. R-PC009	Gail Hutcheson	October 22, 2019

Response to Comment R-PC009-1

The comment is noted. As discussed in Section 5.4.1, Alternative Location, of the Recirculated Draft EIR, consideration has been previously given to the possibility of developing a new commercial airport facility elsewhere within the San Diego region to accommodate future demand for air travel that would otherwise be directed to SDIA. Implementation of the currently proposed Airport Development Plan (ADP) would provide for improvements at SDIA to help accommodate projected future regional demand for air travel. The need for those improvements and the associated environmental impacts at and around SDIA, as addressed in the SDIA ADP Recirculated Draft EIR, could be avoided or substantially reduced by accommodating future demand for air travel at an airport facility developed at an alternative location, recognizing that such a scenario does not completely eliminate the impacts, but rather shifts certain impacts to the alternative location.

The idea of developing a new airport facility at an alternative location is not new to San Diego and was comprehensively studied by the SDCRAA between 2003 to November 7, 2006. As part of the San Diego Airport Site Selection Program, the SDCRAA was required to have a county-wide advisory ballot measure with an airport recommendation. The advisory ballot measure was identified as San Diego County Measure A in the November 7, 2006 election, and identified a portion of MCAS Miramar as the location for a proposed new commercial airport to provide for San Diego's long-term air transportation needs. The final decision was made by the voters of San Diego County and the measure did not pass in a final result of 61.83 percent No and 38.17 percent Yes (County of San Diego, Election Results 2006). In light of the San Diego Airport Site Selection Program experience and results, development of airport improvements at an alternative location is not considered to be feasible and was rejected from further consideration.

The Regional Aviation Strategic Plan (RASP) for San Diego County, prepared in March 2011, assessed the long-range capabilities of all public-use airports in the county with the goal of improving the performance of the regional airport system. One of the scenarios evaluated was moving air cargo flights from SDIA to Brown Field Municipal Airport. The RASP evaluation determined that shifting cargo operations from SDIA to Brown Field cannot feasibly be implemented for the following reasons: (1) The FAA has determined precision instrument approaches are infeasible at Brown Field due to terrain and airspace complications, thereby precluding commercial operators from conducting all-weather operations; (2) established passenger airlines are reluctant to "split operations" with SDIA, and there are two other competitive commercial service airports (SDIA and Tijuana Rodriguez International) in close proximity; and (3) air cargo carriers are unwilling to operate from a facility south of SDIA due to distance to their demand base in San Diego County and lack of cargo sorting infrastructure.[24]

[24] San Diego Association of Governments. San Diego Forward: The Regional Plan | 2015-2050. October 2015. Appendix U6, Regional Aviation Strategic Plan and San Diego Airport Multimodal Accessibility Plan, page ES-12. Available: http://www.sdforward.com/pdfs/Final_PDFs/AppendixU6.pdf.

From: Valerie Michelotti <wozfive@gmail.com>
Sent: Tuesday, October 22, 2019 7:43 PM
To: Airport Planning
Subject: Comments on DEIR

RECEIVED
OCT 22 2019
BY: .....

Attn: Mr Ted Anasis

Dear Mr Anasis,
This email is to raise our objections to the DEIR.
We have lived in Point Loma for 35 years, and have been good neighbors to the airport, and we expect that the airport can be a good neighbor to Point Loma.

Most importantly, I would like to emphaisze the requests that the Point Loma Community Planning Board has made in their response to the DEIR.

1. Complete the already pending Flight Path & Procedure and Part 150 Studies, assessing commercial jet and airport operation noise mitigation measures;

2. Gather and assess the medical evidence regarding the human health risks of the proposed SDIA airport expansion and the associated substantial increase in flight operations, including cardiac, stress, cancer, sleep disturbances, and cognitive learning;

3. Conduct a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents, and analyze the toxicity of the hydrocarbon residue on human health; and

4. Only after steps 1, 2 & 3 are completed, consider the proposed ADP expansion plan which will increase flight operations and impact the surrounding communities; and in that context (a) consider realistic alternatives to reduce the project scope, (b) reduce or eliminate the additional jet "Remain Overnight" parking places, (c) require quieter Stage 4 & 5 jet engines during morning and evening operations, and (d) provide funding for meaningful noise and pollution mitigation programs.

R-PC010-1

Sincerely,

Valerie Michelotti, MD

wozfive@gmail.com

COMMENT LETTER NO. R-PC010	Valerie Michelotti, M.D.	October 22, 2019

Response to Comment R-PC010-1

The comment is noted. The content of this comment is the same as Comment R-AL003-15; please see Response to Comment R-AL003-15.

Dear Ted Anasis,

I have emailed both these letters to you. However, I feel so strongly about this issue that I am also sending them by mail with the hope that you will understand my concerns.

R-PC011-1

Thank you,

K Eaquinta

Korla Eaquinta

I have also sent copies to my
City Council Rep - Jen Campbell
Mayor Faulconer
Scott Peters

RECEIVED
OCT 24 2019
BY: .....

RECEIVED
OCT 24 2019
BY: .....

SDCRAA
Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276 E-mail: planning@san.org

Re: Comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR")

Dear Mr. Anasis:

I object to the DEIR as all the benefits of the Airport expansion go to the Airport Authority and the airlines. However, the burdens of increased noise and pollution all unfairly fall on the residents of Point Loma. The Airport's position in the DEIR is that these issues of noise and pollution are "significant but unavoidable harm" to the human health of Point Loma residents. **This is offensive and unacceptable.** There are procedures in place to address these human health issues that should be followed first. Thus, the DEIR should not be approved or move forward until real harms to human health are properly addressed.

The $3 Billion ADP does not commit any moneys to protect the health of persons in Point Loma or in other affected communities. Instead, the ADP will significantly accelerate the airport's growth rate to reach operational capacity within several years, resulting in: 3 times the current noise, human health consequences as documented by the World Health Organization; Greater risks of missed approaches; Increased pollution and climate impacts from increased aircraft operations.

Increased evening and nighttime arrivals and departures, especially with the additional "Remain Overnight" aircraft parking places will cause early morning noise impacts that will adversely harm the health of Point Loma residents. The loud freight plane that lands each morning in the 5 AM hour testifies to this. This plane wakes me daily instead of the allowed 6:30 AM takeoffs!

The FAA's Reauthorization Act of 2018, requiring studies to be conducted on human health issues, implicitly before expansion projects resulting in more noise are undertaken are not being considered.

The intent and purpose of Title 21 of the Cal. Code of Regulations, which provides regulations designed to cause SDCAA to work to (1) "diminish"

R-PC011-2

noise problems; (2) hold SDCRAA responsible for "controlling and reducing the controlling and reducing the noise impact area in communities; and (3) to "protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors" is not being considered.

Therefore, I demand that SDCRAA withdraw and suspend the Revised Draft Environmental Impact Report, and instead do things in the proper order, as follows:

1. Complete the already pending Flight Path & Procedure and Part 150 Studies, assessing commercial jet and airport operation noise mitigation measures;

2. Gather and assess the medical evidence regarding the human health risks of the proposed SDIA airport expansion and the associated substantial increase in flight operations, including cardiac, stress, cancer, sleep disturbances, and cognitive learning;

3. Conduct a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents, and analyze the toxicity of the hydrocarbon residue on human health; and

4. Only after steps 1, 2 & 3 are completed, consider the proposed ADP expansion plan which will increase flight operations and impact the surrounding communities; and in that context (a) consider realistic alternatives to reduce the project scope, (b) reduce or eliminate the additional jet "Remain Overnight" parking places, (c) require quieter Stage 4 & 5 jet engines during morning and evening operations, and (d) provide funding for meaningful noise and pollution mitigation programs.

Thank you for consideration of this information.

R-PC011-2 Cont'd

Korla Eaquinta 33 year Roseville resident

3112 Byron St

619-222-1579

korlajane@icloud.com

RECEIVED
OCT 24 2019
BY:

SDCRAA
Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276 E-mail: planning@san.org

Re: Comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR")

Dear Mr. Anasis:

I emailed yesterday but I so passionately object to increasing the Remain Overnight Parking aspect of the ADP DEIR that I am compelled to write again.

How can a person or organization endorse a plan with an EIR that repeatedly says **SIGNIFICANT and UNAVOIBALBE HARM**? This is offensive and unacceptable! It is also unconscionable!

I understand the airport will expand and reach maximum capacity at some point but remain overnight parking is a serious threat to human health. Lack of sleep is a significant health hazard and risk to human life. Studies show this over and over. At least now we have a few hours of sleep but if planes are landing all night long we will have none. I can attest to a loud freight plane that lands each morning in the 5 AM hour that wakes me daily instead of the allowed 6:30 AM takeoffs!

It seems the airport does not care about the surrounding community or its impacts to human health. Airplanes landing all night long is going to ruin all of our lives.

Please do not allow significant and unavoidable harm to us.

Thank you,
Korla Eaquinta

R-PC011-3
R-PC011-4
R-PC 011-5

COMMENT LETTER NO. R-PC011	Korla Eaquinta	October 24, 2019

Response to Comment R-PC011-1

The comment is noted. Please see Responses to Comments R-PC011-2 through R-PC011-5 below.

Response to Comment R-PC011-2

This comment letter submitted by the commenter and received by SDCRAA via U.S. mail on October 24, 2019 is essentially the same as the comment letter submitted by the commenter via email on October 18, 2019 (R-PC007). Please see the responses to comment letter R-PC007.

Response to Comment R-PC011-3

Pursuant to the California Environmental Quality Act (CEQA), the Recirculated Draft Environmental Impact Report (EIR) evaluates and discloses the potential environmental impacts of the proposed San Diego International Airport (SDIA) Airport Development Plan (ADP). Specifically, the EIR identifies those impacts determined to be significant, evaluates potential mitigation measures and alternatives that could avoid or reduce those significant impacts, and provides conclusions regarding levels of significance after mitigation. Those conclusions identify significant impacts for which there are no feasible mitigation measures that would avoid or reduce such impacts to a level that is less than significant. Prior to taking action on the project, the SDCRAA Board will consider the environmental analysis and conclusions set forth in the EIR. Pursuant to Section 15093 of the State CEQA Guidelines, the decision-making agency is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.

Should the Board decide to approve the project in light of unavoidable significant impacts, they are required under Section 15093 of the State CEQA Guidelines to adopt a Statement of Overriding Considerations.

Response to Comment R-PC011-4

Please see Topical Response TR-NOI-1: Health Effects of Noise and Responses to Comments R-AL003-2 and R-AL003-14.

Response to Comment R-PC011-5

Please see Responses to Comments R-PC011-2 through R-PC011-4 above.

R-PC012

From: Paul Grimes <paulgrimessd@gmail.com>
Sent: Wednesday, October 23, 2019 6:43 AM
To: Anasis Ted <tanasis@san.org>
Subject: Re: San Diego Environmental Impact Report Inquiry

RECEIVED
OCT 23 2019
BY: .....

Hello Ted:

In preparing a response to the ADP, I notice some issues with the fleet mix scenarios in Appendix B. So, I had called Leigh-Fisher to ask a couple questions and they quickly responded to my request by saying the RAA has requested outsiders contact you with questions and responses.

Ted, I have major concerns with the fleet mix up to 2050. To keep it simple, I am speaking only of the Domestic forecast. Both the constrained and unconstrained forecasts have unreasonable numbers of certain aircraft.

The unconstrained forecast has the below questionable items in Table 4-5 of page 23.

- The huge difference between unconstrained and constrained forecasts are massive as some fleets are totally gone in one vs. the other scenario.
- I wonder how SAN will garner the more than double the A320/738/739 and A321 operations by 2050 from aircraft that are out of production today. The only way this can happen is if the airlines cancel flights elsewhere or move older jets to SAN and replace them at other airport with newer aircraft. Let's hope SAN gets its share or more of new aircraft.
- How could the 737MAX have less than half the number of operations in the unconstrained vs. constrained forecast?

The constrained forecast has the below questionable items in Table 5-2 of page 36.

- There is no way the 757 will be have 13 times more operations in 2050 than in 2018. The 757 is undergoing a continual retirement program with the big three, who currently operate just a fraction of their 757 fleet in days past. In 2050 every 757 will be at least 48 years old.
- I would hope the MD80 would be retired instead of ramping up to 11 departures per day in 2050. MD80 would be a minimum of 45 years old in 2050. DL operates 108 MD80/90s and keep them away from the West due to range issues. They plan to retire 40 in 2019. UA and AA don't operate the MD80/90s). Allegiant dumped theirs as well.
- The forecast indicates 737 Classics will return to SAN in a big way - this must be an error as I believe they are not flown in the US.
- The 320NEO is shown with zero operations beginning in 2028. No other 320 Family aircraft are shown with NEO operations.
- The A321 shows a dropoff of operation after 2028
- 73G dips then rises after 2023
- 738 has a major drawdown after 2018 and removed after 2023
- 739 has a huge bump from 2018 to 2023 of 4 times, then drops off until 2050.
- The 737MAX does increase nicely, but it should almost completely replace 30 to 50 year old 737NGs by 2050. The 737NG is out of production as is the A320CEO family.

My concern is that these fleet mixes could have been cranked into the noise contours. If so, they noise contours are totally inaccurate. If not, what are the contours based upon?

Thanks for your response,
Paul Grimes

R-PC012-1

COMMENT LETTER NO. R-PC012	Paul Grimes	October 23, 2019

Response to Comment R-PC012-1

This comment letter submitted by the commenter via email on October 23, 2019 is similar to portions of the comment letter submitted by the commenter via email on November 4, 2019 (R-PC023). Please see the responses to comment letter R-PC023 - specifically, see Response to Comment R-PC023-16 regarding the forecasted fleet mix and Response to Comment R-PC023-31 regarding the noise contours.

From: Gilbert Rebecca
Sent: Friday, October 25, 2019 3:56 PM
To: Airport Planning
Subject: Fw: noise levels at San Diego airport

From: Marga Fountain <margafountain@aol.com>
Sent: Friday, October 25, 2019 3:22:34 PM
To: Planning@san.or <Planning@san.or>
Cc: Gilbert Rebecca <rgilbert@san.org>
Subject: noise levels at San Diego airport

Attention: Ted Anasis and Rebecca Gilbert,

I saw the article in Point Loma-OB Monthly. If you put the question in your computer "What did Schiphol do to control the noise level" you will find a good answer. There is not enough land to do this around the San Diego airport. The airport should never have been expanded within the city limited. You should have a good look at other great airports around the world and see what they have done. Learn from them. R-PC013-1

A Point Loma resident for over 45 years.

RECEIVED
OCT 25 2019
BY: .....

COMMENT LETTER NO. R-PC013	Marga Fountain	October 25, 2019

Response to Comment R-PC013-1

The comment is noted. Please see Response to Comment R-PC008-2.

From: maggielocke@aol.com
Sent: Saturday, October 26, 2019 1:03 PM
To: Airport Planning
Subject: proposed airport expansion
Attachments: SDCRAA letter.docx

Dear Mr. Anasis,
Please include the attached letter in public comments opposing proposed airport expansion. The letter supports the Peninsula Community Planning Board's response to the DEIR.
Thank you,
Maggie Locke

R-PC 014-1

RECEIVED
OCT 26 2019
BY: .....

SDCRAA
Attn: Ted Anasis
PO Box 892776
San Diego, Ca. 92138

RECEIVED
OCT 26 2019
BY: .....

4506 Adair St.
San Diego, Ca.
92107

Oct. 24, 2019

Dear Mr. Anasis,

As I write this, the temperature is 92 degrees in Point Loma, one of the areas that will suffer the greatest harm should the airport expand its operations as planned. The New York Times today ran a front-page story citing new data showing an increase in damaging air pollution in the US since 2016. An op-ed piece outlined the present and future costs of having burned fossil fuels heedlessly for the last several decades. The carbon load from increasing air travel is expected to amount to nearly all of annual global CO2 emissions by mid-century if growth continues without greater regulation or taxation.

Climate change is real. We increasingly feel its effects, and we know what causes it. Yet business interests want to grow the San Diego airport, without regard to current realities. We need to decrease carbon load while there is still a chance avert the worst of what the planet will endure.

The DEIR does not even bother to address this existential threat.

The airport must not be allowed to increase air traffic without commensurate measures to reduce hydrocarbon emissions. Current technologies are not able to sufficiently reduce air industry pollution to ensure human health and safety, locally or globally. It is no longer business as usual, in which economic interests prevail in the name of progress. Our familiar notion of progress coupled with our addiction to fossil fuels ensures our demise.

I have NIMBY concerns as well. I write in support of the PCPB Oct. 17 response to the DEIR which registers community opposition and calls for meaningful environmental studies before any expansion. The DEIR's rhetorical drumbeat acknowledging "significant but unavoidable harm" to areas close to the airport doesn't fly (pun recognized). It is indeed offensive and unacceptable.

R-PC014-2

R-PC014-3

I have lived in the Sunset Cliffs area of Point Loma/Ocean Beach for 35 years. The airport had been an acceptable neighbor, its level of noise and traffic known when I chose to buy my home. I have experienced significant degradation of my immediate environment since changes implemented at the airport in 2016. Increased air traffic has produced more noise and pollution. The new waypoint trajectories bring air traffic closer to my home. The approved paths are also regularly violated, with many airplanes traveling further south and turning closer to the coast than allowed.

In the spring, a roar brought me running outside. I looked up at the belly of a plane flying way too low and way too close, apparently having had to abort a landing. My complaint call is recorded on the airport hotline.

Our airport has always been a difficult one at which to land. The incident I describe is but one illustration of the airport's site being too small and urban to serve the needs of a growing metropolis. It is ill-suited for the expansions since 2016, much less further growth.

I join with my neighbors in vigorous opposition to the airport's proposed plans to expand. On a local level, the intended growth is misguided, and it puts an onerous burden on this community. On a global scale, given present and future climate crises we face, it could be considered insane.

Sincerely,

Maggie Locke

R-PC014-4

R-PC014-5

R-PC014-6

R-PC014-7

COMMENT LETTER NO. R-PC014	Maggie Locke	October 26, 2019

Response to Comment R-PC014-1

The comment is noted. Please see Responses to Comments R-PC014-2 through R-PC014-7 below. Please also see Responses to Comments R-AL003-1 through R-AL003-15 for responses to comments in the Peninsula Community Planning Board's October 17, 2019 comment letter on the Recirculated Draft EIR.

Response to Comment R-PC014-2

Project impacts related to air quality pollutants and climate change are addressed in the Recirculated Draft EIR; specifically, in Section 3.2, Air Quality, and Section 3.3, Greenhouse Gases and Climate Change. As the comment provides background information regarding air quality and climate change issues, citing generally to an article published in The New York Times, and offers no specific critique of the analysis provided in the Recirculated Draft EIR, no further response is required.

Response to Comment R-PC014-3

Please see Responses to Comments R-AL003-1 through R-AL003-15 regarding responses to comments in the Peninsula Community Planning Board's comment letter of October 17, 2019.

Response to Comment R-PC014-4

Potential noise and air quality (pollution) impacts associated with the proposed project are addressed in Section 3.12, Noise, and Section 3.2, Air Quality, respectively, of the Recirculated Draft EIR.

Please see Response to Comment R-PC004-1 regarding the control of flight paths and air space around SDIA, which is within the jurisdiction of the FAA, not the SDCRAA.

Response to Comment R-PC014-5

Please see Response to Comment R-PC003-3.

Response to Comment R-PC014-6

The comment is noted. Please see Response to Comment R-PC008-2.

Response to Comment R-PC014-7

The comment is noted. Please see Responses to Comments R-PC014-2 through R-PC014-6 above.

From: Nadia Benchabane <nadia.benchabane@yahoo.com>
Sent: Sunday, October 27, 2019 8:36 PM
To: Airport Planning
Subject: Public comment attn. Ted Anasis

I am writing because I am deeply concerned about my children's health living in Point Loma. I heard the airport is planning to add more flights and this is concerning mainly because of the pollution the jet fuel drops when flying over. The noise is also a major problem but my main concern is the black soot I find all over my porch and patio and I don't even live under the flight path. There are also schools and sports fields directly under the path. I feel like this is a health hazard for younger generations and it must be stopped. My suggestions are to move the airport to Miramar where there is more open space or put a limit on the number of aircraft allowed. I know there is a demand for more flights but health is more important. There are other airport options in the area for people to use. My family has considered moving out of the area but we can't due to jobs and family. When we bought this home it was not nearly as bad. Now we are constantly cleaning up black soot and getting poor sleep thanks to the planes. Please do not make this problem worse it is unacceptable. R-PC015-1

Thank you for reading.

Sent from my iPhone

RECEIVED
OCT 27 2019
BY: .....

Sent from Yahoo Mail for iPhone

Sent from Yahoo Mail for iPhone

COMMENT LETTER NO. R-PC015	Nadia Benchabane	October 27, 2019

Response to Comment R-PC015-1

This comment letter submitted by the commenter via email on October 27, 2019 is a duplicate of the comment letter submitted by the commenter via email on October 21, 2019 (R-PC008). Please see the responses to comment letter R-PC008.

Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969
SOHO50

RECEIVED
OCT 28 2019
BY: .....

Monday, October 28, 2019

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

Re: Recirculated draft EIR comments, Airport Development Plan (No. 2017011053)

Mr. Anasis,

After reviewing the recirculated draft Environmental Impact Report (EIR) for the Airport Development Plan (No. 2017011053), Save Our Heritage Organisation (SOHO) acknowledges the revised Airport Development Plan project seeks to retain the United Air Hanger/Terminal, which SOHO appreciates and highly supports. However, as demolition of the Brutalist and Futurist style Terminal 1 façade is integral to this development upgrade, SOHO encourages that if it cannot be retained, a portion of this primary façade be studied for incorporation as an art or similar installation, to remain as a permanent fixture at the San Diego Airport.

Significant under Criteria A and C, the c. 1931 United Airlines Hanger and Terminal is the oldest surviving structure associated with the earliest period of Lindbergh Field's development between 1928 and 1933, and is an early aircraft hangar example. SOHO understands that under the recirculated EIR, this project not only retains the UAHT, which was relocated once already to be saved from demolition, but also provides three relocation alternatives. SOHO's preferred alternative location is at the southern edge of the general aviation area, "offering the potential for the building to be reused for airport operational purposes or commercial/public use," because this location is nearest to its original location, provides opportunity for the public to engage directly with the resource, and likely affords the best use for the long-term. However, SOHO could tentatively support the northern end of the cargo handling area and, with more detail, might also be able to support a privately-funded off-site option. SOHO greatly appreciates that the Airport Authority now recognizes the historic value of this significant and rare resource and has devised multiple options to retain this important piece of San Diego's Air and Space history.

Regarding the Brutalist style of the Terminal One primary (south) façade, which includes Futurist stylistic influences and "remains the same today as when it was built in 1967," (p. 3.0-7), SOHO acknowledges there are serious impediments to retaining the existing façade or incorporating it into the new Terminal 1, which will include a two-level roadway. However, as this resource is still significant under Criterion A/1 and C/3, for a significant contribution to the broad patterns of history and for embodying the distinct characteristics of Brutalism and Futurism from 1967, SOHO strongly encourages the façade or a portion thereof, be used to create an art or similar installation for the Airport as a permanent fixture. The construction of Terminal One enabled Lindbergh Field to dock and maintain large jet engine aircraft and also reflects the modernization of San Diego through an increase in air traffic, therefore, SOHO asserts it is important that the Airport Authority continue to share the important Air and Space history that has taken place in San Diego.

SOHO supports the recirculated draft EIR, which seeks to retain the c. 1931 United Air Hanger/Terminal (UAHT) through multiple relocation options, and highly encourages the Airport Authority to consider how they might be able to retain a portion of the existing Terminal One facade or, at a minimum, perform HABS level 2 documentation and feature this façade within an art exhibit.

Thank you for the opportunity to comment,

Bruce Coons
Executive Director
Save Our Heritage Organisation

R-PC016-1

COMMENT LETTER NO. R-PC016 Save Our Heritage Organisation (SOHO) October 28, 2019

Response to Comment R-PC016-1

SOHO's support of SDCRAA's plan to relocate the United Airlines Hangar and Terminal (UAHT) is very much appreciated.

The comment requests that SDCRAA consider how the existing Terminal 1 façade, or a portion thereof, might be used to create an art or similar installation for SDIA as a permanent fixture or, at a minimum, perform HABS level 2 documentation and feature this façade within an art exhibit. As indicated in Mitigation Measure MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation of the Recirculated Draft EIR, a HABS report was completed for the proposed project and includes the existing Terminal 1. The subject HABS documentation, presented in Appendix R-F1 of the Recirculated Draft EIR, includes drawings and plans, as available, numerous photographs, including several of the Terminal 1 façade, and written data and description of the history of Terminal 1. Such documentation is consistent with the Level II requirements of the *Guidelines for Architectural and Engineering Documentation* set forth by the U.S. Department of Interior-National Park Service.[25] Additionally, the SDCRAA proposed to work with a local photographer(s) to develop additional documentation of the Terminal 1 façade, and compile archival photographic and video documentation of Terminal 1 to be posted to a dedicated public website. The website may also host available plans and construction documents related to Terminal 1. SDCRAA's commitment to that follow-up is set forth through the addition of the following new mitigation measure:

> ***MM-HR-4:*** ***Interpretative Display Regarding Existing Terminal 1:*** *Building upon the historical resources study and HABS/HAER documentation completed in June 2018 for the SDIA Airport Development Plan (ADP) EIR, which includes, but is not limited to, drawings, plans, photographs, and written data and description of the history of Terminal 1, the SDCRAA shall develop interpretive material for public exhibition concerning the history of the existing Terminal 1. The interpretive material will include the photographs produced in the HABS/HAER documentation, and the historic archival research previously prepared as part of the ADP EIR, and will be supplemented with additional photographs and video documentation developed in coordination with a local historic resources specialist. This interpretive material will be posted to a dedicated public website. The website may also host available plans and construction documents related to Terminal 1.*

The addition of Mitigation Measure MM-HR-4 is reflected in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

[25] U.S. Department of the Interior – National Park Service. Guidelines for Architectural and Engineering Documentation, Document Number: 03-18-197. July 2003. Available: https://www.federalregister.gov/documents/2003/07/21/03-18197/guidlines-for-architectural-and-engineering-documentation.

SDCRAA
Attn: Ted Anasis
PO Box 892776
San Diego, Ca. 92138

OCT 30 2019
BY: .....

4506 Adair St.
San Diego, Ca.
92107

Oct. 24, 2019

Dear Mr. Anasis,

As I write this, the temperature is 92 degrees in Point Loma, one of the areas that will suffer the greatest harm should the airport expand its operations as planned. The New York Times today ran a front-page story citing new data showing an increase in damaging air pollution in the US since 2016. An op-ed piece outlined the present and future costs of having burned fossil fuels heedlessly for the last several decades. The carbon load from increasing air travel is expected to amount to nearly all of annual global CO2 emissions by mid-century if growth continues without greater regulation or taxation.

Climate change is real. We increasingly feel its effects, and we know what causes it. Yet business interests want to grow the San Diego airport, without regard to current realities. We need to decrease carbon load while there is still a chance avert the worst of what the planet will endure.

The DEIR does not even bother to address this existential threat.

The airport must not be allowed to increase air traffic without commensurate measures to reduce hydrocarbon emissions. Current technologies are not able to sufficiently reduce air industry pollution to ensure human health and safety, locally or globally. It is no longer business as usual, in which economic interests prevail in the name of progress. Our familiar notion of progress coupled with our addiction to fossil fuels ensures our demise.

I have NIMBY concerns as well. I write in support of the PCPB Oct. 17 response to the DEIR which registers community opposition and calls for meaningful environmental studies before any expansion. The DEIR's rhetorical drumbeat acknowledging "significant but unavoidable harm" to areas close to the airport doesn't fly (pun recognized). It is indeed offensive and unacceptable.

R-PC017-1

I have lived in the Sunset Cliffs area of Point Loma/Ocean Beach for 35 years. The airport had been an acceptable neighbor, its level of noise and traffic known when I chose to buy my home. I have experienced significant degradation of my immediate environment since changes implemented at the airport in 2016. Increased air traffic has produced more noise and pollution. The new waypoint trajectories bring air traffic closer to my home. The approved paths are also regularly violated, with many airplanes traveling further south and turning closer to the coast than allowed.

In the spring, a roar brought me running outside. I looked up at the belly of a plane flying way too low and way too close, apparently having had to abort a landing. My complaint call is recorded on the airport hotline.

Our airport has always been a difficult one at which to land. The incident I describe is but one illustration of the airport's site being too small and urban to serve the needs of a growing metropolis. It is ill-suited for the expansions since 2016, much less further growth.

I join with my neighbors in vigorous opposition to the airport's proposed plans to expand. On a local level, the intended growth is misguided, and it puts an onerous burden on this community. On a global scale, given present and future climate crises we face, it could be considered insane.

Sincerely,

Maggie Locke

R-PC017-1
Cont'd

COMMENT LETTER NO. R-PC017	Maggie Locke	October 30, 2019

Response to Comment R-PC017-1

This comment letter submitted by the commenter and received by SDCRAA via U.S. mail on October 30, 2019 is a duplicate of the comment letter submitted by the commenter via email on October 26, 2019 (R-PC014). Please see the responses to comment letter R-PC014.

October 28, 2019

OCT 30 2019
BY: .....

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

RE: Comments on Recirculated Draft EIR - SDIA Airport Development Plan

Dear SDRAA:

I am providing comments on the Recirculated Draft Environmental Impact Report (RDEIR) for San Diego International Airport's proposed Airport Development Plan (ADP). I previously submitted comments via correspondence dated October 18, 2018. A review of the RDEIR indicates that several environmental issues and impacts with the project were not fully vetted, does not provide adequate mitigation measures for several significant environmental impacts, mischaracterizes some mitigation measures as infeasible, and the proposed project and Alternative 4 are inconsistent with the established goals and objectives of the ADP.

Although some progress is made in the RDEIR by updating aviation forecasts, providing a modified alternative to address on and off site transportation impacts, implementation phasing, and structures heights; the RDEIR neglects and avoids adequate mitigation measures to address significant environmental impacts the project will impose.

Mischaracterization of mitigation measures as "infeasible" and "unavoidable" for significant environmental impacts particularly for pollution and noise needs to be readdressed. The proposed project's adverse impacts on pollution, noise, quality of life, human health and the avoidance of mitigation measures do not adequately address the significant impacts the project will impose on individuals, households and communities around and under aircraft flight paths.

The following are comments on the RDEIR:

Air Quality & Green House Gas (GHG)
The RDEIR indicates emissions and green house gas associated with future operations would exceed screening level thresholds and create significant and unavoidable impacts on the environment. Adverse impacts would not only occur during the construction phase but perpetually and ongoing upon development of the Project.[1] Particularly noted is Particulate Matter pollution that would exceed state standards and increase the ambient concentrations of air pollution and GHG with the proposed project and Alternatives 3 and 4. Future year operational impacts would be a Significant. The analysis indicates Alternative 2 would provide "emissions slightly less than those of proposed project in all future years."[2]

R-PC018-1

R-PC018-2

---

[1] San Diego Regional Airport Authority, Recirculate Environmental Impact Report (RDEIR), Executive Summary, September 2019. pp. ES-62-62.

[2] Ibid., Table ES-4, p. ES-69.

Construction and operation of the proposed project would generate GHG emissions that will have a significant impact on the environment.[3] The analysis indicates Alternative 2 would produce less GHG emissions during the construction phase and reduced emissions for on-going operations compared to the proposed project and other alternatives.

The proposed project and several of the alternatives are inconsistent with several SDRAA's adopted ADP goals. Key goals indicate the preferred project should, "Provide a plan that is fiscally and environmentally sustainable", and "Provide a plan that meets the aviation needs of the San Diego region in a socially responsible manner." The extensive demolition required, loss of historically designated buildings, environmental impacts, the grander scope and costs of the proposed project and Alternative 3 and 4 are inconsistent with these goals. Alternative 2, with modifications to include several on-site and off-site transportation measures developed in Alternative 4, would be more consistent with the goals and objectives producing less air pollution, GHG, and be more environmentally sustainable as well as fiscally responsible (Table ES-4).

R-PC018-2 Cont'd

Cultural Resources:
The RDEIR indicates implementation of the project and Alternatives 3 or 4 would require the demolition and loss of two (2) historically significant buildings. The loss of these historically significant structures would not be able to be mitigated. Historic buildings and features of buildings can be saved and restored. Destruction of these historically significant buildings with the proposed project and Alternative 3 and 4 are inconsistent with SDRAA's adopted ADP goal and objective to " Provide a plan that is fiscally and environmentally sustainable" and "Wherever prudent, make use of existing facilities through renewal or modernization to meet future demand."[4] Project Alternative 2 would avoid destruction of two of the three historically significant buildings. Alternative 2 should be seriously considered as the preferred alternative project.

R-PC018-3

Noise:
The RDEIR analysis indicates airport operations in nearer term and future years would significantly increase aircraft-generated noise levels and impact residences, schools and places of worship compared to the existing baseline condition.[5] Population and households impacted by noise within the 60-75+ CNEL contour would <u>increase</u> by 20,346 pop. 10,470 dwelling units by 2024 (22% and 33% respectively), and 33,800 persons and 15,788 households by 2050.[6] These figures are in addition to the already impacted population/households in the existing baseline and do not take into account persons and household already adversely impacted by airport/aircraft operations noise at 60 CNEL or below. SDIA's current sound insulation program has conducted sound insulation of 3,453 residential units since inception in 1997 and does not include houses of worship. The projected <u>additional</u> impacted population and households are signification and must be addressed in a more timely manner as part of the environmental review, proposed mitigation and project EIR approval process.

R-PC018-4

---

[3] Ibid.,Green House Gas (GHG) Emissions, p. ES-62-63.

[4] Ibid., Project Objectives, p. ES-14.

[5] Ibid., Noise, p. ES-64.

[6] Ibid., Noise, Table 3.12-8: p. 3.12.-43.

Excessive, loud, and repetitive noise has several adverse impacts on human health, well being, and quality of life. Particularly noted are adverse impacts on hearing, communications, hypertension, sleep disruption, agitation, and creating or imposing new or additional stressors that aggravate health issues.

R-PC018-5

The RDEIR noise impact also notes increased nighttime flight operations which would have a 'Significant Impact". Current SDIA's use regulation restrict (prohibit) aircraft departures between 11:30 p.m. to 6:30 a.m. There are no restrictions on aircraft arrival times. Noise impacts are aggravated by the large number of flight operations in late nighttime and early mornings which are anticipate to disrupt sleep and awakenings in the population. The RDEIR claims this Significant Impact is "unavoidable".[7] The RDEIR fails to present sufficient mitigation measures to address this Significant Impact.

R-PC018-6

The RDEIM states, "Federal aviation noise abatement policy establishes abatement authority and responsibility of the Federal Government, *airport proprietors (italic mine)*, state and local governments, air carriers, air travels and shippers and airport area resident and prospective resident. It emphasizes the FAA's role is primarily on of regulation noise at it source (the aircraft), plus supporting local effort to develop airport noise abatement plans".[8] It is SDCRAA as the airport proprietor responsibility to provide adequate, effective and timely mitigation measures to address and provide noise abatement measures for major projects proposed in the ADP.

R-PC018-7

The only proposed mitigation measure in the DREIR that implements noise mitigation measures is Expansion of SDCRAA's Sound Insulation Program, identified as MM-NO1. The other Proposed Mitigation Measures: NOI-2 (Update Noise Exposure Maps), NOI-3 (Create Mobile Noise Monitoring Program), and NOI-4 (Assess the Findings of the 2018 FAA Reauthorization Act-Related Noise Studies) do not implement or lessen the significant impacts imposed by noise on sensitive land uses. The document and CEQA define "mitigation" as, "measures that would be implemented to avoid or lessen potentially significant impacts."[9] Only MM-NO1 (and potentially NOI-5 if funds were used for sound insulation) would actually provide a measure to lessen the significant negative impacts of noise from the project. SDCRAA, as the airport proprietor, cannot abdicate its responsibility or make measures solely dependent on outside funding to address and mitigate the significant environmental impact of noise imposed by the project and mislabel the impact at "unavoidable". Mitigation measure to address noise impacts found significant in the environmental review process are feasible and should not have a false condition that only if an outside agency approves the funding is it feasible.

R-PC018-8

SDIA and its successor agencies have had a residential sound insulation program since 1998. Although some progress has been made in implementing sound attenuation improvements to residential units, the waiting period for implementation is excessive. Existing eligible residents have been on waiting lists for years, if not decades. To date the program has completed 3,453 dwelling units. The proposed project will triple the number of housing units significantly impacted by noise within five years eclipsing the total number of housing units that have undergone sound insulation installation by SDCRAA or its predecessor agency over in the past 22 years.

R-PC018-9

---

[7] Ibid., Table ES-3, p. ES-55.

[8] Ibid., Section 3.12 Noise, p 3.12-19

[9] RDEIR, Executive Summary, p. ES-33.

The addition of impacted schools and houses of worship would further exacerbate the long waiting period. The primary reliance solely on FAA funding for the Sound Insulation Program as a mitigation measure is insufficient. SDRAA need to commit sufficient funds and programing implementation measures to expedite the program's backlog and address the additional impacts to noise sensitive uses impacted by the proposed project in more timely manner.

The RDEIR still fails to provide sufficient detail on the location of houses of worship both existing and projected that will be in the noise impact areas. The REIR only provides a legend on Figures 3.12-8 though 3.12-12. The DEIR fails to list the houses of worship impacted in a table format similar to the list compiled for schools in order that these houses of worship are aware of proposed impacts of the project. The Mitigation Measures are inadequate and the language of the DREIR makes it *conditional* on FAA approval of funding. SDIA is again avoiding its responsibility to address the significant impact on these noise sensitive uses by making it "potentially feasible."

Other mitigation measures must be analyzed and proposed by the RDEIR that address harmful noise impacts imposed by the project. Noise mitigation measures commonly noted by the FAA measures include purchase land near airports to maintain compatible land use, sound barriers and berms, Continuous Decent Arrival for aircraft operations https://www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_mitigation/, as well as other noise mitigation measures used by other airports.

The RDEIR neglects to provide mitigation measures for the public health hazards imposed by the project. Exposure to excessive and frequent aircraft noise has a detrimental effects on public health for general demographics and vulnerable population groups. It has been noted in the RDEIR and various noise studies that constant exposure to noise is associated with hypertension, myocardial infarction, heart disease and other health related issues. Various research and studies in partnership with the FAA show there are health related consequences of exposure aircraft/airport noise near airports (www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_impacts/). Cardiovascular effects may arise as a consequence of stress caused by aircraft noise with sleep disturbance where sleep patterns are disturbed and premature awakenings occur, and noise related annoyance can cause negative emotions. Noise can cause cognitive impairment in children, which can lead to a subsequent impairment in the quality of life.[10]

The RDEIR dismisses such findings and its responsible to address and develop measures to mitigate the adverse impacts of noise with the proposed project.

Environmental Justice:
Environmental justice is 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. (Cal. Gov. Code, § 65040.12, subd. (e).) The RDEIM fails to provide an analysis of potential impacts on communities and minority households for environmental justice.

R-PC018-9 Cont'd
R-PC018-10
R-PC018-11
R-PC018-12
R-PC018-13

---

[10]Hales Swift, "Review of the Literature Related to Potential Health Effects of Aircraft Noise." PARTNER Project 19 Final Report, Partnership for AiR Transportation Noise and Emissions Reduction, 2010 http://web.mit.edu/aeroastro/partner/reports/proj19/proj19-healtheffectnoise.pdf

Noise analysis and CNEL contour maps in the RDEIM show disruptive noise impacts will increase to larger and larger areas surrounding the proposed project particularly along aircraft departure and arrival paths. New and disruptive noise impacts will be imposed on new areas surrounding the project. Sample demographic information on new areas projected to be impacted by noise include census track areas 34.03 & 34.04 (attached). These sample census tracks show demographic information that have a much higher percentage of racial/ethnicity and lower median household income compared to the San Diego region.

Low-income and communities of color often bear a disproportionate burden of pollution, negative externalities and associated health risks with major projects. Environmental justice analysis and mitigation measures must be developed for the project's construction and operational impacts particularly for air quality, GHG, land use/planning, human health risk, and noise.

Conclusion:
The proposed Mitigation Measures for Cultural Resources, Air Pollution GHG and Noise in the RDEIR are insufficient and do not sufficiently address the increased significant impacts that will be imposed by the project. Environmental Justice needs to be addressed in the analysis. The less impactful Project Alternative 2 should be pursued as the preferred project. SDRAA should and must take responsibility to address the adverse impacts the proposed project will impose on the community around the proposed project and provide adequate migration measures.

R-PC018-13 Cont'd

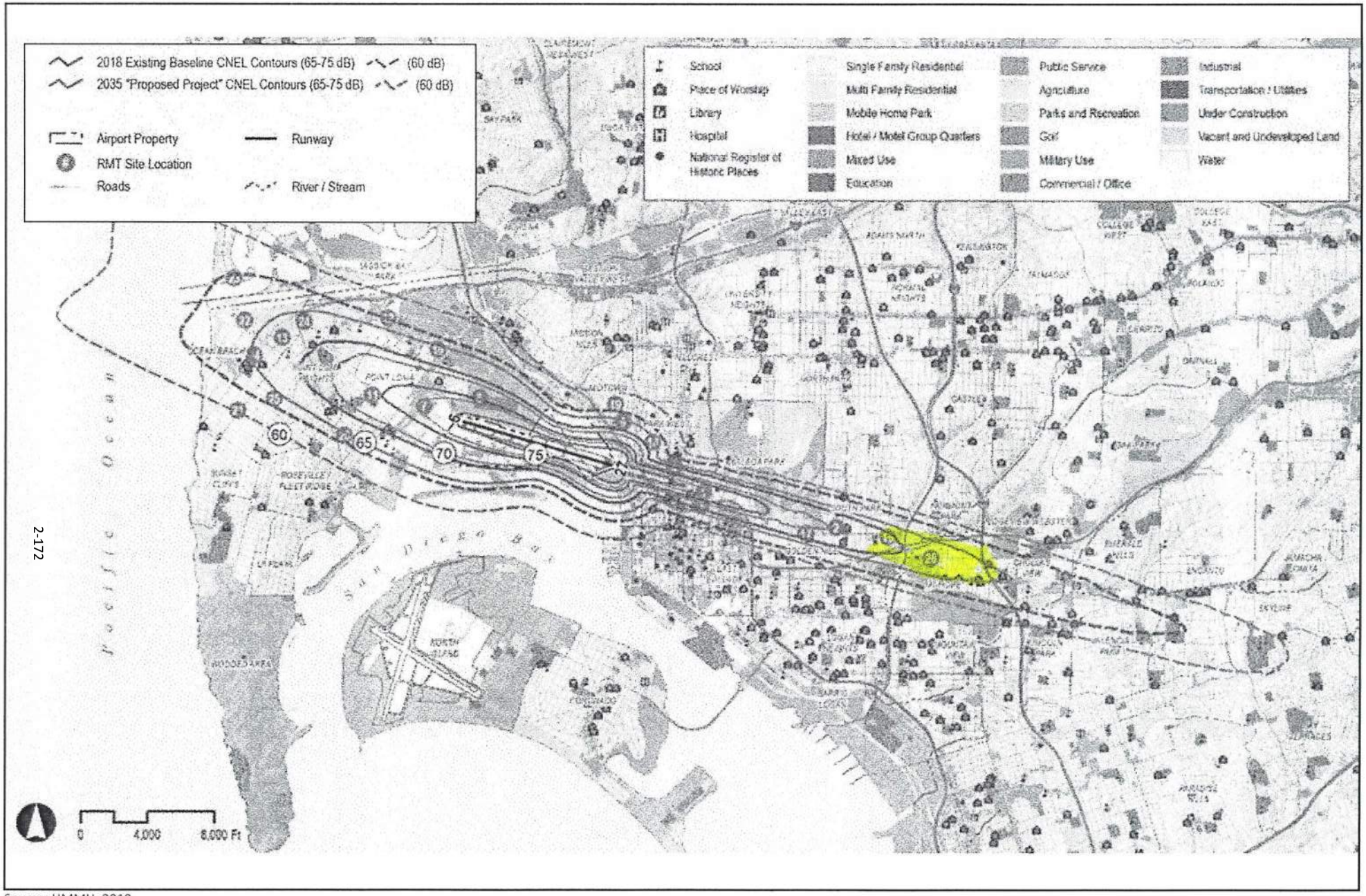
R-PC018-14

Sincerely,

Richard S. Phillips

Richard S. Phillips
1712 Granada Ave
San Diego, CA 92102
rsphill007@cox.net

cc: Mayor Kevin Faulconer, City of San Diego
County Supervisor Nathan Fletcher
Save Our Heritage Organization



Source: HMMH, 2019

Figure 3.12-11

2035 CNEL CONTOURS (60-75 DB)

R-PC018

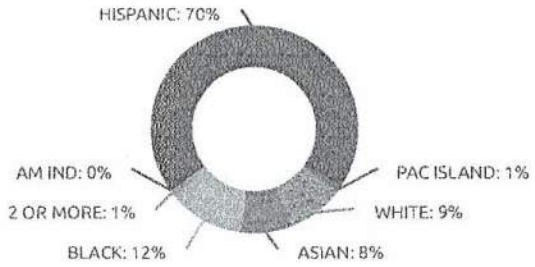
TOTAL POPULATION

3,876

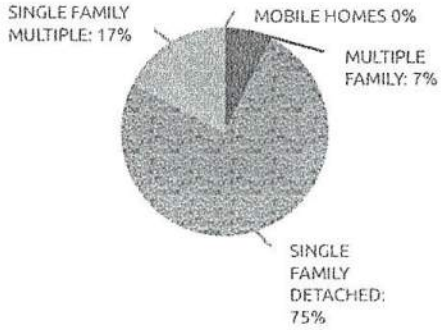
34.03

Select a section of a chart or the plus button to interact with the data.

RACE & ETHNICITY



HOUSING TYPES



AREA MAP



Demographic and Socioeconomic Estimates
Census Tract 2010
34.03

	Jan 1, 2018
Total Population	**3,876**
Household Population	3,876
Group Quarters Population	0
Persons Per Household	3.68

Housing and Occupancy

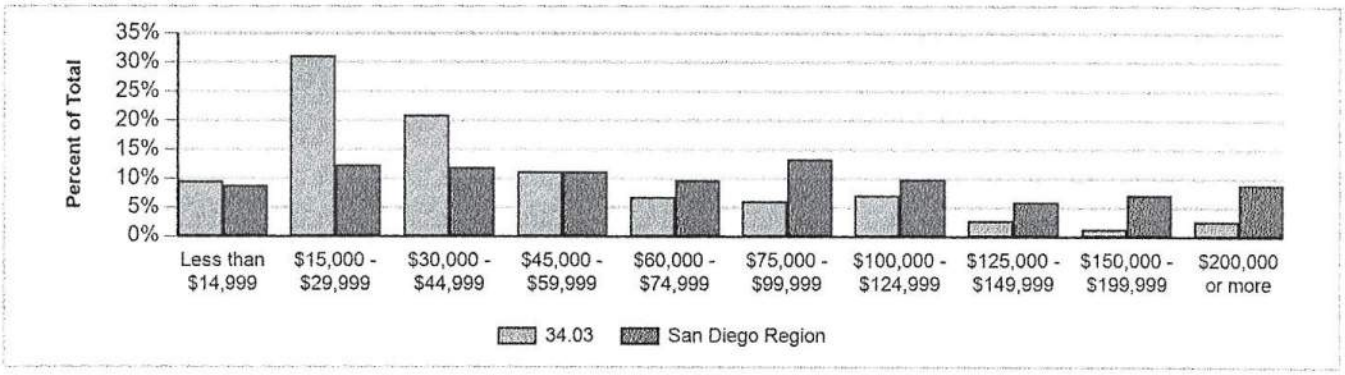
	Total Housing Units	Households	Vacancy Rate
Total Housing Units	**1,095**	**1,054**	**3.7%**
Single Family - Detached	824	790	4.1%
Single Family - Attached	189	182	3.7%
Multi-Family	82	82	0.0%
Mobile Home and Other	0	0	--

Household Income

Households by Income Category (2010 $, adjusted for inflation)

	Less than $15,000	$15,000-$29,999	$30,000-$44,999	$45,000-$59,999	$60,000-$74,999	$75,000-$99,999	$100,000-$124,999	$125,000-$149,999	$150,000-$199,999	$200,000 or more
% of Total	10%	31%	21%	11%	7%	6%	7%	3%	1%	3%

Median Household Income	2018
Adjusted for Inflation (2010 $)	$36,652
Not adjusted for inflation (current 2017$)	$41,330



IMPORTANT ADVISORY:

Caution should be taken when using data for small population groups, particularly at small levels of geography. Minor adjustments were made (such as correcting the location of housing units that were erroneously allocated by the Census Bureau to roads and open space) to more accurately reflect the region's true population and housing distribution.

In addition, Census 2010 does not include information about structure type or household income. Those details and other demographic estimates shown here are developed from other sources, including the California Department of Finance E-5 estimates for cities and the County of San Diego; San Diego County Assessor Records, vital events records from the California Department of Health, and income data from the U.S. Census Bureau American Community Survey.

Caution should always be taken when using data for small population groups, particularly at small levels of geography.

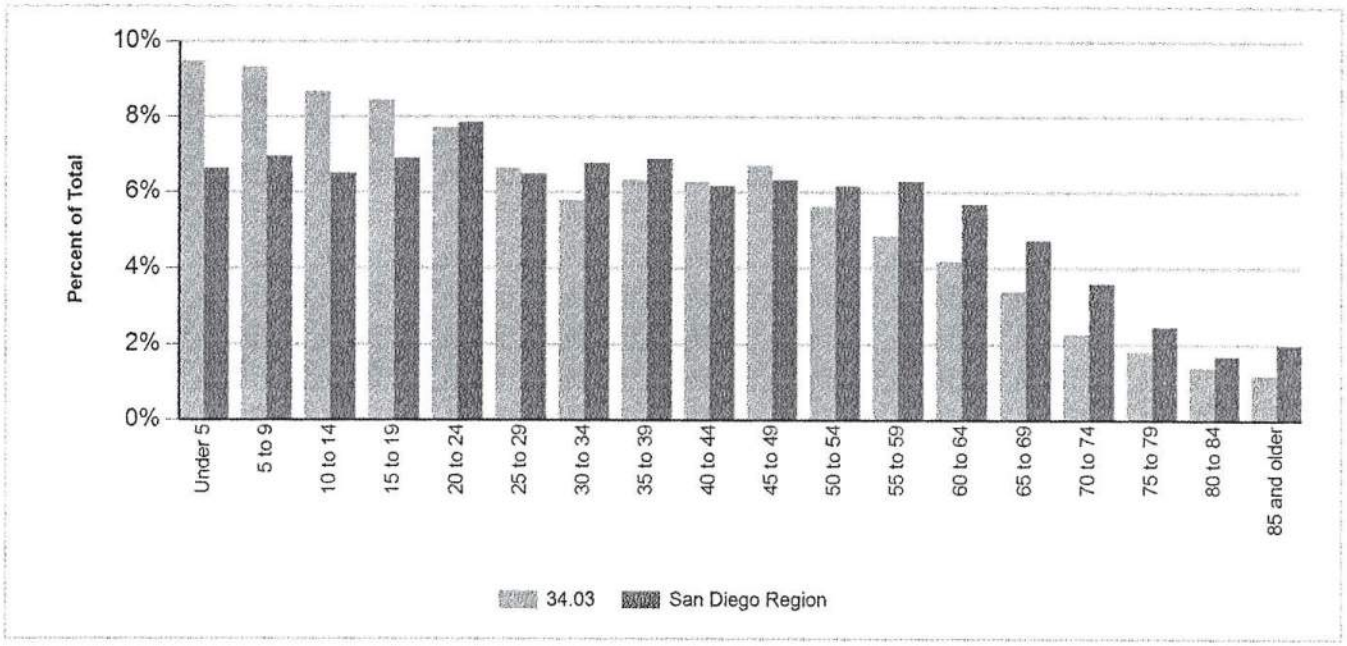
Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

May 25, 2019
34.03

Population by Age and Sex

	Total	Male	Female	Percent Female
Total Population	**3,876**	**1,923**	**1,953**	**50%**
Under 5	367	198	169	46%
5 to 9	361	184	177	49%
10 to 14	336	177	159	47%
15 to 17	202	105	97	48%
18 and 19	125	56	69	55%
20 to 24	299	148	151	51%
25 to 29	257	109	148	58%
30 to 34	224	110	114	51%
35 to 39	245	129	116	47%
40 to 44	243	121	122	50%
45 to 49	260	120	140	54%
50 to 54	218	122	96	44%
55 to 59	188	97	91	48%
60 and 61	78	41	37	47%
62 to 64	84	36	48	57%
65 to 69	131	56	75	57%
70 to 74	88	38	50	57%
75 to 79	70	34	36	51%
80 to 84	54	23	31	57%
85 and older	46	19	27	59%
Under 18	1,266	664	602	48%
65 and older	389	170	219	56%
Median Age	29.8	29.3	30.3	N/A

Population by Age



Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

May 25, 2019
34.03

Population by Race, Ethnicity and Age

		Non-Hispanic				
	Hispanic	White	Black	American Indian	Asian & Pacific Isl.	All Other
Total Population	**2,694**	**329**	**446**	**11**	**334**	**62**
Under 5	271	37	30	0	21	8
5 to 9	279	16	41	1	15	9
10 to 14	269	13	26	0	21	7
15 to 17	168	10	9	0	13	2
18 and 19	98	5	9	0	13	0
20 to 24	227	15	29	2	22	4
25 to 29	165	32	35	4	19	2
30 to 34	149	33	28	3	10	1
35 to 39	163	24	25	0	27	6
40 to 44	171	20	23	0	29	0
45 to 49	192	15	21	0	29	3
50 to 54	153	16	27	0	15	7
55 to 59	109	21	33	0	22	3
60 and 61	50	8	13	0	7	0
62 to 64	42	18	20	0	4	0
65 to 69	67	12	28	0	23	1
70 to 74	41	13	15	0	18	1
75 to 79	34	9	10	1	15	1
80 to 84	23	3	17	0	7	4
85 and older	23	9	7	0	4	3
Under 18	987	76	106	1	70	26
65 and older	188	46	77	1	67	10
Median Age	26.1	35.7	38.2	28.1	41.0	27.5

Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

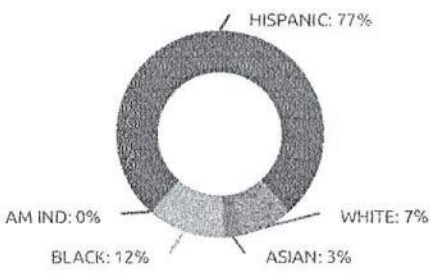
May 25, 2019
34.03

R-PC018

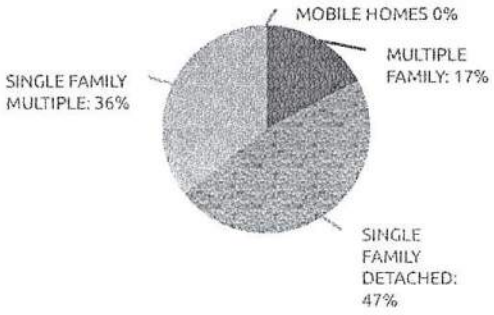
Select a section of a chart or the plus button to interact with the data.

34.04

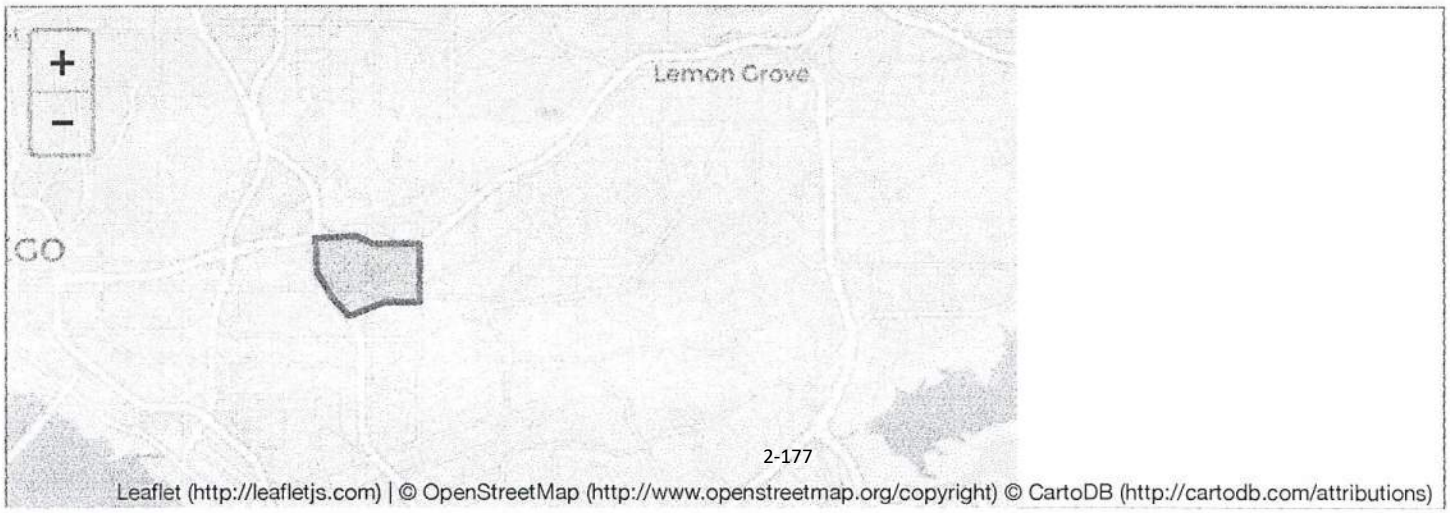
RACE & ETHNICITY



HOUSING TYPES



AREA MAP



Demographic and Socioeconomic Estimates
Census Tract 2010
34.04

	Jan 1, 2018
Total Population	**4,051**
Household Population	4,004
Group Quarters Population	47
Persons Per Household	3.77

Housing and Occupancy

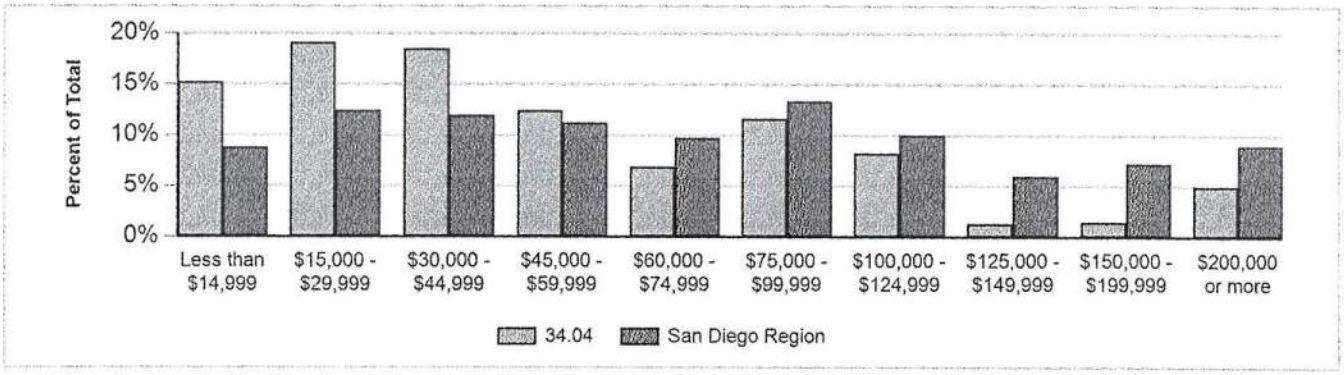
	Total Housing Units	Households	Vacancy Rate
Total Housing Units	**1,130**	**1,062**	**6.0%**
Single Family - Detached	533	501	6.0%
Single Family - Attached	402	377	6.2%
Multi-Family	195	184	5.6%
Mobile Home and Other	0	0	--

Household Income

Households by Income Category (2010 $, adjusted for inflation)

	Less than $15,000	$15,000-$29,999	$30,000-$44,999	$45,000-$59,999	$60,000-$74,999	$75,000-$99,999	$100,000-$124,999	$125,000-$149,999	$150,000-$199,999	$200,000 or more
% of Total	15%	19%	19%	12%	7%	12%	8%	1%	2%	5%

Median Household Income	2018
Adjusted for Inflation (2010 $)	$42,640
Not adjusted for inflation (current 2017$)	$48,083



IMPORTANT ADVISORY:

Caution should be taken when using data for small population groups, particularly at small levels of geography. Minor adjustments were made (such as correcting the location of housing units that were erroneously allocated by the Census Bureau to roads and open space) to more accurately reflect the region's true population and housing distribution.

In addition, Census 2010 does not include information about structure type or household income. Those details and other demographic estimates shown here are developed from other sources, including the California Department of Finance E-5 estimates for cities and the County of San Diego; San Diego County Assessor Records, vital events records from the California Department of Health, and income data from the U.S. Census Bureau American Community Survey.

Caution should always be taken when using data for small population groups, particularly at small levels of geography.

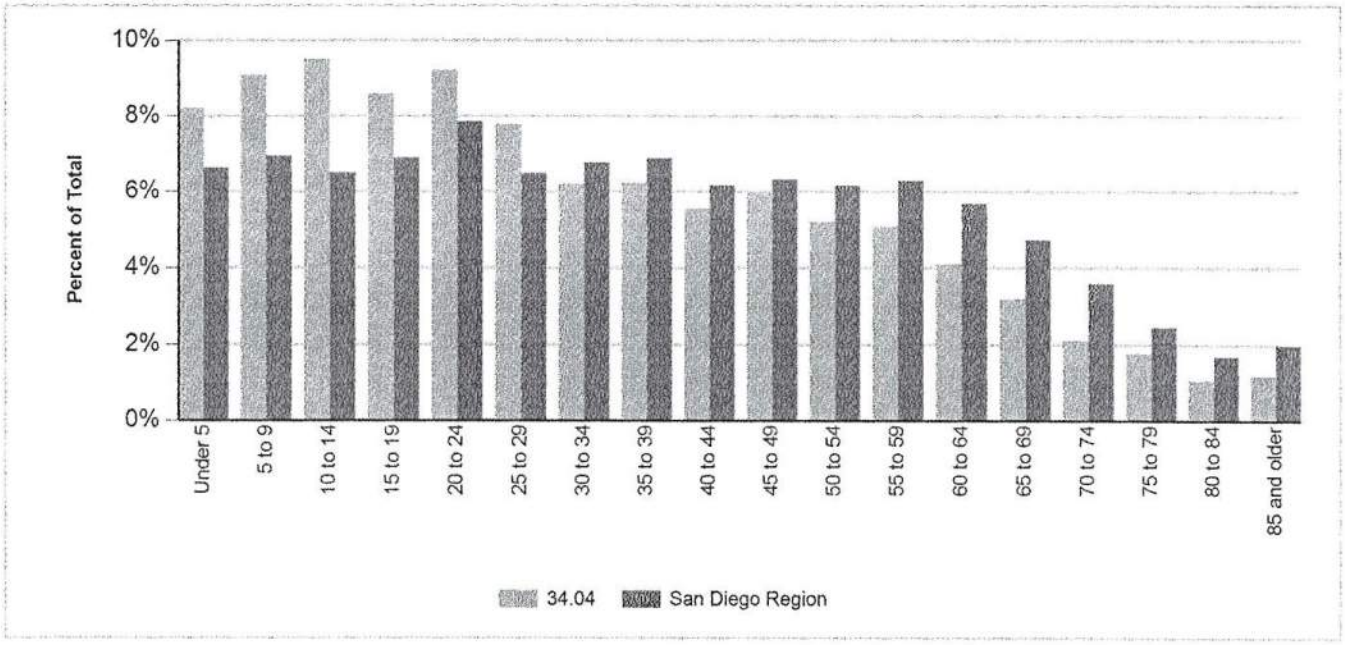
Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

May 25, 2019
34.04

Population by Age and Sex

	Total	Male	Female	Percent Female
Total Population	**4,051**	**2,047**	**2,004**	**49%**
Under 5	332	164	168	51%
5 to 9	368	189	179	49%
10 to 14	385	189	196	51%
15 to 17	220	123	97	44%
18 and 19	128	67	61	48%
20 to 24	373	186	187	50%
25 to 29	315	188	127	40%
30 to 34	251	138	113	45%
35 to 39	252	133	119	47%
40 to 44	225	109	116	52%
45 to 49	242	129	113	47%
50 to 54	211	105	106	50%
55 to 59	206	100	106	51%
60 and 61	72	35	37	51%
62 to 64	94	40	54	57%
65 to 69	129	55	74	57%
70 to 74	85	41	44	52%
75 to 79	72	23	49	68%
80 to 84	43	20	23	53%
85 and older	48	13	35	73%
Under 18	1,305	665	640	49%
65 and older	377	152	225	60%
Median Age	28.5	27.8	29.5	N/A

Population by Age



Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

May 25, 2019
34.04
Page 2 of 3

Population by Race, Ethnicity and Age

		Non-Hispanic				
	Hispanic	White	Black	American Indian	Asian & Pacific Isl.	All Other
Total Population	**3,110**	**270**	**470**	**16**	**140**	**45**
Under 5	284	17	29	0	1	1
5 to 9	311	16	34	0	5	2
10 to 14	322	16	31	2	5	9
15 to 17	185	13	11	0	4	7
18 and 19	103	5	13	0	6	1
20 to 24	276	29	48	1	10	9
25 to 29	242	29	33	2	6	3
30 to 34	180	24	40	1	5	1
35 to 39	193	16	27	2	12	2
40 to 44	196	7	13	1	8	0
45 to 49	187	14	25	0	14	2
50 to 54	168	7	28	1	7	0
55 to 59	151	13	33	1	7	1
60 and 61	46	5	16	0	4	1
62 to 64	62	9	15	0	8	0
65 to 69	76	18	24	2	8	1
70 to 74	46	13	19	0	3	4
75 to 79	36	9	15	1	11	0
80 to 84	19	4	11	1	7	1
85 and older	27	6	5	1	9	0
Under 18	1,102	62	105	2	15	19
65 and older	204	50	74	5	38	6
Median Age	26.5	32.1	34.5	40.0	47.9	21.4

Source: SANDAG, Current Estimates
SANDAG
www.sandag.org

May 25, 2019
34.04

COMMENT LETTER NO. R-PC018	Richard Phillips	October 30, 2019

Response to Comment R-PC018-1

The commenter's previous comments submittal dated October 18, 2018 pertained to the 2018 Draft EIR, which was circulated for public review and comment from July 9, 2018 to September 7, 2018. As explained in Section 1.7, Availability of the Recirculated Draft EIR, of the Recirculated Draft EIR, the Recirculated Draft EIR replaces the 2018 Draft EIR in its entirety. It is understood that the comments submitted on October 28, 2019 are on the Recirculated Draft EIR. The remainder of this comment appears to be an introduction to the more detailed comments that follow. As such, please see Responses to Comments R-PC018-2 through R-PC018-14 below.

Response to Comment R-PC018-2

The first two paragraphs of this comment generally reflect information presented in the Recirculated Draft EIR, although it should be noted that the existing ambient air quality in San Diego County already exceeds the state's 24-hour standard for particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (i.e., PM_{10}), as explained in Section 3.2.5, Environmental Setting, of the Recirculated Draft EIR. Implementation of the proposed project or any of the alternatives evaluated in the Recirculated Draft EIR would not cause an exceedance of state air quality standards for NO_2, CO, SO_2 or $PM_{2.5}$ and would not cause a new exceedance of the state air quality standard for PM_{10}, as implied by the comment, and would also not cause an exceedance of federal air quality standards, as documented in Section 3.2.7, Project Impacts, and Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR.

In the third paragraph, the commenter suggests that Alternative 2, with modifications such as incorporating several on-site and off-site transportation measures proposed under Alternative 4, would be more consistent with the goals and objectives producing less pollution, GHG emissions, and would be more environmentally sustainable and fiscally responsible than the proposed project. An EIR does not, however, need to consider multiple variations on the range of alternatives evaluated in detail. (*Village Laguna of Laguna Beach Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1028.) Also, an EIR need not analyze alternatives that do not offer significant advantages over the alternatives presented in the EIR, or that constitute a different version of an alternative presented in the EIR. (*Sequoia Hills Homeowners Ass'n v. City of Oakland* (1993) 23 Cal.App.4th 7045.) Notwithstanding, even if such modifications were made to Alternative 2, it would still not meet most of the project objectives. Section 5.8, Environmentally Superior Alternative, of the Recirculated Draft EIR, discusses the relationship between each alternative and the project objectives. As indicated in the discussion of Alternative 2 on pages 5-128 through 5-131 of the Recirculated Draft EIR, Alternative 2 fails to meet most of the project objectives associated with the six goals described therein. Integration of Alternative 4's on-site and off-site transportation measures into Alternative 2 would enable Alternative 2 to meet the goal of improving ground access to SDIA and the related objectives, but that would not change the previous conclusions of how and why Alternative 2 fails to meet other objectives.

Response to Comment R-PC018-3

Implementation of Mitigation Measure MM-HR-2, Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building), provides for the relocation and preservation of that historic structure, which avoids a significant impact. Mitigation Measure MM-HR-2 could

also be applied to Alternatives 3 and 4 to also avoid the subject significant impact under those development scenarios. Alternative 4 would avoid the significant impact associated with the demolition of Terminal 2-East that would occur under the proposed project, Alternative 2, and Alternative 3. As such, both Alternative 2 and Alternative 4 would result in an unavoidable significant impact to one historic structure; however, as discussed in Section 5.8, Environmentally Superior Alternative, of the Recirculated Draft EIR, implementation of Alternative 2 would not meet most of the project objectives, while implementation of Alternative 4 would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Response to Comment R-PC018-4

Please see Response to Comment R-AL003-13.

Additionally, as indicated in Section 3.12.3.5.2.1, Mitigation Measures, of the Recirculated Draft EIR, SDCRAA has proposed Mitigation Measure MM-NOI-1: Expansion of SDCRAA's Sound Insulation Program, to address significant aircraft noise impacts. The existing SDIA Quieter Home Program is the SDCRAA's Residential Sound Insulation Program. For implementation of the subject Program, the FAA has determined that residences within the FAA-approved 65 dB CNEL contour (and an average interior noise level of 45 dB or greater) around SDIA may be eligible for sound insulation treatments to mitigate aircraft noise and has set a goal of reducing interior noise levels for eligible residents by at least five (5) dB inside the home, providing a noticeable reduction in noise. To mitigate the significant impacts associated with residential units that are newly exposed to 65 dB CNEL or greater from airport operations in future years of the proposed project, the SDCRAA will, subject to continued FAA approval and funding, expand the existing sound insulation program to increase the average number of housing units that are sound attenuated annually.

Likewise, the SDCRAA will expand the existing sound insulation program to include non-residential uses such as churches (places of worship) and schools in order to mitigate the significant impacts to these other noise-sensitive uses, which are newly exposed to 65 dB CNEL or greater from airport operations in future years of the proposed project. The SDCRAA will apply to the FAA's Airport Improvement Program annually to support the expanded Sound Insulation Program. If the funding is granted by the FAA, then Mitigation Measure MM-NOI-1 is feasible and will be implemented by SDCRAA. If the FAA does not approve the funding, then Mitigation Measure MM-NOI-1 is considered infeasible.

Response to Comment R-PC018-5

Please refer to Topical Response TR-NOI-1: Health Effects of Noise.

Response to Comment R-PC018-6

Please see Response to Comment R-AL003-4.

As described in Section 3.12.3.5.6.1 of the Recirculated Draft EIR, formulation of a mitigation measure specific to sleep disturbance is considered infeasible. Page 3.12-91 explains that it is also important to note, for informational purposes only and not for purposes of making significance determinations, that the subject increase in nighttime flights related to the NA80 and NA90 SELs is attributable to future growth in aircraft activity at SDIA that is projected to occur irrespective of

whether the proposed project is implemented; there is no difference between the proposed project and the No Project Alternative relative to increases in nighttime flights related to the NA80 and NA90 SELs. It should also be noted that although no feasible mitigation measures are available for this significant and unavoidable impact, the SDCRAA will continue to implement the many noise abatement measures and programs at SDIA that are described in Section 3.12.3.2.3 of the Recirculated Draft EIR, which serve to address existing and future aircraft noise impacts from SDIA operations, including, but not limited to, nighttime operations.

Additionally, as described in Section 2.5.1.2 of the Recirculated Draft EIR, operational constraints at SDIA affect aviation activity forecasts. SDIA's Airport Use Regulation restricts departures by any aircraft between the hours of 11:30 p.m. and 6:30 a.m. and gate departures between the hours of 11:15 p.m. and 6:15 a.m. There is no restriction on arrivals.

Response to Comment R-PC018-7

Please see Responses to Comments R-AL003-4 and R-AL003-14.

As summarized in Section 3.12.3.2.3 of the Recirculated Draft EIR, the SDCRAA implements numerous measures and programs relative to the management of aircraft noise at SDIA and efforts to reduce noise impacts to the surrounding communities. Table 3.12-19 includes a summary matrix of potential impacts and mitigation measures associated with the proposed ADP related to noise. Mitigation measures are described in detail in Section 3.12.6.1.

Response to Comment R-PC018-8

Please see Response to Comment R-AL003-4.

As summarized in Section 3.12.3.2.3 of the Recirculated Draft EIR, the SDCRAA implements numerous measures and programs relative to the management of aircraft noise at SDIA and efforts to reduce noise impacts to the surrounding communities. Table 3.12-19 includes a summary matrix of potential impacts and mitigation measures associated with the proposed ADP related to noise. Mitigation measures are described in detail in Section 3.12.6.1.

Response to Comment R-PC018-9

Please see Response to Comment R-PC018-4.

Response to Comment R-PC018-10

Please see Response to Comment R-PC018-4.

Table 3.12-9 in Section 3.12, Noise, of the Recirculated Draft EIR provides information relative to other noise-sensitive uses, such as churches (places of worship), schools, libraries, hospitals, colleges, and historic uses, with comparisons between future years and baseline (2018) conditions, and, for informational purposes and not for purposes of making significance determinations, comparisons between the proposed project and no project scenarios in each future year. It includes the estimated number of places of worship within the aircraft noise contours.

Response to Comment R-PC018-11

Please see Response to Comment R-AL003-4.

Please see Response to Comment R-AL003-10. Further explanation is provided on page 3.12-21 of the Recirculated Draft EIR.

Response to Comment R-PC018-12

Please refer to Topical Response TR-NOI-1: Health Effects of Noise.

Response to Comment R-PC018-13

As stated on page 3.11-2 in Section 3.11, Land Use and Planning, of the Recirculated Draft EIR, there are currently no formal requirements or procedures to evaluate environmental justice impacts under CEQA. Regardless, the Recirculated Draft EIR evaluates the proposed project for consistency with the California Coastal Commission's Environmental Justice Policy. As described on page 3.11-5 of the Recirculated Draft EIR, the policy describes 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 disproportionally overburdened by pollution or with natural resources subject to permanent damage for the benefit of wealthier communities. The policy also recognizes that coastal development planning should be inclusive for all and provide equitable benefits for communities that have historically been excluded or harmed by coastal development. As described on page 3.11-58 of the Recirculated Draft EIR, 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 for the benefit of wealthier communities. SDCRAA's commitments to sustainable development and energy and water conservation, together with efforts in traffic reduction, contribute to keeping urban areas cleaner and more livable. Moreover, the fundamental purpose of the ADP project is to provide a better traveling experience for everyone who uses San Diego International Airport, not just wealthy residents. Therefore, the Recirculated Draft EIR determined that the proposed project would not conflict with the California Coastal Commission's Environmental Justice Policy.

Regarding census tracts located within the 65 CNEL noise contours, the commenter is correct that certain census tracts have a higher percentage minority and low income population as compared to the region. However, as shown in Tables 3.11-2 and 3.11-3 in Section 3.11, Land Use and Planning, of the Recirculated Draft EIR, the census tracts located within the study area, which consists of census tracts within the existing and 2050 65 CNEL noise contours and within 0.5 mile of the 2050 65 CNEL contour, have a variety of average income levels and minority populations, including tracts that have on average lower poverty rates and lower minority populations than the region overall. Looking at the study area in total, on average, the percent of minority population (47%) is slightly below the average for the City of San Diego (57%) and County of San Diego (54%). On average, the study area has a higher percentage of its population with an income below the poverty level (35%) and compared to the City of San Diego (31%) and County of San Diego (31%). The average income levels and minority populations within the study area are also depicted on Figure 3.11-7 and Figure 3.11-8. Figures 3.11-7 and 3.11-8 have been modified in the Final EIR to show a revised existing 65 CNEL contour, the 2050 65 CNEL contour, and the 0.5 mile buffer (see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR under the heading "Section 3.12, Noise" for additional information on the revised noise contours). As shown in the revised Figures 3.11-7 and 3.11-8, both the areas within the existing 65 CNEL noise contour and the 2050 CNEL noise contour, as well as the buffer area, have a variety of average income levels

and minority populations, including tracts that have on average lower poverty rates and lower minority populations than the region overall.

The second sentence of Section 3.11.4.2.5, Minority and Low-Income Population, on page 3.11-30 of the Recirculated Draft EIR has been revised to reflect the modifications to Figures 3.11-7 and 3.11-8, which is shown in strike-through (deleted) and underlined italicized (new) text.

> The study area for evaluating potential environmental justice impacts consists of the census tracts within 0.5 mile of the Airport's ~~existing baseline~~ *2050 65* CNEL contours, which includes 43 census tracts.

This modification and the modified Figures 3.11-7 and 3.11-8 are included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

As further shown on Figure 3.11-7 and Figure 3.11-8, the census tracts with higher minority populations and higher income poverty rates tend to be located at southeastern and northwestern edges of the contour, and not in the immediate area near SDIA. Therefore, minority and low income populations would not be disproportionately affected.

Regarding the commenter's assertion that environmental justice analysis and mitigation measures must be developed for construction and operational impacts, particularly for air quality, GHG, land use/planning, human health risk, and noise, the analysis of construction and operational impacts of the proposed project on these and other resource areas has been conducted throughout the Recirculated Draft EIR. (In particular, see Section 3.2, Air Quality, Section 3.3, Greenhouse Gases and Climate Change, Section 3.11, Land Use and Planning, Section 3.4, Human Health Risk, and Section 3.12, Noise). The analyses presented in those sections and throughout the Recirculated Draft EIR address the entire study area, including areas within the study area that have higher than average minority populations and lower than average incomes. Where significant impacts have been identified, mitigation measures have been developed to address those impacts in all affected portions of the study area. Because, as described above, minority and low income populations would not be disproportionately affected, no additional analysis or mitigation measures to address environmental justice populations are required.

Response to Comment R-PC018-14

The comment is noted. Please see Responses to Comments R-PC018-1 through R-PC018-13 above.

RECEIVED
OCT 31 2019
BY: .....

FINAL TECHNICAL MEMORANDUM, AVIATION ACTIVITY FORECAST UPDATE

San Diego International Airport, AVIATION ACTIVITY FORECAST UPDATE REVIEW AND ASSESSMENT

Prepared by: G Wonacott[1], 731 Avalon Court, San Diego (Mission Beach Community), CA 92109

Prepared for: SDCRAA, Attention Ted Anasis, P.O. Box 82776, San Diego, CA 92138-2776

October 30, 2019

Introduction

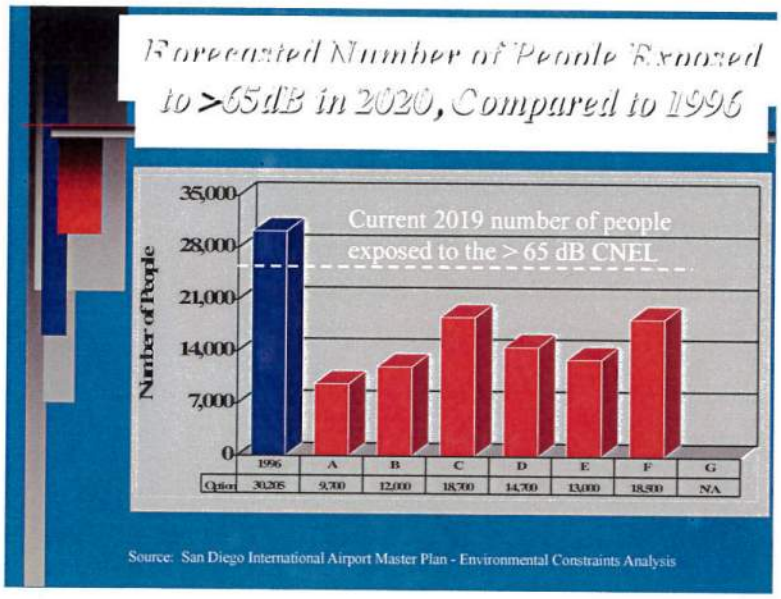
[1] This document must be officially approved by the MBTC Board before it can be released with the MBTC name on it (Chair, Airport Noise Committee, Mission Beach Town Council)

Part of the residents' concern is the credibility of the Airport Authority Noise Abatement Office. Clearly, there were many institutions that questioned the DEIR forecast that preceded the one published in July 2019. The earlier forecast projections of operations were grossly underestimated and there was little or no discussion regarding capacity or a constrained airport. Now the latest version of the DEIR, using optimistic assumptions, is projecting that the airport will reach capacity in 3-5 years, and that enplanement constraint, again with a very optimistic assumption, is projected to start in 2035. There is substantial data that supports a much sooner constraint of enplanements. Given this background information, it strains credulity that the Airport Authority did not intentionally misrepresent the capacity and constrained airport issues to potentially decrease criticism as it is proposing a multibillion dollar project for the Terminal 1 expansion.

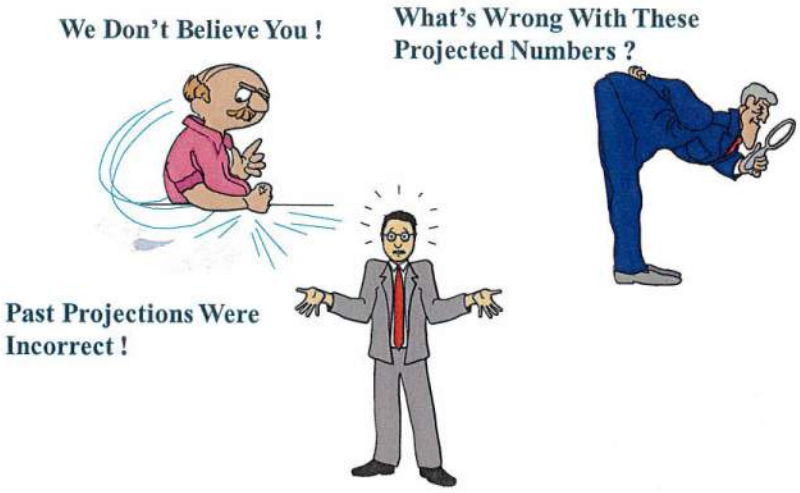
> *But this is not the first time that the Airport Authority has received criticism for it projections. In 1996, the Airport Authority predicted that in the area west of the airport, the number of people exposed to 65dB or greater would be reduced from one-third to two-thirds, compared to current conditions. And to the east of the airport, noise levels would be similar to the 1996 base case, because future reductions in arrival noise level from Stage 3 aircraft are expected to be small.*

The two bar charts below show the projected value for population living within the 65 CNEL area.

- *A - ..."airfield status quo concept"...*
- *B - ...increase airfield capacity by extending Taxiway C to the west...*
- *C - ...construct new 7,500-ft. parallel runway south of existing Runway 9/27...*
- *D - ...convert Taxiway C to 9,000-ft. runway - Runway 9/27 closed and converted to a parallel taxiway - new 9,400 ft. south side parallel runway...*
- *E - ...construct new 9,000 ft. parallel runway to the north - runway 9/27 closed - construct new 9,400 ft. parallel runway to the south...*
- *F - ...construct new 9,400 ft. runway in a "V" configuration to the north of runway 9/27...*
- *G - ...split use with NAS North Island...*



R-PC019-1



The cartoons above represent questions from the residents with regard to the Airport Authority Noise Abatement Office in 1996. It has become increasingly apparent that this organization is not interested in noise mitigation. It is very concerned about propagating its own welfare in the years to come, even at the expense of the residents' environmental impact and the economic health of the San Diego Region. The number one question is:

IF THE RESIDENTS LIVING IN THE COMMUNITIES SURROUNDING LINDBERGH FIELD HAVE NOT BEEN ABLE TO TRUST THE SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY (AIRPORT AUTHORITY, NOISE ABATEMENT OFFICE) HISTORICALLY, WHY SHOULD WE TRUST THEM NOW?

Summary of Questions:

1. The number of operations is a function of enplanements (economy), number of passengers per aircraft, load factor. There is no evidence that supports larger aircraft being used at SDIA. Nor is there evidence of a load factor of 0.9. To the contrary, load factors at most constrained airports are lower. What is the basis for your assumption of a load factor of 0.9?
2. Why did you not perform sensitivity studies on the key metrics used to calculate operations, as this would have allowed you to focus on accuracy for these variables?
3. Why did you use hourly increments to calculate the number of operations per hour, when it is obvious from observations that the runway is well over capacity at 6:30 am, for example. Hourly operations in half hour increments provides far greater accuracy.
4. The operations per hour data suggests that it will be difficult to fill in maximum number of operations per hour for a 17-hour day. What assumption did you make regarding the density of the operations per hour value?
5. Your assumption of 50 operations per hour for a 17-hour day seems very optimistic given the FAA assumes 48 for all weather conditions. How do you justify the higher number?
6. The correct methodology spelled out by the FAA to determine airport hourly capacity uses an interaction diagram. Did you use this approach, and if not, why not?
7. In different sections, you make assumptions that larger aircraft will become more common in the future aircraft mix at SDIA, but then sometimes you state that the primary aircraft type will be narrow body. Which is it? Also, once capacity is reached, how do you know what direction the airport will go given that SDIA is a spoke airport and dependent on what happens at LAX, Sky Harbor, SFO?
8. The airport is projected to reach capacity in the 2024-time period. Why was there not more analysis of delays, which are the primary symptoms that foretell capacity, as was done in the 2004 study by SH&E?
9. The constrained enplaned projection seems very optimistic at 2035 compared to the capacity projection in 2024. How do you justify this delay with a sudden flattening of the constrained enplanements, given that there is no evidence that aircraft size (number of passengers) and load factor will increase?

R-PC019-1 Cont'd

R-PC019-2 R-PC 019-3 R-PC 019-4 R-PC 019-5 R-PC 019-6 R-PC 019-7 R-PC019-8 R-PC 019-9 R-PC 019-10

10. It would seem to make sense given how close the airport is to capacity to establish regular assessments of on-runway (taxi-way) delays, number of aircraft, etc. metrics. Why have you not made this recommendation?
11. It appears that the airport will reach capacity two years after the Terminal 1 expansion is completed. What then is the basis for spending such a large amount of money ($3-4B), if it does not increase the capacity of the airport?
12. The plan is to add 11 new gates at terminal 1. The addition of these gates does not increase airport capacity, but could accelerate the airport reaching capacity for two years before it reaches capacity. There does not seem to be any rationale for including the new gates? What is the primary reason for adding the gates?
13. One concern is that the gates are being added as justification for moving the curfew from 6:30 am to 5 am. Which organization or government body makes the decision regarding the curfew start and stop times?
14. According to data in the public domain, about 42 percent of the arrivals into SDIA are from destinations that are less than 500 miles. Also, about fifty percent of these arrivals depart for destinations that are again less than 500 miles. Why has the SDCRAA not included in the future planning setting up commuter operations using regional jets that would move 150-200 departures daily from SDIA?
15. The Airport Authority consultant has reported substantial increases in the size of the 65 dB CNEL and population living within this contour (about 13 percent by 2026). According to a FAA AEM analysis, the size of the 65 CNEL could be reduced by 18 percent by transitioning all Stage 3 aircraft departing post 10 pm to Stage 4 or 5 aircraft. While some Airport Authority personnel claim that this would be interference with Interstate Commerce; the Airport Authority has violated the same interference with Interstate Commerce in monumental terms by allowing the airport to reach capacity. How can interference with interstate commerce be a defense in this context?
16. The Airport Authority consultants on the TAC and CAC have used their superior knowledge of aeronautics to discourage many if not all of the 22 recommendations made in 2017 by the ANAC Subcommittee. How can this be justified in light of the substantial projected increases in noise between now and when airport capacity is reached?
17. Flighttrack data has shown that for decades aircraft have departed on multiple tracks, 290 versus PEBEL 6 at 293 (3 degrees difference) and 290 versus PADRZ at 295 degrees (5 degrees difference). So, how can the 15-degree rule be used to disqualify moving PADRZ south so that it coincides with the 290-nighttime departure heading up the channel between Dog Beach and the SMB jetty?
18. Given the noise and nuisance impact projected in the DEIR report, why should the Airport Authority move forward with the project without first seeing the results of the Congress directed studies to the FAA on health consequences of aircraft noise and air pollution, Stage 3 phase out, the use and applicability of the SENL 65 that spreads the noise over 24 hours for the San Diego area, and better definition of how communities will participate in land use conversations around the airport?
19. Why does the 15-degree rule apply given there is one runway which establishes by definition substantial spacing between all aircraft?
20. Even if there is an effort to use the 15-degree rule (10-degree approved at Atlanta Hartsfield Airport), this requirement is satisfied, since the apex for the right turn is about 0.75 miles from the end of the runway. Why is this not considered?
21. It appears that since capacity will be reached two years after Terminal One is completed. Further, the DEIR report shows a substantial increase in the delta number of enplanements between constrained and unconstrained after capacity is reached. And when this is factored into the 2018 Airport Authority financial benefits study to the San Diego region, it appears that losses could be anywhere from $2.5B to $5B in the five to ten years beyond 2024. Why then is the SDCRAA not first addressing the capacity issue before investing $3-4B to enhance the passenger experience at Terminal 1.

R-PC019-11
R-PC019-12
R-PC019-13
R-PC019-14
R-PC019-15
R-PC019-16
R-PC019-17
R-PC019-18
R-PC019-19
R-PC019-20
R-PC019-21
R-PC019-22

I. Projections of enplanements, operations, capacity and delays

2.0 KEY DRIVERS OF AVIATION ACTIVITY

No comments

3.0 REVIEW OF RECENT AVIATION TRENDS

One of the flaws in the study is the failure to indicate sensitivity of final proposed operations to key assumed values used in the operations calculations. In previous studies, for example, SH&E 2004 study for the Airport Authority, the consultant showed maximum and minimum values for a number of the key metrics.

4.0 UPDATED unconstrained AVIATION ACTIVITY FORECASTS

The number of operations is quantified by dividing the projected number of annual enplanements by the number of passengers per aircraft and the load factor. These are summarized in Figure 1. The current load factor numbers are consistent with the literature, although the consultant does not provide a specific reference for its assumed values. This is a general problem throughout the document (Reference 1), a failure to provide the basis for assumptions.

Table 4-3
ASSUMPTIONS FOR AIRCRAFT OPERATIONS UNCONSTRAINED FORECAST
San Diego International Airport

	Historical		Unconstrained Forecast					
	2017	2018	2023	2028	2033	2038	2043	2050
Enplaned passengers per departure								
Domestic								
Mainline airline	146.8	145.5	146.4	146.4	146.4	146.4	146.4	146.4
Regional airline	55.7	56.9	58.5	59.9	61.2	62.6	64.0	66.0
Low cost carrier	118.1	122.2	122.8	124.2	125.6	127.0	128.5	130.5
Domestic total	119.5	120.7	121.3	121.9	122.5	123.1	123.7	124.5
International	128.7	130.2	131.4	132.9	134.4	135.9	137.4	139.6
Total Airport	119.9	121.1	121.8	122.5	123.2	124.0	124.8	125.9
Enplaned passenger load factor								
Domestic								
Mainline airline	85.8%	85.7%	86.0%	86.0%	86.0%	86.0%	86.0%	86.0%
Regional airline	74.5%	76.7%	78.2%	79.2%	80.2%	81.2%	82.2%	83.6%
Low cost carrier	77.8%	79.0%	79.0%	79.5%	80.0%	80.5%	81.0%	81.7%
Domestic total	80.9%	81.7%	82.0%	82.3%	82.6%	83.0%	83.3%	83.8%
International	77.2%	79.7%	79.7%	80.2%	80.7%	81.2%	81.7%	82.4%
Total Airport	80.8%	81.6%	81.8%	82.2%	82.5%	82.8%	83.1%	83.6%
Average seats per departure								
Domestic								
Mainline airline	171.1	169.7	170.2	170.2	170.2	170.2	170.2	170.2
Regional airline	74.8	74.1	74.9	75.6	76.4	77.2	77.9	79.0
Low cost carrier	151.8	154.6	155.4	156.1	156.9	157.7	158.5	159.6
Domestic total	147.8	147.7	148.0	148.1	148.3	148.4	148.5	148.6
International	166.6	163.4	164.9	165.8	166.6	167.4	168.3	169.5
Total Airport	148.4	148.3	148.8	149.1	149.4	149.7	150.1	150.6
Enplaned freight per operation (tons)								
All-cargo airlines	19.8	20.2	19.9	20.0	20.1	20.2	20.3	20.3

Note: The forecasts presented in this table were prepared using the information and assumptions given in the accompanying text. Inevitably, some of the assumptions used to develop the forecasts will not be realized and unanticipated events and circumstances may occur. Therefore, there are likely to be differences between the forecast and actual results, and those differences may be material.

Sources: Historical – San Diego County Regional Airport Authority records. Forecast – Leighfisher, November 2018.

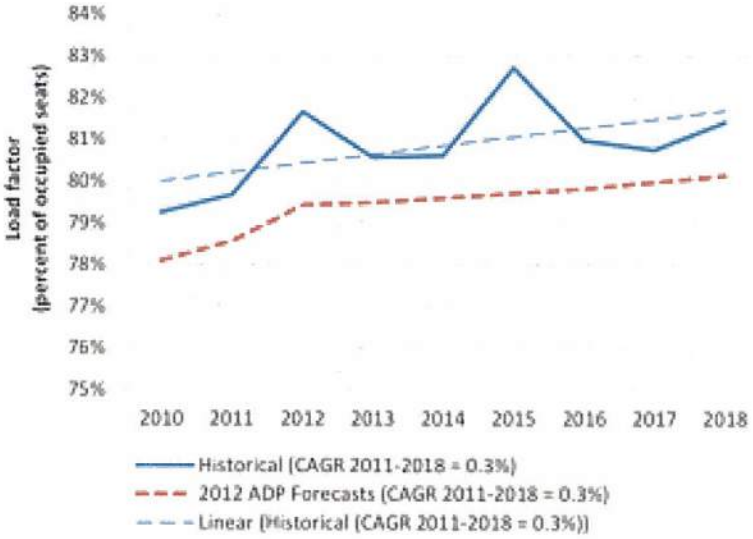
Figure 1 Assumptions for aircraft operations unconstrained forecast

Figure 2 is taken from Reference 1. And shows the historical changes in the load factor over time. Figure 3 shows the linear regression analysis result in Figure 2 extrapolated to 2026. It is not clear that load factor will continue

R-PC019-23
R-PC019-24
R-PC019-25
R-PC 019-26

on a straight line increase or at some point will begin to level off. But in any case, there is no evidence that a 0.9 load factor is realistic for either an unconstrained or constrained airport.

Figure 2-9
HISTORICAL AND FORECAST ENPLANED PASSENGER LOAD FACTOR
San Diego International Airport



CAGR = Compound annual growth rate

Note: Differences in historical and 2012 ADP forecast load factors in 2010 and 2011 reflect revisions to published seat data in 2010 and 2011.

Sources: *Historical*— San Diego County Regional Airport Authority records. OAG Worldwide Aviation Ltd, Schedules Analyser, online database, accessed November 2018. *Forecast*: LeighFisher, San Diego International Airport, Airport Development Plan, Aviation Activity Forecasts, November 2012.

Figure 2 Historical and forecast enplaned passenger load factor

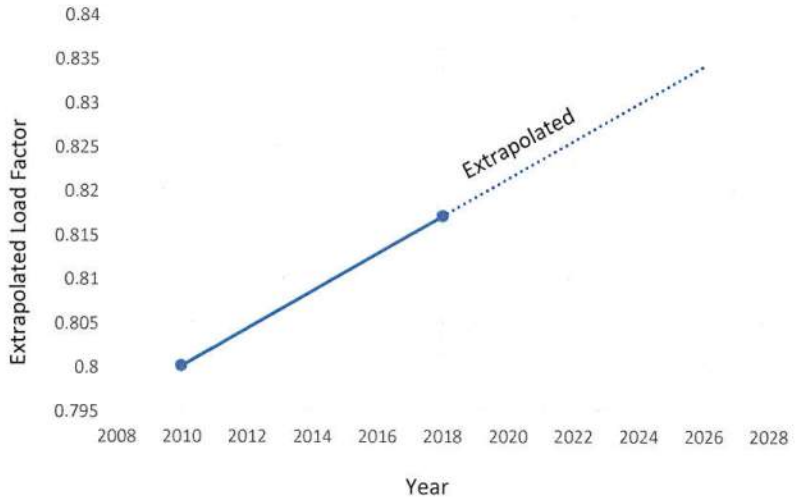


Figure 3 Extrapolated load factor

R-PC019-26 Cont'd

In fact, Figure 4 provides load factors at large hub airports. The comment is made, "by increasing load factors, airlines could carry more passengers per operation, thereby accommodating additional passengers without incurring additional delays. However, there is a natural limit to how high load factors can climb. As shown in Exhibit 6-1 (Figure 4), San Diego's load factors are already higher than those at the most congested airports such as LaGuardia, Newark, San Francisco, and Chicago O'Hare." So, again, the evidence suggests that a substantial increase in the load factor from the current values at SDIA is unlikely.

Exhibit 6-1: Average Domestic Load Factors at US Large Hub Airports, *2003*

L.F. Rank	Airport	Load Factor	L.F. Rank	Airport	Load Factor
1	Las Vegas	76.7%	16	Miami	69.9%
2	Orlando	76.5%	17	Salt Lake City	69.5%
3	Fort Lauderdale/Hollywood	74.6%	18	Dallas/Fort Worth	69.4%
4	**San Diego**	**74.4%**	19	New York Newark	68.9%
5	Atlanta	73.4%	20	Washington Dulles	68.4%
6	Denver	73.1%	21	Minneapolis	67.6%
7	Phoenix	73.1%	22	Detroit	67.0%
8	New York J F Kennedy	72.9%	23	Boston	66.7%
9	Houston Intercontinental	72.6%	24	Chicago Midway	66.5%
10	Tampa	72.5%	25	Cincinnati	66.5%
11	Seattle/Tacoma	72.1%	26	Charlotte	66.0%
12	Chicago O'Hare	72.1%	27	New York La Guardia	66.0%
13	Los Angeles	72.0%	28	Philadelphia	65.0%
14	Baltimore	71.1%	29	St. Louis	64.5%
15	San Francisco	70.4%	30	Pittsburgh	61.2%
				All Large Hubs	**70.4%**

Source: USDOT T100 Databank.

Figure 4 Average Domestic Load Factors at US Large Hub Airports, 2003

Another potential option open to the FAA and the airlines is smoothing of the hourly operations. Figure 5 below shows the hourly operations graph developed by the consultant showing some smoothing of the hourly operations. There is one obvious flaw in the consultant's chart that is immediately apparent when comparing Figures 5 and 6. When the data is shown in operations per hour in **half hour increments**, there is far more spiking, which correlates with greater potential for delays.

In addition, it is far easier to see the departure and arrival trends over the seventeen-hour day when evaluated in half hour increments. Of note is that the departures far outnumber the arrivals early in the morning from 6:30 am to 8:30 am, even though there is no arrival curfew. Also, though it is not conclusive, it seems that there is greater potential for a greater number of operations per hour when the half hour is dominated by departures, as is the case early in the morning.

As will be shown in later charts, some aircraft departing early in the morning are already substantially delayed (up to 30 minutes) on the taxi-way at SDIA despite the potential for virtually all of the operations to be departures. It is also apparent from the data in Figures 6 through 11 that after 6:30 am to 7:30 am that the next time period that will give way to delays are from 10 am to 2 pm.

Contrary to the conclusion reached by the consultant, it appears that there is a strong seasonality as this week in July, the high season for tourism, if multiplied over 365 days would result in a total of 251,745 annual operations. Since this is 2019 data, it could be that there has been a substantial increase from 2018 to 2019, or more likely, the consultant's assumption is flawed. There is also a daily variation as the weekdays typically yield more operations than the weekends. The reason why these two facts are important is that it is likely that the airport will reach capacity far sooner than what the consultant has shown and concluded. The data seems to show that the airport will be at capacity and constrained during the high season and on the weekdays initially from 6:30 am

R-PC019-27

R-PC019-28

to 7:30 am and from 10 am to 2 pm. The fact is that the Airport Authority has been aware of this issue and chosen to ignore it for the past ten years. The Airport Authority standard answer has been and continues to be that the San Diego City residents voted to keep SDIA rather than move it to Mira Mar Naval Air Station. And the business community is well aware of the issue and accepts the impact of a constrained airport on the San Diego regional economy. The idea that the voters of San Diego elected to keep SDIA as the primary regional airport is false. The voters, of which many are either retired or active military, voted against pushing the Navy, in particular the TOP Gun School, out. This decision will soon have monumental implications as far as interfering with interstate commerce, as keeping SDIA as the airport, and or the only airport for the San Diego region will soon begin to cost this region hundreds of millions of dollars. If this was the only airport within the San Diego region, then perhaps the Airport Authority would have a case, but as will be described later, there are alternatives to reaching capacity at SDIA in the next 5-6 years.

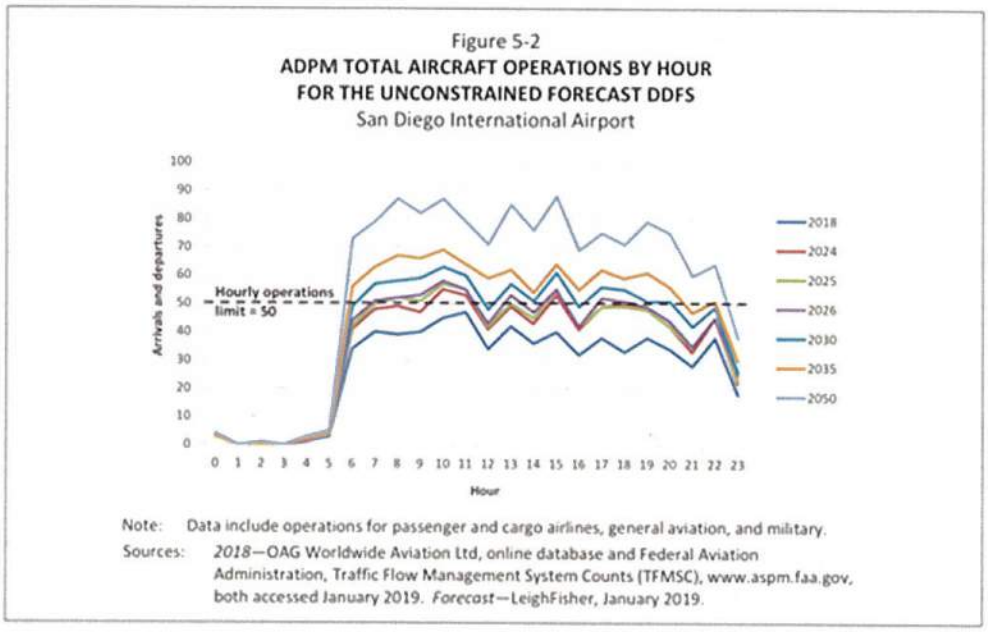
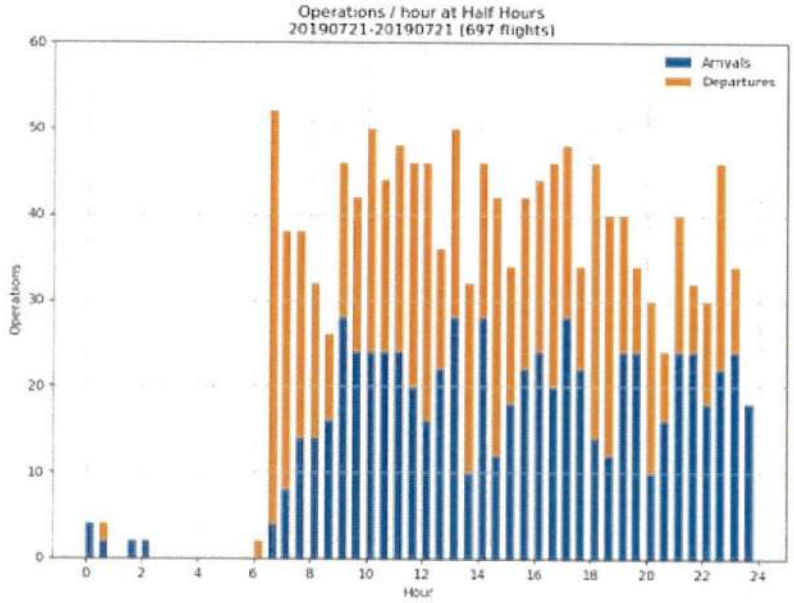


Figure 5 ADPM total aircraft operations by hour for the unconstrained forecast DDFS



R-PC019-28 Cont'd

Figure 6 Operations / hour at half hour increments (July 21 2019, 697 operations)

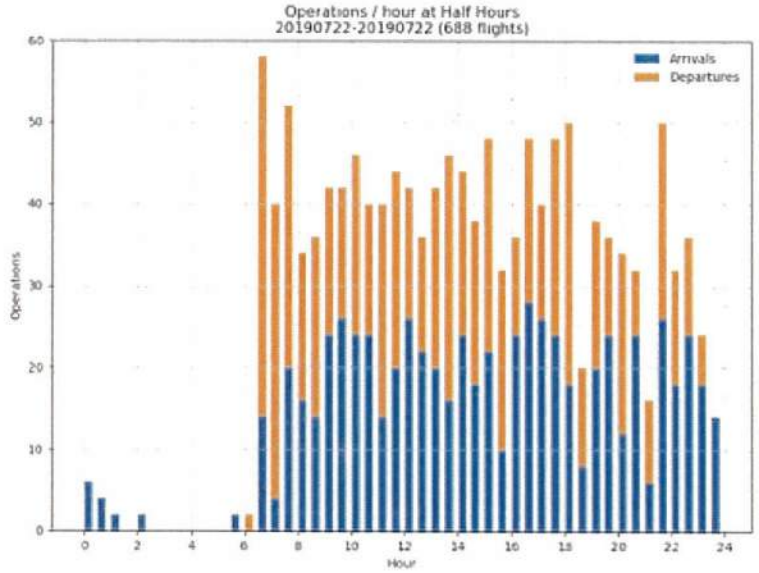


Figure 7 Operations / hour at half hour increments (July 22 2019, 688 operations)

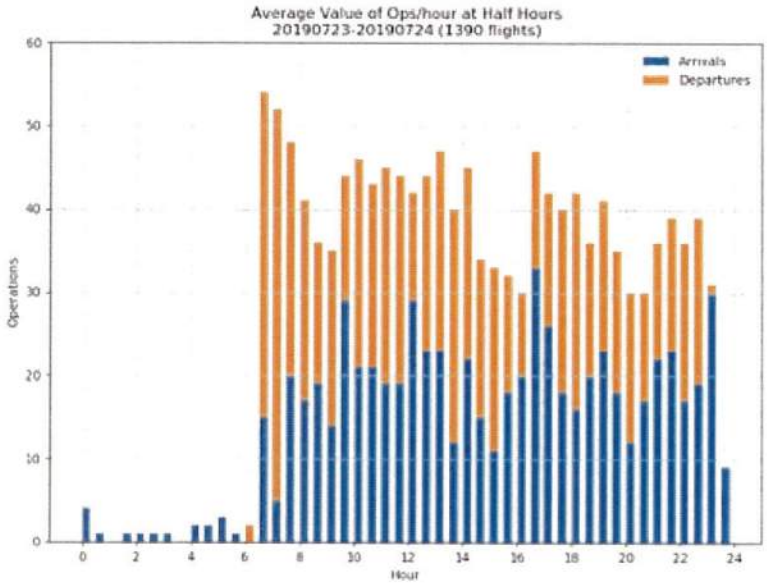


Figure 8 Average value of operations / hour at half hour increments (July 23-24 2019, 1390 operations)

R-PC019-28
Cont'd

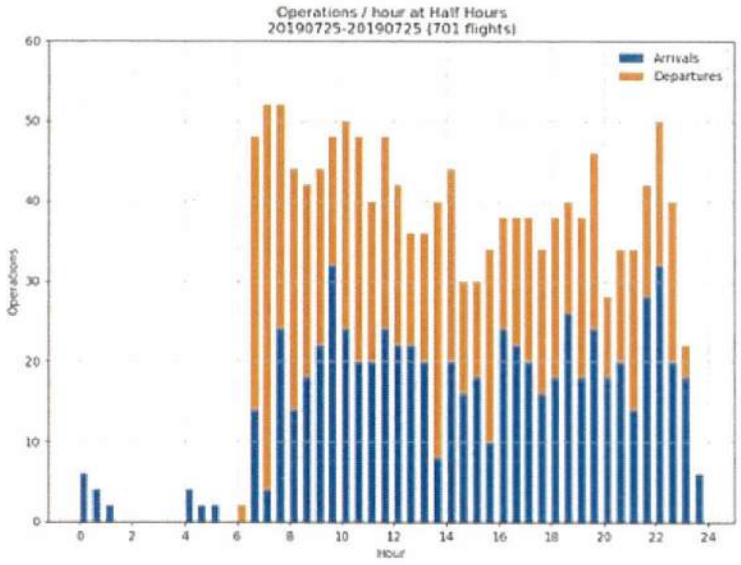


Figure 9 Operations / hour at half hour increments (July 25 2019, 701 operations)

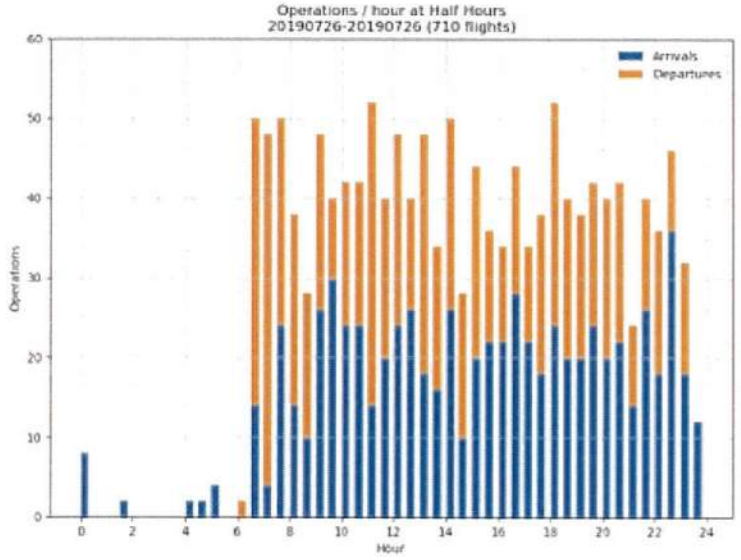


Figure 10 Operations / hour at half hour increments (July 26 2019, 710 operations)

R-PC019-28 Cont'd

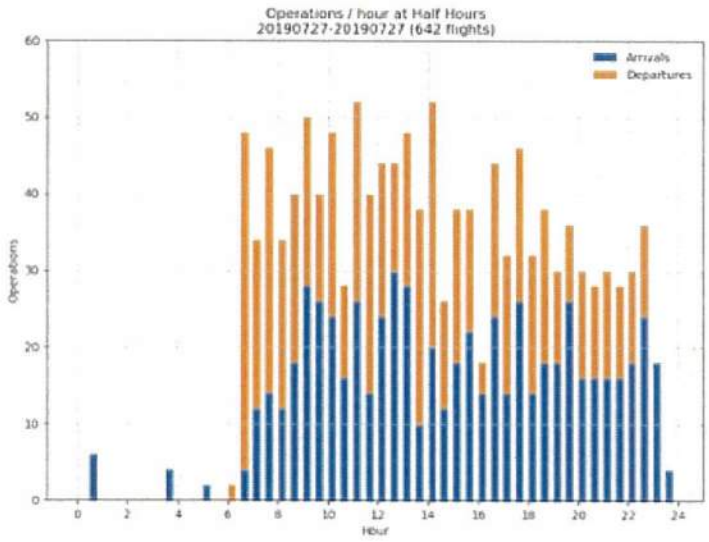
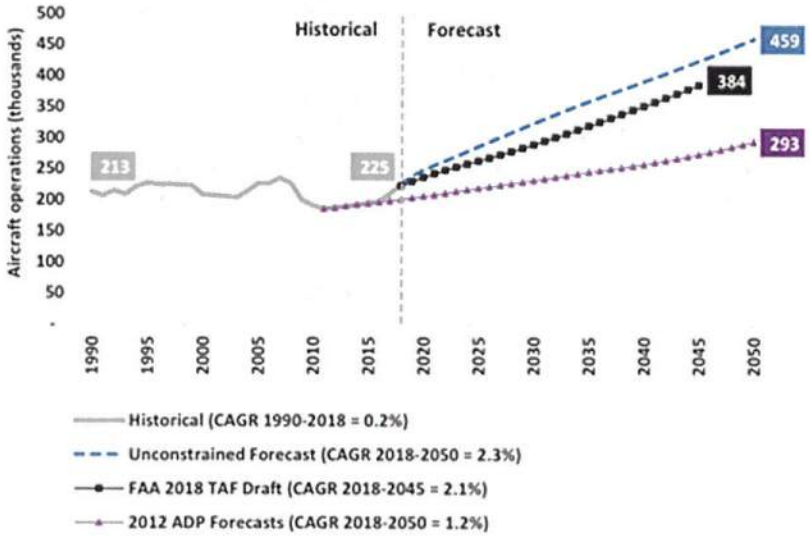


Figure 11 Operations / hour at half hour increments (July 27 2019, 642 operations)

A comparison of the unconstrained forecasts from 2004 and now 2019 shows that they are very comparable. In their capacity/delay assessment, SH&E calculated the capacity of SDIA at 275,000 operations. It appears that taking the average of the 2004 analysis high and low growth curves is close to the more recent forecast by Leigh-Fisher, compared in Figures 12 and 13 and Table 1.

Figure 4-3
UNCONSTRAINED FORECAST OF TOTAL AIRCRAFT OPERATIONS
San Diego International Airport



CAGR = Compound annual growth rate
Note The forecasts presented in this figure were prepared using the information and assumptions given in the accompanying text. Inevitably, some of the assumptions used to develop the forecasts will not be realized and unanticipated events and circumstances may occur. Therefore, there are likely to be differences between the forecast and actual results, and those differences may be material

Figure 12 Unconstrained forecast of total aircraft operations

R-PC019-28 Cont'd

R-PC019-29

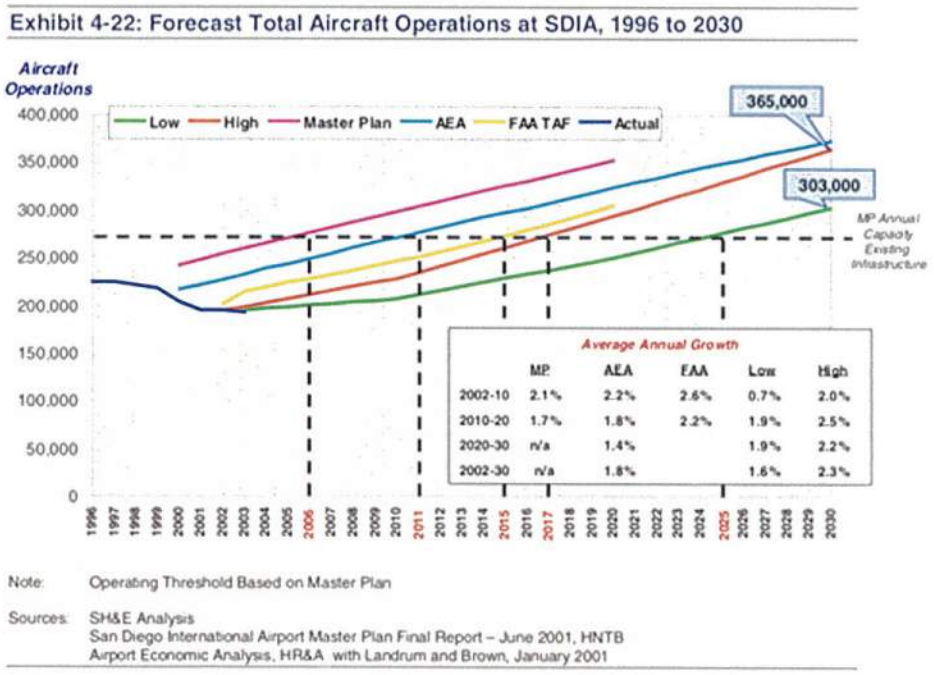


Figure 13 Forecast total aircraft operations at SDIA performed in 2004 by SH&E

Table 1 Comparison of forecasts performed in 2004 by SH&E and 2019 by Leigh-Fisher

	2026 Projections						
	Low	Nominal	High	AEA	Master Plan	AA 2018 TAF	12 ADP Forecast
SH&E	260000	295000	330000	350000	370000		
Leigh/Fisher		300000				270000	225000

5.0 CONSTRAINED DEMAND SCENARIO

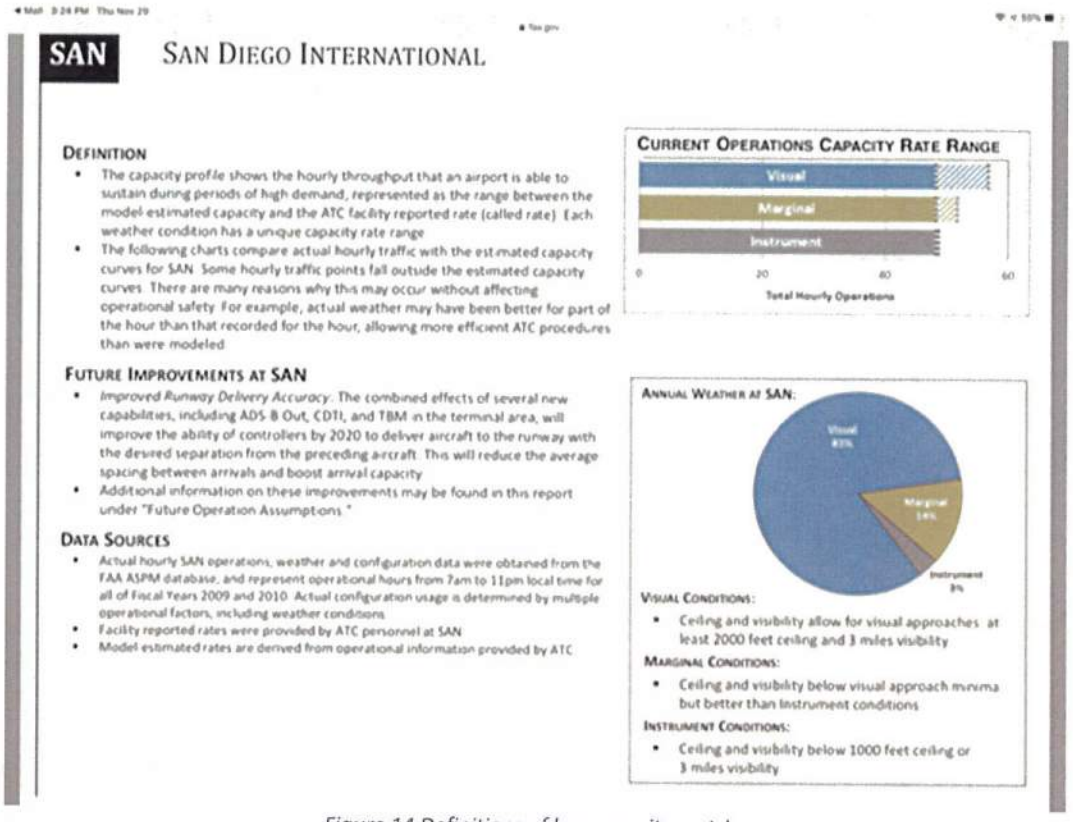
Capacity Assessment

Leigh-Fisher consultants conclude with very little basis that the maximum capacity all weather number for hourly operations at SDIA is 50. This seems over simplified compared to the FAA capacity assessment presented in Figures 14 through 17, which shows the method and limits to be used in an interaction diagram for each of the three weather conditions. Figures 15-17 also show both an analytical and Air Traffic Control (ATC) estimate for the maximum capacity of SDIA's one runway for the three weather conditions. It is notable that ATC estimates a lower number compared to the FAA's analytically derived capacity number. In in all three weather conditions, ATC estimates based on their experience, a maximum capacity of 48. Figure 18 is an example of real ATC data for December 11th, not the day with the greatest amount of air traffic, that shows the interaction diagram with a number or hourly operations exceeding the limits. It is strongly recommended that the consultant use the methodology outlined by the FAA to perform the capacity analysis.

There is a range in the variables that determine both the demand and the capacity of the airport. For demand, these include projected enplanements, aircraft size, and load factor, and for capacity, the variables are the number operations per hour and the degree of smoothing of the number of operations per hour over the 24-hour day (17 for departures). The results of the sensitivity analysis are shown in Figure 19.

R-PC019-29 Cont'd

R-PC019-30



SAN SAN DIEGO INTERNATIONAL

DEFINITION

- The capacity profile shows the hourly throughput that an airport is able to sustain during periods of high demand, represented as the range between the model-estimated capacity and the ATC facility reported rate (called rate). Each weather condition has a unique capacity rate range.
- The following charts compare actual hourly traffic with the estimated capacity curves for SAN. Some hourly traffic points fall outside the estimated capacity curves. There are many reasons why this may occur without affecting operational safety. For example, actual weather may have been better for part of the hour than that recorded for the hour, allowing more efficient ATC procedures than were modeled.

FUTURE IMPROVEMENTS AT SAN

- *Improved Runway Delivery Accuracy*: The combined effects of several new capabilities, including ADS-B Out, CDTI, and TBM in the terminal area, will improve the ability of controllers by 2020 to deliver aircraft to the runway with the desired separation from the preceding aircraft. This will reduce the average spacing between arrivals and boost arrival capacity.
- Additional information on these improvements may be found in this report under "Future Operation Assumptions."

DATA SOURCES

- Actual hourly SAN operations, weather and configuration data were obtained from the FAA ASPM database, and represent operational hours from 7am to 11pm local time for all of Fiscal Years 2009 and 2010. Actual configuration usage is determined by multiple operational factors, including weather conditions.
- Facility reported rates were provided by ATC personnel at SAN.
- Model-estimated rates are derived from operational information provided by ATC.

CURRENT OPERATIONS CAPACITY RATE RANGE

ANNUAL WEATHER AT SAN:

VISUAL CONDITIONS:

- Ceiling and visibility allow for visual approaches at least 2000 feet ceiling and 3 miles visibility

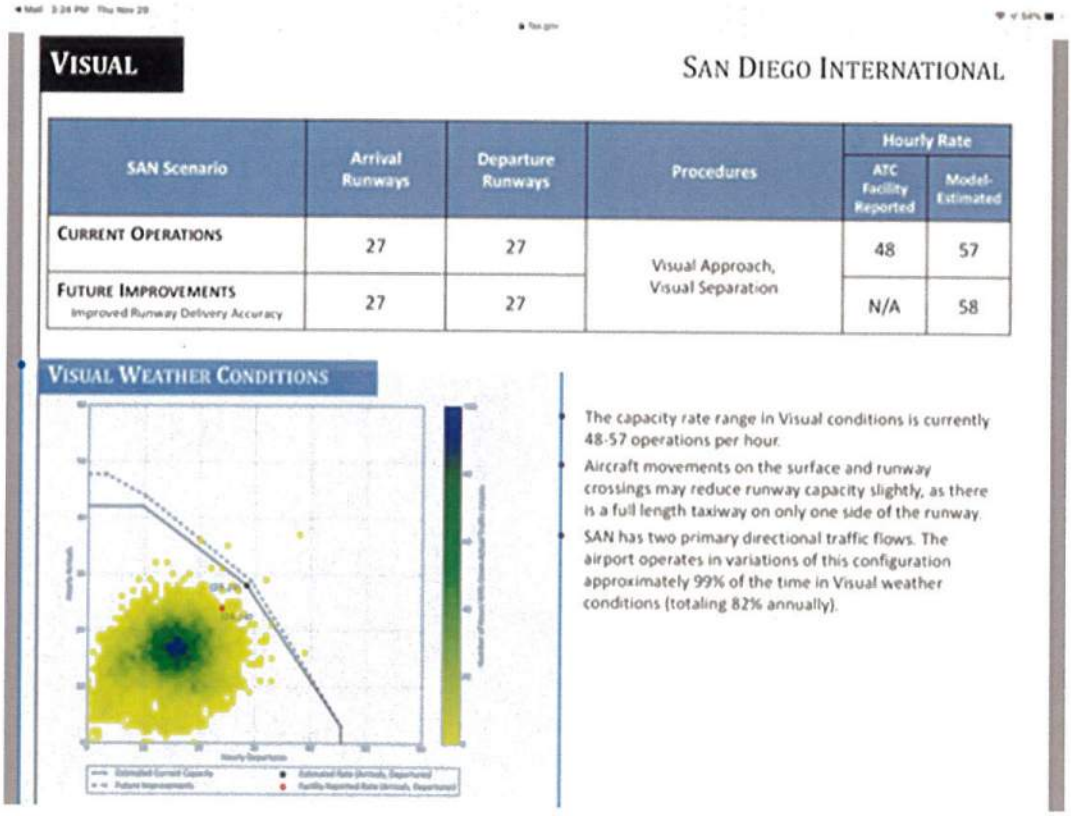
MARGINAL CONDITIONS:

- Ceiling and visibility below visual approach minima but better than Instrument conditions

INSTRUMENT CONDITIONS:

- Ceiling and visibility below 1000 feet ceiling or 3 miles visibility

Figure 14 Definitions of key capacity metrics



VISUAL SAN DIEGO INTERNATIONAL

SAN Scenario	Arrival Runways	Departure Runways	Procedures	Hourly Rate	
				ATC Facility Reported	Model-Estimated
CURRENT OPERATIONS	27	27	Visual Approach, Visual Separation	48	57
FUTURE IMPROVEMENTS Improved Runway Delivery Accuracy	27	27		N/A	58

VISUAL WEATHER CONDITIONS

- The capacity rate range in Visual conditions is currently 48-57 operations per hour.
- Aircraft movements on the surface and runway crossings may reduce runway capacity slightly, as there is a full length taxiway on only one side of the runway.
- SAN has two primary directional traffic flows. The airport operates in variations of this configuration approximately 99% of the time in Visual weather conditions (totaling 82% annually).

Figure 15 Interaction diagram for visual weather conditions

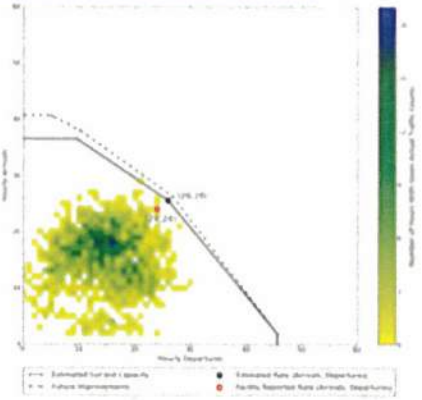
R-PC019-30
Cont'd

MARGINAL

SAN DIEGO INTERNATIONAL

SAN Scenario	Arrival Runways	Departure Runways	Procedures	Hourly Rate	
				ATC Facility Reported	Model-Estimated
CURRENT OPERATIONS	27	27	Non-Precision Instrument Approach, Visual Separation	48	52
FUTURE IMPROVEMENTS Improved Runway Delivery Accuracy	27	27		N/A	53

MARGINAL WEATHER CONDITIONS



- The capacity rate range in Marginal conditions is currently 48-52 operations per hour.
- SAN operates in variations of this configuration approximately 98% of the time in Marginal weather conditions (totaling 14% annually).

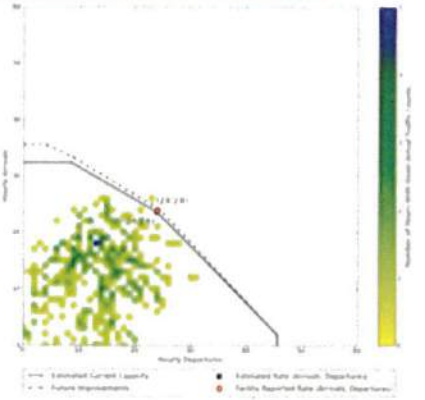
Figure 16 Interaction diagram for marginal weather conditions

INSTRUMENT

SAN DIEGO INTERNATIONAL

SAN Scenario	Arrival Runways	Departure Runways	Procedures	Hourly Rate	
				ATC Facility Reported	Model-Estimated
CURRENT OPERATIONS	27	27	Non-Precision Instrument Approach, Radar Separation	48	48
FUTURE IMPROVEMENTS Improved Runway Delivery Accuracy	27	27		N/A	48

INSTRUMENT WEATHER CONDITIONS



- The capacity rate range in Instrument conditions is currently 48 operations per hour.
- SAN operates in variations of this configuration approximately 61% of the time in Instrument weather conditions (totaling 2% annually).
- A non-precision approach to Runway 27 can only be performed when the ceiling is above 700 feet with at least 1 mile of visibility. When the weather falls below those minima, then instrument approaches must be conducted to Runway 9.

Figure 17 Interaction diagram for instrument weather conditions

R-PC019-30 Cont'd

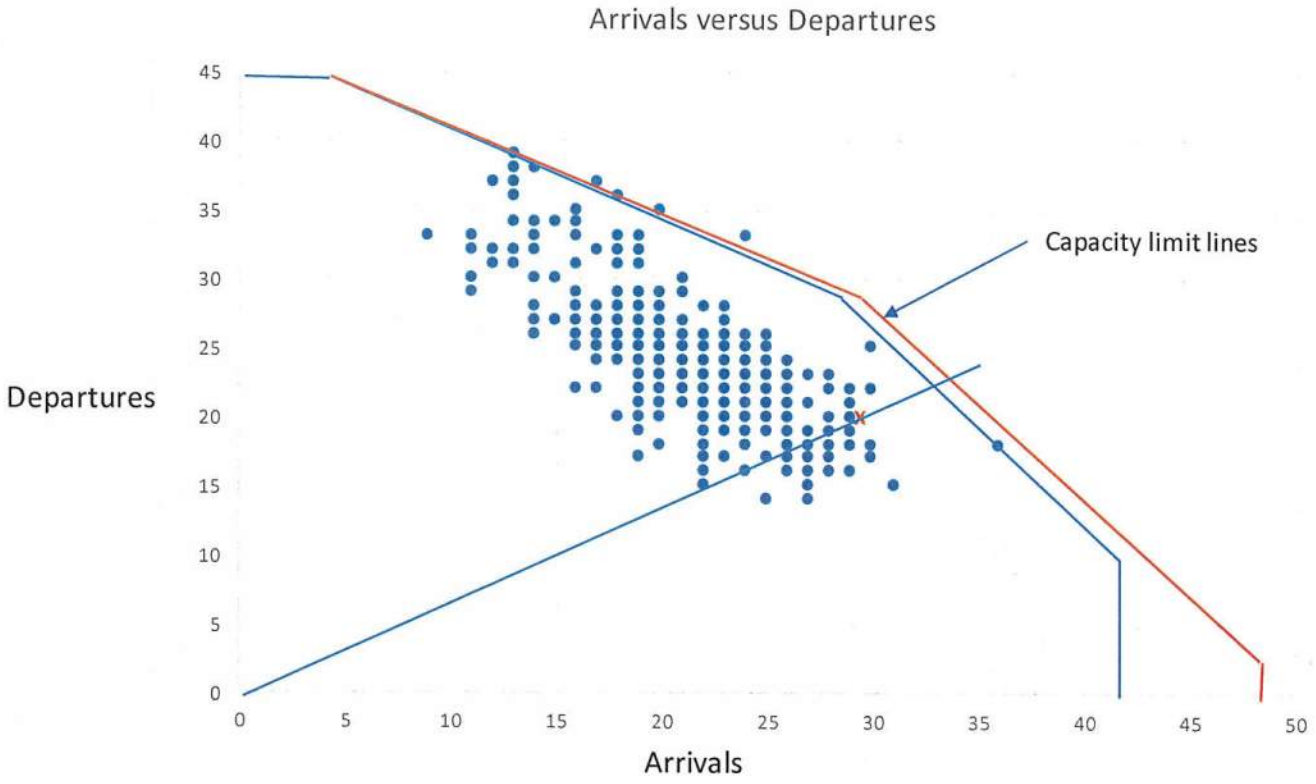


Figure 18 Hourly Arrivals and departures for December 11, 2018 compared to limits

For the most pessimistic case, with a nominal demand plus 0.5 percent and 48 ops per hour with 0.85 utilization, the projected year when the demand would exceed capacity would be 2020. And, the most optimistic case would be for nominal demand minus 0.5 percent and 50 ops per hour with a 1.0 utilization would have demand exceed capacity in 2031 to 2032. In either case, the airport is soon to become constrained, although most likely, capacity of the airport will occur with long taxi-way delays in the 2024 time period.

R-PC019-30 Cont'd

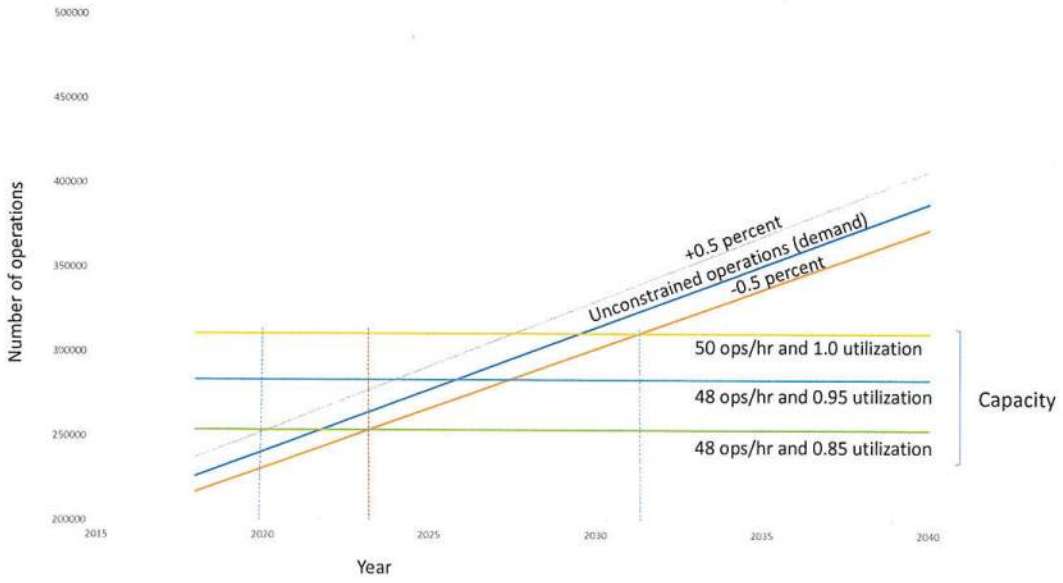


Figure 19 Sensitivity of date when SDIA reaches capacity as a function of demand and capacity metrics.

Once an airport becomes constrained, it creates an instability. The Airport Authority, the residents in the communities surrounding the airport, the FAA and the airlines are all stakeholders trying to influence a wide range of issues. More than anything, the Airport Authority, meaning the SDCRAA will be heavily criticized for ignoring the capacity issue, which impacts the regional economy. The projections of aircraft type being used at SDIA in Figure 20 are at best wild guesses, once the airport becomes constrained. But it seems very unlikely given the destinations for the SDIA aircraft that much larger aircraft, as forecast, would move into the mix.

Table 5-2 (page 2 of 4)
CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE
San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
International						
Narrowbody						
A319	122	49	720	717	716	725
A320neo	--	--	--	--	--	--
A320	185	223	720	717	716	725
B737-800	566	812	1,441	1,075	716	725
B737-900	1,232	859	2,521	3,226	2,865	2,901
B737 MAX	--	--	--	717	1,433	1,451
Subtotal-- narrowbody	3,615	3,699	7,923	10,036	10,744	11,604
Regional jets						
CRJ-700	1,229	118	--	--	--	--
CRJ-900	--	1,694	2,161	717	--	--
ERJ-175	110	274	720	2,151	3,581	3,626
Subtotal--regional jets	1,339	2,086	2,881	2,867	3,581	3,626
Widebody						
A340-300	59	487	720	717	716	2,176
B747-400	282	286	--	--	--	--
B767-200/300	112	--	--	--	--	--
B777	426	431	1,441	1,434	1,433	1,451
B787-8	720	719	1,441	2,151	2,149	2,176
B787-9	--	--	--	--	--	--
Subtotal - widebody	1,599	1,923	3,601	4,301	4,298	5,802
Subtotal-- International	**6,553**	**7,708**	**14,406**	**17,204**	**18,623**	**21,032**
Total--Passenger Airlines	**182,712**	**197,244**	**248,500**	**263,800**	**277,200**	**290,100**

Figure 20 Constrained demand scenario of passenger airline aircraft operations by aircraft type

The data generated by the Airport Authority consultant and shown in Figure 21 is highly questionable. In spite of the fact that the airport reaches operational capacity in the 2024 time frame, the consultant shows that the number of enplanements is not affected until 2035. The implication is that even though the airport reaches operational capacity, the load factor and the aircraft size increases substantially allowing the number of enplanements not to be affected. This assumption is flawed as was indicated in Figure 4 and will be shown in the coming sections. Left out of this discussion, but in the Noise Section, are the projected substantial noise increases between now and 2026. With the recent revelation by the FAA Inspector General that the FAA NexGen planners did not take noise impact on communities surrounding the airports into consideration, at all, it can be expected that residents will demand a greater role in the near term to identify ways to off-set the increasing noise from more operations. The argument that noise mitigation measures interfere with interstate commerce pale in comparison with loss of interstate commerce due to a constrained airport.

R-PC019-30 Cont'd

R-PC019-31

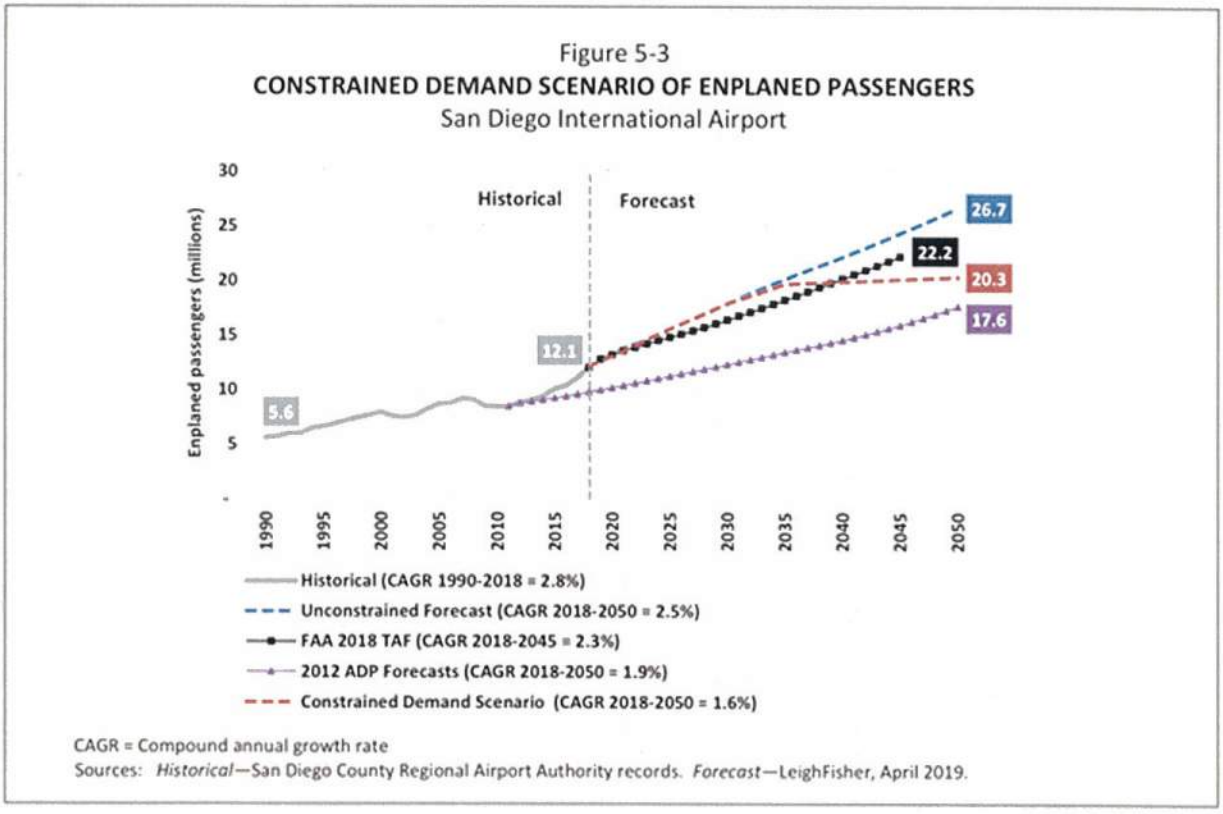


Figure 21 Constrained demand scenario of enplaned passengers

R-PC019-31 Cont'd

Delay Assessment

Pictures speak a thousand words is a cliché, and yet the Flightradar24 screen shot in Figure 22 conveys a strong message of over-capacity and delays. Of note is that airlines do not include the time waiting on taxiways as delays. Delays are associated with the time the airplane leaves the gate compared to when it was scheduled to leave the gate and also delays arriving at the destination. So, if an aircraft sits on the runway at SDIA for 20 minutes, that is not a delay, unless it results in a late arrival. But, the airlines have now factored the time for the taxiway delays into the arrival time at the destination, and therefore there is no delay there either.

On the taxiway, at about 6:30 am on this day, there are fourteen aircraft n line and nine preparing to leave their gates. There is one aircraft in the picture that has just taken off. The consultant misses this congestion on the runway in Figure 5, because the consultant used ops per hour with an hourly increment, instead of a half hour increment. Figures 6 through 10 and 23 show the peaking at the early morning hour for both operations per hour on half hour increment and the number of aircraft waiting on the taxiway. Figures 24 and 25 show the correlation between number of operations per hour, first measured in one hour and then in half hour increments, indicating the sensitivity and importance of the results to the increment of measurement. The consultants have historically ignored this effect, thus rendering many of the conclusions flawed.

R-PC019-32

These are all metrics that the Airport Authority must monitor in the future and make available to the airport planners and State and local officials so that they better understand the potential impact of the single runway at SDIA on the San Diego Regional economy. More on this later.

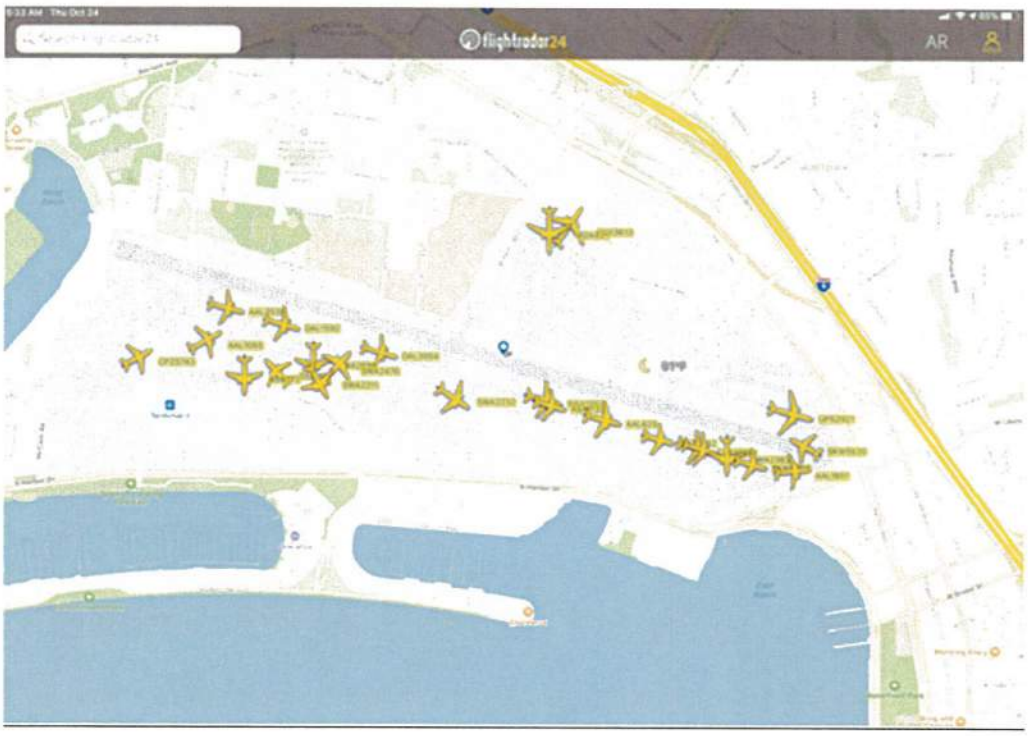


Figure 22 Flightradar24 screen shot at 6:32 am Friday, September 27, 2019.

R-PC019-32 Cont'd

Figures 24 and 25, one showing the correlation of delays and operations per hour with half hour versus quarter hour departures further shows the sensitivity of delay data to analysis increment. The Airport Authority regularly talks about "annual" capacity, while the FAA emphasizes the importance of first looking at hourly capacity and delays to obtain a clear picture of the situation on the runways.

A review of the SH&E document from 2004 and the Leigh – Fisher document from 2019 revealed a number of corroborating graphs and a few differences. The long-term forecasting of operations is consistent, but the spin is different. For example, the Leigh-Fisher document seems to be far more optimistic about the future of SDIA, even though the date for succumbing to capacity is far sooner than was the case in 2004. The SH&E document dwells substantially on the delay issue and implications, while the more recent document, with the exception of one graph, Figure 26, virtually ignores the issue.

Delays and capacity are issues that must first be addressed at the hourly level to gain a good perspective on the magnitude of the problem. Figure 5 by Leigh-Fisher does not capture what we see in Figures 6 through 11 and 22, which is now occurring daily. Figure 6-11 show large peaks and valleys, which may or may not be amenable to smoothing. Clearly the situation early in the morning results in a large peak and many delays, and yet the Airport Authority nor the FAA have taken any steps to smooth out this time period. It is clear that all of the airlines are rushing to be the first on the runway at 6:15 am to 6:30 am, creating a very chaotic situation.

R-PC019-33

Virtually all of the operations per hour charts are in agreement consistently showing fewer operations in the evening and nighttime hours compared to other hours of the day. The majority of these operations in the evening and nighttime are arrivals, which stay overnight and depart early in the morning. It is important to note that the morning hours, that is 6:30 am to 7:30 am are at capacity. Some aircraft are delayed more than 30 minutes. These are the departing aircraft that have departure times from 6:15 am to 6:30 am, heavily weighted on the 6:15 am side, that line up for take-off beginning at 6:30 am.

The Terminal One expansion includes adding 11 gates. This begs the question, why add gates, presumably for overnight aircraft storage, thus allowing 11 more early morning departures, even if there is no space for these aircraft in the morning hours. The other potential use of the 11 new gates would be increase operations during the day, assuming the aircraft using these gates all depart before nighttime. However, the Terminal 1 expansion is due

for completion in 2024, only a couple of years before the airport reaches capacity. The added gates would only further exacerbate an already constrained airport, so this makes little sense as well to invest in the new gates.

This also begs another question, if the Terminal One expansion is going to be completed by 2024, and the airport is at capacity by 2024, then why do it? Why spend billions of dollars to add new gates, or develop an international capability, or add many high-end store leases.

Could the ultimate objective of the Airport Authority be to change the curfew from 6:30 am to 5 am. A review of LAX early morning departures provides insight. From 5 am to 6:30 am, there are between 35 and 40 departures. There is little doubt, given the picture in Figure 22, that some of these departures could move up to earlier departure times.

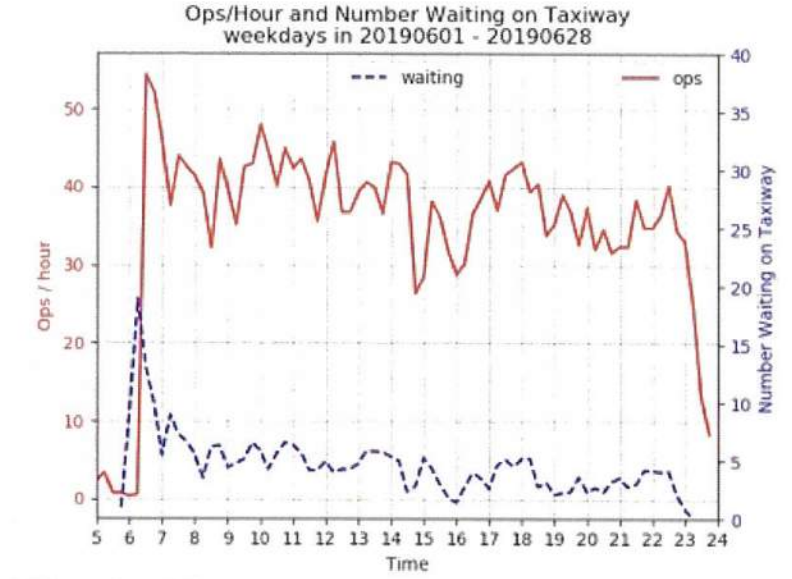


Figure 23 Ops/hour correlates with number of aircraft waiting on taxiways at SDIA

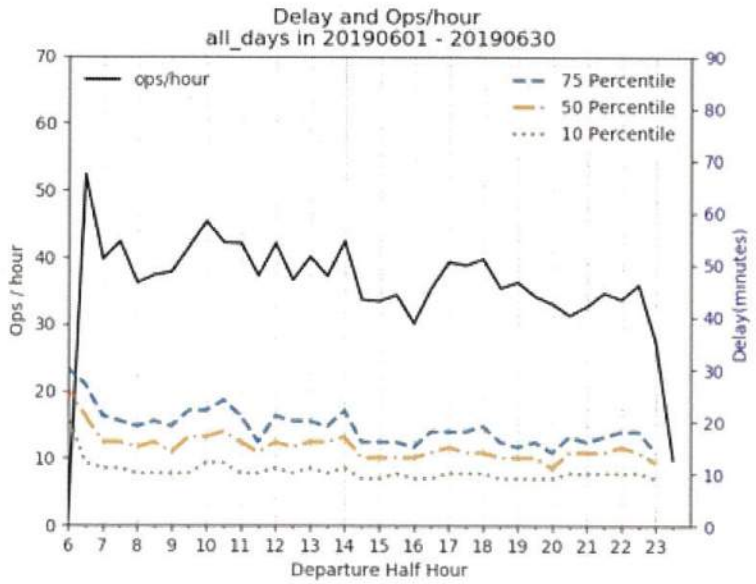
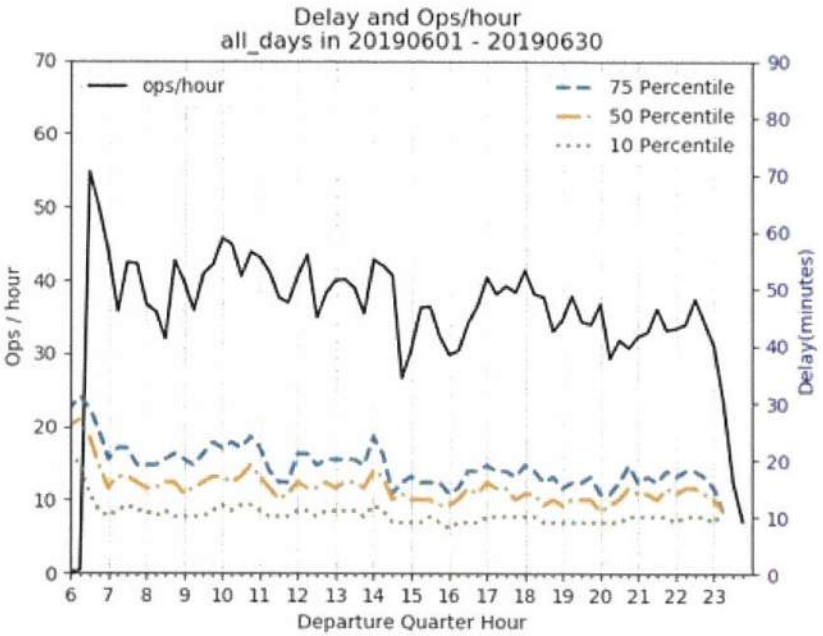


Figure 24 Potential correlation between operations per hour and taxi-way delays (Departure half hour)

At a recent Mission Beach Precise Planning Board (MBPPB) meeting, an Airport Authority planner presented an overview of the Terminal One expansion. At the end of the presentation, there were several questions regarding the over-capacity scheduling at 6:15 am to 6:45 am as well as the need for the 11 gates. One of the residents then

asked if the presenter could be a little more honest and tell us that there is a plan to change the curfew. The presenter's answer was, you will have to ask the Board (presumably SDCRAA Board).



The one chart related to delays in the DEIR document is shown in Figure 26. Delays are symptomatic of an airport approaching or at capacity. It is important that the Airport Authority add a metric to the ANAC quarterly reports that quantifies the on-runway delays.

Figure 25 Potential correlation between operations per hour and taxi-way delays (Departure quarter hour)

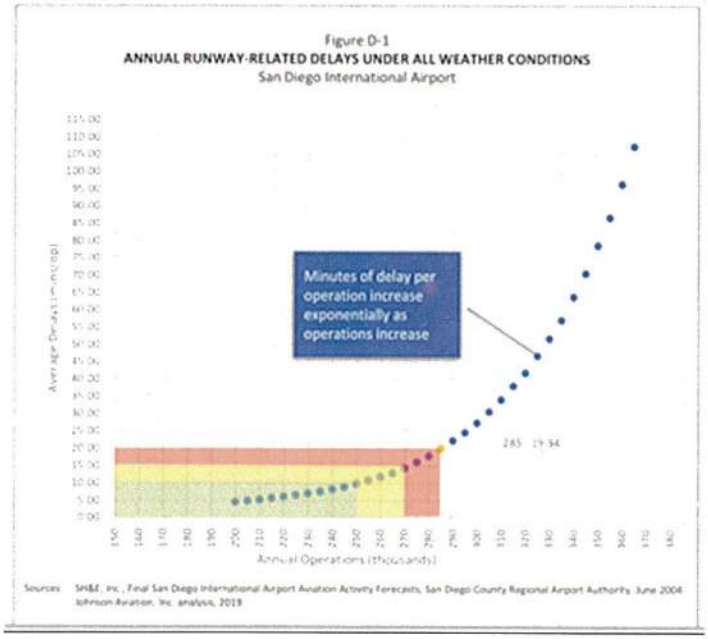


Figure 26 Annual runway related delays under all weather conditions as a function of annual operations

"When faced with increasing congestion and delays, airlines have a number of options:

R-PC019-33 Cont'd

R-PC019-34

R-PC 019-35

- Increasing load factors (already high, so not likely to increase);

The airport load factors data do not support the idea that load factors increase at constrained airports.

- Substituting larger aircraft into their schedules;

The consultant has really forecast that SDIA will be dominated by narrow body jets and further that regional jets will decrease substantially. Large long range international aircraft will stay about the same, which begs the question, why is the Terminal One expansion focusing on services for international travelers?

- Adjusting their schedule timing to "smooth" the hourly demand pattern; and

Some smoothing will occur, but not to the extent that SDIA will sustain maximum hourly operations for the entire 17 hours. There are far more arrivals than departures during the nighttime hours.

- Limit growth in flight schedules and decrease the availability of discount fares to more closely align passenger demand with airline capacity."[Ibid]

IT SEEMS LIKE THE CONSULTANT IS SUGGESTING THAT THE FAA INTERFERE WITH INTERSTATE COMMERCE.

"Managing Demand

If capacity cannot be managed through increased aircraft size or increased load factors, the airlines, the FAA, or SDIA will likely have to implement some form of demand management. SDIA or FAA could implement a demand management program such as congestion pricing or slots in order to limit growth in operations and delays. In addition, the airlines could manage demand by pricing their scarce seat capacity so that capacity and demand are more closely aligned. As an example, the airlines could reduce the availability of discount fares, thereby eliminating those passengers that provide the least profit. Regardless of the form of demand management, it is likely that any free market program will ultimately result in increased fares, which will constrain demand to a level that can be accommodated within the existing airport infrastructure. It is expected that some form of demand management would be the primary consequence of unresolved operating constraints at SDIA.[2]"

R-PC019-35 Cont'd

One of the other challenges at SDIA is that it is a spoke airport and therefore its focus is driven by what happens at airports in proximity, such as Los Angeles International Airport and Phoenix Sky Harbor Airport. These larger hub airports, along with San Francisco, include many international operations, leaving SDIA to focus on domestic flights or some international destinations that are relatively close (with a few exceptions). This trend is amplified during the peak of the tourism season in July 2019, when the largest percent of flights coming to SDIA, forty-two percent, are from destinations within 500 miles (Figure 27).

And even more telling is that about 55 percent of the arrivals depart for destinations that are within 500 miles of SDIA (Figure 28). The Google Earth Pro screen shot in Figure 29 shows a circle with a 500-mile radius. Another question that must be answered by the SDCRAA is why commuter airports have not been developed to address the shorter-range arrivals and departures e.g., Brown Field and Palomar. It would seem that with proper planning, regional jets could be used to shuttle passengers to and from these destinations that are less than 500 miles. This would open up slots and space for larger aircraft that have destinations farther from SDIA.

R-PC019-36

[2] San Diego International Airport Aviation Activity Forecasts, SH&E, Inc., June 2004, Project #5456.

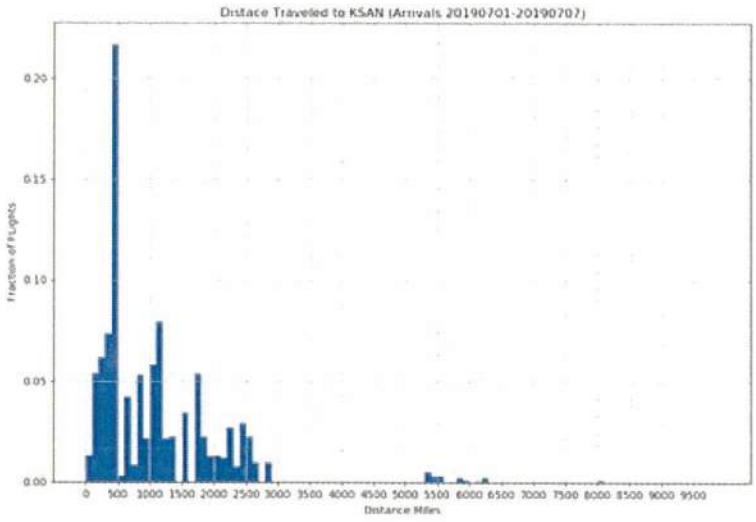


Figure 27 Distribution of arrival distances (miles) for planes flying to SDIA

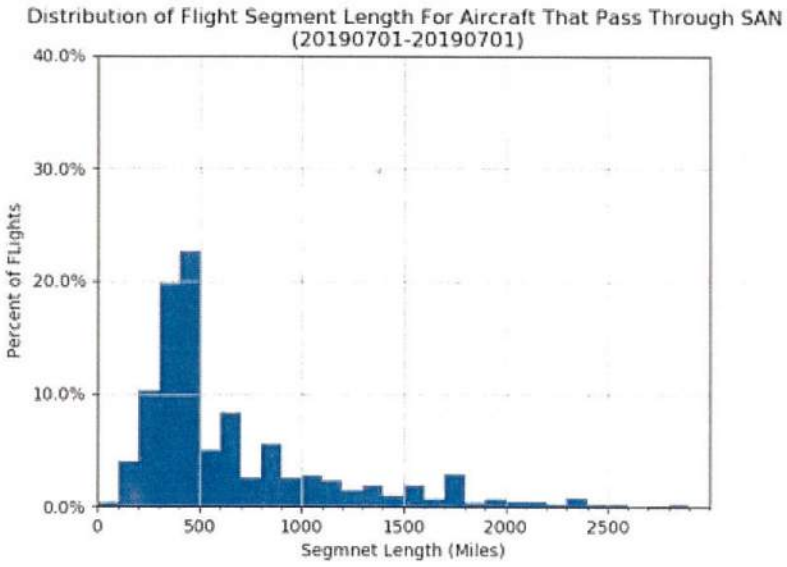


Figure 28 Distribution of flight segment length for aircraft passing through SDIA

R-PC019-36
Cont'd



Figure 29 Forty percent of the arrivals are from destinations within 500 miles (circle has 500 mile radius)

II. SDIA NOISE ISSUES

Noise Impact

In year's past, the litigation against the airport from excessive and nuisance noise was limited to Pt. Loma. But NexGen satellite navigation changed all of that. There has been a relatively hostile reaction to the FAA NexGen satellite navigation from residents of La Jolla and Mission Beach on Runway 27 and La Mesa and Golden Hills on the arrival side. A few years ago, there were only a handful of noise complaints to the airport from Mission Beach residents. The report in Figure 30 shows that Mission Beach residents sent in 7,089 noise complaints from 31 households (number of households reported at the ANAC). There have been similar complaint numbers from La Jolla and some from La Mesa.

R-PC019-36 Cont'd

R-PC019-37



Figure 30 Airnoise monthly report

Leigh-Fisher consultants have seemingly made an effort to distract the readers from the importance of single event noise levels by referring to Figure 28 as proof. It is more than suggested that only one percent of sleepers would be awakened by an indoor SEL of 50 dB, or that only 6 percent of sleepers would be awakened by an indoor SEL of 95 dB.

There is a new computer app called Sleeprate, which uses the Apple Watch, to produce an ambient noise history for each night. The ambient noise results for one night from Sleeprate is shown in Figure 32. There are several major noise events from 10 pm to 11:34 pm which coincide with sleep disruption. The noise recording associated with the 11:34 pm noise event clearly is from an aircraft passing overhead. It is clear that the single noise events from departures on PADRZ are causing people's sleep to be disrupted. I don't think there is any data that does anything but support the point that external noise events that waken sleepers are associated with negative health consequences, including increased stress on the heart and the brain.

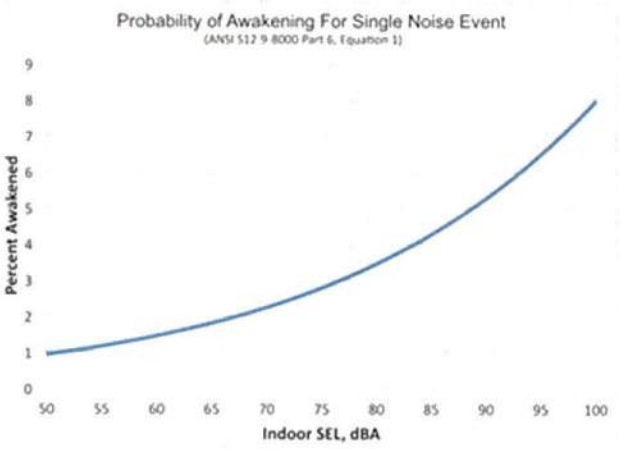


Figure 31 Probability of awakening for single event noise level (reference Leigh-Fisher document)

R-PC019-37 Cont'd

R-PC019-38

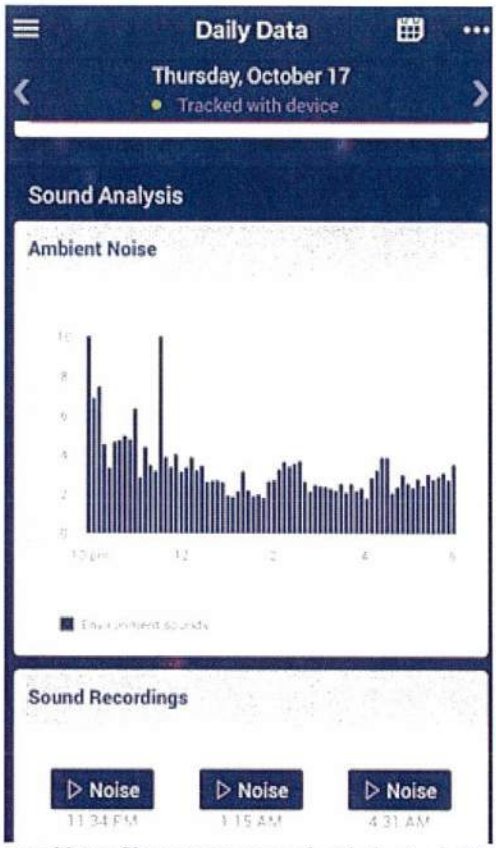


Figure 32App Sleeprate integrated with the Apple Watch

This issue will be addressed and likely confirmed by studies ordered by Congress that are summarized in a letter from Congressman Scott Peters dated August 7, 2019 and shown in Figure 33. The key studies that are relevant to the residents of the communities both inside and outside of the 65 dB CNEL are:

- Study the health impacts of aircraft noise on communities in the Southern California in concert with an academic institution(s),
- The FAA Comptroller General will study the benefits of phasing out Stage 3 aircraft,
- Increase community input on airport land use compatibility planning

In addition, the FAA will examine alternative metrics to the Day-Night Sound Level (DNL) 65 Standard; there is concern that this metric understates the noise levels because it averages the total noise over a 24-hour period.

It is clear that the noise levels are anticipated to increase substantially from 2016 to 2026, in large part because of the increased operations during the nighttime hours, which includes the 10-dB penalty. The noise contours for the 2016 baseline and the projected contour for 2026 are shown in Figure 34. It is obvious from the figure that the contours are increasing in size, but the actual impact based on the State Standards which are dictated by the Operating Variance document cannot be calculated. The data in Table 2 are for planning zones within the 65 dB CNEL. This State Variance only includes those residential zones that have an incompatible land use. This is the data included in the quarterly reports to the State. So, it is not clear how to use the data and information from Table 2, except in assessing the benefits of using Stage 4 and 5 aircraft during nighttime operations. Again, a flawed analysis.

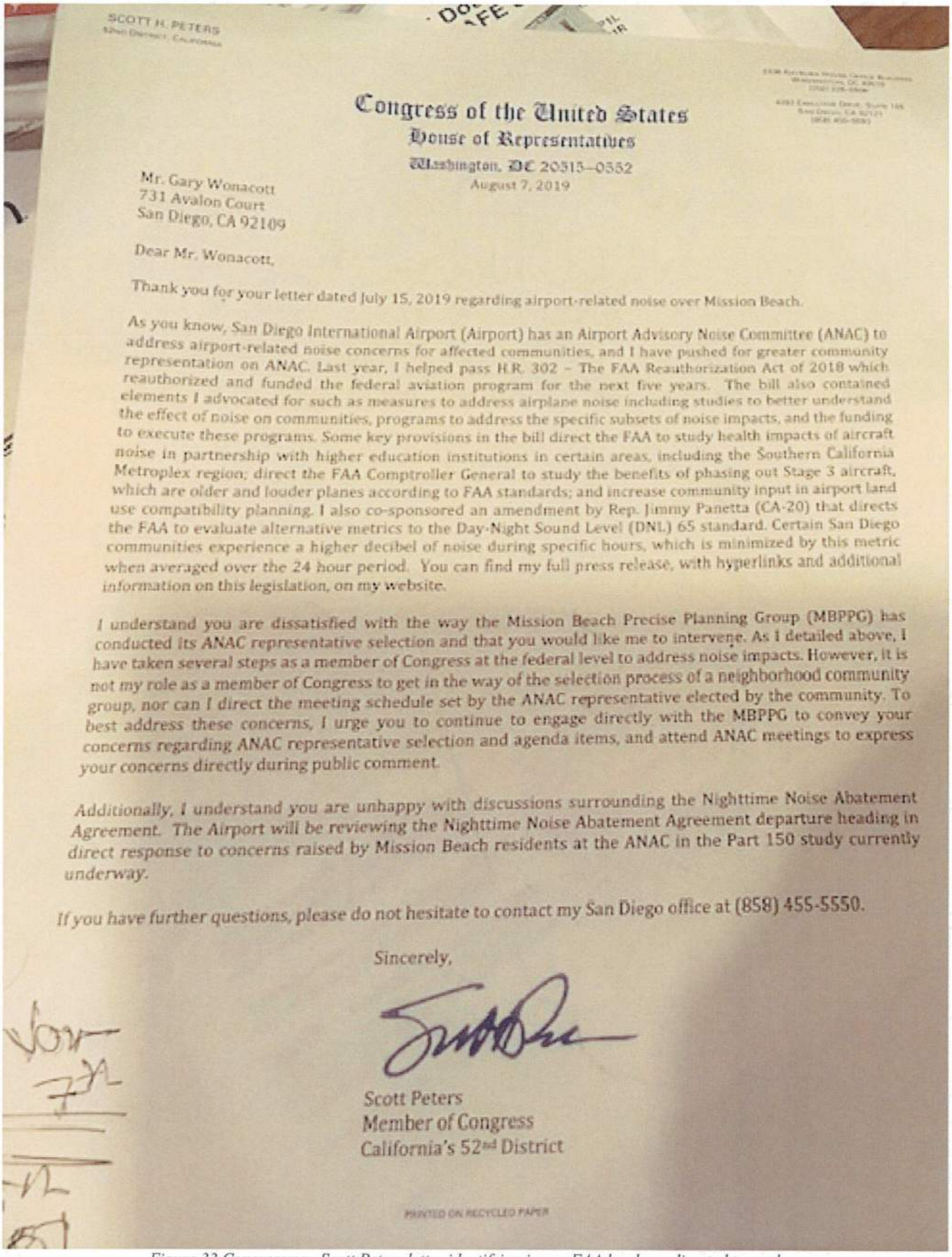
There is an interesting contrast in Figure 35 between the 65 CNEL data and the noise data specific to Mission Beach. While the 65 CNEL contour size and population has been increasing according to the Airport Authority data since 2015, the noise over Mission Beach at noise monitor #23 has been increasing since 2011. There is no apparent explanation for this, but it bears further investigation.

R-PC019-38 Cont'd

R-PC019-39

R-PC019-40

R-PC019-41



SCOTT H. PETERS

Congress of the United States
House of Representatives
Washington, DC 20515–0552
August 7, 2019

Mr. Gary Wonacott
731 Avalon Court
San Diego, CA 92109

Dear Mr. Wonacott,

Thank you for your letter dated July 15, 2019 regarding airport-related noise over Mission Beach.

As you know, San Diego International Airport (Airport) has an Airport Advisory Noise Committee (ANAC) to address airport-related noise concerns for affected communities, and I have pushed for greater community representation on ANAC. Last year, I helped pass H.R. 302 – The FAA Reauthorization Act of 2018 which reauthorized and funded the federal aviation program for the next five years. The bill also contained elements I advocated for such as measures to address airplane noise including studies to better understand the effect of noise on communities, programs to address the specific subsets of noise impacts, and the funding to execute these programs. Some key provisions in the bill direct the FAA to study health impacts of aircraft noise in partnership with higher education institutions in certain areas, including the Southern California Metroplex region; direct the FAA Comptroller General to study the benefits of phasing out Stage 3 aircraft, which are older and louder planes according to FAA standards; and increase community input in airport land use compatibility planning. I also co-sponsored an amendment by Rep. Jimmy Panetta (CA-20) that directs the FAA to evaluate alternative metrics to the Day-Night Sound Level (DNL) 65 standard. Certain San Diego communities experience a higher decibel of noise during specific hours, which is minimized by this metric when averaged over the 24 hour period. You can find my full press release, with hyperlinks and additional information on this legislation, on my website.

I understand you are dissatisfied with the way the Mission Beach Precise Planning Group (MBPPG) has conducted its ANAC representative selection and that you would like me to intervene. As I detailed above, I have taken several steps as a member of Congress at the federal level to address noise impacts. However, it is not my role as a member of Congress to get in the way of the selection process of a neighborhood community group, nor can I direct the meeting schedule set by the ANAC representative elected by the community. To best address these concerns, I urge you to continue to engage directly with the MBPPG to convey your concerns regarding ANAC representative selection and agenda items, and attend ANAC meetings to express your concerns directly during public comment.

Additionally, I understand you are unhappy with discussions surrounding the Nighttime Noise Abatement Agreement. The Airport will be reviewing the Nighttime Noise Abatement Agreement departure heading in direct response to concerns raised by Mission Beach residents at the ANAC in the Part 150 study currently underway.

If you have further questions, please do not hesitate to contact my San Diego office at (858) 455-5550.

Sincerely,

Scott Peters
Member of Congress
California's 52nd District

PRINTED ON RECYCLED PAPER

Figure 33 Congressman Scott Peters letter identifying issues FAA has been directed to analyze

Part of R-PC019-39

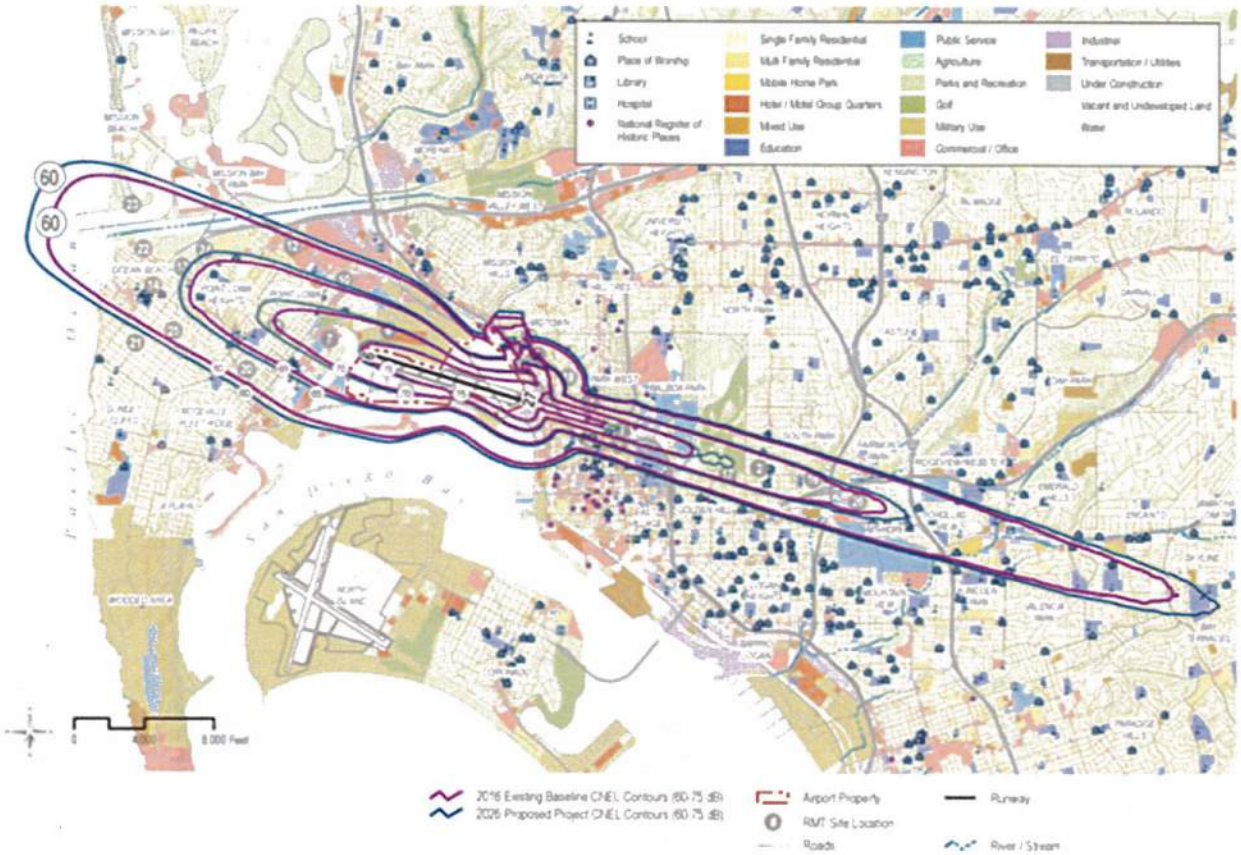


Figure 34 2026 and existing CNEL Contours 60 dB to 80 dB

Table 2 Estimated population, housing counts, and acreage for existing and future operational scenarios

Table 3.12-8: Estimated Population, Housing Counts, and Acreage for Existing and Future Conditions (2016, 2022, 2026, 2030, and 2035)

	Population					Housing Units					Acreage				
	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL
Existing (2016) Baseline	**53,440**	**20,637**	**4,432**	**827**	**79,336**	**24,127**	**8,888**	**1,329**	**590**	**34,934**	**5,804**	**2,344**	**784**	**388**	**9,319**
2022 Conditions															
2022 – Proposed Project	55,435	24,257	5,230	978	85,900	24,835	10,685	1,557	698	37,775	6,422	2,532	894	425	10,273
Difference Between Proposed Project in 2022 and Existing Baseline	1,995	3,620	798	151	6,564	708	1,797	228	108	2,841	618	188	110	37	954
2022 – No Project	55,435	24,257	5,230	978	85,900	24,835	10,685	1,557	698	37,775	6,422	2,532	894	425	10,273
Difference Between Proposed Project in 2022 and No Project in 2022	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2026 Conditions															
2026 – Proposed Project	56,328	25,389	5,475	1,031	88,223	25,274	11,211	1,615	737	38,837	6,652	2,606	930	440	10,628
Difference Between Proposed Project in 2026 and Existing Baseline	2,888	4,752	1,043	204	8,887	1,147	2,323	286	147	3,903	848	263	146	53	1,309
2026 – No Project	56,328	25,389	5,475	1,031	88,223	25,274	11,211	1,615	737	38,837	6,652	2,606	930	440	10,628
Difference Between Proposed Project in 2026 and No Project in 2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

R-PC019-41 Cont'd

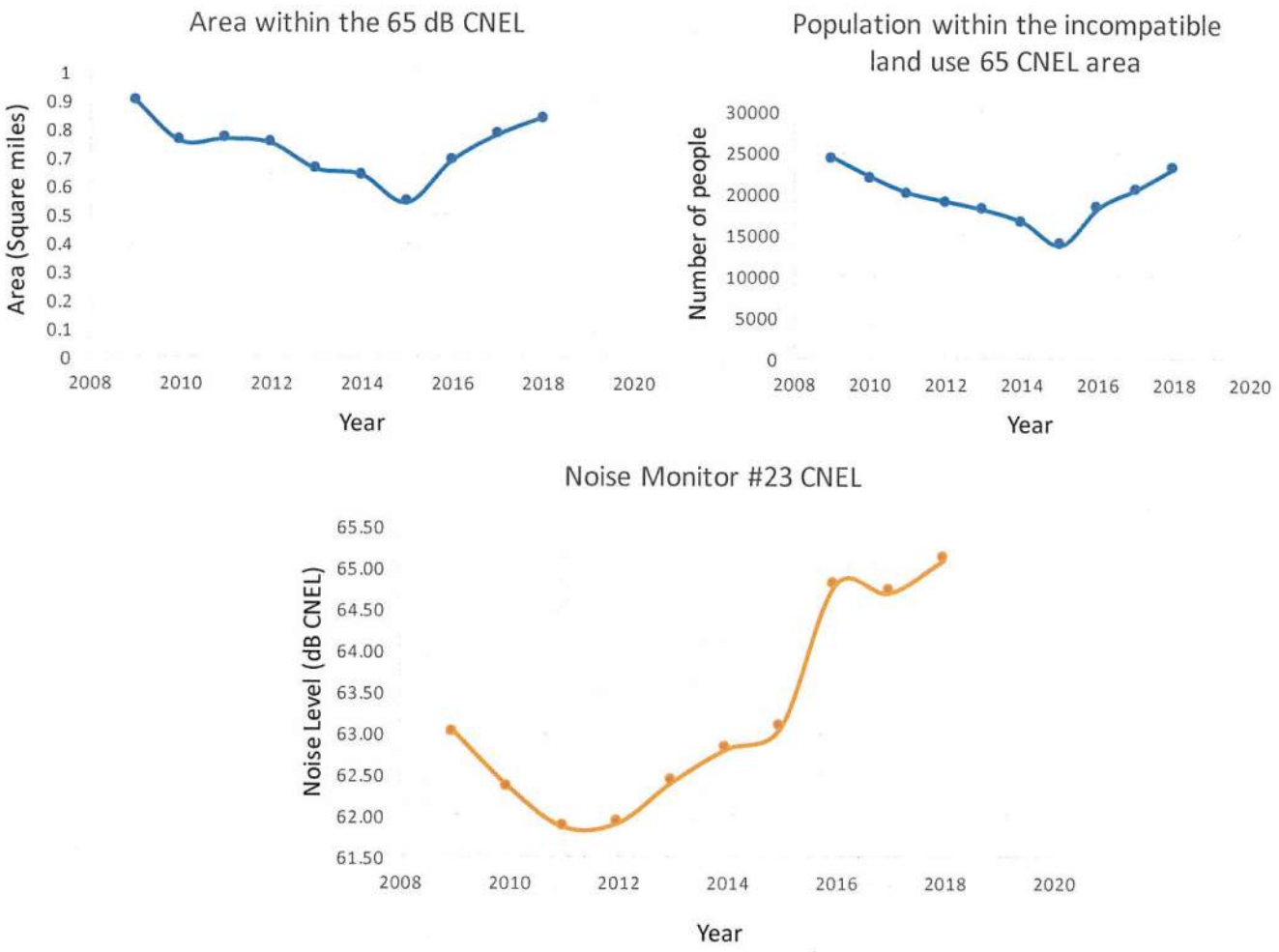


Figure 35 Historical information from the quarterly reports to the State of California

Table 3 Estimated population, housing counts, and acreage for existing and future operational scenarios

Table 3.12-8: Estimated Population, Housing Counts, and Acreage for Existing and Future Conditions (2016, 2022, 2026, 2030, and 2035)

	Population					Housing Units					Acreage				
	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL	60-65 CNEL	65-70 CNEL	70-75 CNEL	75+ CNEL	TOTAL
Existing (2016) Baseline	53,440	20,637	4,432	827	79,336	24,127	8,888	1,329	590	34,934	5,804	2,344	784	388	9,319
2022 Conditions															
2022 – Proposed Project	55,435	24,257	5,230	978	85,900	24,835	10,685	1,557	698	37,775	6,422	2,532	894	425	10,273
Difference Between Proposed Project in 2022 and Existing Baseline	1,995	3,620	798	151	6,564	708	1,797	228	108	2,841	618	188	110	37	954
2022 – No Project	55,435	24,257	5,230	978	85,900	24,835	10,685	1,557	698	37,775	6,422	2,532	894	425	10,273
Difference Between Proposed Project in 2022 and No Project in 2022	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2026 Conditions															
2026 – Proposed Project	56,328	25,389	5,475	1,031	88,223	25,274	11,211	1,615	737	38,837	6,652	2,606	930	440	10,628
Difference Between Proposed Project in 2026 and Existing Baseline	2,888	4,752	1,043	204	8,887	1,147	2,323	286	147	3,903	848	263	146	53	1,309
2026 – No Project	56,328	25,389	5,475	1,031	88,223	25,274	11,211	1,615	737	38,837	6,652	2,606	930	440	10,628
Difference Between Proposed Project in 2026 and No Project in 2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

data has dropped substantially for no apparent reason. The noise monitoring instruments have been questioned before, and this latest trend does not help.

Noise and Capacity Mitigation Recommendations

The question is, has the Airport Authority in combination with the FAA (NexGen satellite navigation) now gone

R-PC019-41 Cont'd

R-PC 019-42

too far, such that the residents, no longer confined to Loma Portal and Pt. Loma, strongly object to the current placement and planning for the airport. There are solutions, in fact 22 recommendations for noise mitigation developed by the ANAC Subcommittee. Consultants have been brought in by the Airport Authority Noise Abatement Office to evaluate these recommendations. And these folks have been very effective finding rationale for why these recommendations cannot be implemented. Most engineering companies actually have the opposite mandate from the customer, to find ways to make recommendations work.

Two of the responses commonly used by the FAA and the Airport Authority to stop recommendations from moving forward are:

- It interferes with interstate commerce,
- It will take years to get approval from the FAA, and going through this process could jeopardize the current curfew.

In answer, allowing the airport to reach capacity, a constrained airport, is a monumental example of interfering with interstate commerce, when there are alternatives. Second, everything takes forever at the FAA, so five or ten years should not be a deterrent in pursuit of substantial noise mitigation. In that context, the following noise mitigation ideas are evaluated.

R-PC019-42 Cont'd

Stage 4 and 5 aircraft

The consultant stated at a review of the DEIR that the much of the increase in the 65 dB CNEL would come from increased operations during the nighttime when the 10-dB penalty is applied to the aircraft noise levels. It therefore makes sense to offset the increased operations during this period with use of quieter Stage 4 and 5 aircraft. Figure 36 shows the noise decrease trend for Stage 4 and 5 aircraft relative to Stage 3. In this section, an analysis is performed to estimate the benefits by using the quieter Stage 4 and 5 at Lindbergh using the FAA's AEM modeling tool.

Noise Stages
The current FAA noise standards applicable to new type certifications of jet and large turboprop aircraft is Stage 4. It is equivalent to the ICAO Annex 16, Volume 1 Chapter 4 standards. Recently, the international community has established and approved a more stringent standard within the ICAO Annex 16, Volume 1 Chapter 14, which became effective July 14, 2014. The FAA is adopting this standard and promulgating the rule for Stage 5 that is anticipated to be effective for new type certificates after December 31, 2017 and December 31, 2020, depending on the weight of the aircraft. The Notice of Proposed Rule Making (NPRM) for Stage 5 was published on January 14, 2016.

The FAA Modernization and Reform Act of 2012, in Section 513, had a prohibition on operating certain aircraft weighing 75,000 pounds or less not complying with Stage 3 noise levels, and on July 2, 2013, the FAA published a Final Rule in the Federal Register for the Adoption of Statutory Prohibition the Operation of Jets Weighing 75,000 Pounds or Less That Are Not Stage 3 Noise Compliant. In 1990, Congress passed the Aviation Noise and Capacity Act, which required that by the year 2000 all jet and large turboprop aircraft at civilian airports be Stage 3.

R-PC019-43

Step one in the analysis is to select a representative list of operations for a given day, which is shown in Table 4. The AEM model only includes daytime and nighttime operations, therefore, next need to develop an equivalent list that converts the evening to daytime operations. This equivalent list is shown in Table 5.

The next step was to identify the Stage 3 aircraft used in the nighttime operations and find an equivalent Stage 4 or 5 aircraft with approximately the same MTOW. This was done using the inventory in AEM which provides a wealth of information (see Table 6 for examples). The final step was to run the AEM analysis tool for the two cases, one with the baseline nighttime aircraft, and one with the equivalent Stage 4 aircraft. The first analysis yielded a value of 7.7 square miles for the 65 CNEL. Replacing the Stage 3 with Stage 4 resulted in a reduced value of the 65 CNEL to 6.5 square miles, or a 16 percent decrease in the 65 CNEL size. This compares with the increase in the 65 CNEL in Table 2 from 5.5 square miles in 2016 to 6.2 square miles in 2026, or a 13 percent increase. It can therefore be concluded that converting the Stage 3 to Stage 4 for nighttime operations would offset the increase in nighttime operations from 2016 to 2026. The final point in this section is that AEM can be used for

a wide variety of analyses as long as the assumption is that the only changes made are the aircraft type.

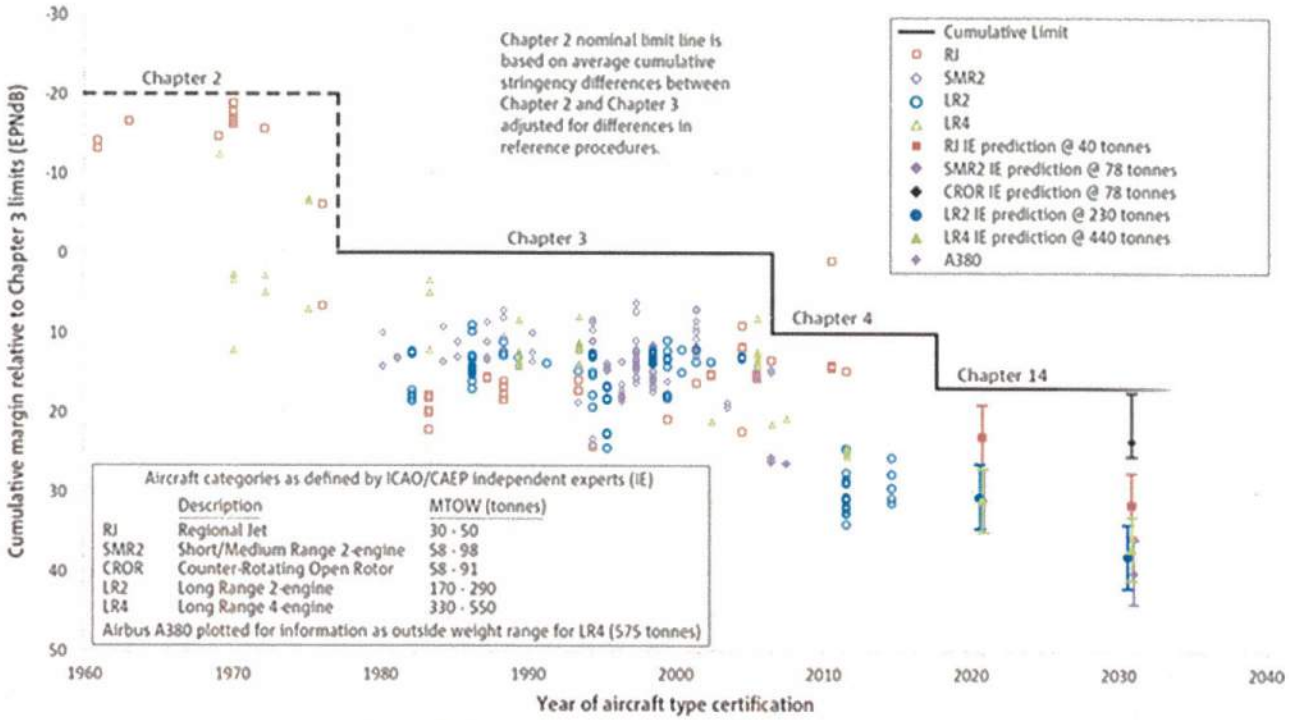


Figure 36 Quantitative measure of noise levels for Stage 2, 3, 4, and 5 aircraft

Table 4 Representative list of aircraft operations for day, evening and nighttime by aircraft type

	Baseline							
	Arrivals			Departures			Totals	
	Day	Evening	Night	Day	Evening	Night		
Airbus A300F4-600	0.8				0.8		1.5	0.27%
Airbus A319-100	5.6		3.8		5.6	3.8	18.8	3.31%
Airbus A320-100	9.4	2.8		9.4	2.8		24.4	4.31%
Airbus A320-200	6.6	2.8	0.9	6.6	2.8	0.9	20.6	3.65%
Airbus A320-NEO	2.8		1.9	3.8		1.9	10.3	1.82%
Airbus A330-200	0.9			0.9			1.9	0.33%
B787-8R	1.9	0.9	1.0	1.9	0.9	1.0	7.6	1.34%
Boeing 717-200	0.9			0.9			1.8	0.31%
Boeing 737-300	9.8	2.7		9.8	2.7		24.8	4.39%
Boeing 737-700	2.8	0.9	0.9	1.9	0.9	0.9	8.4	1.49%
Boeing 737-700 winglets	55.3	15.9	6.6	54.4	15.9	6.6	154.8	27.35%
Boeing 737-800	16.6	2.8	5.6	15.9	2.8	4.7	48.5	8.57%
Boeing 737 winglets	29.1	6.6	3.8	31.0	7.5	3.8	81.6	14.42%
Boeing 737-900	12.2	3.8	7.5	12.2	3.8	6.6	46.0	8.12%
Boeing 757-200		0.8	0.8	0.8	0.8		3.0	0.53%
Boeing 757-300	0.9			0.9			1.9	0.33%
Boeing 767-200	0.8				0.8		1.5	0.27%
Boeing 767-300	1.5		2.3	2.3	1.5		7.5	1.33%
Boeing 777-200		0.9			0.9		1.9	0.33%
DC 10-10			0.7	0.7			1.5	0.26%
Boeing MD-90	0.9		0.9			0.9	2.8	0.50%
Bombardier CRJ-200	1.8	0.9		1.8	0.9		5.3	0.94%
Bombardier CRJ-700	4.7	1.9		4.7	1.9		13.1	2.32%
Bombardier CS-100			0.9			0.9	1.9	0.33%
Bombarider de Havilland Dash 8 Q400	3.3			3.3			6.6	1.16%
Cessna 210 Caravan	1.5	1.5		3.0			5.9	1.05%
Embrarer ERJ175	7.7	2.2	1.1	7.7	2.2	1.1	21.9	3.86%
Embrarer ERJ175-E2	15.3		3.3	15.3		3.3	37.2	6.57%
Fairchild SA-226-T Merlin		0.7			0.7		1.5	0.26%
Raytheon Beech 99	0.7			0.7			1.5	0.26%
	193.7	48.1	41.9	189.7	56.2	36.3	565.9	

R-PC019-43 Cont'd

R-PC019-43
Cont'd

Table 5 Equivalent list of aircraft operations for day and nighttime by aircraft type

				Equivalent			
	Arrivals			Departures			Totals
	Day	Evening	Night	Day	Evening	Night	
Airbus A300F4-600	0.8		0.0	2.4		0.0	3.1
Airbus A319-100	5.6		3.8	17.8		3.8	30.9
Airbus A320-100	18.3		0.0	18.3		0.0	36.6
Airbus A320-200	15.5		0.9	15.5		0.9	32.8
Airbus A320-NEO	2.8		1.9	3.8		1.9	10.3
Airbus A330-200	0.9		0.0	0.9		0.0	1.9
B787-8R	4.8		1.0	4.8		1.0	11.7
Boeing 717-200	0.9		0.0	0.9		0.0	1.8
Boeing 737-300	18.2		0.0	18.2		0.0	36.4
Boeing 737-700	5.8		0.9	4.8		0.9	12.5
Boeing 737-700 winglets	105.8		6.6	104.8		6.6	223.7
Boeing 737-800	25.5		5.6	24.8		4.7	60.7
Boeing 737 winglets	49.8		3.8	54.7		3.8	112.0
Boeing 737-900	24.1		7.5	24.1		6.6	62.2
Boeing 757-200	2.4		0.8	3.1		0.0	6.3
Boeing 757-300	0.9		0.0	0.9		0.0	1.9
Boeing 767-200	0.8		0.0	2.4		0.0	3.1
Boeing 767-300	1.5		2.3	7.0		0.0	10.8
Boeing 777-200	3.0		0.0	3.0		0.0	5.9
DC 10-10	0.0		0.7	0.7		0.0	1.5
Boeing MD-90	0.9		0.9	0.0		0.9	2.8
Bombardier CRJ-200	4.6		0.0	4.6		0.0	9.2
Bombardier CRJ-700	10.6		0.0	10.6		0.0	21.2
Bombardier CS-100	0.0		0.9	0.0		0.9	1.9
Bombarider de Havilland Dash 8 Q400	3.3		0.0	3.3		0.0	6.6
Cessna 210 Caravan	6.2		0.0	3.0		0.0	9.1
Embrarer ERJ175	14.6		1.1	14.6		1.1	31.3
Embrarer ERJ175-E2	15.3		3.3	15.3		3.3	37.2
Fairchild SA-226-T Merlin	2.3		0.0	2.3		0.0	4.7
Raytheon Beech 99	0.7		0.0	0.7		0.0	1.5
	345.9		41.9	367.4		36.3	791.5

Table 6 Selection of data available in FAA's AEM preliminary modeling capability

Aircraft Type	Aircraft Description	Takoff Weight (lbs)	Noise ID/Stage
707	BOEING 707-120/JT3C	302400	1
720	BOEING 720/JT3C	223500	1
737	BOEING 737/JT8D-9	109000	1
747B	Boeing 747-8F/GEmx-2B67	987000	5
707120	BOEING 707-120B/JT3D-3	302400	1
707320	BOEING 707-320B/JT3D-7	334000	1
717200	BOEING 717-200/BR 715	121000	3
727100	BOEING 727-100/JT8D-7	169500	1
727200	BOEING 727-200/JT8D-7	217000	1
737300	BOEING 737-300/CFM56-3B-1	135000	3
737400	BOEING 737-400/CFM56-3C-1	150000	3
737500	BOEING 737-500/CFM56-3C-1	133500	3
737700	BOEING 737-700/CFM56-7B24	154500	3
737800	BOEING 737-800/CFM56-7B26	174200	3
747100	BOEING 747-100/JT9D3D	733000	2
747200	BOEING 747-200/JT9D-7	775000	3
747400	BOEING 747-400/PW4056	875000	5
757300	BOEING 757-300/RB211-535E4B	275000	3
767300	BOEING 767-300/PW4060	407000	3
767400	BOEING 767-400ER/CF6-80C2B(F)	450000	3
777200	BOEING 777-200ER/GE90-90B	650000	3
777300	BOEING 777-300/TRENT892	660000	3
1900D	BEECH 1900D / PT6A67	16950	1
707QN	BOEING 707-320B/JT3D-7QN	334000	2
720B	BOEING 720B/JT3D-3	234000	1
727D15	BOEING 727-200/JT8D-15	208000	1
727D17	BOEING 727-200/JT8D-17	208000	2
727EM1	FEDX 727-100/JT8D-7	169500	3
727EM2	FEDX 727-200/JT8D-15	208000	3
727Q15	BOEING 727-200/JT8D-15QN	208000	2
727Q7	BOEING 727-100/JT8D-7QN	169500	2
727Q9	BOEING 727-200/JT8D-9	191000	2
727QE	UPS 727100 22C 25C	169000	3
737B2	BOEING 737-300/CFM56-3B-2	130500	3
737D17	BOEING 737-200/JT8D-17	124000	2
737N17	B737-200/JT8D-17 NORDAM B737 LGW HUSHKIT	124000	3
737N9	B737/JT8D-9 NORDAM B737 LGW HUSHKIT	109000	3
737QN	BOEING 737/JT8D-9QN	109000	2
747100	BOEING 747-100/JT9D-7QN	733000	3
74720A	BOEING 747-200/JT9D-7A	785000	3
74720B	BOEING 747-200/JT9D-7Q	800000	3
747SP	BOEING 747SP/JT9D-7	702000	3
757PW	BOEING 757-200/PW2037	255000	3
757RR	BOEING 757-200/RB211-535E4	255000	3
767CF6	BOEING 767-200/CF6-80A	315500	3
767JT9	BOEING 767-200/JT9D-7R4D	351000	3
777GER	Boeing 777-300ER/GE90-115B-EIS	775000	3
787BR	Boeing 787-8/T1000-C/01 Family Plan Cert	502500	5
A10A	FAIRCHILD THUNDERBOLT II TF34-GE-100 NM	50000	0
A3	MCDONNELL DOUGLAS SKYWARRIOR J79-GE-8 NM	80000	0
A300-622R	A300-622R/PW4168	378533	3
A300B4-203	AIRBUS A300B4-200/CF6-50C2	364000	3
A310-304	A310-304/GE CF6-80 C2A2	346126	3
A319-131	A319-131/IAE V2522-A5	166449	5
A320-211	A320-211/CFM56-5A1	169756	5
A320-232	A320-232/V2527-A5	169756	5
A321-232	A321-232/V2530-A5	190211	3
A330-301	A330-301/GE CF6-80 E1A2	467360	5
A330-343	A330-343/RR TRENT 772B	513677	5
A340-211	A340-211/CFM56-5C2	566588	3
A340-642	A340-642/Trent 556	804687	4
A37	CESSNA DRAGONFLY J85-GE-17A NM	14389	0
A380-841	A380-841/RR trent970	1254430	4
A380-861	A380-861/EA GP7270	1254430	4

Move PADRZ south

The primary argument against moving PADRZ south is that it violates the 15 degree separation rule. However, the FAA and the Airport Authority have been violating this rule for decades. For years, maybe decades, the Airport Authority and the FAA tried to convince residents west of the airport that post 10 pm, all departures were directed by ATC to the 290-nighttime noise abatement agreement heading (see Figure 37). But thanks to modern flight tracking software, there is strong evidence that nighttime departures with destinations north were directed to PEBLE SIX, with a turn right to 293 degrees[3]. The FAA has claimed that there is a minimum angle that must be maintained between any two departure tracks, and yet, the 290-degree departure and PEBLE SIX have only 3 degrees separating the two tracks.

With the implementation of the NexGen RNAV satellite navigation, the 290-nighttime noise abatement agreement stayed in place while PEBLE SIX was replaced by PADRZ (see Figure 38). There is again strong evidence backed up by public domain flight tracking data that shows that aircraft on PADRZ turn right to about 295 degrees. Some of the aircraft turn to a higher angle, up to 300 degrees, depending on when the right turn is initiated (see Figure 39).

The three parallel lines in Figure 39, all at 290 degrees on the picture have turn points at:

1. 1 mile from the end of the runway,
2. at the end of the runway, and
3. at the midpoint of the runway.

Again, it is important to note that post 10 pm, there are two departure tracks separated by three to five degrees,

[3] I met with Ms. S. Knack and Ms. D. Watkins about five years ago at Ms. Knacks office when she tried to convince me that PEBLE and the 290 were one and the same; however, it was clear even from the data that I presented that this was not the case.

R-PC019-43 Cont'd

R-PC019-44

which supposedly violate the 15-degree rule. Finally, there is question whether the 15-degree rule applies for a single runway that guarantees separation associated with the time between departures.

The Airport Authority Noise Abatement Office has claimed that PADRZ is on a 290-degree heading. The picture in Figure 39 clearly shows the misinformation passed along by the Noise Abatement Office personnel in their ANAC meeting materials. The picture is annotated with the phrase, "Compliant on PADRZ", and then above in the table, it states that this data is the 290-degree nighttime abatement procedure heading. This comes very close to being a cover up. The differences between the 290 and PADRZ are verified in Figure 40. This figure shows altitude versus a horizontal distance, with zero at the very southern tip of South Mission Beach. There are clearly two groups of data, one for the 290 nighttime noise abatement heading and one for PADRZ.

There is a distinct difference in the horizontal difference from the southern tip of Mission Beach, used as the reference point, between the aircraft tracking on the 290 degrees heading, versus those on PADRZ. Note that those on the 290-degree heading are flying to destinations back in the Midwest and east, and therefore turn left, while those on PADRZ turn right. Second, a very important point is that the average altitude for those on 290-degrees that are heading east are crossing over or past Mission Beach on average at 2260 feet. This compares with departures on PADRZ that cross over Mission Beach on average at 2,900 feet. This difference in altitude is due to the heavier aircraft with destinations back east. These aircraft are far noisier than those on PADRZ.

The Airport Authority has shown recommendations moving all of the nighttime departures on the 290 degree heading to PADRZ. Not only would it be unfair to move all of the departing aircraft to PADRZ, adding substantial noise to Mission Beach, but, it makes all of the sense in the world to move PADRZ south to the 290-degree heading. It really does not make sense to use the angular spacing in this case, but even if it does, then if the actual apex of the turn is used, about a mile from the end of the runway, then the angular spacing is satisfied anyway.

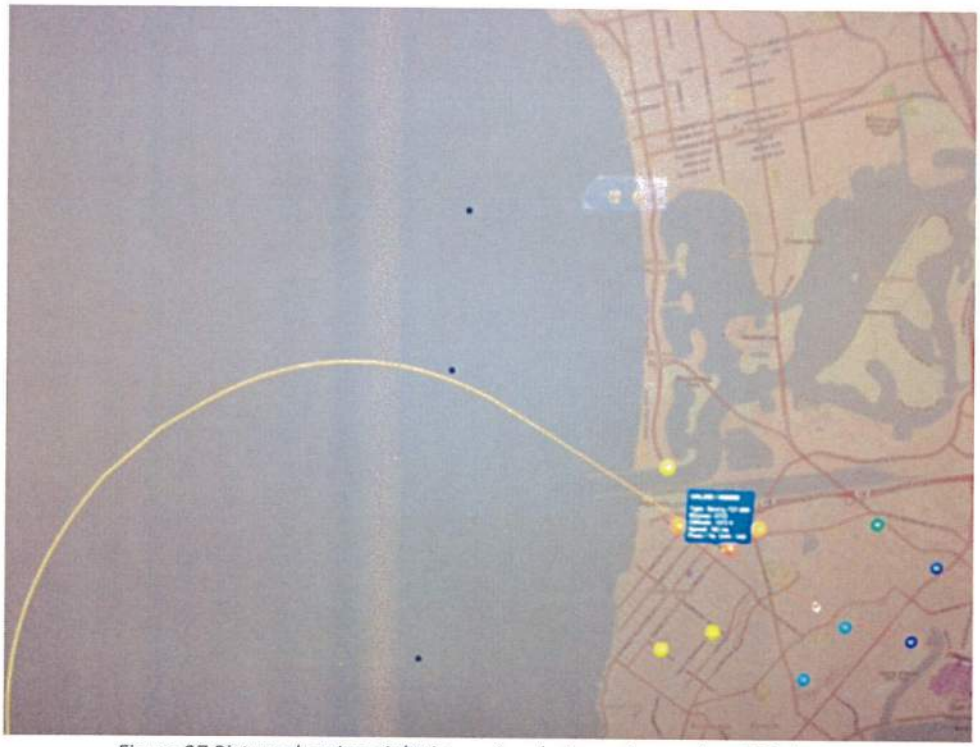


Figure 37 Picture showing nighttime noise abatement procedure 290 degrees

R-PC019-44 Cont'd

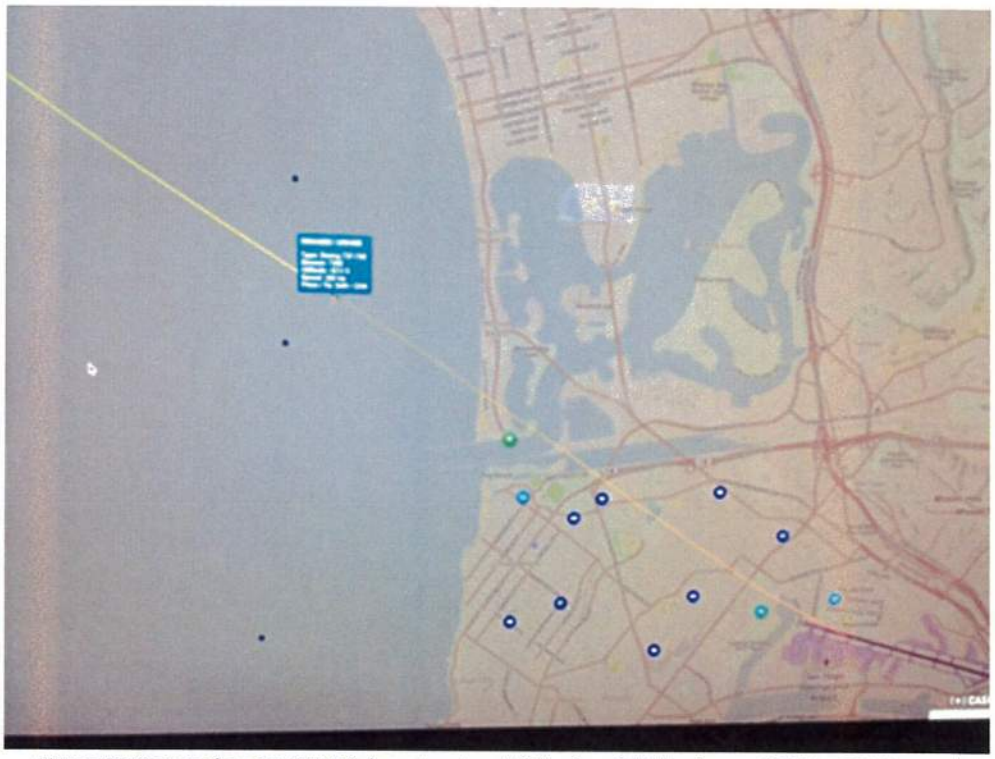


Figure 38 Picture showing PADRZ departure track following RNAV software (295 to 300 degrees)



Figure 39 The 290 degree heading track is dependent on the location of the apex of the line.

R-PC019-44 Cont'd

Date	Compliant with Nighttime Departure Heading (290°)	Non-Compliant with Nighttime Departure Heading		
		Straight Out	East Departures	Over La Jolla
April	423	2	0	10
May	441	3	0	14

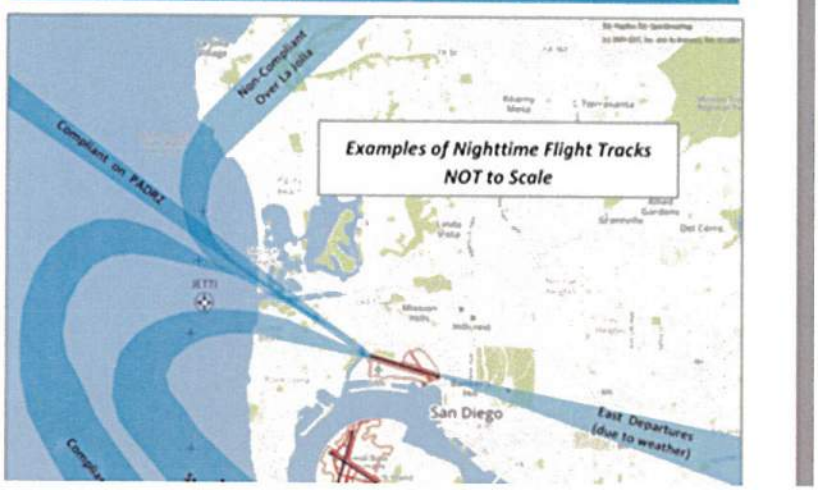


Figure 40 Misrepresentation of PADRZ being coincident with the 290 degree heading.

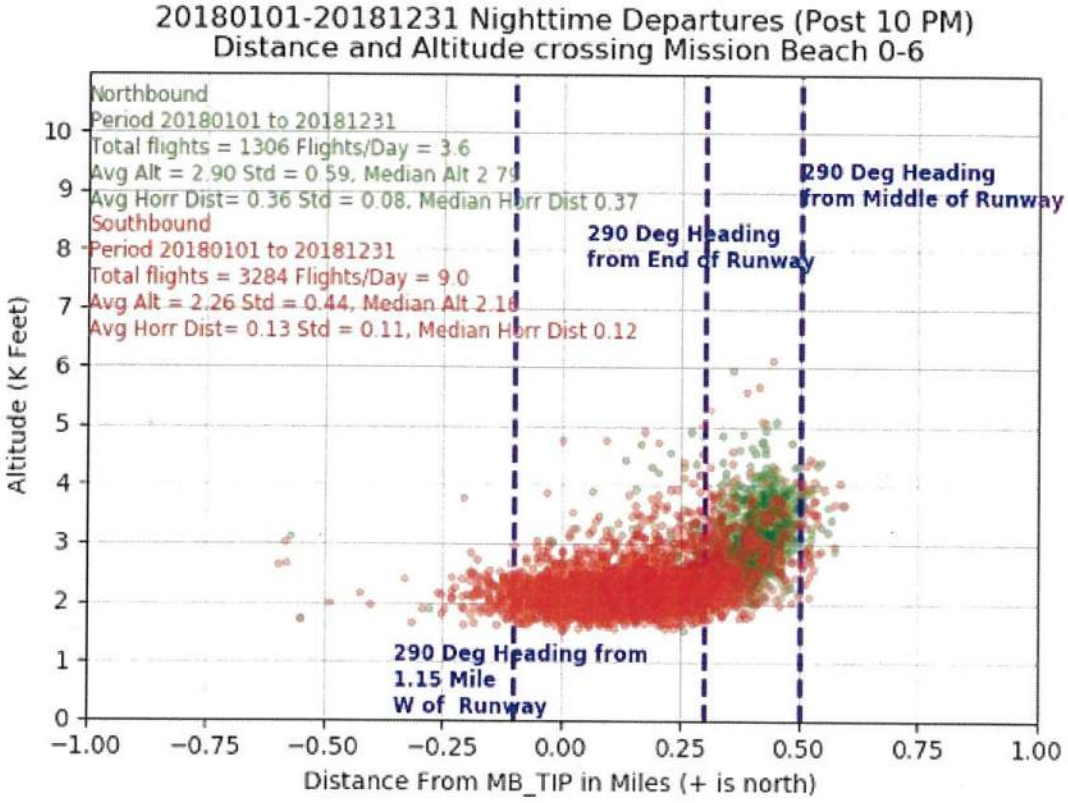


Figure 41 Data showing nominal positon of 290-degree nighttime noise abatement departure heading versus PADRZ heading.

The bottom line noise mitigation recommendation is to move PADRZ south such that the aircraft cross Mission Beach south of the peninsula, aligned with the current 290-degree noise abatement heading. There are different ways to accomplish this objective. It is up to the FAA to determine the best way to accomplish this requirement.

Move flights to alternative airports

The San Diego County Regional Airport Authority (SDCRAA) has been well aware of the pending constrained airport conditions along with the loss of hundreds of millions of dollars annually to reduced enplanements. While the Airport Authority Noise Abatement Office personnel typically have thrown out interference with interstate commerce as a rationale for not even considering real noise mitigation (replacement of Stage 3 with Stage 4 aircraft for nighttime operations), the airport reaching capacity and becoming constrained is in itself interference with interstate commerce on monumental proportions. There are ways to substantially delay reaching capacity, but as usual, this planning should have begun years ago.

As was shown earlier in Figures 27 and 28, a large percentage of the operations at SDIA are within 500 miles. Even if half of these operations could be moved to an alternative airport in San Diego County, this could be from 150-200 operations. This would have multiple benefits:

- It would open up 150-200 more operations for longer haul flights out of SDIA
- It would substantially reduce noise over La Jolla, Pacific Beach, and Mission Beach in particular, but initially over Loma Portal, Pt. Loma and Ocean Beach.
    - The benefit to La Jolla, Mission Beach and Pacific Beach would result from the fact that most of the commuter flights, that would be moved, are ones that depart on PADRZ.
- It would make far more sense to add the 11 gates

The candidate alternative airports include Brown Field, Palomar, and a Southern California International Airport (south end of Pendleton). It is now common to find luxury buses transporting passengers from airports to downtown areas in both domestic and international airports. Bus services could depart every 15 minutes. Reservations for bus seats would be available from the planned new transportation hub.

FINANCIAL IMPACT OF CONSTRAINED LINDBERGH FIELD

In June of 2018, a report was published by a consultant to the Airport Authority[4]that concluded that the contribution of SDIA to the economy is about $12B annually. A summary of the study is shown in Table 7. While there is a difference of opinion when the airport will become constrained, which ranges from 2023 to 2035, there is no doubt about the financial impact when this does happen. The difference between constrained and unconstrained enplanements after five and ten years is roughly 2.5 and 5 million passengers.

In 2018, the number of enplanements is about 12 million. The next question is what percent of the total $12 billion is directly related to the number of enplanements. Conservatively assuming from Table 7 that $9.1B relates directly to enplanements, then the loss in revenue to the San Diego region can be estimated at $1.9B after five years and $3.8 B after ten years.

Someone stated that the business community in San Diego is aware of this potential loss and is OK with it. I am not that sure this is the case.

R-PC019-44 Cont'd

R-PC019-45

Table 7 Summary of results from 2018 financial benefits study for SDIA on the San Diego region

[4] **SAN DIEGO INTERNATIONAL AIRPORT ECONOMIC IMPACT STUDY** Prepared for: **SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY** Third Floor, SDCRAA Administration Building 3225 North Harbor Drive, San Diego, CA 92101 619-400-2404 Prepared by: **CDM SMITH,** 8845 Governor's Hill Drive, Suite 430 Cincinnati, OH 45249
513-583-9800

Table 1-1
Total Economic Impacts, San Diego International Airport, 2017

	Direct Impacts	Multiplier Impacts	Total Impacts
EMPLOYMENT			
On-Airport Tenants[1]	8,349	10,389	18,738
Visitors[2]	58,875	38,958	97,833
Airport Total	**67,224**	**49,347**	**116,571**
Off-Airport Parking and Air Cargo Facilities	604	796	1,400
Airport and Off-Airport Facilities Total	**67,828**	**50,143**	**117,971**
PAYROLL			
On-Airport Tenants[1]	$413,010,000	$371,299,000	$784,309,000
Visitors[2]	$1,603,170,000	$1,483,978,000	$3,087,148,000
Airport Total	**$2,016,180,000**	**$1,855,277,000**	**$3,871,457,000**
Off-Airport Parking and Air Cargo Facilities	$28,025,000	$29,456,000	$57,481,000
Airport and Off-Airport Facilities Total	**$2,044,205,000**	**$1,884,733,000**	**$3,928,938,000**
OUTPUT			
On-Airport Tenants[1]	$1,319,751,000	$1,289,827,000	$2,609,578,000
Visitors[2]	$4,687,878,000	$4,416,441,000	$9,104,319,000
Airport Total	**$6,007,629,000**	**$5,706,268,000**	**$11,713,897,000**
Off-Airport Parking and Air Cargo Facilities	$92,247,000	$88,492,000	$180,739,000
Airport and Off-Airport Facilities Total	**$6,099,876,000**	**$5,794,760,000**	**$11,894,636,000**

[1]Includes associated on-airport construction activity.
[2]Includes commercial service and general aviation visitors.

References:

1. FINAL TECHNICAL MEMORANDUM, AVIATION ACTIVITY FORECAST UPDATE San Diego International Airport, AVIATION ACTIVITY FORECAST UPDATE, San Diego International Airport, Prepared for: San Diego County Regional Airport Authority San Diego, California, Prepared by Leigh-Fisher July 2019.
2. 3 SAN ADP DEIR Appendix G Noise July 2019
3. SAN DIEGO INTERNATIONAL AIRPORT AVIATION ACTIVITY FORECASTS, Prepared for: San Diego County Regional Airport Authority Prepared by: SH&E, Inc. June 2004 Project #5456.

COMMENT LETTER NO. R-PC019	Gary Wonacott	October 31, 2019

Response to Comment R-PC019-1

The comment offers an opinion on the merits of the proposed project and does not pertain to the environmental analysis in the Recirculated Draft EIR. No further response is required.

Response to Comment R-PC019-2

A number of factors support an increase in the average size of aircraft at SDIA, including:

(1) Southwest Airlines has accounted for more than 40% of seats at SDIA since 2008 and therefore influences the average seats per departure for the Airport as a whole. Southwest operates an all narrowbody fleet and is replacing its 143-seat B737-700 aircraft with 175-seat B737-800 and B737 MAX8 aircraft thus supporting an increase in the average aircraft size at SDIA during the forecast period.

(2) Similarly, other network airlines serving SDIA are replacing narrowbody aircraft in their fleet with larger capacity aircraft, e.g., American has orders for 172-seat B737-MAX aircraft, Delta has orders for 180-200-seat A321-200neo aircraft, and United has orders for 179-seat B737-MAX aircraft.

(3) As primarily an origin and destination (O&D)[26] airport, SDIA has a relatively low share of domestic aircraft operations performed by regional aircraft (13% in 2018), compared with other West Coast large hub airports such as LAX (21%), PDX (37%), SEA (28%), SFO (17%). Fewer operations by regional aircraft supports a higher average seats per operation at SDIA than at connecting hub airports.

(4) In 2018, the number of seats per operation on domestic flights at SDIA averaged 148, compared with 140 for all U.S. airports.

In 2018, several large-hub airports had average annual domestic load factors approaching 90%, including Denver (88%), Honolulu (88%), Miami (87%), and Orlando (87%). (The relevant comparison is for domestic load factors since 96% of SDIA's enplaned passengers were domestic in 2018.).

Response to Comment R-PC019-3

The sensitivity of the passenger airline operations forecasts to changes in load factor and average seats per operation was tested in preparing unconstrained and constrained demand scenarios. In addition, the assumptions for load factors and average seats per operation are benchmarked to the assumptions in the FAA National Aerospace Forecasts published each year in March.

[26] Origin and destination airports, such as SDIA, are characterized by their dependence on growth in the local economy to drive the growth in demand for air service. By comparison, a connecting hub airport depends on both its local economy and the choices by airlines to flow connecting flights and passengers through the hub airport. Connecting demand is much more sensitive to frequent flight options that trend toward regional jet and smaller narrowbody aircraft sizes to keep operating costs competitive.

(1) In the unconstrained forecast, SDIA load factors are forecast to increase an average of 0.1% per year between 2018 and 2050, the same as the FAA's forecast assumption for the nation and slower than SDIA's constrained forecast (0.2% per year).

(2) In the unconstrained forecast, SDIA average seats per operation are forecast to increase an average of less than 0.1% per year between 2018 and 2050, slower than the FAA's forecast assumption for the nation (an average increase of 0.4% per year) and SDIA's constrained forecast (an average increase of 0.5% per year).

It is important to note that:

(1) As part of the planning process, the aviation demand forecasts prepared for an airport must be reviewed and approved by the FAA for the planning to proceed. The FAA requires an airport operator to identify a "preferred" forecast for its review and approval. The preferred forecast must be driven by one set of assumptions for metrics such as load factor and average seats per operation.

(2) The constrained forecast scenario was developed using an airline schedule for a representative day in the peak month. In addition to testing the sensitivity of metrics such as load factor and average seats per operation, changes in the hourly distribution of airline flights were also tested.

Response to Comment R-PC019-4

For reporting purposes, all hourly aircraft operations and capacity numbers are summarized in hourly figures. Analysis of operations in the Recirculated Draft EIR is based on Design Day Flight Schedules (DDFS), in which each operation is time stamped to the one-tenth (0.1) of a minute. Simulation results and delay outputs include this same level of accuracy for each aircraft operation.

Response to Comment R-PC019-5

See Response to Comments R-PC003-6.

Response to Comment R-PC019-6

See Response to Comments R-PC003-6.

Response to Comment R-PC019-7

FAA guidance for determining both annual as well as hourly airport capacity is published in Advisory Circular l50/5060-5 "*Airport Capacity and Delay*", September 23, 1983. This publication provides a high-level long-range approach to determining practical capacities and related delay approximations for various runway configurations in VFR and IFR weather conditions. The study team used this publication as an initial baseline to assess approximate operational levels and constraints. Since 1983, numerous other tools have been developed in the industry to more accurately assess airspace and airfield capacities, including detailed math models, discrete modeling and simulation software applications, as well as proprietary tools. The tools used by the study team to determine the hourly capacities at SDIA include a spreadsheet model developed through an Airport Cooperative Research Program Report 79 "Evaluating Airfield Capacity", 2012. These findings were further validated by the team utilizing FAA-sponsored SIMMOD, an airspace and airport simulation model that is used to test and analyze the impact of various air traffic

scenarios. This simulation tool confirmed the findings of previous analyses and defined planning horizon delay levels to a high level of accuracy.

Response to Comment R-PC019-8

As noted in Response to Comment R-PC019-2 above, U.S. airlines have placed orders for narrowbody aircraft with a greater number of seats than the narrowbody aircraft in their existing fleets.

The direction at SDIA, in terms of the average number of seats per operation, is driven by airline fleets and orders. As noted in Response to Comment R-PC019-2, U.S. airlines have placed orders for narrowbody aircraft with a greater number of seats than the narrowbody aircraft currently in their existing fleets.

Also, SDIA is primarily an O&D airport with passenger traffic growth driven by the local economy and the availability of competitive airfares. SDIA's airline service is not dependent on service at LAX, PHX, and SFO. In 2018, SDIA had nonstop service to 65 U.S. airports, including 36 airports that were not airline connecting hubs.

Response to Comment R-PC019-9

Please see Response to Comment R-PC019-7 above. Extensive math modeling, discrete gate assignment modeling, and airspace and airport simulation modeling was performed to assess and validate capacities and projected delays. Delays were calculated for VFR and IFR weather, for arrival and departure sequences, and for airfield taxi movements to/from the available gates. Once peak hour arrival and departure capacities are determined, quick comparisons with projected flight schedules in the peak hour is often a reliable indicator that delays may occur. Primary symptoms, which allude to capacity constraints for a runway may include, but not limited to: presence of an unencumbered airspace system, adequacy of runway poor weather instrumentation, the complement of taxiways (full length parallel, high-speed, exit, and by-pass taxiways), and the operational characteristics of the particular airfield. All of these factors were taken into careful consideration for the SDIA airfield.

Response to Comment R-PC019-10

Please see Response to Comment R-PC019-2 to support the assumption of gradually increasing load factors and seats per operation at SDIA. The flattening of the constrained demand scenario of enplaned passengers reflects the estimates of airport capacity (in terms of annual operations) and upper limits for load factors and seats per departure based on an assessment of airline fleets and orders. For discussion of airline responses in a constrained environment, see Section D.4 Market Responses in Appendix D of Appendix R-B, Aviation Demand Forecasts and Gated Schedules, of the Recirculated Draft EIR.

Response to Comment R-PC019-11

SDCRAA Airport Operations staff closely monitor airfield operations 24 hours per day, 365 days per year. They communicate closely with the FAA Air Traffic Control tower staff and airline operations staff to ensure that the airfield is open, fully operational, and safe for the flying public. As part of this constant monitoring, Airport Operations staff are regularly assessing aircraft

operations counts, taxiway usage, coordinating construction, and coordinating with all other departments of the Authority to ensure the most safe and efficient operation possible at SDIA.

Response to Comment R-PC019-12

Capacity of the Airport can be expressed for many components – e.g., the airfield (runway, taxiway system, and apron areas), the terminal and gates, and the landside (roads, curbs, and parking). The purpose of the multi-billion dollar capital improvement program is to focus on improving each of these components to accommodate the growing regional demand by: (1) ensuring current industry standards are met, given the nature of the SDIA operation, (2) providing facilities that enhance the customer experience and expectations of a world class airport, (3) providing optimized facilities that allow for operational flexibility by both tenants and patrons, and (4) enhancing the interconnectivity with regional infrastructure. As noted in the responses to questions 6 and 8, as demand continues to increase from regional growth, delays are expected, resulting in added operating costs to the airlines and significant passenger inconvenience. The proposed improvements to the airfield do not add capacity; rather they provide much needed operational flexibility for aircraft on the ground, while adhering to established FAA standards. Likewise, the improvements planned for the terminal and gate areas do not add capacity for the number of hourly aircraft operations but they do provide much needed interior functional spaces and new common-use gates which afford the carriers and passengers additional operational areas to eliminate delays and improve the air travel experience. Finally, the improvements identified for the landside components, much like the terminal building areas, target expected delays and passenger inconvenience. Enhancements to the access roadways, curb areas, and parking are intended to add much needed movement areas, queuing space, and to enhance the operational flexibility of each element.

Response to Comment R-PC019-13

T1 is the oldest terminal at SDIA and does not meet current standards for customer service of commercial air passengers, including undersized security screening checkpoints and passenger waiting areas at gates, limited restrooms and concessions, and no post-security connection between concourses. As described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. As discussed in Section 5.5.4.8, Aircraft Gates, in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, at completion of Alternative 4, the number of gates at SDIA would increase from 51 to 62. The improvements would enable SDCRAA to accommodate future demand for air travel that is anticipated to occur at SDIA, with or without the project, with more modern, efficient, and comfortable facilities. These improvements would be paid for through a combination of terminal rents, landing fees, passenger facility charges, parking charges, and access fees. In July 2019, airlines operating at SDIA approved a new 10-year agreement for rates and charges for their facilities and included funding for major transportation improvements to the Airport.

Also see Response to Comments R-AL003-2 for additional information.

Response to Comment R-PC019-14

Consideration has not been given during the ADP planning or Draft EIR process to adjust the established departures-only curfew in place at the SDIA. All planning associated with the ADP and Draft EIR processes has specifically respected the 11:30 p.m. to 6:30 a.m. departures curfew in place in an effort to remain sensitive to the public's expectations. The establishment of the curfew is led by the San Diego Country Regional Airport Authority, in partnership with local governments and neighboring communities, and is ultimately approved by the Federal Aviation Administration (FAA).

Replacement of Terminal 1 and its gates, including 11 additional gates, is based entirely on the need to enhance operational flexibility, to accommodate the growing regional air travel demand, and to improve the customer experience at SDIA. (See Response to Comment R-AL003-2.) This in no way justifies or has a bearing on the curfew currently in place at SDIA.

Response to Comment R-PC019-15

The SDCRAA does not determine which airports airlines choose to serve with scheduled passenger flights. Although it is true that approximately 42% of SDIA departures were to destinations less than 500 miles from San Diego according to published airline schedules in the Official Airline Guide (OAG):

(1) Approximately 78 percent of these departures were on narrowbody aircraft with Southwest Airlines accounting for 55 percent of those departures. Southwest operates an all narrowbody fleet (i.e., no regional jets in its fleet).

(2) The remaining 22 percent were on regional aircraft in 2018 (or approximately 26 average daily departures).

In order for similarly reliable departures to destinations less than 500 miles from San Diego to be transferred to a secondary airport, that airport would need to be able to accommodate narrowbody aircraft operations. Secondly, the airlines serving these destinations would have to have enough demand to support separate operations or be willing to split their operations between SDIA and a secondary airport, which would impose additional costs on airlines. Currently, there is no other airport in San Diego County with scheduled commercial passenger air service. Scheduled commercial service could restart at airports that have had similar service in the past and new service could start at airports that have not historically had it. However, there are currently no public plans for this type of air service or for the types of airport improvements that could accommodate narrowbody aircraft.

Response to Comment R-PC019-16

Please see Responses to Comments R-PC023-15 and R-PC019-22.

Response to Comment R-PC019-17

Please see Response to Comment R-AL003-13.

Response to Comment R-PC019-18

Please see Responses to Comments R-PC001-1, R-PC004-1, and R-PC024-3 regarding the facts that implementation of the ADP would not affect existing flight paths to and from SDIA, and that the ability to change flight paths is solely within the jurisdiction of the FAA and not the SDCRAA.

Response to Comment R-PC019-19

Please see Response to Comment R-AL003-15.

Response to Comment R-PC019-20

Please see Response to Comment R-PC019-18 above.

Response to Comment R-PC019-21

Please see Response to Comment R-PC019-18 above.

Response to Comment R-PC019-22

The comment offers an opinion on the merits of the proposed project and does not pertain to the environmental analysis in the Recirculated Draft EIR. No further response is required.

Response to Comment R-PC019-23

It is noted that the commenter had no comments on this issue.

Response to Comment R-PC019-24

Please see Response to Comment R-PC019-3 above.

Response to Comment R-PC019-25

Please see Response to Comment R-PC019-3 above.

Response to Comment R-PC019-26

Please see Response to Comment R-PC019-3 above.

Response to Comment R-PC019-27

Since 2003 (the date of the data shown in Exhibit 6-1), SDIA's average domestic load factor increased to 82 percent in 2018, as shown in Table 4-3 on page 18 in Appendix R-B Aviation Demand Forecasts and Gated Schedules of the Recirculated Draft EIR. Similar to historical trends, the extent to which load factors increase at SDIA will depend on a number of factors such as:

(1) The operating efficiency of the mix of airlines serving the Airport;

(2) Competition between airlines in terms of reduced airfares, which may reduce profitability and put upward pressure on load factors;

(3) External events such as a spike in aviation fuel prices, which may cause airlines to reduce capacity in an effort to control costs and, as a result, put upward pressure on load factors;

(4) The ability of airlines to respond to increased passenger demand through up-gauging, i.e., if an airline operates a homogenous fleet (such as Southwest and other Low Cost Carriers), load factors will increase in response to increased passenger demand; and,

(5) The operational constraints at an airport.

Response to Comment R-PC019-28

SDIA, like other West Coast airports, has an early morning departure peak, when airlines direct their aircraft to their connecting hubs and East Coast destinations and when a significant number of passengers prefer to travel. Airlines can mitigate the impact of peak hour departures on their system by spreading out morning flights, using larger capacity aircraft during the peak hour (if possible), and/or increasing load factors. It is not unusual for departures to dominate operations during the morning hours at West Coast airports due to the limited number of destinations, where flights can depart at a time when passengers prefer to fly and arrive at SDIA in the early morning hours.

Response to Comment R-PC019-29

In the 15 years since the SH&E forecasts were prepared, many of the underlying metrics driving operations at SDIA have changed, including load factors, fleet mix, operational efficiency, and mix of airlines. It is difficult to make a comparison of the forecasts based on the total number of operations alone.

Response to Comment R-PC019-30

Please see Response to Comment R-PC019-2 above.

Response to Comment R-PC019-31

Please see Response to Comment R-PC019-10 above.

Response to Comment R-PC019-32

The airlines, FAA, and airport planners all measure taxi delay as the difference between the actual operational time and the unimpeded taxi time for each aircraft operation. This calculation is made for both outbound (from the departure gate to the departure runway end) and inbound (from runway exit to the arrival gate). SDIA departure operations are busy each morning and the lineup of aircraft departures is a regular occurrence, as it is at most West Coast airports, with both local and east-bound flights queuing for first flights of the day. This departure operation is also very efficient and allows for maximum throughput of the SDIA single runway, because there is very low arrival demand during the early morning hours. Airlines schedule for some amount of delay within their system of airports and national airspace to ensure that their flights and air crews can operate within the scheduled time allotted for a flight.

The SDIA airfield and airspace system has been analyzed as part of the ADP Recirculated Draft EIR process. See Response to Comment R-PC003-6 for additional details on the operational analysis performed on the proposed project and project alternatives to accurately simulate the future operational activity. See also Responses to Comments R-PC019-4 and R-PC019-11.

Response to Comment R-PC019-33

Please see Response to Comment R-PC019-29 above.

Response to Comment R-PC019-34

The comment offers an opinion on the merits of the proposed project and does not pertain to the environmental analysis in the Recirculated Draft EIR. No further response is required.

Response to Comment R-PC019-35

All potential market responses to the runway constraint at SDIA are typical of airlines operating in the national system of airports and airspace and is not an interference with interstate commerce. Capacity of these facilities are all finite and further limited by other operators' actions and weather disruptions. The FAA and individual airport sponsors, like SDCRAA, work together with airlines to maximize this system. When capacity of one airport is reached, these entities work together to find market-based solutions to limit the operational impacts to the rest of the system. This is evident in the FAA's slot programs in place for John F. Kennedy International Airport (JFK), LaGuardia Airport (LGA), and Ronald Reagan Washington National Airport (DCA). In addition, the FAA monitors scheduled air traffic demand at other airports and has a formal schedule review and approval process at several airports. Those airports are Chicago O'Hare International Airport (ORD), Los Angeles International Airport (LAX), Newark Liberty International Airport (EWR), and San Francisco International Airport (SFO).

Response to Comment R-PC019-36

Please see Responses to Comments R-PC019-8 and R-PC019-15 above.

Response to Comment R-PC019-37

The comment regarding noise complaints is so noted.

Response to Comment R-PC019-38

Although the comment refers to "Figure 28," which pertains to aircraft flight segment length, as presented on page 22 of the comment letter, the commenter may have meant to refer to Figure 31 on page 24 of the comment letter, which pertains to the probability of nighttime awakenings.

The scientific basis for, and substantial evidence in support of, the nighttime awakenings characteristics presented in Table 3.12-3 of the Recirculated Draft EIR, which is copied as Figure 31 in the comment letter, is provided as Footnote 8 on page 3.12-9 of the Recirculated Draft EIR. As indicated in that footnote, the basis for that table is the American National Standards Institute (ANSI), *Quantities and Procedures for Description and Measurement of Environmental Sound -- Part 6: Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard in Homes.* ANSI S12.9-2000/Part 6, 2008. The information presented by the commenter for a one-night noise measurement using the Sleeprate app on an Apple Watch is not substantial evidence that invalidates the ANSI equation presented in Table 3.12-3.

Response to Comment R-PC019-39

The letter from Congressman Scott Peters that is referenced in, and attached to, the comment letter is so noted, with the understanding that the results of the studies identified in Congressman Peter's letter would be applied at SDIA, if and when applicable, regardless of implementation of the ADP.

Response to Comment R-PC019-40

The aircraft noise analysis presented in Section 3.12, Noise, of the Recirculated Draft EIR accounts for increases in flight operations during the different times of the day for each of the analysis years (i.e., 2018, 2024, 2026, 2030, 2035, and 2050). As correctly noted by the commenter and explained in Section 3.12.2 of the Recirculated Draft EIR, the calculation of the Community Noise Equivalent Level (CNEL) includes the application of a noise "penalty" of 4.77 dB for noise events occurring in

evening hours (7 pm to 10 pm) and 10 dB for noise events occurring in nighttime hours (10 pm to 7 am).

Regarding the commenter's reference to a noise variance at airports, including SDIA, please see Response to Comment R-AL003-14.

Table 3.12-8 in the Recirculated Draft EIR, which is reproduced as Table 2 in the comment letter, delineates the increases in numbers of people, homes, and area that would be exposed to different levels of aircraft noise for each of the future horizon years (i.e., 2024, 2026, 2030, 2035, and 2050), as compared to existing (2018) baseline conditions. That information provided the basis for assessing the potential for significant noise impacts relative to the Threshold of Significant for Impact 3.12-1, as presented on page 3.12-37 of the Recirculated Draft EIR.

Regarding the use of Stage 4 and Stage 5 aircraft engines, please see Responses to Comments R-AL003-13 and R-PC023-5.

Response to Comment R-PC019-41

The relevance of the "interesting contrast between Figure 35 [in the comment letter] and the 65 CNEL data and the noise data specific to Mission Beach" and "…noise monitor #23" to the Recirculated Draft EIR is unclear. As such, it is not possible to further respond.

Response to Comment R-PC019-42

Please see Response to Comment R-AL003-13.

Response to Comment R-PC019-43

Please see Responses to Comments R-AL003-13 and R-PC023-5.

Response to Comment R-PC019-44

Please see Response to Comment R-PC001-1 regarding the facts that implementation of the ADP would not affect existing flight paths to and from SDIA, and that the ability to change flight paths is solely within the jurisdiction of the FAA and not the SDCRAA.

Response to Comment R-PC019-45

The comment offers an opinion on the merits of the proposed project and does not pertain to the environmental analysis in the Recirculated Draft EIR.

Quiet Skies La Jolla, Inc.

A 501(c)(4) Non-Profit Public Benefit Corporation

San Diego Country Regional Airport Authority
Attention: Ted Anasis
P.O. Box 82776
San Diego, CA 92138-2776
Email: Planning@san.org

RECEIVED
NOV 04 2019
BY: .....

November 4, 2019

Re: San Diego County Regional Airport Authority's Recirculated Draft Environmental Impact Report addressing the Proposed Airport Development Plan

This letter is submitted by Quiet Skies La Jolla, Inc.

We address here the San Diego County Regional Airport Authority's (SDCRAA) release of its "Recirculated Draft Environmental Impact Report" ("DEIR") on September 19, 2019, that purportedly corrects faults within the initial DEIR release in the Fall of 2018 and addresses the proposed $3 billion Airport Development Plan ("ADP") and its impact on commercial jet noise.

Background of the ADP

The SDCRAA's ADP proposes a currently unfunded $3Billion project to add 11 new gates, an undefined number of additional overnight jet parking places, a new Airport Administration office and improvements including restaurants and stores to enhance the customer experience at Terminal 1 of our airport. However, the ADP does nothing to mitigate the increasing jet noise that will affect the surrounding communities as a consequence of this expansion, including and specifically La Jolla.

The DEIR

The DEIR notes that there will be very "significant but unavoidable harm" to human health associated with the ADP, caused by increased jet noise due to more frequent flight operations during all hours, including significant risks of human physiological harm, stress, cardiac issues and cancer. The DEIR also discloses that the ADP will cause atmospheric environmental harm from greenhouse gas emissions and damage to environmentally sensitive areas and biodiversity. The DEIR acknowledges that the FAA Reauthorization Bill of 2018 requires the FAA to study these issues, but then concludes that the human health issues are "too speculative" to consider and dismisses them from further consideration in the DEIR and ADP. We disagree. The FAA and SDCRAA have it exactly backwards. Before spending $3B+ on an airport improvement project that coincidentally enables and accelerates the airlines to reach maximum capacity at

R-PC020-1
R-PC020-2
R-PC020-3
R-PC 020-4
R-PC 020-5
R-PC 020-6

SDIA sooner, the studies should be conducted and assessed first, before the ADP progresses—and the damage to human health and the environment is irreversible.

SDCRAA concedes that project implementation would cause a 3db or more increase in noise sensitive areas starting as early as 2024, due to a substantial increase in flight operations from the current average of 36 flights per hour now to an average of 50 per hour. That means communities surrounding the airport and its departure and arrival flight paths, including Point Loma, La Mesa, Kensington, North Park, Golden Hill, Mission Beach, Ocean Beach, Pacific Beach, La Jolla and others, where noise levels have traditionally been around 40-45db or less, will be substantially impacted. Any additional jet overnight parking places will essentially guarantee a corresponding increase in the number of early departing flights in the 6:30 a.m.—9:00 a.m. window, and a corresponding number of increased arrivals at night, including after 11:30 p.m. when there is no curfew on arrivals. Perhaps worse, the SDCRAA also reveals that "implementation of the proposed project would cause a substantial increase in the number of night-time flight operations that produce Sound Exposure Levels ("SELs") sufficient to awaken an increasing population starting in 2024, which would be significant and unavoidable". It is questionable how this is consistent with SDCAA's CEO Kim Becker's stated commitment to "[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation".

The DEIR and SDCRAA argue that the increase in flight operations at SDIA would occur, with or without the ADP, because airlines will pack more flights into the SDIA schedule to meet customer demand, regardless of whether the airport is expanded. Yet the SDCRAA also concedes that the ADP and its 11 new gates and the new additional "Remain Overnight" jet parking places would enable SDIA to reach maximum capacity much faster.

The Adverse Impacts to Human Health from Jet Noise and the ADP

The DEIR and SDCAA data note, but accept, that if the ADP moves forward, the 65db-75db noise contour directly around the airport will significantly expand, dramatically impacting 15,000 additional residents by 2026 and that the "noise would be significant and unavoidable". The noise will not stop at the airport boundaries: it will carry over to the surrounding communities and clearly, the increased noise is not good for humans, and in particular the residents of La Jolla.

Sleep Disturbance, Cardiovascular Disease, Cancer and Cognitive Learning Issues Associated with Jet Noise

The DEIR admits that there are sleep disturbance, stress and cardiology issues associated with jet noise, but dismisses them. Buried in the DEIR is the statement that while a "relationship between noise and health effects seems plausible, it has yet to convincingly be demonstrated" and "it is not known whether changes in pulse rate and blood pressure cause harm or are a sign of harm". The medical community, which is eminently more qualified to opine than the self-interested FAA and SCRAA, thinks otherwise. Indeed, the DEIR even notes that a 2018 World

R-PC 020-6 Cont'd
R-PC020-7
R-PC020-8
R-PC020-9
R-PC020-10
R-PC020-11

Health Organization ("WHO") study strongly recommended reducing noise exposure levels produced by aircraft to below 45db during the daytime and below 40db at night, because of the causal relationship between noise and cardiovascular disease, sleep disturbances, cognitive impairment, adverse birth outcomes, mental health and quality of life. Remarkably the DEIR only addresses the probability of being awakened by jet noise but conveniently provides no data about the inability to begin the sleep cycle until after jet noise from departures subsides at 11:30 p.m. each night. The DEIR further notes that the implementation of the ADP "would result in a significant cancer risk human health impact", which is "significant and unavoidable". The DEIR further says that the human perception of "annoyance from noise depends on frequency" and that noise adversely affects children's' school performance for reading ability, concentration, motivation and long-term learning retention.

The DEIR dismisses the impact of noise pollution on health. In fact, an increasing number of studies demonstrate a strong and significant association between residential day-night equivalent noise levels and cardiovascular health. It is well established that aircraft noise, particularly at night, dose-dependently stimulates adrenaline release and impairs endothelial function, a key player in the development of cardiovascular disease, and that this process occurs in response to noise independently of whether or not there is an annoyance reaction. (Schmidt FP, Basner M, Kroger G, Weck S, Schnorbus B, Muttray A, Sariyar M, Binder H, Gori T, Warnholtz A and Munzel T. Effect of nighttime aircraft noise exposure on endothelial function and stress hormone release in healthy adults. *Eur Heart J*. 2013;34:3508-14a.) In a recent comprehensive review of the topic published in the well-regarded and high-impact *Journal of the American College of Cardiology*, Münzel et al state that "more and more large studies of high quality" find that noise, including that from air traffic, "is associated with coronary heart disease and stroke, as well as with major risk factors for cardiovascular disease, most importantly hypertension and metabolic disease" (Münzel et al, J Am Coll Cardiol 2018; 71:688-97). The authors further propose noise abatement measures to mitigate noise exposure throughout the day and night that include changing the descent and other flight procedures. The World Health Organization (WHO) guidelines for air traffic noise "strongly recommend" reducing noise levels produced by aircraft to below 45 dB, as aircraft noise above this level is associated with adverse health effects; for night noise exposure, the WHO "strongly recommends reducing noise levels produced by aircraft during night time to below 40 dB, as night-time aircraft noise above this level is associated with adverse effects on sleep" (WHO Housing and Health Guidelines. Geneva: World Health Organization; 2018. Table 8.11).

R-PC020-11 Cont'd

SDCRAA's Disregard of the FAA Reauthorization Act of 2018

The DEIR notes that the FAA's Reauthorization Act of 2018, requires additional noise studies to be completed, including a "health impact study" for many airports across the U.S., including San Diego International Airport. Inexplicably, however, the DEIR concludes that the California Environmental Quality Assessment (CEQA) Guidelines authorize an agency "who finds a particular impact too speculative after a thorough investigation, to note this conclusion and terminate the discussion of the impact". The SDCRA then unilaterally concludes: "The

R-PC020-12

discussion above shows that, at this time, the effects of noise on cardiovascular health at noise levels below 65 CNEL are too speculative for further evaluation in this CEQA document", and proposes to plow ahead with the ADP in the face of serious and compelling scientific and peer-reviewed medical journal research that raise substantial concerns for human health linked to aircraft noise. The SCRAA's proposed path forward is shamelessly irresponsible and grossly negligent at a minimum.

R-PC020-12 Cont'd

Ongoing Plans to Mitigate Jet Noise Have Been Ignored by the DEIR and ADP

The DEIR is particularly troubling in light of the ongoing Flight Path & Procedure and Analysis and Part 150 Studies, which are evaluating proposed solutions to mitigate jet noise arising from SDIA. The initially proposed procedures include a requirement for departing jets to fly further west over the ocean, away from our beach and coastal communities, before turning north or south. We are fortunate to live next to the Pacific Ocean and it should be used to San Diego's advantage. Planes can fly more directly away from the coast and over the ocean, thereby minimizing the disturbance and health issues visited on the communities they serve. Flying shorter routes closer to the coast only saves the airlines a few dollars in jet fuel and is strong evidence of greedy corporate airline and SDCRAA economic policies being placed ahead of human health concerns and the individuals on the ground.

Further study by these agency and community committees will also be performed and are projected to be completed in 2021, including the request by Quiet Skies La Jolla, Inc. that the "handshake agreement" requiring all departing flights from SDIA in the evening and/or night time hours be routed north away from Point Loma, be rescinded such that flight traffic during these hours be evenly distributed between Point Loma and the coastal communities to the north of the airport, including La Jolla. Quiet Skies La Jolla specifically requests that the "night-time noise abatement procedure" for SDIA be rescinded and replaced with an even-handed approach in which all flights during "nighttime noise abatement hours", occurring at least after 10:00 p.m. until 6:30 a.m., fly the standard daytime procedures. La Jolla, Mission Beach, and Pacific Beach should not bear the disproportionate brunt of night-time flight operations and the associated noise.

R-PC020-13

Given the objective medical data reported thus far, the ADR must address these real and imminent health risks as air traffic volume from SDIA increases. First, the procedure recommendations in the Part 150 currently being evaluated must be adopted before moving forward with the ADR. Second, as the ADR will further exacerbate the inordinate impact of the "hand-shake" night-time noise abatement procedure on the communities of Mission Beach, Pacific Beach, and La Jolla (which direct all departing traffic on a northerly heading after 10pm), this procedure should be disbanded and daytime departure procedures should be followed throughout the time of airport departing operations prior to the adoption of the ADR. Third, the SDIA's commitment to a nighttime curfew on departures before 6:30 a.m. and after 10pm should re-avowed and memorialized in writing, and appropriate limitations to the number of arriving flights after 11:30 p.m. and before 6:30 a.m. should be proposed.

R-PC020-14

The referenced studies and process should proceed to conclusion before the DEIR and ADP are further considered, let alone before they move forward. The solutions from these studies should be required conditions before any EIR for the ADP is approved. The surrounding communities' interests for quiet, healthful living must be placed ahead of the airlines' and SDCRAA's desire to maximize their revenue and profit by building out the airport to reach maximum capacity as soon as possible.

R-PC020-14 Cont'd

The correct order should be (1) assess and implement all proposals to materially mitigate jet noise that affects the community, (2) gather and assess the medical evidence regarding the health, sleep and cognitive risks of the proposed San Diego Airport expansion, and (3) and only after steps 1 and 2, then consider whether to expand the airport operations that will increase the frequency of flight operations and the associated noise. SDCRAA and the FAA have the process exactly backwards.

Very truly yours,

/Anthony M. Stiegler/

Anthony M. Stiegler, Esq., Member,
SDCRAA Community Advisory Committee for Flight Procedure Analysis and Part 150 Studies;
Secretary Quiet Skies La Jolla, Inc.

Matthew J. Price, MD, Scripps Clinic, Division of Cardiology;
President Quiet Skies La Jolla, Inc.

COMMENT LETTER NO. R-PC020 Quiet Skies La Jolla, Inc. November 4, 2019

Response to Comment R-PC020-1

The comment is a general introductory statement to the specific comments that follow later in the letter. Please see Responses to Comments R-PC020-2 through R-PC020-14 below.

Response to Comment R-PC020-2

The funding mechanisms for a proposed project are not an environmental issue.

Neither the proposed project nor Alternative 4 (the alternative that SDCRAA staff is recommending to the SDCRAA Board for approval) would result in additional overnight aircraft parking positions - see Response to Comment R-AL003-2.

Section 3.12, Noise, of the Recirculated Draft EIR identifies five mitigation measures, specifically, Mitigation Measures MM-NOI-1 through MM-NOI-5, to mitigate significant aircraft noise impacts on surrounding communities.

Response to Comment R-PC020-3

The commenter's quote language "significant but unavoidable harm" to human health is incorrect and is not stated anywhere in the Recirculated Draft EIR. The commenter suggests that the Recirculated Draft EIR suggests that human health will be impacted by "increased jet noise due to more frequent flight operations." Section 2.5 of the Recirculated Draft EIR describes the ADP process that involved preparation of an aviation activity planning forecast for SDIA, which included aircraft operations projections, development of design day future schedules, and gate assignments. The aviation activity projected to occur at the Airport in the future could be accommodated with or without the improvements associated with the proposed project; consequently, there would be no difference in the number and nature of aircraft operations occurring on a daily basis.

Please refer to Topical Response TR-NOI-1: Health Effects of Noise for additional information related to the health effects of noise.

Regarding the assertion regarding "significant risk of…cancer", human health risk impacts, including potential cancer risks and non-cancer health risks, associated with implementation of the proposed project are addressed in Section 3.4, Human Health Risk, of the Recirculated Draft EIR. As indicated in Section 3.4.8 on page 3.4-24 of the Recirculated Draft EIR, "[t]here would not be significant and unavoidable impacts to human health risk associated with construction and operation of the proposed project." The criteria that form the basis for determining significant human health impacts are presented in Section 3.4.5 of the Recirculated Draft EIR.

Response to Comment R-PC020-4

Section 3.3, Greenhouse Gases and Climate Change, of the Recirculated Draft EIR addresses potential impacts related to greenhouse gas emissions. The commenter is incorrect in alleging that "[t]he DEIR also discloses that the ADP will cause … damage to environmentally sensitive areas and biodiversity." There is no such statement anywhere in the Recirculated Draft EIR. Impacts to biological resource are addressed in Section 3.5, Biological Resources, of the Recirculated Draft EIR. As indicated in Section 3.5.8 of the Recirculated Draft EIR, there would be no significant and

unavoidable impacts to biological resources associated with construction and operation of the proposed project.

Response to Comment R-PC020-5

Please see Response to Comment R-PC020-3.

Response to Comment R-PC020-6

Implementation of the proposed project, or Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR, would not enable or accelerate "the airlines to reach maximum capacity at SDIA sooner"- see Response to Comment R-PC003-6.

Please see Response to Comment R-AL003-15 regarding the suggestion that certain studies be completed before taking action on the proposed project.

Response to Comment R-PC020-7

As described in Section 2.5.1.2 of the Recirculated Draft EIR, operational constraints at SDIA related to the single-runway system result in an hourly limit of 50 operations. This was one of the assumptions considered when documenting the constrained demand scenario at SDIA. Information related to Impact 3.12-3, as referenced by the commenter acknowledges that implementation of the proposed project would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.4 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. Mitigation Measures MM-NOI-1 through MM-NOI-5, presented in Section 3.12.3.5.2.1 for Impact 3.12-1, are also recommended relative to Impact 3.12-3.

As described in Section 3.12.3.5.4.2 of the Recirculated Draft EIR, based on uncertainties regarding whether all of the impacted noise-sensitive uses, specifically, those where there would be a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL compared to existing conditions, could be mitigated through Mitigation Measures MM-NOI-1 through MM-NOI-5, the impact is considered to be significant and unavoidable. It is important to note, for informational purposes only and not for purposes of making significance determinations, that the future aircraft noise levels at SDIA would be the same with or without the proposed project (i.e., there is no difference in aircraft noise impacts between the proposed project and the No Project Alternative).

Response to Comment R-PC020-8

As described in Section 2.5.1.2 of the Recirculated Draft EIR, operational constraints at SDIA affect aviation activity forecasts. SDIA's Airport Use Regulation restricts departures by any aircraft between the hours of 11:30 p.m. and 6:30 a.m. and gate departures between the hours of 11:15 p.m. and 6:15 a.m. There is no restriction on arrivals.

In regards to the commenter's point related to Impact 3.12-5, Section 3.12.3.5.6 of the Recirculated Draft EIR acknowledges that implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as

compared to the existing (2018) baseline condition. As such, this would constitute a significant and unavoidable impact.

The impacts analysis compares each future horizon year (i.e., 2024, 2026, 2030, 2035, and 2050) with implementation of the proposed project, based on a comparison to existing (2018) baseline conditions. It should be noted, for informational purposes only and not for purposes of making significance determinations, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis.

It should also be noted that it is not certain that the aforementioned increases in nighttime flights would result in additional nighttime awakenings. As described in Section 3.12.3.4.2 and indicated in Table 3.12-7 of the Recirculated Draft EIR, the relationship between exterior SEL values and awakenings is a matter of probability. For an exterior SEL of 80 dB, the estimated maximum probability of awakenings is between 1.9 percent and 2.5 percent with building windows closed and 5.1 percent with building windows open (i.e., interior noise levels are comparatively higher or lower, depending on whether windows are open or closed). For an exterior SEL of 90 dB, the estimated maximum probability of awakenings is between 3.8 percent and 5.1 percent with building windows closed and 7.9 percent with building windows open (i.e., interior noise levels are comparatively higher or lower, depending on whether windows are open or closed).

Based on information presented in Section 3.12.3.5.6.1 of the Recirculated Draft EIR, formulation of a mitigation measure specific to sleep disturbance is considered infeasible. It is important to note that the subject increase in nighttime flights related to the NA80 and NA90 SELs is attributable to future growth in aircraft activity at SDIA that is projected to occur irrespective of whether the proposed project is implemented. As noted, and for informational purposes only and not for purposes of making significance determinations, there is no difference between the proposed project and the No Project Alternative relative to increases in nighttime flights related to the NA80 and NA90 SELs. It should also be noted that although no feasible mitigation measures are available for this impact, the SDCRAA will continue to implement the many noise abatement measures and programs at SDIA that are described in Section 3.12.3.2.3 of the Recirculated Draft EIR, which serve to address existing and future aircraft noise impacts from SDIA operations, including, but not limited to, nighttime operations. Please see Response to Comment R-AL003-13 related to SDCRAA's commitment to being a good neighbor.

Please also see Response to Comment R-AL003-2.

Response to Comment R-PC020-9

Please see Response to Comment R-AL003-2.

Response to Comment R-PC020-10

The commenter notes "that if the ADP moves forward, the 65db-75db noise contour directly around the airport will significantly expand, dramatically impacting 15,000 additional residents by 2026 and that the noise would be significant and unavoidable." This information is derived from Table 3.12-8 Estimated Population, Housing Unit Counts, and Acreage within the Aircraft Noise

Contours for Existing and Future Conditions (2018, 2024, 2026, 2030, 2035, and 2050), of the Recirculated Draft EIR, which indicates the population, number of housing units, and acreage within the various CNEL ranges that would be affected in each of the future years, and provides a comparison of each future horizon year to baseline (2018) conditions. It should be noted that the 15,000 additional residences referred to by the commenter include those 4,000+ residences that SDCRAA's Quieter Home Program has already treated. Figures 3.12-8 through 3.12-12 of the Recirculated Draft EIR present the aircraft noise contours projected to occur at the completion of each major phase of the proposed project (i.e., Phase 1a in 2024, Phase 1b in 2026, Phase 2a in 2030, and Phase 2b in 2035), as well as the 2050 analysis year.

As summarized and explained in Section 3.12.3.5.2 of the Recirculated Draft EIR, airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition. Mitigation through soundproofing could reduce this impact, but it is uncertain whether all of the affected uses would qualify for soundproofing. As such, this would be a significant and unavoidable impact. It should be noted, however, and for informational purposes only and not for making significance determinations, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis.

Response to Comment R-PC020-11

The commenter suggests that "the DEIR dismisses the impact of noise pollution on health." Contrary to that opinion, Section 3.12, Noise, of the Recirculated Draft EIR, and the related Topical Response TR-NOI-1: Health Effects of Noise presented at the beginning of this chapter of the Final EIR, describes numerous studies evaluating the health effects of noise. As noted in those discussions, there is not a sufficient basis to determine whether the noise levels associated with implementation of the proposed project would result in a significant impact relative to human health. Similarly, the "recent comprehensive review of the topic published in the well-regarded and high-impact *Journal of the American College of Cardiology*…" by Thomas Münzel identified in the comment, concludes that "there is increasing rationale for studying the interaction between this novel [transportation noise] risk factor and its collective impact on cardiometabolic diseases. The questions that need to be addressed are many and include the magnitude and time course of response to coexposure of noise and air pollution; synergistic effects of both exposures on surrogate measures, such as blood pressure and metabolic risk; duration of effect/time course of reversal; impact of low-grade background noise exposure on air pollution exposure effects and vice versa; impact of noise on the circadian rhythm; and finally the effects on lifestyle (e.g., diet, stress, and exercise)."[27] As such, it is too speculative to draw definitive conclusions regarding the relationship between noise and health effects within the CEQA context.

[27] Münzel et al. Environmental Noise and the Cardiovascular System. J AM Coll Cardiol 2018;71:688-97. Available: http://www.onlinejacc.org/content/accj/71/6/688.full.pdf.

Response to Comment R-PC020-12

As stated in Section 3.12.3.5, Project Impacts, of the Recirculated Draft EIR, operation of the proposed project would result in significant aircraft-related noise impacts.[28] One of the mitigation measures identified in order to address aircraft-related noise impacts is to assess the findings of the 2018 FAA Reauthorization Act-related noise studies once they become available. As discussed above, the 2018 FAA Reauthorization Act includes a requirement for the FAA (not airport operators such as SDCRAA) to complete various studies related to aircraft noise impacts. SDCRAA will review those studies, once completed, to help inform and update SDIA's noise management programs and policies. Similarly, the Authority is committed to utilizing the latest research findings and policy guidance coming from the FAA Reauthorization Act to update noise programs, if applicable. This is described under Mitigation Measure MM-NOI-4 and it is considered as a feasible mitigation measure for multiple aircraft-related noise impacts.

It should be noted, for informational purposes only and not for purposes of a significance determination, that approval and implementation of the proposed project would not result in greater or different aircraft noise levels in the future than what would otherwise occur without the project. Please see Section 5.6, Alternatives Impacts Analysis, of the Recirculated Draft EIR, relative to the impacts of the No Project Alternative compared to the impacts of the proposed project. Also, the formulation and implementation of aircraft noise abatement measures that may result from studies completed under the 2018 FAA Reauthorization Act would not be limited by the approval and implementation of the proposed project, or of Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

It should also be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

Response to Comment R-PC020-13

The commenter suggests that "Ongoing Plans to Mitigate Jet Noise Have Been Ignored by the DEIR and ADP." As noted on page 3.12-21 of the Recirculated Draft EIR, in light of recent changes in aircraft operations, changes in aircraft fleet mix, and local community concerns, the SDCRAA will be updating the existing Airport Noise Compatibility Study, which will include updates to the Noise Exposure Maps (NEMs) and Noise Compatibility Program (NCP) for SDIA. The SDCRAA started this effort in the Fall of 2018 and it is expected to run through 2020. Details regarding the ongoing study do not pertain to or affect the aircraft noise impact analysis of the proposed project. Additional information is, however, available at https://sannoisestudy.com/project-overview, including a study timeline and contact email address.

It is important to note that the evaluation of aircraft noise impacts associated with the proposed project, as presented in Section 3.12 of the Recirculated Draft EIR, is not dependent upon the Flight Procedure Evaluation and Part 150 Studies for SDIA, nor is the preparation and completion of those Studies dependent upon the conclusions of the Recirculated Draft EIR or on the approval or disapproval of the ADP. Section 3.12.3, Aircraft Noise, of the Recirculated Draft EIR includes mitigation measures applicable to aircraft noise impacts (see Mitigation Measures MM-NOI-1 through MM-NOI-5 in Section 3.12.3.5.2.1). In the event that additional noise management measures or changes in flight procedures result from the subject Studies, they would be applicable to aircraft operations at SDIA independent from approval or disapproval of the ADP.

It should also be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

Regarding the request that the route and procedures of departing flights at SDIA be modified to shift aircraft noise impacts to other communities, such a change in flight paths and procedures is not within the jurisdiction of the SDCRAA, but rather can only be made by the FAA. Additionally, implementation of the proposed project involves ground improvements, such as the replacement of Terminal 1, development of a new administration office, taxiway improvements, and ground access improvements, and does not affect the single-runway system, as might pertain to aircraft arrivals and/or departure routes and procedures.

Response to Comment R-PC020-14

Please see Responses to Comments R-AL003-10 through R-AL003-12 regarding the commenter's related comments pertaining to health impacts associated with air travel.

Please see Response to Comment R-AL003-15 regarding the suggestion that the Part 150 study and other studies be completed before taking action on the proposed project.

Implementation of the proposed project does not call for, nor is it anticipated to result in, changes to the existing nighttime noise abatement procedures and requirements, including, but not limited to, the nighttime curfew at SDIA. The SDCRAA has no intent or desire to remove or lessen the existing departure curfew, and the forecasting of future airfield operational conditions at SDIA assume continuation of the curfew.

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

KEVIN P. BUNDY
Attorney
bundy@smwlaw.com

November 4, 2019

Via E-Mail and U.S. Mail

Ted Anasis
Manager, Airport Planning
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776
E-Mail: planning@san.org

Re: Recirculated Draft Environmental Impact Report
San Diego International Airport - Airport Development Plan
SDCRAA # EIR-18-01

Dear Mr. Anasis:

We submit the following comments on behalf of the Cleveland National Forest Foundation ("CNFF"), a nonprofit organization committed to sustainable regional land use planning to stem the tide of urban encroachment into the San Diego backcountry and its wildlands. These comments address the Recirculated Draft Environmental Impact Report ("RDEIR") for the San Diego International Airport Development Plan ("Project"). CNFF also submitted extensive comments on the original Draft Environmental Impact Report ("DEIR"). (See generally Ex. 1, CNFF DEIR Comments (Sept. 5, 2018).) Because many of those prior comments are equally applicable to the RDEIR, CNFF's DEIR comments (and the accompanying exhibits) are incorporated by reference as if fully set forth herein. R-PC021-1

Although CNFF has substantial remaining concerns with the Project, the organization is heartened by both the RDEIR's "Alternative 4" and by recent efforts on the part of the San Diego County Regional Airport Authority ("Authority") to participate in and support regional collaboration toward effective transit access to the Airport. While CNFF firmly believes that the Authority can and must do more to support immediate improvements in the use of transit by Airport passengers, Alternative 4 is critical to longer-term transit solutions. As the San Diego Association of Governments R-PC021-2

("SANDAG") begins work toward building a "Grand Central Station" mobility hub near the existing Old Town Transit Center, it is essential that a reliable and time-competitive transit link to the airport be a core component in regional planning. Alternative 4 would, at the very least, begin to align the Authority's planning with broader regional efforts. The Authority's recent announcement of an agreement with airline partners to provide significant funding for transportation infrastructure is also welcome.

That said, as discussed below, the RDEIR in many ways continues to fall short of the requirements of the California Environmental Quality Act (CEQA), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. These deficiencies must be addressed before the Authority takes action to approve the Project in any form.

I. Alternative 4 Is a Step in the Right Direction, But the Authority Can and Must Do More.

If any version of the Project is approved, it must be Alternative 4. As the RDEIR acknowledges, Alternative 4 satisfies all Project objectives. (RDEIR at 5-131 to 5-134.) It also reduces significant environmental impacts, at least to some extent, as compared to the Project as proposed in the DEIR (the "Proposed Project"). (RDEIR at 5-131.) The RDEIR gives no indication that Alternative 4 is infeasible. Moreover, Alternative 4 is the environmentally superior alternative. (RDEIR at ES-80.)

The Authority may not approve the Proposed Project if there is a feasible alternative that would reduce the Project's significant impacts. (See Pub. Resources Code § 21002, 21002.1(b), 21081(a)(3), (b).) Here, Alternative 4 appears to be just such a feasible alternative.

A. Alternative 4 Takes an Important Step Toward Increasing Transit Access to the Airport.

Alternative 4 represents a welcome shift from the Proposed Project, which made almost no provision for transit access to the Airport. Reserving space for a transit center is critical and will help support regional efforts to build a transit mobility hub that effectively links the airport to rail, trolley, and bus service.

The context in which Alternative 4 arises is also important. The Authority has been participating actively in SANDAG's Airport Connectivity Subcommittee. The SANDAG Board of Directors recently authorized staff to proceed with studies of four concepts presented in an Airport Connectivity Analysis prepared by that subcommittee.

R-PC021-2 Cont'd

R-PC021-3

R-PC021-4

(Ex. 2, Sept. 27, 2019 SANDAG Board Meeting Results at 3). The Authority also announced an agreement with airline partners to seek FAA approval to spend more than $500 million on transportation infrastructure, some of which could be used to support construction of a transit station and a fast, reliable connection to the existing regional system. (Ex. 3, Sept. 27, 2019 SANDAG Board Agenda, Item 16 at 19 [Airport Connectivity Analysis at 15]; Ex. 4, SDIA News Release (July 2, 2019).) Again, CNFF appreciates the direction in which the context for this Project has shifted in the past year.

While reserving space for a future transit center is important, Alternative 4 also must clearly reserve on-airport right-of-way and ingress/egress for whatever transit service ultimately serves the transit center (e.g., an automated people mover, light-rail or trolley line, or other service). (See RDEIR at 5-24.) It is not clear from the RDEIR's description of Alternative 4 whether adequate provision has been made not only for the transit center, but also for access to it. Construction anticipated to occur with Alternative 4 could take place many years before any such service is ready to build. Careful planning, both now and in the future, will be necessary so that all aspects of a regional transit connection can be accommodated.

R-PC021-4 Cont'd

B. The Authority Can and Must Do More to Support Transit Now.

Alternative 4 alone will not significantly improve current and near-term problems with transit access to the Airport. Current transit mode share at the Airport is an anemic *one percent*. (Ex. 3, Sept. 27, 2019 SANDAG Board Agenda, Item 16 at 12 [Airport Connectivity Analysis at 8].) Alternative 4 still relies heavily on roadway improvement projects and additional parking. A Grand Central Station with an airport connection is at best many years in the future. The Authority must increase transit mode share to the extent feasible right now.

CNFF appreciates that two transit measures that were merely topics of consideration in the DEIR—electric bus shuttles from the Old Town Transit Center and improvements to Bus Route 992—are components of Alternative 4. However, it is not clear from the RDEIR whether or how much these measures are expected to increase transit mode share, reduce vehicle miles traveled ("VMT") from Airport trips, or help ameliorate congestion, air pollution, and greenhouse gas ("GHG") emissions.

R-PC021-5

The Authority can do more to support transit in the near term as part of Alternative 4. For example, CNFF's prior comments identified several additional mitigation measures to help increase transit use. (See Ex. 1, CNFF DEIR Comments at 21.) The RDEIR does not evaluate these suggested measures. Moreover, the RDEIR continues to rely on a lack of spending authority and a lack of funding as excuses for not

R-PC021-6

doing more to support transit. As discussed further below and in CNFF's prior comments, those excuses largely lack support in both the law and the record.

Finally, in addition to evaluating and adopting CNFF's suggested mitigation measures, the Authority should revise its project objectives to include specific support for transit; for example, one objective could be to "make transit to the airport time-competitive with private automobiles." Objectives also could identify specific transit mode share goals (e.g., "Increase transit mode share to ## percent.").

II. The Revised Draft EIR's Analysis Remains Deficient

CNFF understands that the RDEIR contains some updated analysis, some of which is discussed below. However, the Proposed Project and much of the EIR's analysis remain unchanged. (RDEIR at 2-26 to 2-27.) Accordingly, CNFF's comments on the Draft EIR, as incorporated by reference, remain relevant. Specific further deficiencies are addressed below.

A. Aviation Activity Forecasts Still Fail to Account for the Project's Growth-Inducing Potential.

CNFF's prior comments explained that the DEIR obscured environmental impacts because it assumed growth would occur regardless of the Project, failed to include forecasts reflecting all constraints on growth, and failed to address ways in which the Project facilitated (rather than merely accommodated) growth. (Ex. 1, CNFF DEIR Comments at 9-10.) The RDEIR contains some updated analysis, but largely fails to correct these deficiencies.

For example, although the RDEIR now includes a "constrained demand scenario," it appears to be almost entirely focused on constraints created by the Airport's single runway. (RDEIR at 2-15.) The RDEIR claims that a gate assignment analysis shows that terminal improvements would not facilitate growth in aviation activity because the single-runway constraint would begin to limit future growth before additional gates would be needed. (RDEIR at 2-25.) This analysis, however, appears to contradict the conclusions of the Airport Master Plan regarding the urgent need for more gates (as of 2008) to accommodate anticipated growth within acceptable levels of service, as discussed in CNFF's DEIR comments. (Ex. 1, CNFF DEIR Comments at 9 & Exs. 17-19.) The RDEIR does not explain whether the new gate assignment analysis shows that all anticipated flights could be gated within acceptable levels of service, or merely shows that it is physically possible that all flights could be gated *regardless* of acceptable levels of service.

R-PC021-6 Cont'd
R-PC021-7
R-PC021-8
R-PC021-9

Whether or not the Airport is able to provide "acceptable levels of service" may affect customer demand. Passenger concerns with "levels of service" likely extend beyond the mere capacity to get a certain number of planes in and out of a certain number of gates. Ease of access to terminals, security lines and configurations, and gate area crowding may affect customers' willingness to choose the Airport over others (or over other modes of travel). All of these factors are potential "constraints" that this Project might help remove; indeed, maintaining both "high levels of passenger satisfaction" and "appropriate level of service on the curbfront, security checkpoints, passenger holdrooms, and bag claim areas" is one of the Project's primary objectives. (RDEIR at 2-11 to 2-12.) Once again, the RDEIR does not provide a complete picture regarding the extent to which the Project may encourage (rather than merely accommodate) growth.

As a result—as CNFF's prior letter explained with respect to the DEIR—the RDEIR likely underestimates environmental impacts by assuming that most impacts will occur whether or not the Project is built. This flawed approach makes it very difficult, if not impossible, for decision-makers and the public to understand the impact of this Project on the environment.

B. The RDEIR's Transportation Analysis Remains Deficient.

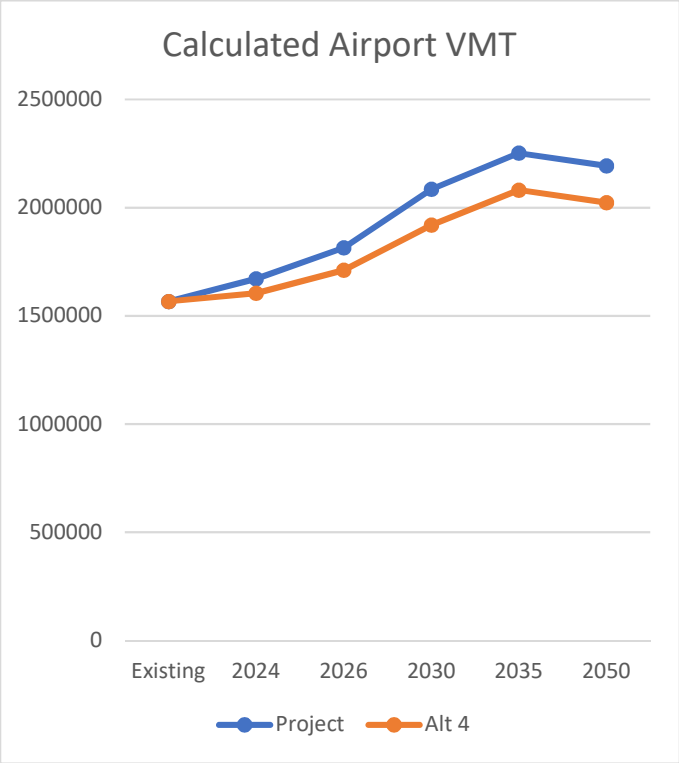
CNFF's prior comments pointed out that the DEIR inappropriately relied exclusively on a level of service ("LOS") methodology rather than a vehicle miles traveled ("VMT") methodology for determining impacts. As those comments explained, exclusive use of the LOS methodology results in mitigation measures that increase roadway capacity rather than shift passengers to other transportation modes. (Ex. 1, CNFF DEIR comments at 11-12.)

As the following chart shows, Airport VMT will increase substantially in future years:

R-PC021-9 Cont'd

R-PC021-10

R-PC021-11



(Chart compiled from Calculated Airport VMT figures for each target year; see RDEIR at 3.14-85, 3.14-113, 3.14-146, 3.14-185, 3.14-233; RDEIR, Appx. R-H1 at H-54, H-82, H-113, H-150, H-194.)

However, the RDEIR continues to rely on LOS for assessment of impacts and development of mitigation. (See RDEIR at 3.14-3.) As a result, the RDEIR does not comprehensively analyze, and does not make a serious effort to reduce, VMT from the Proposed Project.[1]

Instead, the RDEIR continues to propose numerous mitigation measures calling for roadway improvement projects. Ultimately, the RDEIR determines that many of these would be infeasible. As explained in CNFF's prior comments, the EIR's

[1] The RDEIR claims that VMT per passenger will decrease over time due to Authority efforts to reduce Transportation Network Company trips; these efforts apparently consist of "encouraging" drivers to pick up new passengers after dropping passengers at terminals. (See, e.g., RDEIR at 3.14-85.) The RDEIR does not explain how this "encouragement" would work or provide any analysis supporting the calculated reductions.

R-PC021-11 Cont'd

R-PC 021-12

Part of R-PC021-11

discussion of feasibility was—and remains—inadequately supported. (Ex. 1, CNFF DEIR Comments at 17-20.) The Authority apparently has asked the Federal Aviation Administration for authorization to contribute a relatively small amount of money (just under $7.5 million) to a small subset of roadway and intersection projects associated with Alternative 4. (RDEIR, Appx. R-K0 at 2 & Ex. C [requesting authorization to provide funding for 12 roadway segment and intersection projects].) Yet the RDEIR does not address whether FAA approval has been sought for other mitigation projects or whether other sources of funding (outlined in CNFF's prior comments) might be available. (See RDEIR at 3.14-34.)

Mitigation measures that could conceivably help reduce VMT, despite some improvements, remain relatively weak. For example, the version of MM-TDM-1 in the DEIR was vague, improperly deferred, and unenforceable. (Ex. 1, CNFF DEIR comments at 15-16.) The measure has been revised somewhat in the RDEIR, but still falls short of a clear commitment to mitigation. Although MM-TDM-1 now states that shuttle service from Old Town Transit Center will be "implemented" rather than merely "considered" and concludes that the service is physically and operationally feasible, it also warns that "[i]mplementation of this service is dependent on further outreach with Old Town stakeholders" to ensure that passengers do not simply drive to and/or park at the Old Town Transit Center. (RDEIR at 3.14-36.) The other two components of this mitigation measure simply call for "promoting" transit use. The RDEIR does not evaluate other potential mitigation measures proposed in CNFF's prior comments. (See Ex. 1, CNFF DEIR Comments at 21.)

The RDEIR also proposes an additional mitigation measure—MM-TR-LRP-1—describing the Authority's participation in regional planning efforts to "determine transit connections" to the Airport and implement "improvements and strategies identified in the Airport Connections Study." (RDEIR at ES-88.[2]) However, the RDEIR finds the measure infeasible for many of the same reasons discussed above. While the Authority's participation in regional planning efforts concerning transit connections to the Airport is essential, this mitigation measure should commit the Authority to seek all potential sources of funding. Moreover, any feasibility analysis must include an assessment of the funding described in the Authority's recent "landmark" agreement with airline partners. (Ex. 4, SDIA News Release (July 2, 2019).)

R-PC021-12 Cont'd

R-PC021-13

R-PC021-14

[2] This measure is described somewhat differently in different portions of the RDEIR. (Compare, e.g., RDEIR at ES-88, 3.14-162, 3.14-223.) The description of the measure should be consistent throughout the document.

C. The RDEIR's Air Quality Analysis Remains Deficient.

The RDEIR reflects many of the same flaws discussed in CNFF's prior comments. (See Ex. 1, CNFF DEIR Comments at 22-27.) For example, the RDEIR still relies on questionable emissions factors for mobile sources drawn from the California Air Resources Board's EMFAC2017 model, which anticipates a number of future emissions benefits that may not materialize. (RDEIR, Appx. R-C at C-42.) As discussed in CNFF's DEIR comments, the Trump Administration has proposed rolling back national emissions standards for passenger cars and trucks. (Dept. of Transportation and U.S. EPA, Notice of Proposed Rulemaking: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks, 83 Fed. Reg. 42,986 (Aug. 24, 2018), available at https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-16820.pdf.) The Administration also recently issued a final rule expressly preempting California's authority under the Clean Air Act to establish its own more stringent emissions standards. (Ex. 5, U.S. EPA and Dept. of Transportation, Final Rule: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, 84 Fed. Reg. 51,310 (Sept. 27, 2019).) The Administration expects to issue a final rule rolling back national fuel efficiency and vehicle emissions standards soon. (*Id.*, at 51,130.) To the extent the EMFAC2017 model incorporates emissions reductions or benefits reflected in regulations that the Trump Administration is eliminating or rolling back, the RDEIR's inventory may underreport mobile source emissions.[3]

The RDEIR contains other deficiencies as well. Existing air quality monitoring data are from stations in Chula Vista and El Cajon, respectively located 10 miles and 14 miles from the airport. (RDEIR at 3.2-23.) However, there are additional data available—at least as to particulate matter concentrations—from other monitoring stations much closer to the airport, including a station west-northwest of the airport in line with the runway.[4] The Authority should evaluate whether monitoring stations closer

R-PC021-15

R-PC021-16

Part of R-PC021-15

[3] The RDEIR states that emissions factors resulting from "current and future regulatory emissions controls" included in the EMFAC2017 model "are embedded" and can be changed only by regulatory agencies. (RDEIR, Appx. R-C at C-42.) However, the Authority is the entity making the choice to use the EMFAC2017 model to estimate emissions. If the Authority knows—as it now should—that the assumptions in the model regarding future regulatory benefits are likely incorrect, it should disclose that fact and attempt to estimate emissions (or correct for the errors in the model) in some other way.

[4] Data from this station are available at https://www.purpleair.com/map?select=12831&module=PM25&conversion=C0&averag

to the airport may provide additional data that could support a more accurate assessment of existing ambient air quality.

Table 3.2-5 (RDEIR at 3.2-23) also contains an apparent error. The "Measured Level" of 8-hour ozone is listed as 147, which exceeds the CAAQS "Standard" of 137. (*Ibid.*) However, the "Above Standard (Yes/No)" column for this pollutant reads "No," and the text below the table does not disclose that measured 8-hour ozone concentrations exceeded the CAAQS. (*Ibid.*) Given the importance of compliance with the 8-hour ozone standard, this may be a significant error. The Authority must ensure that this error did not affect the balance of the RDEIR's analysis.

Finally, Table 3.2-9 appears to show that "Proposed Project" emissions of sulfur oxides ("SOx") in 2030 would exceed future emissions included in San Diego County's 2008 Attainment Plan. (RDEIR at 3.2-28.) The potential significance of this exceedance is not addressed, as the RDEIR focuses entirely on ozone standards.

D. The RDEIR's Climate Change Analysis Remains Deficient.

Like the DEIR, the RDEIR fails to address all Project-related aircraft operational emissions. Only specific operational modes are included in the criteria pollutant analysis (operations occurring from approach at mixing height through climb out at mixing height). (RDEIR Appx. R-C at C-2.) GHG emissions estimates appear to have been prepared from the same model output used for criteria pollutants. (*Id.*, at C-96.) The RDEIR thus appears to exclude GHG emissions (above mixing height) from the inventory. As explained in CNFF's DEIR comments, those emissions should be disclosed regardless of whether the Authority has the legal power to regulate or mitigate them. (CNFF DEIR Comments at 31-32.) Moreover, while it arguably may make some sense for the RDEIR to disregard emissions of criteria pollutants below mixing height, GHG emissions are well-mixed in the atmosphere and contribute to climate change at all stages of flight. Indeed, the Intergovernmental Panel on Climate Change warned as early as 1999 that the overall radiative forcing effect of aviation pollution may be two to four

R-PC 021-16 Cont'd
R-PC021-17
R-PC021-18
R-PC021-19

---

e=10&layer=standard&advanced=false&inside=true&outside=true&mine=true#12.71/32.72902/-117.23984 (accessed Oct. 29, 2019). The station continuously monitors particulate matter concentrations and air quality indices for both PM2.5 and PM10. A screenshot of raw PM2.5 concentration data available from the website (showing 10-minute, 1-hour, and 6-hour averages in µg/m^3) is attached as Exhibit 7.

Part of R-PC021-15

times greater than the effect of aircraft CO_2 emissions alone. (See Ex. 6, IPCC 1999 at 8-9.)

The RDEIR also remains unclear as to whether and how its emissions inventory accounts for natural gas usage. The RDEIR states that all natural gas usage is associated with the Airport's boilers and is captured under the "Stationary Source" category rather than the "Other" category. (RDEIR at 3.3-36.) The Air Quality/GHG Technical Report, however, indicates that certain sources in the "Other" category (including the terminals) use natural gas as an energy source.[5] (RDEIR, Appx. R-C at C-59.) The Utilities section of the RDEIR similarly attributes natural gas demand directly to Project buildings. (RDEIR at 3.15-67 [describing increase in natural gas demand associated with "Terminal," "General Office," "Commercial Development Opportunity" and "Parking Structure" elements of Proposed Project], 5-119 to 5-121 [describing natural gas demand associated with "Terminals" and "General Office" for Alternative 4].) These discrepancies must be addressed, and a full inventory of any emissions from natural gas usage—whether at "Stationary" or "Other" sources or both—must be provided.

Finally, as discussed in the Air Quality section of this letter, above, the RDEIR cannot rely on emissions factors that assume future regulatory improvements in vehicle efficiency and pollution reduction. The Trump Administration is actively planning to undermine regulations on which these emissions factors may be based. The RDEIR must confront and account for this reality.

E. The RDEIR's Energy Analysis Remains Deficient.

The RDEIR's energy analysis remains deficient for the same reasons explained in CNFF's prior comments. (See Ex. 1, CNFF DEIR Comments at 41-46.) Moreover, CEQA Guidelines section 15126.2(b) now requires analysis of energy impacts. CEQA Guidelines Appendix F provides that the "wise and efficient use of energy" entails, among other things, "decreasing reliance on fossil fuels such as . . . natural gas" and "increasing reliance on renewable energy sources." (CEQA Guidelines, Appx. F, § I(2), (3).) Here, even though the RDEIR claims the new Proposed Project will replace less efficient structures, it will more than quadruple building-related electricity demand, and more than double building-related natural gas demand, compared to existing

[5] The Technical Report appears to be internally inconsistent on this point, stating for purposes of air quality analysis that "Other" sources include natural gas combustion (*ibid.*), while claiming for purposes of GHG analysis that "Other" sources include only "emissions due to electricity usage, water usage and solid waste disposal." (*Id.*, at C-97.)

R-PC021-19 Cont'd
R-PC021-20
R-PC021-21
R-PC021-22
Part of R-PC021-20

conditions. (RDEIR at 3.15-69.) Yet the RDEIR fails to address whether significantly *increasing* reliance on fossil fuels represents a wasteful and inefficient use of energy. The RDEIR should explore the feasibility of additional on-site renewable energy generation and eliminating natural gas usage altogether, for both the Proposed Project and Alternative 4.

R-PC021-22 Cont'd

III. Conclusion

Alternative 4 represents a step in the right direction for the Airport and the Authority because it would accommodate future regional transit planning efforts. If any alternative is adopted, it should be Alternative 4. However, prior to adopting Alternative 4, the Authority must address the deficiencies in the RDEIR identified in CNFF's prior comments and in this letter. In particular, the Authority should commit to seeking all available funding to support both on-airport and off-airport transit infrastructure. The Authority also must take additional steps to ensure that Alternative 4 increases transit mode share to the maximum feasible extent in the near future, while more comprehensive planning efforts proceed.

R-PC021-23

Thank you for your consideration of these comments.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kevin P. Bundy

Encls.: (see attached exhibit list)

cc: Duncan McFetridge, Cleveland National Forest Foundation

1176269.6

COMMENT LETTER NO. R-PC021	Shute, Mihaly, & Weinberger LLP on behalf of the Cleveland National Forest Foundation	November 4, 2019

Response to Comment R-PC021-1

The comment states that the commenter, Cleveland National Forest Foundation (CNFF), "submitted extensive comments on the original Draft Environmental Impact Report ("DEIR")" by letter dated September 5, 2018, and that "many of those prior comments are equally applicable to the RDEIR." The comment then indicates that the comments set forth in CNFF's letter of September 5, 2018 (and the accompanying exhibits) "are incorporated by reference as if fully set forth herein."

Below, SDCRAA provides specific responses to those CNFF comments, set forth in the letter dated November 4, 2019, that directly relate to the Recirculated Draft EIR. With respect to those comments that were submitted on September 5, 2018, SDCRAA responds as follows: As indicated in Section 1.7, Availability of the Recirculated Draft EIR, on page 1-15 of the Recirculated Draft EIR: "The Recirculated Draft EIR replaces the 2018 Draft EIR in its entirety and includes a full statutory public review and comment period; therefore, all comments should address the Recirculated Draft EIR, not the 2018 Draft EIR or any portion thereof. While comments submitted on the 2018 Draft EIR will be included in the administrative record for the project, the SDCRAA will prepare written responses only to the comments submitted on the Recirculated Draft EIR."

In this case, CNFF's comment letter of September 5, 2018 addresses a document – the 2018 Draft EIR – that has been entirely superseded by the Recirculated Draft EIR. Note that the Recirculated Draft EIR is a complete reassessment of the ADP project; it is not a partial recirculation. Moreover, the project has been revised since the 2018 Draft EIR was withdrawn. In addition, the Recirculated Draft EIR includes a new alternative – Alternative 4 – that SDCRAA staff are recommending that the SDCRAA Board approve. This alternative was not part of the 2018 Draft EIR and, thus, CNFF's September 5, 2018 letter did not address it. Note also that the Recirculated Draft EIR includes new analyses and new data, including updated passenger forecast numbers, that affect the CEQA "existing conditions" baseline as well as many of the key impact assessments, such as traffic, air quality, greenhouse gas emissions, and noise. Because the Recirculated Draft EIR is a completely new CEQA document and does not rely on the withdrawn 2018 Draft EIR, it is impossible to translate CNFF's comments on the latter into comments on the former. CNFF states only that "many of those prior comments are equally applicable to the RDEIR." CNFF does not identify which of the prior comments are, in fact, relevant or applicable to the Recirculated Draft EIR, and CEQA does not require the lead agency to speculate as to which comments on a withdrawn document are relevant to the new document and which ones are not. A few examples illustrate why CNFF's comments on the 2018 Draft EIR no longer apply to the 2019 Recirculated Draft EIR:

1. On page 7 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF argues that the EIR's project description is inadequate and that the aviation activity forecasts used in the document are inaccurate. The Recirculated Draft EIR, however, includes a different project description than the one set forth in the 2018 Draft EIR. The Recirculated Draft EIR also uses updated aviation activity forecasts that are substantially different from those used in the 2018 Draft EIR. For these reasons, there is no way to meaningfully respond to CNFF's "project description" comments, as set forth in its September 5, 2018 letter.

2. On page 13 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF claims that the proposed project would add too many parking spaces and thereby induce more vehicle travel to the Airport. The Recirculated Draft EIR, however, includes a new alternative – Alternative 4 – that reduces the size of the proposed parking facility. Therefore, it is impossible to determine if Alternative 4, which SDCRAA staff are recommending for approval, addresses CNFF's concerns regarding parking and travel inducement.

3. Starting on page 15 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF argues that the recommended mitigation measures for traffic impacts are flawed. The Recirculated Draft EIR, however, includes a new traffic study, updated traffic impact determinations, and new mitigation measures. Consequently, CNFF's comments on the 2018 Draft EIR's traffic mitigation program are no longer relevant.

4. On page 25 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF argues that the air quality modeling assumptions used to identify the "existing 2016 baseline emissions" are insufficient and/or flawed. The Recirculated Draft EIR, however, includes a new air quality analysis that uses a different "existing conditions" baseline. Moreover, that analysis is based on updated passenger forecasts. For these reasons, it is unlikely that the concerns expressed in CNFF's September 5, 2018 letter are still relevant or applicable to the 2019 Recirculated Draft EIR.

5. Starting on page 34 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF objects to the fact that the 2018 Draft EIR recommended only one mitigation measure to address the project's greenhouse gas impacts (MM-GHG-1). The 2019 Recirculated Draft EIR, however, not only includes a newly updated greenhouse gas emissions analysis, it recommends 10 mitigation measures, not one. (Recirculated Draft EIR, Section 3.3.7.2.1 – Mitigation Measures, pp. 3.3-37—3.3-40.) Thus, CNFF's comments on the 2018 Draft EIR's greenhouse gas mitigation measures no longer apply.

6. On page 48 of its September 5, 2018 comment letter regarding the withdrawn 2018 Draft EIR, CNFF contends that the document does not consider an adequate range of alternatives. The 2019 Recirculated EIR, however, includes a new alternative – Alternative 4 – that reduces or eliminates key impacts of the "proposed" project. Further, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4 instead of Alternative 2 or the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. In light of these facts, CNFF's 2018 comments regarding the need for additional alternatives no longer apply.

It is likely that CNFF's concerns regarding the 2018 Draft EIR have been addressed by the new information and analyses set forth in the 2019 Recirculated Draft EIR. To assist CNFF (and others) in locating where the Recirculated Draft EIR provides new information and analyses relevant to CNFF's issues of concern, SDCRAA provides the following guidance.

- Project Description: The updated Project Description is set forth in Chapter 2 of the Recirculated Draft EIR. In addition, SDCRAA has prepared responses to comments addressing the project description. Such responses are identified in the table below.

- Traffic Impacts: The updated traffic impacts analysis is set forth in Section 3.14 of the Recirculated Draft EIR. The new traffic studies prepared by Kimley-Horn are attached as technical Appendices R-H1, R-H2, R-H3, R-H4, R-H5, and R-J to the EIR. In addition, SDCRAA has prepared responses to comments that address traffic-related issues, including mitigation. Such responses are identified in the table below.

- Air Quality Impacts: The updated air quality impacts analysis is set forth in Section 3.2 of the Recirculated Draft EIR. The new Air Quality/Greenhouse Gas technical study prepared by KB Environmental Sciences is attached as Appendix R-C to the EIR. In addition, SDCRAA has prepared responses to comments that address air quality-related issues, including mitigation. Such responses are identified in the table below.

- Greenhouse Gas/Climate Change Impacts: The updated greenhouse gas/climate change impacts analysis is set forth in Section 3.3 of the Recirculated Draft EIR. The new Air Quality/Greenhouse Gas technical study prepared by KB Environmental Sciences is attached as Appendix R-C to the EIR. In addition, SDCRAA has prepared responses to comments that address greenhouse gas-related issues, including mitigation. Such responses are identified in the table below.

- Energy Impacts: The updated energy impacts analysis is set forth in Sections 3.15.4.4 and 3.15.6.5 of the Recirculated Draft EIR. Also, SDCRAA has prepared a response to comment that addresses energy-related issues. This response is identified in the table below.

- Alternatives: The updated alternatives analysis is set forth in Chapter 5 of the Recirculated Draft EIR and includes a full description of new Alternative 4, which SDCRAA staff is recommending that the SCRAA approve in lieu of the "proposed" project identified in Chapter 2 of the Recirculated Draft EIR. New traffic studies specific to Alternative 4 are attached as Appendices R-H1, R-H4, and R-H5 to the EIR. In addition, SDCRAA has prepared responses to comments that address alternatives. Such responses are identified in the table below.

Responses Related to Topics of Concern in Comment R-PC021-1

Topic	Related Response to Comment	
Project Description		
	R-AL003	2
	R-AL003	3
	R-AL003	6
	R-PC003	5
	R-PC019	22
	R-PC019	27
	R-PC019	28
	R-PC019	32
	R-PC019	34
	R-PC019	35
	R-PC021	8
	R-PC003	6
	R-PC019	1
	R-PC019	2
	R-PC019	3
	R-PC019	4

Responses Related to Topics of Concern in Comment R-PC021-1

Topic	Related Response to Comment	
	R-PC019	7
	R-PC019	8
	R-PC019	9
	R-PC019	10
	R-PC019	11
	R-PC019	12
	R-PC019	13
	R-PC019	14
	R-PC019	15
	R-PC019	29
	R-PC019	45
	R-PC021	9
	R-PC023	15
	R-PC023	16
	R-PC023	17
	R-PC023	40
	R-PC023	41
	R-PC023	42
	R-PC023	45
	R-PC027	1
	R-PC003	7
	R-PC023	4
	R-PC023	13
	R-PC021	7
	R-AS004	3
	R-AR004	2
	R-PC020	2
	R-PC025	2
	R-PC025	24
	R-PC023	14
	R-PC023	10
	R-PC023	11
	R-AR002	2
	R-AR002	7
Traffic/Circulation		
	R-PC023	47
	R-AR003	3
	R-PC021	12
	R-AL004	3
	R-AR002	4
	R-AR002	5
	R-AR004	4
	R-AR004	5
	R-AS001	2
	R-AS001	3
	R-AS001	4
	R-AS001	5
	R-AS001	6
	R-AS001	7
	R-AS001	8
	R-AS001	9
	R-PC021	5
	R-PC021	6
	R-PC023	51

Responses Related to Topics of Concern in Comment R-PC021-1

Topic	Related Response to Comment	
	R-PC023	52
	R-PC023	53
	R-PC023	54
	R-PC023	55
	R-PC021	13
	R-PC021	14
	R-PC022	2
	R-AL004	4
	R-AL004	5
	R-AL004	16
	R-AL004	17
	R-AL004	18
	R-AR002	6
	R-PC023	49
	R-PC002	1
	R-AS001	10
	R-PC023	50
	R-AR004	3
	R-AL004	6
	R-PC026	1
	R-PC023	46
	R-PC023	18
	R-PC023	35
	R-PC023	48
	R-PC021	11
Air Quality		
	R-PC021	17
	R-PC021	18
	R-PC021	15
	R-PC021	16
Greenhouse Gases		
	R-PC018	2
	R-AR004	6
	R-PC014	2
	R-AL003	8
	R-PC020	4
	R-PC024	5
	R-PC025	12
	R-PC021	19
	R-PC021	20
	R-AL004	2
Energy		
	R-PC021	22
Alternatives		
	R-PC003	8
	R-PC003	13
	R-AL004	1
	R-AR002	3
	R-AR003	2
	R-AR003	4
	R-PC008	2
	R-PC009	1
	R-PC023	2
	R-PC023	32

Finally, SDCRAA would point out that CNFF, in its final comment on the withdrawn 2018 Draft EIR, requested that the document be "revised and recirculated." SDCRAA took this request seriously. SDCRAA did not just revise the 2018 Draft EIR, rather it withdrew the document in its entirety and created a completely new document – the 2019 Recirculated Draft EIR – which includes updated data and analyses, and which SDCRAA circulated for full public review and comment.

Response to Comment R-PC021-2

SDCRAA remains committed to participating in regional efforts to develop a long-range transportation solution for accessing the SDIA, as reflected in Mitigation Measure MM-TR-LRP-1: Airport Regional Connections, which is first presented on page ES-88 of the Recirculated Draft EIR. Given that environmental impacts associated with Alternative 4: T1 Replacement and Transportation Improvements would be less than those of the proposed project and that Alternative 4 meets all of the project objectives, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4 instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. Note that Alternative 4 includes Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (see Appendix R-H1 – Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR), that likewise specifies SDCRAA commitment to participating in regional efforts to develop a long-range transportation solution for accessing the Airport, which includes continuing to work with SANDAG, the City, the Port, and other stakeholders on that issue.

The Final EIR for the Airport Development Plan meets the requirements of CEQA and is adequate for decision-makers to take action on the project, including approval of Alternative 4, if they so choose.

Response to Comment R-PC021-3

Based on the alternatives analysis presented in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. As summarized in Section ES.10.4, Environmentally Superior Alternative, and Section 5.8, Environmentally Superior Alternative, of the Recirculated Draft EIR, Alternative 4 would meet all of the project objectives, while resulting in fewer and/or less severe environmental impacts than would the proposed project.

Response to Comment R-PC021-4

Please see Response to Comment R-AR002-2.

Response to Comment R-PC021-5

As indicated on page 4 of the Alternative 4 Technical Memorandum (Appendix R-H4), of the Recirculated Draft EIR, transit mode share is expected to increase from 2% to 5% by 2024 (an increase of 3% from 2017 levels) due to Alternative 4 measures that include implementing new transit service between the Old Town Transit Center (OTTC) and the Airport, and enhancements to MTS Route 992. Additional measures are beyond the sole control of SDCRAA to implement.

It is estimated that vehicle miles traveled (VMT) would be reduced by about 1.1 VMT/passenger due to the proposed transit improvements.

Note: The VMT decrease that would specifically be due to transit improvements was not directly calculated in the Recirculated Draft EIR; however, it can be estimated by comparing VMT reductions in 2026 for the proposed project to VMT reductions in 2026 for Alternative 4, as shown below.

- The proposed project would reduce VMT by 1.6 VMT/passenger due to changes in TNC policy and operations, as shown in Table 3.14-26 on page 3.14-113 in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR.
- Alternative 4 would add transit service to the OTTC and enhancements to MTS Route 992, in addition to the TNC policy and operations changes, resulting in a total reduction of 2.7 VMT/passenger, as depicted in Table H-18 on page H-82 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.
- Therefore, the TNC policy changes result in a 1.6 VMT/passenger reduction and the remaining 1.1 VMT/passenger reduction would be attributable to the transit service changes.

Response to Comment R-PC021-6

The commenter's September 5, 2018 comment letter on the July 2018 Draft EIR, and the suggestions to further improve transit service to the SDIA included in that letter, (pages 49-52 in Exhibit 1, of the commenter's November 4, 2019 comment letter), are acknowledged. Similar suggestions for improving transit service were made by others as comments on the July 2018 Draft EIR. As a result of such comments, two things occurred as reflected in the Recirculated Draft EIR:

1) As discussed in Section 2.3.5 of the Recirculated Draft EIR, SDCRAA, SANDAG, MTS, Caltrans, the City of San Diego, and the Port have formed the Airport Connectivity Subcommittee. The Subcommittee is studying and developing concepts for implementation of transit improvements for the region. It is expected that funding for these improvements will be provided through a variety of sources, including SDCRAA funds (subject to FAA review and approval). SDCRAA's commitment to continued collaboration with the members of the Subcommittee is demonstrated in Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

2) As discussed in Section 1.2, Background to the Recirculated Draft EIR, Alternative 4 was developed, which includes, as project features, near-term (by 2024) transit service improvements at SDIA, including an airport shuttle service to and from the Old Town Transit Center (OTTC), which is an intermodal transit station with connections for commuter and inter-city rail service (Amtrak/North County Transit District's COASTER), light rail service (San Diego Trolley), and San Diego Metropolitan Transit System (MTS) bus lines. SDCRAA would also implement measures to help increase Bus Route 992 ridership, between downtown and SDIA, including preferential bus stop locations at the terminals and better branding of the transit route.

Regarding feasibility of funding additional off-site traffic improvements, SDCRAA has formally requested the FAA's authorization for use of airport funds to mitigate traffic impacts. The mitigation measures that were documented are not considered feasible, because of this reliance on FAA approval. If the FAA approves the use of airport funds, the proposed traffic mitigation measures will be implemented provided that the measures are physically feasible and approved by the City of San Diego.

Response to Comment R-PC021-7

Section 2.4, Project Objectives, of the Recirculated Draft EIR already includes objectives that specifically support transit. Such objectives are shown on page 2-13 of the Recirculated Draft EIR, and include the following:

- Goal: Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand

- Objectives:

  - Provide enhanced vehicular access from Harbor Drive to SDIA.
  - Improve mobility for private vehicles, transit users, and bicyclist/pedestrians along the North Harbor Drive corridor.
  - Improve transit connections to the existing transit system planned by SANDAG and operated by MTS, including bus shuttle service to light rail stations and transit centers (Santa Fe Depot and Old Town Transit Centers).
  - Accommodate demand for short-term and long-term parking spaces on-airport to ensure sufficient passenger satisfaction and appropriate revenue generation.

Response to Comment R-PC021-8

Please see Response to Comment R-PC021-1 above regarding comments previously submitted on the 2018 Draft EIR. Regarding the alleged deficiencies of the Recirculated Draft EIR, please see Responses to Comments R-PC021-9 through R-PC021-23 below.

Response to Comment R-PC021-9

The commenter states that the aviation activity forecasts in the Recirculated Draft EIR "fail to account for the project's growth-inducing potential" but provides no evidence that this statement and assertion is supportable. The commenter further identifies and acknowledges that the Recirculated Draft EIR analysis shows that terminal improvements would not facilitate growth, but attempts to dismiss this analysis as a claim that contradicts the Authority's 2008 Master Plan. In fact, the Recirculated Draft EIR provides specific analyses and evidence that the single-runway constraint is the limiting facility on growth of activity at SDIA (See Response to Comment R-AL003-2). Though not a part of the current ADP nor a requirement of the Recirculated Draft EIR, a close examination of the 2008 Master Plan shows that its forecast, facility constraints, and proposed project are in line with the current Recirculated Draft EIR.

The commenter goes further to question whether "acceptable levels of service" may affect customer demand and their willingness to choose SDIA over other airports and over other modes

of travel. The supposition is that congestion of getting to and through the airport to an aircraft would deter passengers and that if this congestion is relieved by the ADP that this relief would create additional demand for the airport. This supposition is not borne out by the analysis or by the experience of congested airports throughout the world. On the contrary, even in multi-airport systems where passengers have airport and transportation mode choices, they have shown that they will adjust their behavior and schedules to make flights that meet their willingness to pay for air travel options offered by airlines. According to research by the Transportation Research Board (Parrella, p. 12) "[a]ir service quality (availability, frequency, capacity, and routing) and [p]rice (airfare, taxation, and ancillary fees)" are the two key factors that drive passengers' airport choices.[29]

Response to Comment R-PC021-10

The comment does not reflect the information and analysis presented in the Recirculated Draft EIR. Chapter 3 of the Recirculated Draft EIR evaluates the potential impacts of the proposed project and for every environmental topic addressed therein, the impacts of the project are compared against existing (2018) baseline conditions, including as related to each of the future horizon years (i.e., 2024, 2026, 2030, 2035, and 2050). Conclusions regarding the significance of impacts are drawn accordingly (i.e., impacts of future project conditions compared to existing baseline conditions). Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR provides a comprehensive analysis of alternatives, including the No Project Alternative (i.e., Alternative 1) that is required by CEQA. The Recirculated Draft EIR analysis of the No Project Alternative accurately addresses and discloses the fact that certain operational impacts, such as those related to air quality, greenhouse gas emissions, human health risk, noise, and traffic, would be the same as, or in some cases worse than, those of the proposed project and some of the other alternatives, including Alternative 4, which SDCRAA staff is recommending for approval. That approach reflected in the Recirculated Draft EIR is consistent with the letter and intent of CEQA in clearly delineating to the public and decision-makers the environmental impacts associated with implementing the proposed project and with not implementing the project.

Response to Comment R-PC021-11

As indicated in Section 3.14.2.7.4, Vehicle Miles Traveled (VMT), of the Recirculated Draft EIR, Senate Bill 743 requires that public agencies amend their traffic impact study of a project on VMT. Evaluation of transportation impacts using the VMT metric is not yet required by the State or any San Diego-based agencies, and LOS is an allowable metric for identifying traffic impacts and mitigation. The revisions to the State CEQA Guidelines including modifications per Senate Bill 743 reflected in new State CEQA Guidelines Section 15064.3, were adopted by the California Natural Resources Agency in December 2018; however, per Section 15064.3(c), CEQA-related analysis for a development project will not require use of the VMT metric to analyze transportation impacts until July 1, 2020. Notwithstanding that the use of LOS, alone, as the measure of traffic impacts meets current CEQA requirements, project-related VMT is generally discussed in the Recirculated Draft EIR.

[29] Parrella, Barney C. et al.. "Understanding Airline and Passenger Choice in Multi-Airport Regions," Airport Cooperative Research Program (ACRP) Report 98, Transportation Research Board, National Academies of Sciences, Engineering, and Medicine, Washington, D.C., 2013. Available: https://doi.org/10.17226/22443.

The graph on page 6 of this comment letter provides a line graph of the forecasted overall VMT for airport operations for each analysis scenario. The data points in the graph are based on data from the VMT summary tables for the proposed project (Table 3.14-26 on page 3.14-113 in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR) and Alternative 4 (Table H-18 on page H-82 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR). The graph accurately shows that, predictably, as the number of airport passengers increases, the total Airport VMT would increase. What the graph does not depict is the associated decrease in VMT per passenger that would be realized as a result of the proposed transit and operations improvements that would be implemented for the proposed project and for Alternative 4.

By way of background, relative to the question in Footnote 1 regarding how TNC drivers are encouraged to pick-up new passengers after dropping passengers at the terminals, TNC companies began operating at SDIA on a pilot program beginning in July of 2015, with a permit issued in January of 2016. At the time, most TNC drivers dropping off passengers were not picking up a passenger on the same trip. SDCRAA subsequently worked with TNCs to institute a re-matching program, whereby drivers dropping off passengers at the terminal had the opportunity to immediately perform a pick-up while still at the Airport. The ability for re-matching drop-offs and pick-ups was also enhanced through SDCRAA's provision of a TNC hold lot at SDIA. The combination of the TNC hold lot and re-match has been successful in reducing "deadhead" trips which, in turn, reduces the VMT associated with passengers traveling to and from SDIA. This resulted in a 40-50% matching rate during peak periods at SDIA. As indicated in Response to Comment R-PC021-5 above, TNC management practices implemented by SDCRAA will result in a reduction in VMT of about 1.6 VMT/passenger by 2026.

Additionally, SDCRAA has continually worked with TNCs to implement other measures relative to environmental issues associated with TNC operations. SDCRAA's TNC permit program incentivizes cleaner fuels, more fuel-efficient vehicles, and "pooled" (multi-party) rides for all companies by measuring the GHG rating of each vehicle against a national standard.

Response to Comment R-PC021-12

Alternative 4 was developed with the intent to implement feasible transportation improvements as part of the project or as project mitigation. TDM improvements were recrafted to include measures that SDCRAA could implement as part of the project. The OTTC bus service to SDIA was developed in coordination with MTS and would be implemented as a project feature of Alternative 4.

Other service, such as an LRT extension to the terminals or Automated People Mover service between SDIA and a future Mobility Hub, will take regional planning and coordination, as well as funding from a variety of sources. Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, were developed to demonstrate SDCRAA's commitment to working with the region to develop, implement, and help fund the further improvements to transit.

The identification of mitigation measures included discussion with the owner of the transportation facility to determine what SDCRAA would be allowed to construct. Since the City of San Diego owns and operates most roadways and intersections surrounding SDIA, SDCRAA regularly met with City staff throughout preparation of the traffic analysis for the Recirculated Draft EIR. The result of this vetting process was confirmation of the mitigation measures that the City would permit SDCRAA to implement, and those improvements that would not be permitted due to inconsistencies with Community Plan recommendations for street configuration and bicycle facility improvements. Where stated in the Recirculated Draft EIR that an improvement is inconsistent with a community plan, this was based on concurrence from the City of San Diego. This collaborative effort resulted in the proposed mitigation measures provided in both Section 3.14, Traffic and Circulation, and Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR. SDCRAA has formally requested the FAA's authorization for use of airport funds to mitigate traffic impacts.

Further, as noted in the August 27, 2019 letter to the FAA and in the November 27, 2019 letter to the FAA (included as an Addendum to Appendix R-K--see Chapter 3, Corrections and Additions to the Recirculated Draft EIR, and Attachment 1 of this Final EIR), and as discussed in Appendix R-K, FAA funding approval for off-Airport roadway and intersection improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. Other specific potential off-Airport roadway and intersection improvement items listed as possible mitigation measures in Section 3.14 (for the proposed project) and Appendix R-H1 (for Alternative 4) of the Recirculated Draft EIR either would not meet this FAA funding requirement, or have not been approved or supported by the City of San Diego, which has jurisdiction over the improvement items.

Response to Comment R-PC021-13

As noted, Mitigation Measure MM-TDM-1: TDM and Transit Measures, first presented on pages ES-80 and ES-81 (Executive Summary) of the Recirculated Draft EIR, was modified from the original version of that mitigation measure in the 2018 Draft EIR to include those measures that SDCRAA could feasibly implement. In addition, Measure 1 of MM-TDM-1 has been further revised to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text, to strengthen the commitment by SDCRAA to implement this service.

1. Implement a shuttle service connecting the Old Town Transit Center and Amtrak Station to SDIA. Adding a new shuttle service from the Old Town Transit Center would enhance Airport access for COASTER, Trolley, Amtrak, and *MTS* bus line riders who could connect at the station. Implementation of this service ~~is dependent on~~ *will include* further outreach with Old Town stakeholders to ~~ensure~~ *implement measures* that *discourage* Airport passengers ~~do not~~ *from using* ~~attempt to drive to the station and overrun~~ the parking available for the Transit Center, Old Town San Diego Historic Park, California Department of Transportation (Caltrans) District 11 office, or other area businesses.

These revisions are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, for all instances in which the text of Mitigation Measure MM-TDM-1 is presented.

Promotion of transit on the SDCRAA website, in employee break rooms, and at kiosks within the terminals are important measures to aid in the success of the other transit service improvements.

As part of development of Alternative 4, MM-TDM-1 was removed and the transit improvements were included as project features, as described on page H-2 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

Response to Comment R-PC021-14

SDCRAA concurs that regional access solutions are needed, which are being evaluated through a multi-agency planning effort being conducted by the SANDAG Airport Connectivity Subcommittee. Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, commits SDCRAA to continued participation in the planning and implementation of regional transportation improvements. The intent of this mitigation is to identify feasible improvements to provide regional access to the Airport and to request FAA funding for those improvements.

In addition, SDCRAA has already received Airline Industry support and has formally requested FAA approval to spend SDCRAA funds to implement some of the recommendations from the study, that will benefit air passengers and improve ground access to SDIA: MM-TR-RS-1a, MM-TR-RS-1b, MM-TR-RS-1c, MM-TR-RS-1d, MM-TR-I-1a, MM-TR-I-1b, MM-TR-I-1c, MM-TR-I-1d, MM-TR-I-1e, MM-TR-I-4a, MM-TR-I-4b, and MM-TR-I-5c.

Further, as noted in Section 3.14.6 of the Recirculated Draft EIR, and as discussed in Appendix R-K, FAA funding approval for off-Airport programs or projects is limited under federal law to items that provide a direct benefit to air passenger travelers. SDCRAA has formally requested the FAA's approval to allow SDCRAA to fund the mitigation of direct and cumulatively considerable impacts to roadways and intersections providing access to SDIA (estimated at approximately $7.7 million). The remainder of the $350 Million commitment could be used to fund other improvements, such as those being identified through SANDAG's Airport Connectivity Subcommittee, if approved by FAA. Mitigation Measures MM-TR-LRP-1 and MM-TR-LRP-2, discussed in Response to Comment R-AS001-5 above, provide the mechanism for SDCRAA's participation in the Airport Connectivity Study and participation with other stakeholders in the further design of transportation solutions, and a request to FAA to allow the use of airport revenue to implement agreed-upon solutions (once their specific scope is more firmly determined), including access to I-5 and connections to the regional transit system. The comment also noted slight differences in the wording of Mitigation Measure MM-TR-LRP-1. Revisions to Mitigation Measure MM-TR-LRP-1 for consistency throughout the EIR and to add additional specificity to the text of the measure per comments on the Recirculated Draft EIR submitted by the Port of San Diego (see Response to Comment R-AR003-3), are reflected in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-PC021-15

The air quality analysis presented in the Recirculated Draft EIR used the most recent on- and off-road emission factors available at the time of its preparation. More specifically, the on- and off-road emission factors from the California Air Resources Board's (CARB) EMFAC2017 and OFFROAD2017 models, respectively, were used. On November 20, 2019, CARB published off-model factors to adjust the emissions output of nitrogen dioxide (NO_X), particulate matter (PM), and carbon monoxide (CO) from EMFAC2017 to account for the impact of the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program."[30] This rule revokes California's authority to set zero-emission vehicle mandates applicable to vehicles in California. As a result of the reduction in future sales requirements of zero emission vehicles (ZEVs), CARB presumes that fewer ZEVs will be sold and, as a result, more gasoline-fueled vehicles will be sold. This reduction in ZEVs sales is assumed, therefore, to increase emissions of the criteria air pollutants and pollutant precursors.

To account for the potential increase in emissions due to the SAFE Vehicle Rule, the total motor vehicle-related emissions of VOCs, NO_X, PM, and CO estimated for the years 2024, 2026, 2030, 2035, and 2050 were increased using CARB's EMFAC2017 adjustment factors. Although the factors only apply to estimated emissions resulting from the operation of gasoline light duty vehicles, the factors were conservatively applied to total emission estimates (i.e., to emission estimates from both gasoline and diesel fueled vehicles and both light and heavy-duty vehicles), thereby resulting in some over-estimation of the SAFE Rule's effects on the project's criteria air pollutant emissions quantities.

In response to this comment, the air pollutant emissions tables in the Recirculated Draft EIR are hereby revised as follows, with the former emissions values shown in strikeout text and the revised emissions values shown as underlined italicized text.[31] It is important to note that the emissions inventory refinements resulting from application of the new CARB guidance do not result in the identification of any new significant air quality impacts or a substantial increase in the severity of impacts previously identified in the Recirculated Draft EIR.

Section 3.2, Air Quality

1. Table 3.2-11 on pages 3.2-31 through 3.2-33 of the Recirculated Draft EIR is hereby revised as follows:

Table 3.2-11: Proposed Project Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
1a/	**Aircraft**	111	1,104	7	7	992	105	609	6,049	41	41	5,438	577

[30] California Air Resources Board. EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One. November 20, 2019. Available: https://ww3.arb.ca.gov/msei/emfac_off_model_adjustment_factors_final_draft.pdf?utm_medium=email&utm_source=govdelivery. It should be noted that the November 20, 2019 guidance from CARB only identified off-model adjustment factors for criteria air pollutants and not GHG emissions because the effects of the SAFE Rule on GHG emissions are not known by CARB at the time of the preparation of this response.

[31] Typographical errors in the table were also corrected; specifically, the difference in emissions between 2018 baseline and mitigated project emissions for the year 2035 in Table 3.2-14.

Table 3.2-11: Proposed Project Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
2024	APUs	<1	7	1	1	4	1	2	40	4	4	22	5
	GSE	29	81	2	2	867	<1	157	443	12	11	4,748	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7
	Motor Vehicles	2	14	10	1	114	1	11	78	52	7	~~624~~ *627*	3
	Energy Use	<1	1	<1	<1	1	<1	1	5	<1	<1	4	<1
	Construction	3	17	10	1	17	<1	16	91	57	8	95	<1
	Totals	**149**	**1,241**	**37**	**15**	~~**2,006**~~ ***2,007***	**108**	**817**	**6,800**	**201**	**80**	~~**10,993**~~ ***10,995***	**592**
Existing 2018 Baseline Emissions		141	1,058	25	14	1,887	95	773	5,797	135	75	10,341	519
Difference from Existing 2018 Baseline		8	183	12	1	119	13	43	1,002	66	5	~~652~~ *654*	74
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Exceeds Threshold?		***No***	***Yes***	***No***	***No***	***Yes***	***No***	***No***	***Yes***	***No***	***No***	***Yes***	***No***
1b/ 2026	Aircraft	120	1,186	8	8	1,045	111	655	6,501	44	44	5,728	610
	APUs	<1	8	1	1	4	1	2	42	4	4	20	5
	GSE	29	79	2	2	922	<1	157	432	13	11	5,051	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7
	Motor Vehicles	2	17	11	1	~~111~~ *112*	1	10	96	~~58~~ *60*	~~6~~ *7*	~~599~~ *616*	3
	Energy Use	<1	1	<1	<1	1	<1	1	7	<1	1	6	<1
	Construction	1	6	6	1	6	<1	5	31	33	4	34	<1
	Totals	**155**	**1,314**	~~**34**~~ ***35***	**15**	~~**2,101**~~ ***2,102***	**114**	**851**	~~**7,196**~~ ***7,202***	~~**187**~~ ***189***	**80**	~~**11,499**~~ ***11,516***	**626**
Existing 2018 Baseline Emissions		141	1,058	25	14	1,887	95	773	5,797	135	75	10,341	519
Difference from Existing 2018 Baseline		14	256	~~9~~ *10*	1	214	~~19~~ *20*	78	~~1,399~~ *1,405*	~~52~~ *54*	5	~~1,158~~ *1,175*	107
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***Yes***	***No***
2a/ 2030	Aircraft	132	1,404	8	8	1,146	125	724	7,691	45	45	6,280	684
	APUs	<1	8	1	1	4	1	2	42	4	4	21	5
	GSE	26	61	1	1	947	<1	145	336	7	6	5,188	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7

Table 3.2-11: Proposed Project Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
	Motor Vehicles	1	13	11	1	~~103~~ *105*	1	~~7~~ *8*	~~69~~ *70*	~~61~~ *62*	6	~~564~~ *573*	3
	Energy Use	<1	2	<1	<1	2	<1	<1	12	1	1	10	<1
	Construction	1	7	3	<1	13	<1	4	39	16	2	71	<1
	Totals	**165**	**1,512**	**31**	**13**	~~**2,225**~~ ***2,227***	**128**	**905**	**8,283**	~~**169**~~ ***170***	**73**	~~**12,194**~~ ***12,203***	**700**
Existing 2018 Baseline Emissions		141	1,058	25	14	1,887	95	773	5,797	135	75	10,341	519
Difference from Existing 2018 Baseline		24	454	6	<1	~~338~~ *340*	33	~~131~~ *132*	2,486	~~34~~ *35*	~~-2~~ *-1*	~~1,853~~ *1,862*	181
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***Yes***	***No***
2b/ 2035	Aircraft	149	1,660	9	9	1,386	149	819	9,098	50	50	7,597	818
	APUs	<1	9	1	1	5	1	2	48	5	5	26	6
	GSE	26	57	1	1	1,011	<1	144	311	8	7	5,537	1
	Stationary Sources	4	17	6	2	11	1	22	93	35	9	60	7
	Motor Vehicles	1	7	11	1	~~89~~ *91*	1	4	40	~~58~~ *59*	5	~~488~~ *499*	3
	Energy Use	<1	2	<1	<1	2	<1	<1	13	1	1	11	<1
	Construction	<1	1	2	<1	2	<1	2	8	13	2	11	<1
	Totals	**181**	**1,754**	**31**	**14**	~~**2,506**~~ ***2,508***	**152**	**994**	**9,612**	~~**170**~~ ***171***	**78**	~~**13,730**~~ ***13,741***	**835**
Existing 2018 Baseline Emissions		141	1,058	25	14	1,887	95	773	5,797	135	75	10,341	519
Difference from Existing 2018 Baseline		40	696	~~6~~ *7*	1	~~618~~ *621*	58	221	3,815	~~35~~ *36*	4	~~3,389~~ *3,400*	316
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***
2050	Aircraft	157	1,795	9	9	1,427	158	861	9,833	52	52	7,822	864
	APUs	<1	10	1	1	5	1	2	53	5	5	28	7
	GSE	21	34	1	1	497	<1	114	187	4	3	2,722	1
	Stationary Sources	4	17	6	2	11	1	22	93	35	9	60	7
	Motor Vehicles	<1	4	11	1	~~86~~ *89*	<1	~~2~~ *3*	23	~~59~~ *61*	4	~~473~~ *488*	3
	Energy Use	<1	2	<1	<1	2	<1	1	13	1	1	11	<1

Table 3.2-11: Proposed Project Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
	Totals	**183**	**1,862**	**28**	**14**	~~**2,029**~~ ***2,031***	**161**	**1,004**	**10,203**	~~**155**~~ ***156***	**74**	~~**11,116**~~ ***11,131***	**881**
Existing 2018 Baseline Emissions		141	1,058	25	14	1,887	95	773	5,797	135	75	10,341	519
Difference from Existing 2018 Baseline		42	804	4	<1	~~141~~ *143*	66	231	4,406	~~20~~ *21*	<1	~~775~~ *790*	362
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***

Source: KB Environmental Sciences, Inc., 2019.
Note: Totals may reflect rounding.

2. Table 3.2-14 on pages 3.2-38 through 3.2-40 of the Recirculated Draft EIR is hereby revised as follows:

Table 3.2-14: Proposed Project With Mitigation - Operational Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
1a/ 2024	**Aircraft**	111	1,104	7	7	992	105	609	6,049	41	41	5,438	577
	APUs	<1	7	1	1	4	1	2	40	4	4	22	5
	GSE	19	51	2	2	314	<1	106	280	11	10	1,722	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7
	Motor Vehicles	2	13	9	1	~~107~~ *108*	1	10	73	49	6	~~587~~ *589*	3
	Energy Use	--	--	--	--	--	--	--	--	--	--	-	-
	Construction	3	17	10	1	17	<1	16	91	57	8	95	<1
	Totals	**140**	**1,209**	**36**	**14**	**1,446**	**108**	**765**	**6,626**	**196**	**78**	~~**7,925**~~ ***7,927***	**592**
Existing 2018 Baseline Emissions		***141***	***1,058***	***25***	***14***	***1,887***	***95***	***773***	***5,797***	***135***	***75***	***10,341***	***519***
Difference from Existing 2018 Baseline		***-2***	***151***	***11***	***1***	***-441***	***13***	***-9***	***829***	***61***	***3***	~~***-2,416***~~ ***-2,414***	***73***
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Mitigated Emissions Exceeds Threshold?		***No***	***Yes***	***No***	***No***	***No***	***No***	***No***	***Yes***	***No***	***No***	***No***	***No***
Proposed Project Without Mitigation Emissions		***149***	***1,241***	***37***	***15***	~~***2,006***~~ ***2,007***	***108***	***817***	***6,800***	***201***	***80***	~~***10,993***~~ ***10,995***	***592***

Table 3.2-14: Proposed Project With Mitigation - Operational Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
Mitigated Emissions Difference from Proposed Project Without Mitigation		***-10***	***-32***	***-1***	***<-1***	***~~-560~~ -561***	***<-1***	***-52***	***-174***	***-5***	***-2***	***~~-3,068~~ -3,069***	***~~0~~ <1***
Unmitigated Emissions Exceed Threshold (from Table 3.2-11)?		***No***	***Yes***	***No***	***No***	***Yes***	***No***	***No***	***Yes***	***No***	***No***	***Yes***	***No***
1b/ 2026	**Aircraft**	120	1,186	8	8	1,045	111	655	6,501	44	44	5,728	610
	APUs	<1	8	1	1	4	1	2	42	4	4	20	5
	GSE	19	51	2	2	352	<1	103	278	10	9	1,926	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7
	Motor Vehicles	2	17	11	1	~~111~~ *112*	1	10	96	~~59~~ *60*	7	~~611~~ *616*	3
	Energy Use	--	--	--	--	--	--	--	--	--	--	--	--
	Construction	1	6	6	1	6	0	5	31	33	4	34	<1
	Totals	145	1,285	34	14	~~1,529~~ *1,531*	114	797	~~7,040~~ *7,041*	185	76	~~8,380~~ *8,387*	626
Existing 2018 Baseline Emissions		***141***	***1,058***	***25***	***14***	***1,887***	***95***	***773***	***5,797***	***135***	***75***	***10,341***	***519***
Difference from Existing 2018 Baseline		***4***	***227***	***9***	***<1***	***-358***	***20***	***23***	***~~1,243~~ 1,244***	***50***	***2***	***~~1,961~~ -1,954***	***107***
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Mitigated Emissions Exceeds Threshold?		***No***	***Yes***	***No***	***No***	***No***	***No***	***No***	***Yes***	***No***	***No***	***No***	***No***
Proposed Project Without Mitigation Emissions		***155***	***1,314***	***34***	***15***	***~~2,101~~ 2,102***	***114***	***851***	***~~7,198~~ 7,202***	***~~188~~ 189***	***80***	***~~11,499~~ 11,516***	***626***
Mitigated Emissions Difference from Proposed Project Without Mitigation		***-10***	***-29***	***-1***	***-1***	***-572***	***<-1***	***-55***	***~~-168~~ -161***	***-4***	***-3***	***~~-3,131~~ -3,129***	***<-1***
Unmitigated Emissions Exceed Threshold (from Table 3.2-11)?		***Yes***	***Yes***	***No***	***No***	***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***Yes***	***No***
2a/ 2030	**Aircraft**	132	1,404	8	8	1,146	125	724	7,691	45	45	6,280	684
	APUs	<1	8	1	1	4	1	2	42	4	4	21	5
	GSE	15	31	1	1	303	<1	82	171	5	4	1,658	1
	Stationary Sources	4	17	6	2	11	1	21	93	35	9	60	7
	Motor Vehicles	1	10	~~10~~	1	~~98~~	<1	7	~~55~~	~~57~~	5	~~536~~	3

Table 3.2-14: Proposed Project With Mitigation - Operational Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
				11		*99*			*56*	*58*		*544*	
	Energy Use	--	--	--	--	--	--	--	--	--	--	--	--
	Construction	1	7	3	<1	13	<1	4	39	16	2	71	<1
	Totals	153	1,477	~~29~~ *30*	13	~~1,574~~ *1,576*	128	840	8,092	~~161~~ *163*	70	~~8,626~~ *8,624*	~~700~~ *699*
Existing 2018 Baseline Emissions		***141***	***1,058***	***25***	***14***	***1,887***	***95***	***773***	***5,797***	***135***	***75***	***10,341***	***519***
Difference from Existing 2018 Baseline		***12***	***419***	***5***	***-1***	~~*-313*~~ *-311*	***33***	~~*66*~~ *67*	***2,295***	~~*26*~~ *28*	***-5***	~~*-1,715*~~ *-1,707*	***181***
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Mitigated Emissions Exceeds Threshold?		***No***	***Yes***	***No***	***No***	***No***	***No***	***No***	***Yes***	***No***	***No***	***No***	***No***
Proposed Project Without Mitigation Emissions		***165***	***1,512***	***31***	***13***	~~*2,225*~~ *2,227*	***128***	***905***	~~*8,284*~~ *8,283*	***170***	***73***	~~*12,194*~~ *12,203*	***700***
Mitigated Emissions Difference from Proposed Project Without Mitigation		***-12***	~~*-36*~~ *-35*	~~*-2*~~ *-1*	***-1***	***-651***	***<-1***	***-65***	~~*-192*~~ *-191*	~~*-8*~~ *-7*	***-3***	~~*-3,568*~~ *-3,569*	***-1***
Unmitigated Emissions Exceed Threshold (from Table 3.2-11)?		***Yes***	***Yes***	***No***	***No***	***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***Yes***	***No***
2b/ 2035	**Aircraft**	149	1,660	9	9	1,386	149	819	9,098	50	50	7,597	818
	APUs	<1	9	1	1	5	1	2	48	5	5	26	6
	GSE	15	35	1	1	329	<1	84	193	6	5	1,805	1
	Stationary Sources	4	17	6	2	11	1	22	93	35	9	60	7
	Motor Vehicles	1	7	11	1	~~89~~ *91*	1	4	40	~~58~~ *59*	5	~~487~~ *499*	3
	Energy Use	--	--	--	--	--	--	--	--	--	--	--	--
	Construction	<1	1	2	<1	2	<1	2	8	13	2	11	<1
	Totals	170	1,730	~~30~~ *31*	14	~~1,823~~ *1,824*	152	933	9,481	~~167~~ *168*	76	~~9,986~~ *9,997*	834
Existing 2018 Baseline Emissions		*141*	*1,058*	*25*	*14*	*1,887*	*95*	*773*	*5,797*	*135*	*75*	*10,341*	*519*
Difference from Existing 2018 Baseline		*29*	~~*676*~~ *672*	*6*	*<1*	~~*-64*~~ *-63*	*58*	~~*161*~~ *159*	~~*3,704*~~ *3,684*	*33*	~~*3*~~ *1*	~~*-350*~~ *-344*	*316*
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Mitigated Emissions Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***Yes***

Table 3.2-14: Proposed Project With Mitigation - Operational Emissions Inventory

Phase/ Year	Sources	Pollutants											
		Tons/Year						Pounds/Day					
		VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOC	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
Proposed Project Without Mitigation Emissions		***181***	***1,754***	***31***	***14***	***~~2,506~~ 2,508***	***152***	***994***	***~~9,613~~ 9,612***	***171***	***78***	***~~13,730~~ 13,741***	***835***
Mitigated Emissions Difference from Proposed Project Without Mitigation		***-11***	***-24***	***-1***	***-1***	***~~-683~~ -684***	***<-1***	***-62***	***~~-132~~ -131***	***~~-4~~ -3***	***-3***	***-3,744***	***<-1***
Unmitigated Emissions Exceed Threshold (from Table 3.2-11)?		***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***
2050	**Aircraft**	157	1,795	9	9	1,427	158	861	9,833	52	52	7,822	864
	APUs	<1	10	1	1	5	1	2	53	5	5	28	7
	GSE	18	31	1	1	370	<1	98	169	3	3	2,030	1
	Stationary Sources	4	17	6	2	11	1	22	93	35	9	60	7
	Motor Vehicles	<1	4	11	1	~~86~~ *89*	<1	~~2~~ *3*	23	~~59~~ *60*	4	~~472~~ *487*	3
	Energy Use	--	--	--	--	--	--	--	--	--	--	--	--
	Totals	180	~~1,856~~ *1,857*	28	13	~~1,900~~ *1,901*	161	986	10,172	~~154~~ *155*	73	~~10,412~~ *10,427*	881
Existing 2018 Baseline Emissions		***141***	***1,058***	***25***	***14***	***1,887***	***95***	***773***	***5,797***	***135***	***75***	***10,341***	***519***
Difference from Existing 2018 Baseline		***39***	***~~798~~ 799***	***3***	***<1***	***~~13~~ 14***	***66***	***~~213~~ 212***	***4,375***	***~~19~~ 20***	***-1***	***~~71~~ 86***	***362***
Threshold of Significance		***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Mitigated Emissions Exceeds Threshold?		***Yes***	***Yes***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***Yes***
Proposed Project Without Mitigation Emissions		***183***	***~~1,862~~ 1,863***	***28***	***~~14~~ 13***	***~~2,029~~ 2,031***	***161***	***1,004***	***~~10,202~~ 10,203***	***~~153~~ 156***	***~~74~~ 75***	***~~11,116~~ 11,131***	***881***
Mitigated Emissions Difference from Proposed Project Without Mitigation		***-3***	***-6***	***<-1***	***<-1***	***-129***	***<-1***	***-18***	***-31***	***<-1***	***-1***	***-704***	***<-1***
Unmitigated Emissions Exceed Threshold (from Table 3.2-11)?		***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***Yes***	***Yes***

Source: KB Environmental Sciences, Inc., 2019.
Note: Totals may reflect rounding.

3. Table 3.2-19 on page 3.2-65 of the Recirculated Draft EIR is hereby revised as follows:[32]

Table 3.2-19: Cumulative Projects Operational Emissions Inventory

	Average Annual Amount of Pollutants (tons/year)						Average Daily Amounts of Pollutant (pounds/day)					
	VOCs	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X	VOCs	NO_X	PM_{10}	$PM_{2.5}$	CO	SO_X
Near-Term Cumulative Projects	188	104	~~90~~ *91*	39	~~344~~ *348*	1	~~1,032~~ *1,033*	~~572~~ *574*	~~493~~ *500*	~~212~~ *215*	~~1,886~~ *1,910*	6
Proposed Project[1]	23	447	3	<1	~~325~~ *327*	33	127	2,447	~~18~~ *19*	<1	~~1,782~~ *1,791*	181
Total	211	551	~~93~~ *94*	39	~~669~~ *675*	34	~~1,159~~ *1,160*	~~3,109~~ *3,021*	~~511~~ *519*	~~212~~ *216*	~~3,668~~ *3,700*	187
Threshold of Significance	***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Any Exceedance of Threshold?	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No
Long-Term Cumulative Projects	62	~~72~~ *73*	~~47~~ *48*	14	~~120~~ *123*	<1	~~342~~ *343*	~~393~~ *396*	~~259~~ *267*	~~79~~ *81*	~~656~~ *673*	3
Proposed Project[2]	42	804	4	<1	~~141~~ *144*	66	231	4,406	~~20~~ *22*	~~<1~~ *1*	~~775~~ *790*	362
Total	104	~~876~~ *877*	~~51~~ *53*	~~14~~ *15*	~~261~~ *267*	~~66~~ *67*	~~573~~ *574*	~~4,799~~ *4,802*	~~279~~ *289*	~~79~~ *82*	~~1,431~~ *1,463*	365
Threshold of Significance	***13.7***	***40***	***15***	***10***	***100***	***40***	***75***	***250***	***100***	***55***	***550***	***250***
Any Exceedance of Threshold?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Source: CDM Smith, 2019.
Notes:
1. For Near-Term Cumulative Projects, the 2030 ADP operational emissions (without construction) increase over 2018 are assumed.
2. For Long-Term Cumulative Projects, the 2050 ADP operational emissions (without construction) increase over 2018 are assumed.

The modifications presented above are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

[32] Revisions to emissions for cumulative projects were based on the ratio of mobile source emissions to total emissions, as determined from the CalEEMod modeling data presented in Appendix R-C of the Recirculated Draft EIR, multiplied times the CARB Off-Model Adjustment Factors for 2030 (Near-Term Cumulative Projects) and 2050 (Long-Term Cumulative Projects). Revisions to emissions for cumulative projects were based on the 2030 and 2050 project-related mobile source emissions presented in Table 3.2-11 of the Recirculated Draft EIR multiplied times the CARB Off-Model Adjustment Factors for those years.

It should be noted that given the changes in emissions values are very minor, there would be no material change in the air pollutant dispersion values presented in Tables 3.2-12, 3.2-13, and 3.2-15 of the Recirculated Draft EIR.

Chapter 5, Alternatives Analysis

1. Table 5-9 on pages 5-31 through 5-33 of the Recirculated Draft EIR is hereby revised as follows:[33]

Table 5-9: Comparison of Emissions Inventory: Proposed Project versus Alternative 1 (No Project)

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1
1a/ 2024	Aircraft	111	117	1,104	1,117	7	8	7	8	992	1,072	105	109
	APUs	<1	<1	7	7	1	1	1	1	4	4	1	1
	GSE	29	29	81	81	2	2	2	2	867	867	<1	<1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	2	2	14	15	10	10	1	1	114	~~120~~ *121*	1	1
	Energy Use	<1	<1	1	2	<1	<1	<1	<1	1	1	<1	<1
	Construction	3	--	17	--	10	--	1	--	17	--	<1	--
	Totals	149	152	1,241	1,239	37	26	15	15	~~2,006~~ *2,007*	2,075	108	112
Tons/ Year	*Existing*	141		1,058		25		14		1,887		95	
	Future-Existing	8	10	183	181	12	~~<1~~ *1*	1	<1	119	188	13	~~17~~ *18*
	Threshold	***13.7***		***40***		***15***		***10***		***100***		***40***	
	Exceeds Threshold?	***No***	***No***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
	Alternative 1 - Proposed Project	~~3~~ *2*		-2		-11		<1		~~68~~ *69*		4	
1b/ 2026	Aircraft	120	127	1,186	1,204	8	8	8	8	1,045	1,150	111	116
	APUs	<1	<1	8	8	1	1	1	1	4	4	1	1
	GSE	29	29	79	79	2	2	2	2	922	922	<1	<1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	2	2	17	18	11	11	1	1	~~111~~ *112*	~~117~~ *118*	1	1
	Energy Use	<1	<1	1	2	<1	<1	<1	<1	1	1	<1	<1
	Construction	1	--	6	--	6	--	1	--	6	--	<1	--
	Totals	155	162	1,314	1,328	~~34~~ *35*	28	15	14	~~2,101~~ *2,102*	~~2,204~~ *2,205*	114	119

[33] Revisions in Table 5-9 also include typographical error corrections; specifically, the sum of $PM_{2.5}$ emissions in 2024.

Table 5-9: Comparison of Emissions Inventory: Proposed Project versus Alternative 1 (No Project)

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1
Tons/ Year	***Existing***	141		1,058		25		14		1,887		95	
	Future-Existing	14	21	256	270	~~9~~ *10*	~~2~~ 3	1	<1	214	~~317~~ *318*	~~19~~ *20*	~~24~~ *25*
	Threshold	***13.7***		***40***		***15***		***10***		***100***		***40***	
	Exceeds Threshold?	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
	Alternative 1 – Proposed Project	7		~~10~~ *13*		-7		<1		~~97~~ *103*		5	
2a/ 2030	**Aircraft**	132	144	1,404	1,432	8	9	8	9	1,146	1,310	125	133
	APUs	<1	<1	8	8	1	1	1	1	4	4	1	1
	GSE	26	26	61	61	1	1	1	1	947	947	<1	<1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	1	1	13	13	11	~~11~~ *12*	1	1	~~103~~ *105*	~~107~~ *108*	1	1
	Energy Use	<1	<1	2	2	<1	<1	<1	<1	2	1	<1	<1
	Construction	1	--	7	-	3	--	<1	--	13	--	<1	--
	Totals	165	176	1,512	1,533	31	~~27~~ *28*	13	13	~~2,225~~ *2,227*	~~2,380~~ *2,381*	128	136
Tons/ Year	***Existing***	141		1,058		25		14		1,887		95	
	Future-Existing	24	35	454	475	6	~~2~~ *3*	<1	<1	~~338~~ *340*	~~492~~ *494*	33	41
	Threshold	***13.7***		***40***		***15***		***10***		***100***		***40***	
	Exceeds Threshold?	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***Yes***
	Alternative 1 – Proposed Project	11		21		~~-4~~ *-3*		<1		154		8	
2b/ 2035	**Aircraft**	149	163	1,660	1,695	9	10	9	10	1,386	1,570	149	158
	APUs	<1	<1	9	9	1	1	1	1	5	5	1	1
	GSE	26	26	57	57	1	1	1	1	1,011	1,011	<1	<1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	1	1	7	8	11	11	1	1	~~89~~ *91*	~~93~~ *95*	1	1
	Energy Use	<1	<1	2	2	<1	<1	<1	<1	2	1	<1	<1
	Construction	<1	-	1	--	2	--	<1	--	2	--	<1	--
	Totals	181	194	1,754	1,786	31	28	14	14	~~2,506~~ *2,508*	~~2,690~~ *2,692*	152	161

Table 5-9: Comparison of Emissions Inventory: Proposed Project versus Alternative 1 (No Project)

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1	Prop. Project	Alt. 1
Tons/ Year	***Existing***	141		1,058		25		14		1,887		95	
	Future-Existing	40	53	696	728	~~6~~ *7*	4	1	1	~~618~~ *621*	~~803~~ *805*	58	67
	Threshold	***13.7***		***40***		***15***		***10***		***100***		***40***	
	Exceeds Threshold?	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***
	Alternative 1 – Proposed Project	13		32		~~-2~~ *-3*		<1		~~185~~ *184*		9	
2050	**Aircraft**	157	171	1,795	1,831	9	10	9	10	1,427	1,616	158	167
	APUs	<1	<1	10	10	1	1	1	1	5	5	1	1
	GSE	21	21	34	34	1	1	1	1	497	497	<1	<1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	<1	<1	4	4	11	11	1	1	~~86~~ *89*	~~90~~ *93*	<1	1
	Energy Use	<1	<1	2	2	<1	<1	<1	<1	2	1	<1	<1
	Totals	183	197	~~1,862~~ *1,863*	~~1,897~~ *1,898*	28	28	14	14	~~2,029~~ *2,031*	~~2,221~~ *2,223*	161	170
Tons/ Year	***Existing***	141		1,058		25		14		1,887		95	
	Future-Existing	42	56	804	839	4	3	***<1***	***<1***	~~141~~ *143*	~~333~~ *336*	66	76
	Threshold	***13.7***		***40***		***15***		***10***		***100***		***40***	
	Exceeds Threshold?	***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***
	Alternative 1 – Proposed Project	14		35		<1		<1		192		~~10~~ *9*	

Source: KB Environmental Sciences, Inc., 2019.
Note: Totals may reflect rounding.

2. Table 5-15 on pages 5-57 through 5-60 of the Recirculated Draft EIR is hereby revised as follows:

Table 5-15: Comparison of Operational Emissions Inventory: Project versus Alternative 3

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3
1a/ 2024	Aircraft	111	114	1,104	1,108	7	7	7	7	992	1,019	105	106
	APUs	<1	<1	7	7	1	1	1	1	4	4	1	1
	GSE	29	29	81	81	2	2	2	2	867	867	<1	1
	Stationary Sources	4	4	17	17	6	5	2	2	11	11	1	1
	Motor Vehicles	2	2	14	14	10	10	1	1	~~115~~ *114*	114	1	1
	Energy Use	<1	<1	1	1	<1	<1	<1	<1	1	1	<1	1
	Construction	3	1	17	4	10	3	1	1	17	4	<1	1
	Totals	**149**	**150**	**1,241**	**1,232**	**37**	**29**	**15**	**15**	~~**2,007**~~ ***2,006***	**2,020**	**108**	**112**
Existing Baseline		***141***		***1,058***		***25***		***14***		***1,887***		***95***	
Difference		**8**	**9**	**183**	**174**	**12**	**4**	**1**	**1**	***119***	***133***	***13***	***17***
Threshold (tpy)		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***No***	***No***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 3 - Proposed Project		***1***		***-9***		***-8***		***0***		***14***		***4***	
1b/ 2026	Aircraft	120	122	1,186	1,190	8	8	8	8	1,045	1,174	111	126
	APUs	<1	<1	8	8	1	1	1	1	4	4	1	1
	GSE	29	19	79	51	2	2	2	2	922	922	<1	1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	2	2	~~17~~ *18*	13	11	~~1~~ *11*	1	1	~~113~~ *112*	111	1	1
	Energy Use	<1	<1	~~<1~~ 1	<1	<1	<1	<1	<1	<1	<1	<1	1
	Construction	1	2	6	13	6	13	1	2	6	13	<1	1
	Totals	155	150	~~1,314~~ *1,315*	1,293	35	32	15	17	2,102	2,236	114	132
Existing Baseline		***141***		***1,058***		***25***		***14***		***1,887***		***95***	
Difference		***14***	***9***	***257***	***235***	***10***	***7***	***1***	***3***	***215***	***349***	***20***	***37***
Threshold (tpy)		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 3 - Proposed Project		***-5***		***-21***		***-2***		***2***		***136***		***18***	
2a/	Aircraft	132	132	1,404	1,404	8	8	8	8	1,146	1,146	125	125

Table 5-15: Comparison of Operational Emissions Inventory: Project versus Alternative 3

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3
2030	APUs	<1	1	8	8	1	1	1	1	4	4	1	1
	GSE	26	26	61	61	1	1	1	1	947	947	<1	1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	1	1	13	13	11	11	1	1	105	103	1	1
	Energy Use	<1	1	2	2	<1	1	<1	1	2	2	<1	1
	Construction	1	2	7	15	3	6	<1	1	13	27	<1	1
	Totals	**165**	**167**	**1,512**	**1,520**	**31**	**34**	**13**	**15**	~~**2,225**~~ **2,227**	**2,240**	**128**	**131**
Existing Baseline		***141***		***1,058***		***25***		***14***		***1,887***		***95***	
Difference		***24***	***26***	***454***	***462***	***6***	***9***	***<1***	***-1***	***340***	***353***	***33***	***36***
Threshold (tpy)		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 3 - Proposed Project		***2***		***8***		***4***		***2***		~~***15***~~ ***13***		***3***	
2b/ 2035	Aircraft	149	149	1,660	1,660	9	9	9	9	1,386	1,386	149	149
	APUs	<1	<1	9	9	1	1	1	1	5	5	1	1
	GSE	26	26	57	57	1	1	1	1	1,011	1,011	<1	1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	1	1	7	7	11	11	1	1	91	89	1	1
	Energy Use	<1	1	2	2	<1	1	<1	1	2	2	<1	1
	Construction	<1	1	1	2	2	2	<1	1	2	2	<1	1
	Totals	**181**	**183**	**1,754**	**1,755**	**31**	**31**	**14**	**16**	~~**2,506**~~ **2,508**	**2,506**	**152**	**155**
Existing Baseline		***141***		***1,058***		***25***		***14***		***1,887***		***95***	
Difference		***40***	***42***	***696***	***697***	***7***	***6***	***1***	***2***	~~***618***~~ ***621***	***618***	***58***	***60***
Threshold (tpy)		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***
Alternative 3 - Proposed Project		***2***		***1***		***<1***		***2***		***0***		***2***	
2050	Aircraft	~~154~~ *157*	157	~~1,759~~ *1,795*	1,795	9	9	9	9	~~1,425~~ *1,427*	1,427	~~156~~ *158*	158

Table 5-15: Comparison of Operational Emissions Inventory: Project versus Alternative 3

Phase/ Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3	Prop. Project	Alt. 3
	APUs	<1	1	~~9~~ *10*	10	1	1	1	1	5	5	1	1
	GSE	21	21	34	34	1	1	1	1	497	497	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	<1	1	4	4	11	10	1	1	89	86	<1	1
	Energy Use	<1	1	2	2	<1	1	<1	1	2	2	<1	1
	Totals	~~180~~ *183*	185	~~1,826~~ *1,862*	1,862	~~29~~ *28*	28	14	14	~~2,029~~ *2,031*	2,029	~~159~~ *161*	161
Existing Baseline		***141***		***1,058***		***25***		***14***		***1,887***		***95***	
Future-Existing		~~*39*~~ *42*	*44*	~~*768*~~ *804*	*804*	*4*	*3*	*<1*	*<1*	~~*142*~~ *143*	*142*	~~*64*~~ *66*	*66*
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***
Alternative 3 - Proposed Project		***2***		***<1***		***1***		***<1***		***<1***		***<1***	

Source: CDM Smith., 2019.
Notes: Totals may reflect rounding.

3. Table 5-19 on pages 5-93 through 5-95 of the Recirculated Draft EIR is hereby revised as follows:[34]

Table 5-19: Comparison of Operational Emissions Inventory: Proposed Project versus Alternative 4

Phase / Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4
1a/ 2024	Aircraft	111	114	1,104	1,110	7	7	7	7	992	1,027	105	107
	APUs	<1	<1	7	7	1	1	1	1	4	4	1	1
	GSE	29	29	81	81	2	2	2	2	867	867	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	2	2	14	11	10	9	1	1	114	104	1	1

[34] Revisions to Table 5-19 also include typographical error corrections; specifically, clarifying that emissions associated with Alternative 4 would in many cases be less than those of the proposed project (i.e., the comparison totals presented in the Recirculated Draft EIR did not have a negative sign before the numeric value where Alternative 4 emissions would be less than those of the proposed project).

Table 5-19: Comparison of Operational Emissions Inventory: Proposed Project versus Alternative 4

Phase / Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4
	Energy Use	<1	<1	1	2	<1	<1	<1	<1	1	2	<1	<1
	Construction	3	3	17	15	10	9	1	1	17	17	<1	<1
	Totals	**149**	**151**	**1,241**	**1,244**	**37**	**35**	**15**	**15**	**2,006**	~~**2,031**~~ ***2,032***	**108**	**110**
Existing		141		1,058		25		14		1,887		95	
Future-Existing		***8***	***10***	***183***	***186***	***12***	***10***	***1***	***1***	***119***	***144***	***13***	***15***
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***No***	***No***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 4 – Proposed Project		***2***		***3***		***-2***		***<1***		***25***		***2***	
1b/ 2026	Aircraft	120	119	1,186	1,184	8	8	8	8	1,045	1,030	111	111
	APUs	<1	<1	8	8	1	1	1	1	4	4	1	1
	GSE	29	29	79	79	2	2	2	2	922	922	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	2	2	17	13	11	9	1	1	~~111~~ *112*	~~98~~ *99*	1	1
	Energy Use	<1	<1	1	2	<1	<1	<1	<1	1	2	<1	<1
	Construction	1	1	6	4	6	5	1	1	6	5	<1	<1
	Totals	**155**	**154**	**1,314**	**1,307**	**35**	**32**	**15**	**14**	~~**2,101**~~ ***2,102***	**2,072**	**114**	**113**
Existing		141		1,058		25		14		1,887		95	
Future-Existing		14	13	~~257~~ *256*	249	10	7	1	1	214	~~184~~ *185*	~~19~~ *20*	19
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***No***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 4 - Proposed Project		~~1~~ *-1*		~~6~~ *-6*		~~3~~ *-3*		~~>1~~ *<-1*		~~29~~ *-29*		~~0~~ *<-1*	
2a/ 2030	Aircraft	132	132	1,404	1,403	8	8	8	8	1,146	1,140	125	125
	APUs	<1	<1	8	8	1	1	1	1	4	4	1	1
	GSE	26	26	61	61	1	1	1	1	947	947	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	1	1	13	10	11	10	1	1	~~103~~ *105*	~~92~~ *93*	1	1
	Energy Use	<1	<1	2	~~<1~~ *2*	<1	<1	<1	<1	2	2	<1	<1
	Construction	1	<1	7	<1	3	<1	<1	<0	13	<1	<1	<1
	Totals	**165**	**164**	**1,512**	~~**1,052**~~ ***1,501***	**31**	~~**25**~~ ***27***	**13**	**13**	~~**2,225**~~ ***2,227***	~~**2,196**~~ ***2,197***	**128**	**127**

Table 5-19: Comparison of Operational Emissions Inventory: Proposed Project versus Alternative 4

Phase / Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4
Existing		141		1,058		25		14		1,887		95	
Future-Existing		24	23	454	443	6	2	<1	-1	338	~~308~~ *310*	33	33
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***No***	***No***
Alternative 4 – Proposed Project		~~1~~ *-1*		~~11~~ *-11*		~~4~~ *-4*		~~<1~~ *<-1*		~~30~~ *-28*		~~<1~~ *<-1*	
2b/ 2035	**Aircraft**	149	147	1,660	1,654	9	9	9	9	1,386	1,350	149	148
	APUs	<1	<1	9	9	1	1	1	1	5	5	1	1
	GSE	26	26	57	57	1	1	1	1	1,011	1,011	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	1	1	7	7	11	10	1	1	~~89~~ *91*	~~82~~ *84*	1	<1
	Energy Use	<1	<1	2	2	<1	<1	<1	<1	2	2	<1	<1
	Construction	<1	-	1	--	2	--	<1	--	2	--	<1	--
	Totals	**181**	**178**	**1,754**	**1,745**	**31**	**28**	**14**	**14**	~~**2,506**~~ ***2,508***	~~**2,461**~~ ***2,463***	**152**	**151**
Existing		141		1,058		25		14		1,887		95	
Future-Existing		40	37	696	~~687~~ *688*	~~6~~ *7*	3	1	<1	~~618~~ *621*	~~574~~ *576*	58	56
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***Yes***	***Yes***	***Yes***
Alternative 4 – Proposed Project		~~3~~ *-3*		~~9~~ *-9*		~~3~~ *-3*		~~<1~~ *<-1*		~~44~~ *-44*		~~2~~ *-2*	
2050	**Aircraft**	157	155	1,795	1,788	9	9	9	9	1,427	1,392	158	156
	APUs	<1	<1	10	10	1	1	1	1	5	5	1	1
	GSE	21	21	34	34	1	1	1	1	497	497	<1	<1
	Stationary Sources	4	4	17	17	6	6	2	2	11	11	1	1
	Motor Vehicles	<1	<1	4	4	11	10	1	1	~~86~~ *89*	~~80~~ *83*	<1	<1
	Energy Use	<1	<1	2	2	<1	<1	<1	<1	2	2	<1	<1
	Totals	**183**	**181**	**1,862**	**1,855**	**28**	***27*** ***28***	**14**	**13**	~~**2,029**~~ ***2,031***	~~**1,987**~~ ***1,989***	**161**	**159**
Existing		141		1,058		25		14		1,887		95	
Future-Existing		42	~~39~~ *40*	804	797	4	3	<1	<1	~~141~~ *143*	~~100~~ *102*	66	64
Threshold		***13.7***		***40***		***15***		***10***		***100***		***40***	
Exceeds Threshold?		***Yes***	***Yes***	***Yes***	***Yes***	***No***	***No***	***No***	***No***	***Yes***	***No***	***Yes***	***Yes***

Table 5-19: Comparison of Operational Emissions Inventory: Proposed Project versus Alternative 4

Phase / Year	Sources	Pollutants (tons/year)											
		VOC		NO_X		PM_{10}		$PM_{2.5}$		CO		SO_X	
		Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4	Prop. Project	Alt. 4
Alternative 4 – Proposed Project		~~3~~ *-3*		~~7~~ *-7*		~~1~~ *-1*		~~<1~~ *<-1*		~~41~~ *-41*		~~2~~ *-2*	

Source: KB Environmental Sciences, Inc., 2019.
Notes: Totals may reflect rounding.

The modifications presented above are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-PC021-16

Air monitoring data from the nearest U.S. EPA-approved monitoring station for particulate matter was selected for the air quality analyses presented in the Recirculated Draft EIR. Other monitoring sites, such as those from "PurpleAir.com" that are referenced by the comment, do not use U.S. EPA-approved measurement methodologies.

Air quality sensors like the one referenced in the website cited by the comment have wide appeal to professional researchers, community groups, students, and citizen scientists alike because they generally are more compact and lower in cost than traditional air quality monitoring methods. However, the technology used by such sensors is still under development and little information exists on the quality of data that these sensors produce.[35] Therefore, the sensors are not considered a reliable source of data at this time by the U.S. EPA.

Further information on U.S EPA's air quality data collected at outdoor monitors across the U.S. can be found at: https://www.epa.gov/outdoor-air-quality-data.

Response to Comment R-PC021-17

The comment is noted. Table 3.2-5 on page 3.2-23 of the Recirculated Draft EIR has been revised to reflect the following correction, which is shown in strike-through (deleted) and underlined italicized (new) text:

Table 3.2-5: San Diego Air Quality Monitoring Data (µg/m³)

			Applicable to the CAAQS			Applicable to the NAAQS			
Pollutant	Averaging Time	Dist. and Dir. from SDIA (Miles)	Measured Levels[1]	Standard	Above Standard (Yes/No)	Measured Levels[1]	Standard (NAAQS)	Primary/ Secondary[2]	Above Standard (Yes/No)
Ozone (O3)	1 hour[3]	10 SE	172	180	No	--	--	--	--
	8-hour	10 SE	145	137	~~No~~ *Yes*	120	137	Both	No
Particulate Matter (PM10)	24-hour	10 SE	59	50	Yes	40	150	Both	No
	Annual	10 SE	20	20	No	--	--	--	--

[35] EPA, https://www.epa.gov/air-sensor-toolbox/evaluation-emerging-air-pollution-sensor-performance.

Table 3.2-5: San Diego Air Quality Monitoring Data (µg/m³)

			Applicable to the CAAQS			Applicable to the NAAQS			
Pollutant	Averaging Time	Dist. and Dir. from SDIA (Miles)	Measured Levels[1]	Standard	Above Standard (Yes/No)	Measured Levels[1]	Standard (NAAQS)	Primary/ Secondary[2]	Above Standard (Yes/No)
Particulate Matter (PM2.5)	24-hour	10 SE	--	--	--	25	35	Both	No
	Annual	10 SE	10	12	No	9	12	Primary	No
							15	Secondary	No
Carbon Monoxide (CO)	1 hour	14 NE	1,834	23,000	No	1,834	40,000	Primary	No
	8-hour	14 NE	1,604	10,000	No	1,604	10,000	Primary	No
Nitrogen Dioxide (NO2)	1 hour	10 SE	107	339	No	85	189	Primary	No
	Annual	10 SE	24	57	No	17	100	Both	No
Sulfur Dioxide (SO2)	1 hour	14 NE	9	655	No	3	196	Primary	No
	3-hour	14 NE	--	--	--	3	1,300	Secondary	No
	24-hour	14 NE	1	105	No	--	--	--	--
Lead (Pb)	30-day[3]	14 NE	0.09	1.5	No	--	--	--	--
	3-month	14 NE	--	--	--	0.01	0.15	Both	No

Source: USEPA AirData and CARB Air Quality Data Statistics (https://www.arb.ca.gov/adam/index.html) extracted July 2019.
Notes:
-- Not applicable
See Table 3.2-3 for pollutant abbreviation definitions.
1. For standards that are not to be exceeded or not to be exceeded more than once per year, the reported values represent the highest measured level over the period of measurement (i.e., 2016 through 2018).
2. Primary standards provide public health protection. Secondary standards provide public welfare protection (e.g., protection against decreased visibility and damage to animals, crops, vegetation, and buildings).
3. Reported CAAQS based level is the maximum daily level measured for the period 2015 through 2017 (2018 data was not available).

This correction is also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

The above change to Table 3.2-5 does not affect the Recirculated Draft EIR's analysis, because it simply corrects the answer to the question of whether existing/measured concentrations of ozone exceed the CAAQS, which does not affect any of the calculations of pollutant emissions or concentrations completed for the Recirculated Draft EIR nor any of the conclusions of the impacts analyses.

Response to Comment R-PC021-18

The potential significance of the Proposed Project's SO_x exceedance of 0.3 tons presented in Table 3.2-9 (Recirculated Draft EIR page 3.2-28) is addressed in footnote number 32 on page 3.2-27 of the Recirculated Draft EIR, which states the following:

> Although SO_x emissions associated with project operations in 2030 are 0.2 percent greater tha[n] the SO_x emissions assumed for SDIA in the Ozone Attainment Plan in 2030, as indicated in Table 3.2-9, SO_x is not an ozone precursor. As such, that 0.2 percent emissions exceedance in 2030 would not conflict with or obstruct implementation of the Ozone

Attainment Plan. Additionally, San Diego County is currently in attainment with state and federal standards for SO_2 (SO_x); therefore, the SDIA future operational emissions of SO_x would not conflict with any applicable attainment plan.

Response to Comment R-PC021-19

The analyses of aircraft-related air quality and greenhouse gas impacts completed for the Recirculated Draft EIR are based on standard industry practice for CEQA documents. As such, the analysis of aircraft operations accounts for those aspects of landings, takeoffs, and ground taxiing and idling that most relate to SDIA and may be affected by the proposed project and project alternatives, which is the point of a CEQA analysis. Modeling aircraft operations within defined three-dimensional parameters for an airport, including the mixing height, also is an integral part of the recognized and expert agency-issued air quality models, such as the FAA's Aviation Environmental Design Tool (AEDT), which was used for the ADP analysis. It is not feasible nor reasonable to attempt to model aircraft operations at each origin and destination airport linked to all the flights at SDIA that are addressed in the aircraft operations analyses for the ADP, and to also attempt to model the air pollutant emissions, including greenhouse gas emissions, for each entire flight between the origin and destination airports.

It is important to note that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." Case law also supports the fact that CEQA does not require a lead agency to perform all recommended research in evaluating a project's environmental impacts. (Society for Cal. Archaeology v. County of Butte (1976) 65 Cal.App. 3d 832.)

Response to Comment R-PC021-20

Emissions of the criteria air pollutants/pollutant precursors and greenhouse gases (GHGs) due to the use of natural gas were conservatively estimated for existing conditions and all future years and captured under both the "Stationary Sources" and "Other Sources" categories. This is in part due to the methodologies and models used to prepare the emissions inventories.

As detailed in the Air Quality/GHG Technical Report (Recirculated Draft EIR, Appendix R-C), stationary sources fueled by natural gas (i.e., boilers such as those used in the SDIA Central Utility Plant to heat water for space heating in buildings) were modeled using project-specific fuel throughput data and the FAA's AEDT model and presented under the "Stationary Sources" category. In addition, emissions resulting from activities in buildings for which natural gas is used as energy source were also estimated under the "Other Sources" category, using the California Emissions Estimator Model (CalEEMod), which also includes building space heating. These latter emissions were based on project-specific land uses and sizes rather than fuel throughput. Notably, the two methods result in conservative estimates as the emissions due to natural gas usage are accounted under both source categories; therefore, they are duplicative/redundant (i.e., emissions from natural gas usage were counted twice by keeping the estimates from both methodologies for estimating emissions).

To help clarify this matter, relative to the perceived inconsistency suggested in the comment, Note 1 in Table 3.3-5 on page 3.3-36 of the Recirculated Draft EIR has been revised to reflect the following modifications, which are shown in strike-through (deleted) and underlined italicized (new) text.

1. Estimates of emissions resulting from energy consumption associated with electricity usage, water usage (conveyance, consumption and treatment), and solid waste disposal. Emissions associated with natural gas consumption within the built environment are captured by the "Stationary Sources" category, *including* ~~as~~ natural gas consumption ~~is~~ associated with SDIA's existing~~,~~ on-site Central Utility Plant *and natural gas consumption associated with the operation of the replacement terminal and new administrative offices. It should be noted that due to the use of different methodologies and assumptions associated with estimating natural gas-related emissions from the Central Utility Plant and from new building areas, as described in Appendix R-C of the Recirculated Draft EIR, there is some duplication in the natural gas-related emissions estimates. More specifically, natural gas-related emissions for new buildings include those associated with space heating, as estimated by CalEEMod. The expanded on-airport Central Utility Plant will provide hot water for space heating at the replacement terminal and new administrative offices and the Plant's natural gas emissions are separately estimated. As such, emissions from the consumption of natural gas for space heating have been counted twice – once via CalEEMod and once via AEDT – resulting in the conservative over-estimation of emissions from natural gas consumption for space heating*.

These modifications are also included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Response to Comment R-PC021-21

Please see Response to Comment R-PC021-15 above.

Response to Comment R-PC021-22

The commenter appears to equate the increased energy demand that would occur under the proposed project as a result of increasing the size of facilities with wasteful and inefficient use of energy. However, as discussed extensively in Section 3.15, Utilities, of the Recirculated Draft EIR, SDCRAA is committed to reducing energy demand and reliance on non-renewable energy. These efforts to reduce energy demand have contributed to a decreased energy use intensity at SDIA as shown in Table 3.15-3 on page 3.15-21 in Section 3.15, Utilities, of the Recirculated Draft EIR. Thus, although energy use has increased over time as facilities have expanded and the number of passengers has risen, energy efficiency has improved since 2011. With continued implementation of SDCRAA's programs and policies, this trend is expected to continue into the future. Further, SDCRAA has been increasing "greener" grid-deliverables and on-site renewables as discussed on page 3.15-20 of the Recirculated Draft EIR. In addition to the programs that SDCRAA is currently implementing to improve energy efficiency, page 3.15-70 of the Recirculated Draft EIR identifies sustainable energy requirements of the proposed project that would ensure energy use associated with the new facilities would be reliable and sufficient to meet facility and human needs, but not wasteful or inefficient. Therefore, while energy demand would increase as a consequence of

anticipated growth in passenger numbers – growth that would occur with or without the proposed project – energy efficiency efforts would preclude wasteful and inefficient use of energy.

Regarding the comment that the SDCRAA should explore the feasibility of additional on-site renewable energy generation and eliminating natural gas use altogether, the Recirculated Draft EIR evaluated the feasibility of the proposed project increasing renewable energy use and decreasing reliance on fossil fuels. To this end, the proposed project includes actions to support the increased renewable energy use and decreased reliance on fossil fuels, and these are discussed in the Recirculated Draft EIR on pages 3.15-70 through 3.15-71 in Section 3.15, Utilities, and in Section 3.3, Greenhouse Gases and Climate Change. Further, Table 3.2-17 in Section 3.2, Air Quality, of the Recirculated Draft EIR presents an extensive analysis of the feasibility of implementing various measures that would reduce criteria pollutants and greenhouse gases. Many of these measures would also reduce energy use and or/increase renewable energy use/decrease reliance on fossil fuels. Actions that have been determined to be feasible under the proposed project to support increasing renewable energy use include, for example, measures such as (but not limited to) requiring the new T1 would be photovoltaic ready, transitioning off-road ground support equipment (GSE) to alternative fuels by 2024, and requiring buildings within the project to be powered by 100 percent renewable electricity by 2024. See the Recirculated Draft EIR pages referenced previously for additional information.

These actions that would be implemented under the proposed project are not acknowledged in the comment, nor does the commenter identify any deficiencies in the analysis of the feasibility of these measures that should be considered; therefore, no additional analysis is required.

Regarding the assertion that the energy analysis in the Recirculated Draft EIR is deficient for the same reasons explained in comments provided on the 2018 Draft EIR, see Response to Comment R-PC021-1. As explained therein, because the Recirculated Draft EIR is a completely new CEQA document and does not rely on the withdrawn 2018 Draft EIR, it is impossible to translate CNFF's comments on the latter into comments on the former. For example, the 2018 comment letter asserts that the 2018 Draft EIR "impermissibly attempts to rely on compliance with unspecified regulations and policies as a substitute for consideration of the specific concerns in Appendix F." While, contrary to this assertion, the 2018 Draft EIR did include identification of specific regulations and specific policies that would reduce energy consumption, the identification of specific regulations, policies, and mitigation measure to reduce energy consumption is expanded upon in the Recirculated Draft EIR. For example, Table 3.2-17 in Section 3.2, Air Quality, of the Recirculated Draft EIR (also referenced in Section 3.3, Greenhouse Gases and Climate Change, and Section 3.15, Utilities) provides a comprehensive list of existing programs at SDIA, specific project design features, and project mitigation measures that would reduce reliance on fossil fuels, thereby reducing energy demand associated with the proposed project.

Regarding the assertion that all applicable requirements of Appendix F (Energy Conservation) of the State CEQA Guidelines are not addressed, Appendix F Section II presents a list of several "energy impact possibilities" to assist in the preparation of an EIR, and that should be considered in an EIR where applicable or relevant. Appendix F Section II.C provides a list of six items that "[e]nvironmental [i]mpacts ***may*** include" (emphasis added) such as addressing a project's energy requirements and energy use, the effects of the project on local and regional supplies, the effects of

the project on peak and base period demands, the degree to which the project complies with existing energy standards, the effects of the project on energy resources, and the project's projected transportation energy use and its overall use of efficient transportation alternatives. These items are address in Section 3.15, Utilities, of the Recirculated Draft EIR. Specifically, see Section 3.15.6.5, which provides an estimate of transportation-related fuel consumption and electricity and natural gas demand for project construction and operation and addresses the effects of the project on energy resources, and Section 3.15.6.6 which addresses the proposed project's compliance with energy standards. Section 3.15.6.5 and 3.15.6.6 identify conservation measures that would be implemented to reduce transportation-related fuel consumption and energy demand. Regarding peak demand, as described in Section 3.15.4.4 beginning on page 3.15-19 of the Recirculated Draft EIR, there are existing facilities in place and planned to address peak demand at SDIA, including the Central Utility Plant (CUP), medium voltage distribution network, and battery energy storage system to store solar power for use during periods of peak demand. It should also be noted that the peak energy demand at the Airport typically does not coincide with the utilities' peak energy demand. For example, electricity use at SDIA peaks in the early morning at 6:00 a.m. primarily due to the preconditioning of the terminal facilities and increased landside power demand from aircraft, while San Diego Gas & Electric (SDG&E) peak periods are identified as between 4:00 p.m. and 9:00 p.m.[36,37] Therefore, the Airport and SDG&E peak energy periods do not overlap. Regarding efficient transportation alternatives, the Recirculated Draft EIR includes a new Alternative 4: T1 Replacement and Transportation Improvements, that includes a transit-ready area located between Terminals 1 and 2, and provides for the preservation of right-of-way on airport property to accommodate potential future off-airport access road improvements. The SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Regarding the demand factors used to determine increased energy demand associated with the proposed project, see Section 3.15.2, General Approach and Methodology, which explains that the factors used were selected based on the California Emissions Estimator Model (CalEEMod) demand factors that most closely approximate uses associated with the proposed project (CalEEMod does not provide demand factors for airport terminals). It should also be clarified that the commercial development opportunity area is separate from Terminal 1 and as such was considered as separate use with a separate energy demand from the terminal. It should be noted that, unlike the proposed project, Alternative 4 does not include the 400,000 square foot commercial development opportunity area proposed adjacent to the new (replacement) Terminal 1.

As described above, the proposed project would comply with specific regulations, policies, and mitigation measures that would serve to reduce the overall energy demand, including transportation fuel consumption and electricity and natural gas demand. Therefore, the proposed project would avoid and reduce the inefficient, wasteful, and unnecessary consumption of energy.

[36] San Diego International Airport. Strategic Energy Plan – An Integrated Approach to Energy Resiliency. October 2017.

[37] State of California Public Utilities Commission. Decision Adopting Revenue Allocation and Rate Design for San Diego Gas & Electric Company. August 24, 2017. Available: http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M194/K473/194473384.PDF.

As described in Section 3.15 of the Recirculated Draft EIR, impacts associated with energy use would be less than significant. No additional analysis is required.

Response to Comment R-PC021-23

Please see Response to Comment R-PC021-3 above regarding Alternative 4 being recommended by SDCRAA staff for approval by the SDCRAA Board instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. Please see Response to Comment R-PC021-1 above regarding the commenter's comments on the 2018 Draft EIR.

As indicated in Section 3.2, Air Quality, and Section 3.3, Greenhouse Gases and Climate Change, of the Recirculated Draft EIR, the SDCRAA entered into a 10-year agreement with various airlines operating at SDIA for the contribution of over a half-billion dollars for improvements related to transportation and transit systems serving the Airport. The SDCRAA will continue to partner with SANDAG, which leads regional transportation planning and construction, and other public agencies to seek other available funding related to transit serving SDIA.

SELTZER | CAPLAN | MCMAHON | VITEK
A LAW CORPORATION

www.scmv.com
619.685.3003
619.685.3100 FAX

750 B STREET, SUITE 2100
SAN DIEGO, CALIFORNIA 92101

G. SCOTT WILLIAMS
swilliams@scmv.com
(619) 685-3151
(619) 702-6842 FAX

RECEIVED
NOV 04 2019
BY: .....

November 4, 2019

VIA U.S. MAIL & E-MAIL

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

Re: Airport Development Plan, Draft Environmental Report
(SCH # 2017011053/SDCRAA # EIR-18-01)

Dear Mr. Anasis:

We represent the California Alliance for a Cleaner Tomorrow, Inc. ("CACTI"). CACTI previously submitted comments on September 7, 2018, and July 1, 2019, on the San Diego County Regional Airport Authority's ("SDCRAA") Draft Environmental Report ("DEIR") for the Airport Development Plan ("ADP"). On behalf of CACTI, we hereby submit additional comments on SDCRAA's Recirculated DEIR ("RDEIR") for the ADP.

R-PC022-1

I. Infeasibility of Mitigation Measures

As with its original DEIR, SDCRAA has failed in the RDEIR to comply with CEQA, including case law interpreting the statute, as it applies to the determination of whether potential mitigation measures are feasible or may be deemed infeasible. Under CEQA, the scope of a public agency's duty to mitigate or avoid its project's significant effects extends not only to its own property, but also the surrounding environment that will be affected, including areas off-site from the project. (*City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 957.) "CEQA does permit a lead agency to determine that mitigation measures necessary to avoid a project's environmental effects 'are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.' [Citation.]" (*Ibid.*) But if a public agency shares with other agencies the responsibility for mitigating its project's effects on regional infrastructure, the lead agency may disclaim responsibility "'only when the other agency said to have responsibility has exclusive responsibility.' [Citation.]" (*Ibid.*) And if another agency with jurisdiction over off-site

R-PC022-2

R-PC022

infrastructure agrees to permit the lead agency to implement necessary mitigation measures, those mitigation measures must be implemented except in the most narrow circumstances.

One potential basis for a lead agency to determine that necessary mitigation measures are infeasible is if funding for such measures is unavailable. But an agency cannot simply assert that it has asked for funding for off-site mitigation measures and conclude vaguely that it may or may not receive funding, and as a result important mitigation measures may be infeasible. This is particularly true where the mitigation measures are necessary to reduce overwhelming impacts that would dramatically affect the quality of life for hundreds of thousands of people per year. Instead, before a lead agency may make a potential finding of infeasibility for a mitigation measure, an EIR must include a comprehensive discussion of potential sources of funding for off-site mitigation measures from all potential sources. (*City of San Diego, supra,* 61 Cal.4th at p. 966.) In addition, a lead agency must fully explain all steps it has taken to obtain funding for off-site mitigation measures and, if certain funding sources are unavailable, the agency must provide a detailed explanation of why those sources are unavailable and how the lead agency might obtain funding from alternative sources. (*Ibid.*)

In the RDEIR, the SDCRAA finds that certain off-site mitigation measures necessary to reduce significant transportation impacts may be infeasible because FAA approval is required before funds may be spent on off-site improvements and such approval, while requested, has not been received. The RDEIR states repeatedly for many different potential mitigation measures that such mitigation would be infeasible if the FAA does not approve funding for the improvements. (RDEIR, 3.14-41 - 3.14-51, 3.14-66, 3.14-75 – 3.14-79, 3.14-92 – 3.14-94.)

These statements do not satisfy CEQA's requirements that must be fulfilled before a lead agency may make a finding of infeasibility based on funding unavailability. First, the RDEIR's vague, but oft-repeated, narrative regarding FAA approval does not satisfy the requirements in the *City of San Diego* case that an agency must provide a detailed discussion of funding availability, efforts to obtain funding and alternative sources of funding if FAA approval is not forthcoming. (*City of San Diego*, *supra*, 61 Cal.4th at p. 966.)

Second, the RDEIR fails its fundamental purpose of disclosing to the public and the agency decisionmakers the environmental impacts of the proposed project. Because the RDEIR says no more than that important mitigation measures might be feasible, we have no ability to understand the ADP's true environmental impacts and, consequently, whether the ADP should be approved. This is particularly true because the significant traffic impacts that might or might not be subject to mitigation measures would seriously degrade many roadways, intersections and freeway segments used by tens of thousands of residents of and visitors to San Diego daily. As a result, the uncertainty caused by the generalities in the RDEIR go fundamentally to whether the ADP would be good for the region. That uncertainty undermines the very purpose of the RDEIR as mandated by CEQA.

Third, the RDEIR fails to discuss: (1) the availability of potential sources of funding other than FAA funds for offsite mitigation measures; and (2) reasons supporting why those sources cannot

R-PC022-2 Cont'd

R-PC022-3

R-PC 022-4

R-PC022

be used to pay for mitigation of the significant off-site environmental effects of the project. (*City of San Diego*, supra, 61 Cal.4th at 966.)

II. No Increase in Air Traffic with Project Moving Forward

The RDEIR states that the number of enplaned passengers at the Airport is expected to be the same with or without the ADP improvements. (RDEIR, 2-25.) The project components include replacement of Terminal 1, substantial modifications to Terminal 2, an increase in the number of gates from 51-61, a new airport access roadway, 400,000 additional square feet of floor space for such uses as a farmer's market and a conference center and 2,650 additional parking spaces. (RDEIR, 2-27, 2-30, 2-32, 2-36.) Despite this substantial expansion, the RDEIR concludes that future activity levels at the Airport are the same for both the proposed project and for the No Project Alternative. The RDEIR makes this conclusion for aircraft operations and passenger levels (RDEIR, 2-25, 5-2), air quality (RDEIR, ES-62), greenhouse gas emissions (RDEIR, ES-62), noise (RDEIR, ES-64/65) and traffic (RDEIR, ES-67), at a minimum.

The RDEIR fails to explain or support how environmental impacts would not be increased as a result of the ADP. For example, how does a 20% increase in the number of gates, and an increased capacity to accommodate larger planes, not increase the overall number of passengers at the airport? In addition, how does the construction of a conference center and 2,650 additional parking spaces not increase traffic to and from the airport? The RDEIR seeks to minimize the impacts associated with the ADP, but it cannot escape the unavoidable consequences of such a massive expansion.

III. Conclusion

Because of the deficiencies in the RDEIR identified above, the SDCRAA should revise the RDEIR and recirculate it for public comment once again.

Very truly yours,



Jessica S. Doidge, on behalf of,

G. Scott Williams, Esq.
Seltzer Caplan McMahon Vitek
A Law Corporation

GSW:JSD:sc

R-PC 022-4 Cont'd

R-PC022-5

R-PC022-6

COMMENT LETTER NO. R-PC022	Seltzer Caplan McMahon Vitek on behalf of the California Alliance for a Cleaner Tomorrow (CACTI)	November 4, 2019

Response to Comment R-PC022-1

Please see Responses to Comments R-PC022-2 through R-PC022-6, which address the commenter's comments on the Recirculated Draft EIR.

As indicated in Section 1.7, Availability of the Recirculated Draft EIR, on page 1-15 of the Recirculated Draft EIR: "The Recirculated Draft EIR replaces the 2018 Draft EIR in its entirety and includes a full statutory public review and comment period; therefore, all comments should address the Recirculated Draft EIR, not the 2018 Draft EIR or any portion thereof. While comments submitted on the 2018 Draft EIR will be included in the administrative record for the project, the SDCRAA will prepare written responses only to the comments submitted on the Recirculated Draft EIR."

Response to Comment R-PC022-2

As discussed in Appendix R-K to the Recirculated Draft EIR, all airline fees, passenger fees, concession payments, lease payments, parking fees, rental car fees, and any other form of revenue received or generated within the boundaries of the Airport is determined under federal law to be Airport revenue. Also as discussed in Appendix R-K to the Recirculated Draft EIR, Airport revenues may legally be used for the capital or operating costs of: (1) the airport; (2) the local airport system; or (3) other local facilities owned and operated by the airport owner or operator and directly and substantially related to the air transportation of passengers or property. (49 U.S.C. § 46301(a)(3); see also FAA Order 5190.6B, p. 15-4; FAA Policy and Procedure Concerning the Use of Airport Revenue, Feb. 16, 1999, p. 7705.) To satisfy the "directly and substantially related to the air transportation" prong, the access way should be the primary means of ground access to the airport, and in this case, funding is limited to the portion of the road from the airport to the nearest line of mass capacity. (FAA Order 5190.6B, p. 15-6.) This general rule prohibits the use of airport revenues for off-site projects that are not owned or operated by the airport and are not directly or substantially related to air transportation. (See FAA Order 5100.38D, p. C-5.) In addition, if portions of the project will be used by both airport and non-airport passengers, airport funds must be pro-rated so that they are proportional to expected airport patrons' use. (Note that FAA grant funds also are similarly restricted to prevent use on off-Airport improvement projects.) The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA (included in Appendix R-K) are understood by the SDCRAA to satisfy the legal standards for FAA funding approval. Other than Airport revenue (which is subject to FAA approval for use), no other source of funding for off-site mitigation measures or improvements exists. Any possible Airport bond revenues, for example, would have to be paid back with Airport revenues, which are subject to the use restrictions stated above.

Response to Comment R-PC022-3

In accordance with CEQA, the Recirculated Draft EIR discusses potential mitigation measures for impacts determined to be significant. The discussion of each mitigation measure clearly states whether the potential measure is considered feasible or infeasible. In the case of the latter, the EIR provides the reason(s) why the measure is considered infeasible. In some cases, the feasibility of the mitigation measure is contingent upon approvals or actions by others, such as whether the FAA

would allow the use of airport funds or FAA grants for off-airport improvements or whether implementation of off-airport improvements requires approval(s) from the City of San Diego. Following the discussion of mitigation measures, the EIR discloses whether the impact, if subject to the identified feasible mitigation measures, would be reduced to less than significant or would remain significant and unavoidable. That approach and associated conclusions are applied to all of the environmental topics addressed in Chapter 3 of the Recirculated Draft EIR including, but not limited to, traffic, and provides the public and decision-makers with complete information regarding project impacts and mitigation measures.

Response to Comment R-PC022-4

Please see Responses to Comments R-PC003-7, R-AR002-5, R-AS001-5, and R-AS001-6 regarding project funding.

Response to Comment R-PC022-5

The Recirculated Draft EIR, on page 2-25, explains that future aircraft activity and passenger levels would be the same with or without implementation of the proposed project. As stated therein:

> "The aircraft gate assignment of flights from the DDFSs was conducted for the proposed project, as well as for the No Project Alternative and Alternative 4, and it was determined that all flights could be successfully gated under any and all of those scenarios. Copies of the gated schedules for each scenario are included in Appendix R-B of this Recirculated Draft EIR.
>
> The fact that all flights anticipated to occur in the future project horizon years (i.e., 2024, 2026, 2030, and 2035) could be successfully gated under any of these scenarios provides the basis for concluding that the additional gates provided under the "build" scenarios (i.e., the proposed project and Alternative 4) compared to the "no build" scenario (i.e., the No Project Alternative) would not result in higher aviation activity levels at SDIA in the future. As aviation activity at SDIA continues to grow in the future, the capacity limitations of the single-runway would constrain that future growth to a level that would be less than the point, where the existing gates could not handle more activity and additional gates are needed. The additional gates provided under the proposed project and Alternative 4, 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."

Consistent with CEQA requirements, Chapter 3, Environmental Analysis, of the Recirculated Draft EIR provides a comprehensive analysis and disclosure of the environmental impacts associated with implementation of the ADP, as compared to existing baseline conditions. The proposed project, which is addressed in Chapter 3, includes the 400,000 square foot commercial development area at the new T1, with potential uses that could include, but not be limited to, a farmers' market, a conference center, restaurants, and retail uses, as described on page 2-30 of the Recirculated Draft EIR. It should be noted that the 400,000 square foot commercial development area was eliminated from the development program proposed under Alternative 4, which SDCRAA staff is recommending be approved by the SDCRAA Board instead of the proposed project

described in Chapter 2, Project Description, of the Recirculated Draft EIR. The impacts analysis in Chapter 3 also accounts for the 2,650 additional net parking spaces associated with the new parking structure included in the proposed project, as indicated on page 2-37 of the Recirculated Draft EIR. Under Alternative 4, the size of the new parking structure has been reduced such that only 650 additional net parking spaces would occur, as indicated on page 5-25 of the Recirculated Draft EIR.

In summary, the environmental impacts associated with the proposed project and with Alternative 4 are addressed in the Recirculated Draft EIR.

Response to Comment R-PC022-6

Please see Responses to Comments R-PC022-1 through R-PC022-5 above regarding the alleged deficiencies. The subject allegations are without merit. The Recirculated Draft EIR meets the requirements of CEQA and does not need to be recirculated.

November 4, 2019

SDCRAA

RECEIVED
NOV 04 2019
BY:.....

Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276

E-mail: planning@san.org

Comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report" ("DEIR")

Dear Mr. Anasis:

As you know, I have closely followed operations at SAN since arriving in San Diego in 1982 as Director of Schedule Planning for PSA (until the USAir merger in 1988). Between 1995 and 2002, I was the council representative specializing in airport and transportation issues for District 2 Councilmember Byron Wear. More recently I have been on the Peninsula Community Planning Board (PCPB) Airport Subcommittee for about a decade as well as currently serving on the PCPB's Traffic Subcommittee.

Primarily, the DEIR is flawed due to the following:

- Numerous unmitigated impacts to the surrounding community – no proposed mitigation solutions
- Unrealistic position that expansion will happen with or without the ADP
- Excessive construction with no financing plan provided
- Unreasonable assumptions for people-mover\trolley
- No detailed information for widebody/International expansion impacts
- Inaccurate fleet mix forecast that results in a totally inaccurate noise contours
- Poorly conceived RON parking
- Unnecessary full length Taxiway A extension

My questions and comments below are on the Recirculated DEIR for the SAN Airport Development Plan (ADP).

- It is unclear if Alternative 4 has replaced Alternative 1 as the working proposal. Is the full blown Alternative 1 too expensive to provide transportation changes?
- Is there a cost estimate or financing plan for the massive expansion?
- Does the ADP depend on a near doubling of the Passenger Facility Fee, one that the airlines' lobbyist organization opposes?
- It is stated that the project will not increase operations and noise. If this is the case, why are additional gates proposed? Have one or more airlines requested additional gates and are they willing to pay additional fees for larger facilities?

R-PC023-1
R-PC 023-2
R-PC 023-3
R-PC023-4

- The ADP mentions numerous times that "significant and unavoidable" impacts will result. The ADP also mentions "Environmental Justice". Those surrounding the airport need the RAA to come to bat for their Environmental Justice. Of the numerous negative impacts, the most easily obtained improvement would be to mandate Stage IV aircraft for all new operations and departures between 1900 and 0700, a phase out of Stage III aircraft and all long-haul international widebodies depart between 0700 and 1859. This is a minor concession to the community that can be accomplished to minimize noise and should keep noise contours inside current boundaries.
- There doesn't appear to be an analysis on increased missed approaches that cannot be avoided as the airfield moves toward to capacity. The ADP should include this analysis and resulting impacts.
- About 10 years ago, the SAN Tower proposed a 250 degree take off heading due to congestion at the east end of Runway 27 due to a taxiway construction project. Hopefully this was an unnecessary precaution as the heading was never used – there was an outcry by those in the surrounding neighborhoods. The concern is that the ADP would add many more departures than the taxiway project affected. ***The SANRRA and the FAA must know that the surrounding community would never accept a standard 250 degree heading in any case.***
- Does the ADP take into account the larger aircraft, heavier takeoff weights and longer stage lengths that include international flights? How many international widebodies are forecast to take off after 7pm and what impact will that have on overall noise contours?
- Higher load factors are forecast. Has the added weight been included in noise calculations as flights will use increased take-off thrust, be at lower altitudes and have a lower climb rate?
- New proposed Taxiway A will only be able to accommodate Class III or smaller aircraft. Taxiway B will be moved south to allow Class V aircraft, which doesn't include the A380 or 747-8 aircraft.
- Taxiway A will be blocked a large portion of the time. It is assumed the linear terminal will house high gate use airlines and aircraft will be pushing back up to twice per hour per gate.
- RON aircraft parked remotely at the east end of the airport is a problematic. These aircraft may need to be taxied under power, adding taxiway congestion, burning significant fuel and taking key maintenance personel away from their area of work.
- The single taxilane gates near the street proposed for the new Terminal 1appear to be a security risk, being so close to the street. Additionally, the design of these gates will trap airplanes entering and exiting, especially if used by a high gate use airline.
- If Alternative 1 builds "stinger" gates and removes T2E, it will just be swapping a terminal for a RON area. This is a poor use of millions of dollars to move gates from close- in ticket counters/baggage claim to a remote area. Due to location and flight operations at SAN, these "stinger" gates will have the lowest gate utilization of the airport and most likely used for a morning departure and an evening arrival. Additionally, the RON pad where the stinger gates are proposed

R-PC023-5
R-PC 023-6
R-PC023-7
R-PC023-8
R-PC 023-9
R-PC 023-10
R-PC 023-11
R-PC 023-12
R-PC 023-13
R-PC023-14

is more efficient as more aircraft can be parked and towed on and off close in gates.

- The Constrained forecast should be equal to the unconstrained forecast until SAN's capacity of 290,000 Annual Operations is met. Airlines will not change operations until nearing the 290,000 level, which is not forecast in the unconstrained forecast until after 2028. In fact, when slot controlled airports are compared, historically airlines will fly more operations to gain placement for future slot restrictions. This will include smaller aircraft sizes, if necessary, to obtain long-range slots. This is contrary to the forecasts and fleet mix in the ADP Constrained forecast.
- Forecasted fleet mix is inaccurate, questioning if typos have been made or unrealistic judgements are made for future years. One would hope SAN would continue to get more of its share of new generation aircraft due to loads, stage length and other factors. 757, 737NG and 320ceo aircraft have ceased production yet the forecasts add significant operations by these fleet types. The fact is many of these aircraft are being retired and that will accelerate in the next decade. It makes one wonder how significantly more flights at SAN can be added by aircraft that are being slowly retired. Does the forecast assume airlines will replace current aircraft in other US markets with new generation aircraft? Will inefficient, retired aircraft be pulled from the desert to fly again?
- Does the ADP address the gate loss necessary to accommodate wingspans of 757 or similar aircraft that are forecasted to increase operations?
- The proposed people-mover/trolley appears to target about 30% of total passengers when operational. With a large percentage of departures requiring passengers to be at the airport prior to 6 am, it's doubtful these passengers would ever use this mode of transportation. The same would apply to the high percentage of evening arrivals at SAN. This proposed service would provide only a connection to downtown and other areas of San Diego, unlike the direct service provided at many other US airports. At US airports, most direct service transportation systems top out at about 7% of total passengers. One would wonder if we can trust a SANDAG forecast on airport use over 4 times higher than the highest use airports, especially in today's climate of Uber/Lyft and a nationwide transit ridership decline. Additionally, tunneling under the runway (below the water table) could be risky and surely expensive. One would expect a realistic construction estimate, solid ridership projection, revenue estimate and operational cost estimate be completed before proceeding. Transit projects in Cincinnati, Detroit, Austin have run into trouble and been labeled as boondoggles with huge subsidies to cover each rider. My personal adage is that the next trolley line will always carry fewer riders and/or cost much more than the previous trolley line or it would have been built before the previous line. Trying to make a vacant property work as a "Grand Central Station" to support the airport while building airport transit to support the Grand Central Station is a very shaky proposal that could easily be San Diego's largest boondoggle.

R-PC 023-14 Cont'd

R-PC023-15

R-PC023-16

R-PC 023-17

R-PC023-18

The unconstrained forecast has the below questionable items in Table 4-5 of page 23.

- The differences between unconstrained and constrained forecasts are massive as some fleets are totally gone in one vs. the other scenario.
- How SAN will garner the more than double the A320/738/739 and A321 operations by 2050 by currently out of production aircraft?
- How could the 737MAX have fewer than half the number of operations in the unconstrained vs. constrained forecast?

The constrained forecast has the below questionable items in Table 5-2 of page 36.

- There is no way the 757 will have 13 times more operations in 2050 than in 2018. The 757 is undergoing a continual retirement program with the big three, who currently operate just a fraction of their 757 fleet from days past. In 2050 every 757 will be at least 48 years old.
- One would hope the MD80 would be retired instead of ramping up to 11 departures per day in 2050. MD80 would be a minimum of 45 years old in 2050. DL operates 108 MD80/90s and keeps them away from the West due to range issues. They plan to retire 40 in 2019. UA and AA don't operate MD80/90s. Allegiant dumped theirs as well.
- The forecast indicates 737 Classics will return to SAN in a big way - this must be an error as I believe they have all been retired and are not flown in the US.
- The 320neo is shown with zero operations beginning in 2028. No other 320 Family aircraft are shown with neo operations.
- The A321 shows a dropoff of operations after 2028
- 73G dips then rises after 2023, when higher seat capacity aircraft are expected.
- 738 has a major drawdown after 2018 and removed after 2023. Is the 738 going to be replaced by the smaller 73G?
- 739 shows a huge bump from 2018 to 2023 of 4 times, then drops off until 2050.
- The 737MAX does increase nicely, but it should almost completely replace 30 to 50 year old 737NGs by 2050. The 737NG is out of production as is the A320ceo family.

My concern is that the above fleet mixes are probably the basis for projected noise contours. If so, the noise contours are totally inaccurate.

The abandonment of Terminal 1 is questionable – it is younger than any satellite at LAX, where these facilities live on with remodeling. An alternative of double decking Terminal 1 for roadway, ticketing/security, concessions and creating a consolidated secure area appears to have not been assessed. The same can be said for an extended "stinger" concourse that could extend east from Gate 1, then turn north along the old PSA hanger (never owned by United Airlines, by the way). This would save several structures, including the RAA building and keep the RON spaces outside the hanger area. The result would be as many new gates as proposed and provide a RON area east of Terminal 1. Of course, the current satellites would have gates removed

R-PC023-19
R-PC023-20
R-PC023-21
R-PC023-22
R-PC023-23
R-PC023-24
R-PC023-25
R-PC023-26
R-PC023-27
R-PC023-28
R-PC023-29
R-PC023-30
R-PC023-31
R-PC023-32

close to the runway for Taxiway A. Note that operationally, Taxiway A is not really needed west of the main runway turnoff point of arriving aircraft (under the 97% of the time west flow is utilized). Taxiway A extension east of Terminal 1 is probably only needed to service the ill-placed RON spaces proposed in the ADP.

Since the ramp area at the west end of the airport is best utilized as a RON area, the large RAA headquarters would be best to stay at its current location.

Specific comments:

Section 3.11.4. Speaking of "Environmental Justice", those surrounding the airport are looking for the ADP to provide "Environmental Justice" by capping noise impacts that are forecast to increase.

Regarding Sea Level Rise, has the forecast of increase been established? What impact would higher sea level have on the runway, which is rumored today to actually rise a couple inches during high tides? Has the RAA evaluated a higher water table's affect on any underground rail connection?

Page 3.11.7

How does SB10, which is 12 years old fit into the new proposals? The so-called Intermodel Transit Center was never expected to be at the former SPAWARS facility. Similarly, the RASP from 2011 seems out of date as CA High-Speed Rail has abandoned the LOS-SAN route. Would the possible, hugely expensive "Grand Central Station" terminate AMTRAC/Coaster trains at the massive facility? If so, it would probably improve Grape and Laurel Street access with a reduction in trains blocking those streets. If more AMTRAC/Coaster trains head all the way downtown, there has to be a grade separation for Grape and Laurel Streets or airport vehicle traffic would often be at a standstill.

Page 3.11.56

Where is the half a billion dollars coming from to pay for transit changes? How much will be federal money? How much will come from ticket tax fees? Will San Diego citizens be charged? Are SANDAG contributions included that would reduce money for other projects in SD County?

Page 3.12.30

The Airport Noise Mitigation Office monitors noise and curfew violations. Curfew regulations are assessed by violators via fines. The RAA does little, if anything, in its history to encourage operators to utilize state of the art, quieter aircraft – as other airports like SNA mandated quieter aircraft SAN would not even ask airlines to change

R-PC023-32 Cont'd
R-PC023-33
R-PC023-34
R-PC023-35
R-PC023-36
R-PC023-37

equipment. Honestly, the RAA appears complicit with high noise emitting aircraft as a higher noise base can soften the blow of any future noise increases.

Page 3.12.43

There are calls for housing units and upzoning surrounding the airport. This would increase the residents under worsening noise impacts. Would the RAA fight any construction or remodeling based on current or future noise increases? A projected 30% rise in acreage impact is just huge!

Page 3.12.7

Significant and Unavoidable is wrong - the RAA is simply claiming no flights will be added with or without the project to indemnify themselves of expanded noise, traffic and other significant impacts. Current gate numbers create an hourly limit that could allow 100% capacity of the runway. More gates can only generate more flights during peak hours, thus creating additional runway congestion and delays. Customer service and amenities can be improved without increasing total gates if the project truly will not increase airline flights. There are ways to avoid at least some noise impacts by mandating the quietest aircraft. If the FAA doesn't help, the State of CA, which mandates noise impacts, could be asked to mandate the quieter aircraft mix. The community is stating that "unavoidable" noise impacts are avoidable if the RAA teams with the FAA, State of CA and airlines to fly the quietest aircraft.

Aviation Forecast Update 2.4.4

Aircraft gauge also includes airlines adding more seats to the same aircraft they fly. Most carriers have added at least 2 rows to every narrow body, adding about 8% just by changing seats. Southwest has begun moving many flights to the larger 737-800 vs. the 737-700. This change doesn't affect gates or field operation, but does affect traffic and numbers of passengers utilizing the terminals. This is probably reflected in the disparity between the forecast and actual counts on Figure 2.8.

It appears odd that the actual vs forecast 2017 seat count per trip is up 11 seats, load factor is up 1%, yet the passengers carried is flat. Does that mean operations were lower than forecast? Unfortunately as similar chart of operations was left out of the report that could address the disparity.

Table 4-5. There is no way 737NG or standard 320ceo family airplanes will be operating in 2050 with such numbers as forecast. These types are basically out of production and surely 30+ year old jets will not be operating 3 times more operations at SAN than today. On Table 4-5, British Airways flights are probably not shown as the 744 is gone and alternatives would be a downgrade to 788 or 343. British has a small

R-PC 023-37 Cont'd
R-PC023-38
R-PC023-39
R-PC023-40
R-PC023-41
R-PC023-42

fleet of 788s and doesn't operate the A330 series aircraft. Most likely BA would operate a 77W , A350 series aircraft or double daily 788 aircraft if operational and economically feasible. The A350 is not reflected in any fleet mix assumptions.

Table 6.1 Page 41

Figure D1 on Page D7 shows delays under operational capacities flown. There should be a similar chart for the number of Missed Approaches.

Page D-9

What is the reason for 11 additional gates? Gate Charts are a bit hard to read, but appears that there is not much difference between expansion or not. I don't understand why more gates are needed. A simple change to common gates use would really improve utilization. More RON spaces could help with future flight additions as would mid-day use of major carrier's unused gates for carriers like Southwest.

The ADP states people prefer flying East between 9 and 11am, which doesn't match current service that is before 9am, between 11 and 2pm or redeye flights after 9pm?

Comments on Traffic, pedestrians, bicycles and transit

There has been a huge change in transportation with Uber and Lyft carrying an increasingly major portion of travelers. In the near future these vehicles may operate without drivers, further reducing the cost of such services. Has the ADP evaluated how these services will affect total demand for public transportation and its funding sources?

Does the ADP envision passengers hauling luggage from Laurel Street to the airport? Bikes are fine, but how many people take their bike on a flight as luggage and/or travel without bags? Maybe they can use a scooter or rent-a-bike to access the airport. Maybe a parking area for such rent-a-bike/scooters should be provided.

The proposal talks about using the Palm Ave Trolley station for workers and passengers. This requires riders to walk up a hill for over 500 feet. If a real solution was desired, the Washington Street Station would be serviced by a short extension of the Rent-a Car buses and the RAA or MTS acquiring the plot of land just west of the tracks. Buses could access the new bus stop via Sassafras and the return could utilize an unused rail line to access Sasafras. This would create a real pick up/ drop off area instead of requiring passengers to stand at a remote bus stop.

A road diet on Pacific Highway for a cycle track doesn't seem to be related to the airport project. A road diet will only reduce the throughput of Pacific Highway, extending signal phases. An additional phase for bike traffic would further degrade throughput at the intersection, thus delaying airport traffic. Extending the cycle track/road diet to

R-PC 023-42 Cont'd
R-PC023-43
R-PC023-44
R-PC 023-45
R-PC023-46
R-PC023-47
R-PC023-48
R-PC 023-49

Washington would only reduce throughput of Pac Highway traffic. How is this airport related?

One of the large issues with traffic to/from the I-5 is AMTRAC and Coaster trains and it will get worse with all this talk of high speed trains, grandiose transportation centers, etc. Unless the AMTRAC/Coaster tracks are grade separated on key streets, adding trains along with added vehicle traffic will bring airport access to a halt more than today. Additionally, freight trains must be limited to after midnight – they can't go 5 MPH or stop, bringing traffic to a standstill.

Ketner and Laurel. Why do we need funds, just remove the straight arrows on the second lane from the right and add a sign a block before the intersection.

Kettner and Palm. A signal is not needed; it would just slow traffic to the airport. Four lanes on Palm would remove parking and make 11' or narrower lanes where the center divider exists to prevent people from going around the train signals. Does the RAA believe airport traffic getting so bad that a second lane on Palm in each direction would be needed? The Sassafras proposal is similarly not needed.

Grape Street is a heavily traveled street one-way street. Why would all parking be removed for a cycle track, with one side of the cycle track heading against traffic? What does a cycle track have to do with the airport?

Columbia Street via Laurel as a way to get to I-5 South is something Waze might not even propose. The circuitous proposal would add traffic to Laurel Street.

A triple turn lane to Laurel Street would reduce road width of N. Harbor Drive, require a third lane eastbound on Laurel and reduce westbound Laurel to one lane. Since Laurel Street reduces to 2 lanes by Pacific Highway, a third lane wouldn't improve any movements.

Thank you,

Paul Grimes
936 Moana Dr
San Diego CA 92106
paulgrimessd@gmail.com
619-518-4983

R-PC 023-49 Cont'd
R-PC023-50
R-PC 023-51
R-PC023-52
R-PC 023-53
R-PC 023-54
R-PC023-55

COMMENT LETTER NO. R-PC023	Paul Grimes	November 4, 2019

Response to Comment R-PC023-1

The comment is noted. Please see Responses to Comments R-PC023-2 through R-PC023-55 below which address each of the concerns identified by the commenter.

Response to Comment R-PC023-2

Based on the alternatives analysis presented in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR. As summarized in Section ES.10.4, Environmentally Superior Alternative, and Section 5.8, Environmentally Superior Alternative, of the Recirculated Draft EIR, Alternative 4 meets all of the project objectives and would result in fewer and/or less severe impacts than would the proposed project.

Response to Comment R-PC023-3

Please see Responses to Comments R-PC003-7, R-AR002-5, R-AS001-5, and R-AS001-6 regarding project funding.

Response to Comment R-PC023-4

T1 is the oldest terminal at SDIA and does not meet current standards for customer service of commercial air passengers, including undersized security screening checkpoints and passenger waiting areas at gates, limited restrooms and concessions, and no post-security connection between concourses. As discussed in Section 5.5.4.8, Aircraft Gates, in Chapter 5, Alternatives Analysis, of the Recirculated Draft EIR, at completion of Alternative 4, the number of gates at SDIA would increase from 51 to 62. The improvements would enable SDCRAA to accommodate future demand for air travel that is anticipated to occur at SDIA, with or without the project, with more modern, efficient, and comfortable facilities. These improvements would be paid for through a combination of terminal rents, landing fees, passenger facility charges, parking charges, and access fees. In July 2019, airlines operating at SDIA approved a new 10-year agreement for rates and charges for their facilities and included funding for major transportation improvements to the Airport.

Response to Comment R-PC023-5

The commenter suggests that "the most easily obtained improvement would be to mandate Stage IV aircraft for all new operations and departures between 1900 and 0700, a phase out of Stage III aircraft and all long-haul international widebodies depart between 0700 and 1859."

As discussed on page 3.12-22 in Section 3.12, Noise, of the Recirculated Draft EIR, and as discussed further below, the Airport Noise and Capacity Act of 1990 (ANCA) severely constrains the ability of airport proprietors, such as SDCRAA, to impose noise restrictions that are more onerous than the standards imposed by federal law. As such, SDCRAA is not legally authorized to hand select the type of aircraft that operate at SDIA beyond the current restrictions established by the curfew, as grandfathered under ANCA.

Federal Air Regulation Part 161 (Part 161), formally titled *Notice and Approval of Airport Noise and Access Restrictions*, was promulgated as a result of ANCA adopted by Congress in 1990. The purpose of ANCA was to limit the ability of airports to restrict access based on noise, in exchange for an airline "phase-out" of noisier Stage 2 aircraft (over 75,000 pounds) by the year 2000.

ANCA and its implementing regulations, Part 161, impose onerous requirements on airports that must be satisfied prior to implementing certain types of noise rules. ANCA and Part 161 apply to any "noise or access restriction," which is defined very broadly and includes, for example, the following: Part 161 applies to airports attempting to impose restrictions on Stage 2 aircraft operations proposed after October 1, 1990, and to airports seeking to impose restrictions on Stage 3 aircraft operations that became effective after October 1, 1990. Part 161 also applies to airports attempting to amend airport noise and access restrictions that were in effect on October 1, 1990, but were amended after that date, where the amendment reduces or limits aircraft operations or affects aircraft safety. Airports that adopt noise or access restrictions subject to ANCA and Part 161 without following the law and regulations may lose eligibility for Airport Improvement Program ("AIP") grants and authority to impose and use Passenger Facility Charges.

Specifically, Part 161 prohibits the following access restrictions:[38]

> *Noise or access restrictions* means restrictions (including but not limited to any regulation, provisions of ordinances and leases or other mandatory restriction or requirement) affecting access or noise that affect the operations of Stage 2 or Stage 3 aircraft, such as limits on the noise generated on either a single-event or cumulative basis; a limit, direct or indirect, on the total number of Stage 2 or Stage 3 aircraft operations; a noise budget or noise allocation program that includes Stage 2 or Stage 3 aircraft; a restriction imposing limits on hours of operations; a program of airport-use charges that has the direct or indirect effect of controlling airport noise; and any other limit on Stage 2 or Stage 3 aircraft that has the effect of controlling airport noise. This definition does not include peak-period pricing programs, where the objective is to align the number of aircraft operations with airport capacity.
>
> Aircraft operational procedures that must be submitted for adoption by the FAA, such as preferential runway use, noise abatement approach and departure procedures and profiles, and flight tracks, are not subject to this part. Other noise abatement procedures, such as taxiing and engine runups, are not subject to this part unless the procedures imposed limit the total number of Stage 2 or Stage 3 aircraft operations or limit the hours of Stage 2 or Stage 3 aircraft operations, at the airport.

There are two ways for an airport to impose a restriction affecting Stage 3 aircraft: obtain the agreement of all airport users (including all "new entrants") affected by the proposed restriction or submit an application and obtain FAA approval. Both are daunting challenges.

[38] Federal Air Regulation Part 161, Notice and Approval of Airport Noise and Access Restrictions. Available: https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=243d803bf33a2f497a575740f07a2010&ty=HTML&h=L&mc=true&r=PART&n=pt14.3.161

The FAA will approve a restriction on Stage 3 aircraft only if it makes six specific findings based on the airport's study, as provided below, and determines that the airport has completed any environmental documentation that may be required under the National Environmental Policy Act ("NEPA"). The following is the complete text of six statutory requirements that must be met in a Part 161 Application.

(i) ***Condition 1: The restriction is reasonable, nonarbitrary, and nondiscriminatory.***

In order to meet this condition, at least three findings must be made, as follows:

(a) The restriction must be based on an empirically observed problem that exists at a particular airport;

(b) The restriction must be supported with adequate data, including some form of study prepared by a professional in the relevant field; and

(c) The restriction must be targeted at and have a direct relationship to the identified problem at the particular airport.

(ii) ***Condition 2: The restriction does not create an unreasonable burden on interstate or foreign commerce.***

(a) Essential information needed to demonstrate this statutory condition includes:

(*1*) Evidence, based on a cost-benefit analysis, that the estimated potential benefits of the restriction have a reasonable chance to exceed the estimated potential cost of the adverse effects on interstate and foreign commerce. In preparing the economic analysis required by this section, the applicant shall use currently accepted economic methodology, specify the methods used and assumptions underlying the analysis, and consider:

(*i*) The effect of the proposed restriction on operations of aircraft by aviation user class (and for air carriers, the number of operations of aircraft by carrier), and on the volume of passengers and cargo for the year the restriction is expected to be implemented and for the forecast timeframe.

(ii) The estimated costs of the proposed restriction and alternative nonaircraft restrictions including the following, as appropriate:

(*A*) Any additional cost of continuing aircraft operations under the restriction, including reasonably available information concerning any net capital costs of acquiring or retrofitting aircraft (net of salvage value and operating efficiencies) by aviation user class; and any incremental recurring costs.

(*B*) Costs associated with altered or discontinued aircraft operations, such as reasonably available information concerning loss to carriers of operating profits; decreases in passenger and shipper consumer surplus by aviation user class; loss in profits associated with other airport services or other

entities: and/or any significant economic effect on parties other than aviation users.

(*C*) Costs associated with implementing nonaircraft restrictions or nonaircraft components of restrictions, such as reasonably available information concerning estimates of capital costs for real property, including redevelopment, soundproofing, noise easements, and purchase of property interests; and estimates of associated incremental recurring costs; or an explanation of the legal or other impediments to implementing such restrictions.

(*D*) Estimated benefits of the proposed restriction and alternative restrictions that consider, as appropriate, anticipated increase in real estate values and future construction cost (such as sound insulation) savings; anticipated increase in airport revenues; quantification of the noise benefits, such as number of people removed from noise contours and improved work force and/or educational productivity, if any; valuation of positive safety effects, if any; and/or other qualitative benefits, including improvements in quality of life.

(b) At the applicant's discretion, information may also be submitted as follows:

(*1*) Evidence that the affected carriers have a reasonable chance to continue service at the airport or at other points in the national airport system.

(*2*) Evidence that other air carriers are able to provide adequate service to the airport and other points in the system without diminishing competition.

(*3*) Evidence that comparable services or facilities are available at another airport controlled by the airport operator in the market area, including services available at other airports.

(*4*) Evidence that alternative transportation service can be attained through other means of transportation.

(*5*) Information on the absence of adverse evidence or adverse comments with respect to undue burden in the notice process required in §161.303, or alternatively in §161.321, of this part as evidence that there is no undue burden.

(iii) ***Condition 3: The proposed restriction maintains safe and efficient use of the navigable airspace.***

Essential information needed to demonstrate this statutory condition includes evidence that the proposed restriction maintains safe and efficient use of the navigable airspace based upon:

(a) Identification of airspace and obstacles to navigation in the vicinity of the airport; and

(b) An analysis of the effects of the proposed restriction with respect to use of airspace in the vicinity of the airport, substantiating that the restriction maintains or enhances safe

and efficient use of the navigable airspace. The analysis shall include a description of the methods and data used.

(iv) ***Condition 4: The proposed restriction does not conflict with any existing Federal law or regulation.***

Essential information needed to demonstrate this condition includes evidence demonstrating that no conflict is presented between the proposed restriction and any existing Federal statute or regulation, including those governing:

(a) Exclusive rights;

(b) Control of aircraft operations; and

(c) Existing Federal grant agreements.

(v) ***Condition 5: The applicant has provided adequate opportunity for public comment on the proposed restriction.***

Prior to submitting an application to the FAA, the airport must notify interested and affected parties of the proposed rule and invite public comment. Essential information needed to demonstrate this condition includes evidence that there has been adequate opportunity for public comment on the restriction as specified in §161.303 or §161.321 of this part.

(vi) ***Condition 6: The proposed restriction does not create an undue burden on the national aviation system.***

Essential information needed to demonstrate this condition includes evidence that the proposed restriction does not create an undue burden on the national aviation system such as:

(a) An analysis demonstrating that the proposed restriction does not have a substantial adverse effect on existing or planned airport system capacity, on observed or forecast airport system congestion and aircraft delay, and on airspace system capacity or workload;

(b) An analysis demonstrating that nonaircraft alternative measures to achieve the same goals as the proposed subject restrictions are inappropriate;

(c) The absence of comments with respect to imposition of an undue burden on the national aviation system in response to the notice required in §161.303 or §161.321.

Each applicant proposing a noise or access restriction on Stage 3 operations must prepare, and make available for public comment, an analysis that demonstrates, by substantial evidence, that the six statutory conditions for approval have been met for each restriction and any alternatives submitted. In addition, the airport must demonstrate through a cost benefit analysis that the benefit of the proposed restriction exceeds the cost. The benefits must be expressed in dollars and then compared to the cost to the aircraft operators of implementing the restriction(s). In other words, any noise benefits projected to result from the restrictions must be expressed in terms of dollars and must be compared to costs borne by the affected air carriers, such as acquisition of new

aircraft, fuel associated with longer flight routes, etc. Although an airport must prove, at a minimum, that the benefits of a restriction outweigh the costs, the FAA has considerable discretion to disapprove an application on a variety of grounds. These statutory and regulatory conditions for Stage 3 restrictions make it abundantly clear that the FAA will approve a restriction on Stage 3 aircraft only in exceptional circumstances. This is consistent with Congress' intent in ANCA to protect Stage 3 aircraft. While some airports have attempted to complete the full analysis required by Part 161, few have completed it and most view the prospect for FAA approval of any restriction on Stage 3 operations as practically impossible.

It should also be noted that the SDCRAA, as the recipient of federal funds, is required to "... make its airport available as an airport for public use on reasonable terms, and without unjust discrimination, to all types, kinds, and classes of aeronautical uses." (Grant Assurance 22(a)). As noted on page 3.12-21 of the Recirculated Draft EIR, in light of recent changes in aircraft operations, changes in aircraft fleet mix, and local community concerns, the SDCRAA will be updating the existing Airport Noise Compatibility Study, which will include updates to the Noise Exposure Maps (NEMs) and Noise Compatibility Program (NCP) for SDIA. The SDCRAA started this effort in the Fall of 2018 and it is expected to run through 2020. Details regarding the ongoing study do not pertain to or affect the aircraft noise impact analysis of the proposed ADP project. Additional information is, however, available at https://sannoisestudy.com/project-overview, including a study timeline and contact email address.

Please see Response to Comment R-PC018-13 regarding environmental justice associated with the proposed project.

Response to Comment R-PC023-6

The commenter requests an analysis be included in the Recirculated Draft EIR related to missed approaches. Please see Response to Comment R-PC003-3, which also addresses a similar comment.

Response to Comment R-PC023-7

The commenter notes that "the ADP would add many more departures than the taxiway project affected." The commenter further states that "the surrounding community would never accept a standard 250 degree heading in any case."

The construction project 10-years ago required entire sections of the north taxiway system to be taken out of service, blocking access to large sections of the runway at a time. This required all aircraft from the north side of the Airport to cross to the south side for departure. In peak periods, there was the potential need to accelerate the departure rate of aircraft by using the 250-degree heading, so that aircraft would have additional time to cross the runway to the south side. This is not the case with ADP.

For the Recirculated Draft EIR, flight tracks for 2018 were collected and assessed to develop nominal flight tracks that represent arrival and departure ground tracks of aircraft using SDIA. Three westerly departure routes are represented in the analysis for occasional departures that turn to the southwest. One of these nominal flight tracks is identified in the analysis as D27PE05 (See Appendix R-G2, Aircraft Noise Modelling Approach and Input Assumptions, of the Recirculated Draft EIR, page 25, Model Tracks for Departure Operations from Runway 27 depicting westerly departure tracks) and it approximates a left, southwesterly ground track of approximately 250

degrees (relative to magnetic north in San Diego). Based on 2018 radar data collected, this nominal flight track represents 0.12 percent (0.12%) of all west departures (See Table 15. Flight Track Utilization in Appendix R-G2 of the Recirculated Draft EIR, page 22). The 250-degree heading is not associated with any of the standard departure procedures and there is no operational reason to make it standard. Its very limited use arises when additional separation is needed between successive departing aircraft, avoiding other aircraft, or to avoid weather events in the normal northwesterly departure paths.

Response to Comment R-PC023-8

The general approach and noise modeling methodology is provided in Section 3.12.3.1 of the Recirculated Draft EIR. To clarify, the evaluation of project-related noise exposure levels due to SDIA aircraft operations utilized the latest version of the FAA Aviation Environmental Design Tool (AEDT), which for this project is Version 2d, since that was the latest version at the onset of the project. AEDT is a software system that models aircraft performance in space and time to estimate fuel consumption, emissions, noise, and air quality consequences.[39] AEDT has an extensive database of civilian and military aircraft noise characteristics and incorporates advanced plotting features.

The software requires a variety of inputs in order to develop the average annual daily noise contours for both baseline and future scenarios, based upon the existing facilities at SDIA and the number and type of annual operations that were projected for each year and scenario. AEDT requires the input of the physical and operational characteristics of the airport. Operational characteristics include various types of aircraft data. This includes not only the aircraft types and flight tracks, but also departure procedures, arrival procedures, and stage lengths (flight distance) that are specific to the operations at the airport.

As further described in Appendix R-G: Noise, of the Recirculated Draft EIR, specific noise and performance data were entered into AEDT for each aircraft type operating at SDIA. Noise data are included in the form of Sound Exposure Level (SEL) at a range of distances (from 200 feet to 25,000 feet) from a particular aircraft with engines at a specific thrust level. Performance data include thrust, speed, and altitude profiles for takeoff and landing operations. The AEDT database contains standard noise and performance data for over 300 different fixed-wing aircraft types, most of which are civilian aircraft. AEDT automatically accesses the noise and performance data for takeoff and landing operations by those aircraft.

Within the AEDT database, aircraft takeoff or departure profiles are usually defined by a range of trip distances identified as "stage lengths." A longer trip distance or higher stage length is associated with a heavier aircraft due to the increase in fuel requirements for the flight. Stage length determinations were obtained from gated schedules derived from data analyzed by Leigh Fisher and KBE. Table 9 through Table 14 provide the modeled stage length use percentages for both takeoffs and landings by aircraft for each modeling scenario.

Standard aircraft flight profiles were modeled for all aircraft types for landings to Runway 09 and takeoffs from Runways 09 and 27. For the Recirculated Draft EIR, modeling for landings on

[39] U.S. Department of Transportation, Federal Aviation Administration. Aviation Environmental Design Tool webpage. Available: https://aedt.faa.gov/.

Runway 27 was conducted using the AEDT standard (default) trajectory-driven flight performance model approach profile of a 3-degree glide slope; however, at SDIA the actual descent angle is on a 3.5-degree glide slope on the final approach. In discussions with the FAA subsequent to completion of the Recirculated Draft EIR, it was recommended that custom profiles be created for every aircraft type to more accurately account for the 3.5-degree approach to Runway 27. With those revised profiles that accounted for the 3.5-degree approach to Runway 27, the aircraft noise characteristics of SDIA were remodeled for each of the EIR analysis years (i.e., 2018, 2024, 2026, 2030, 2035, and 2050). The revised aircraft noise modeling results are presented in Chapter 3 of this Final EIR, specifically as related to revisions to Section 3.12, Noise, of the Recirculated Draft EIR. As reflected in the revised text and tables presented in Chapter 3 of this Final EIR, the aircraft noise levels and impacts for all of the analysis years would be less than those indicated in the Recirculated Draft EIR.

In summary, as related to the comment, the ADP noise analysis and resulting contours do take into account aircraft types and related stage lengths, among a variety of other model inputs.

Table 2 of Appendix R-G also includes the forecast aircraft operations for both No Project and proposed project scenarios that were used as inputs to the AEDT model. This includes modeled baseline (2018) operations and operations for all future years (2024, 2026, 2030, 2035, and 2050). The aviation activity projected to occur at the Airport in the future could be accommodated with or without the improvements associated with the proposed project; consequently, there would be no difference in the number and nature of aircraft operations occurring on a daily basis. As described in Response to Comment R-AL003-2, the same number of operations would be accommodated in the No Project Alternative without additional terminal contact gates, because the additional flights would be handled by hardstanding and shuttling passengers to the existing terminals. Therefore, as illustrated in the Table, the operations remained constant in all study years.

Response to Comment R-PC023-9

Please see Response to Comment R-PC023-8 above.

Response to Comment R-PC023-10

Aircraft Design Group VI aircraft, such as the Airbus A380 and Boeing 747-8 aircraft, are not included in the aircraft fleet mix and are not part of the fleet forecast for SDIA. Operations by these aircraft types would be handled on a case-by-case basis through a modification of standards and specific operational plan to ensure separation from and safety with other aircraft, buildings, and facilities.

Response to Comment R-PC023-11

As stated in Section 2.6.3 of the Recirculated Draft EIR, the purpose of Taxiway A is to improve airfield efficiency by allowing bidirectional flow of aircraft taxiing between the terminals and the runway. Specifically for the linear design of the proposed Terminal 1, Taxiway A would also help avoid aircraft blocking Taxiway B during pushbacks from the new terminal gates. The ability to pushback, hold, and move aircraft independently of Taxiway B would benefit the entire SDIA airfield.

Response to Comment R-PC023-12

Please see Response to Comment R-AL003-2 relative to how and why the planning of RON parking positions for the ADP sought to locate those parking positions in proximity to the terminals, as much as possible.

Response to Comment R-PC023-13

The gate locations on the southeast face of the proposed Terminal 1 relative to the street network are similar to the east gates at existing Terminal 1. A similar security and jet-blast protection fence would be installed to secure aircraft on the Airport and to protect people and property on the roadways. The six to seven gates accessed by a single taxilane on the southeast portion of the proposed Terminal 1 is fewer than the 10 or more gates accessed by a single taxilane between existing Terminal 2-East and Terminal 2-West and Terminal 2-East and the west rotunda of existing Terminal 1.

Response to Comment R-PC023-14

The comment is noted. As stated in Chapter 1, Introduction, of the Recirculated Draft EIR, in response to comments received on the 2018 Draft EIR, SDCRAA developed a new alternative to the proposed project. The new Alternative 4 reduces the size, scope, and construction period of the ADP improvements by foregoing the addition to Terminal 2 West (i.e., the proposed "stinger") and foregoes the replacement of existing Terminal 2-East. These improvements would add to the efficiency of the associated gates and terminal facilities by reducing the number of gates accessed by a single taxilane. However, they also add to the size, scope, and construction period of the project as compared to Alternative 4 and the No Project Alternative. As described in Section ES.10.4 and Section 5.8 of the Recirculated Draft EIR, Alternative 4 would result in reduced impacts compared to the proposed project and would meet all of the project objectives. As such, SDCRAA staff is recommending that the SDCRAA Board approve Alternative 4: T1 Replacement and Transportation Improvements instead of the proposed project described in Chapter 2, Project Description, of the Recirculated Draft EIR.

Response to Comment R-PC023-15

As SDIA approaches its annual capacity in terms of operations and the Airport becomes increasingly congested, airlines will experience an increasing amount of delay. In response, airlines will make changes in their airline service at SDIA in order to accommodate passenger demand, such as changing the timing of flights, up-gauging aircraft to the extent their fleet permits, and allowing load factors on flights to increase to a level that provides for efficient operations.

As analyzed and reported in Appendix R-B1, Section 5 and Appendix D, of the Recirculated Draft EIR, airlines are expected to adjust air service at SDIA as activity levels approach 262,000 annual operations. Increasing aircraft delays and airfield congestion would likely cause schedule adjustments and fleet mix changes within the limits of the available aircraft fleet options for each carrier. Changes in airline operations would limit reliable arrival and departure capacity for general aviation, cargo, and military flights and, thereby, likely reduce their use of SDIA. Fleet mix adjustments are made to serve as much of the unconstrained passenger demand as possible up to the limits of the single-runway airfield capacity (approximately 292,000 annual operations). The forecast analysis shows that likely operational adjustments happen sooner, because delays and congestion are expensive for airline operations in San Diego, as well as propagated delays

throughout an airlines system of flights. Slower growth rates for operations result from the fleet and schedule adjustments up to the limits of average load factors of 90 percent and increasing number of seats per operation up to an average of 175.

Slot restricted airports in the U.S. follow international slot guidelines and this process does rely heavily on historic operational information. While airlines might attempt to game this system by flying smaller aircraft more frequently leading up to a slot restriction, it is unlikely to happen in a market like San Diego, where flights are primarily origin and destination and airline market shares have been stable for a long period of time. The actual trend at SDIA has been toward larger average seat capacity and higher average load factors. Specifically:

- At SDIA, Southwest Airlines accounted for more than 40 percent of seats in 2018. Southwest operates an all narrowbody fleet and would not be able to substitute smaller regional aircraft for larger capacity narrowbody aircraft.
- Similarly, Frontier and Spirit, both ultra-low-cost carriers that together accounted for five percent of SDIA seats in 2018, operate all narrowbody fleets and would not be able to substitute smaller regional aircraft for larger capacity narrowbody aircraft.
- Regarding other slot-controlled airports, such as the New York-New Jersey airports (LGA, JFK, and EWR):
  - The domestic load factors at JFK, EWR, and LGA in 2018 were 85.7%, 85.9%, and 82.5%, respectively, essentially even with SDIA (86.0%)
  - Between 2010 and 2018, the average aircraft size on domestic flights at JFK, EWR, and LGA in 2018 increased an average of 1.3%, 2.2%, and 1.4% per year, respectively, compared with 1.6% per year at SAN and 1.7% per year at all U.S. airports
  - Between 2010 and 2018, passenger airline aircraft operations at JFK, EWR, and LGA in 2018 increased an average of 0.7%, 1.6%, and 0.0% per year, respectively, less than 2.2% per year at SDIA

Response to Comment R-PC023-16

The comment is noted. Table 5-2 on pages 36 to 39 in Appendix R-B, Aviation Demand Forecasts and Gated Schedules, of the Recirculated Draft EIR has been revised and replaced with the version presented below. Table 5-2 was incorrectly copied from the Excel file version, which contains the detailed analysis to the Word file version. The Excel version of Table 5-2 was used to conduct the technical analyses completed for the Recirculated Draft EIR. The correction to Table 5-2 does not affect the Recirculated Draft EIR's analysis or conclusions.

Presented below is a copy of the previous version of Table 5-2 with all of the old values shown in strike-out text, and below that is the corrected version of Table 5-2 with the replacement values shown in underlined italicized text. The corrected Table 5-2 is included in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

Table 5-2

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
Domestic						
Narrowbody						
A318	499	3,020	–	–	–	–
A319	6,328	4,801	1,441	6,452	1,433	1,451
A320	15,161	14,132	2,161	2,867	7,879	7,253
A320neo	–	–	3,601	–	–	–
A321	12,354	17,699	18,728	16,488	12,177	12,329
B717-200	406	1,531	3,601	4,301	4,298	4,352
B737-300/400/500/600	312	–	19,448	31,541	31,874	31,548
B737-700	57,680	57,471	11,525	18,996	29,726	30,823
B737-800	33,660	37,950	1,441	–	–	–
B737-900	17,799	16,996	70,228	48,029	12,535	11,967
B737 MAX	329	1,493	47,539	54,480	80,940	83,404
B757-200/300	3,733	3,680	22,689	45,520	46,558	47,867
CS100	–	–	–	7,168	12,177	15,230
MD-80	381	24	1,441	4,301	7,163	7,978
MD-90	1,053	260	5,042	,434	–	–
Subtotal – narrowbody	149,695	159,056	208,884	241,578	246,758	254,200
Regional jets						
CRJ-100/200	523	1,351	–	–	–	–
CRJ-700	2,355	3,146	720	–	–	–
CRJ-900	1,175	388	–	–	–	–
ERJ-175	19,408	23,975	23,770	3,584	3,581	5,802
Subtotal – regional jets	23,461	28,861	24,490	3,584	3,581	5,802
Turboprop						
Q400	1,769	699	–	–	–	–
Widebody						
A330-200	720	713	720	717	716	725
B767-200/300	532	146	–	–	–	–
B787-8	–	–	–	717	7,521	8,340
Subtotal – widebody	1,252	859	720	1,434	8,237	9,066
Subtotal – Domestic	**176,176**	**189,475**	**234,094**	**246,596**	**258,577**	**269,068**

Table 5-2 (page 2 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
International						
Narrowbody						
A319	122	49	720	717	716	725
A320neo	--	--	--	--	--	--
A320	185	223	720	717	716	725
B737-800	566	812	1,441	1,075	716	725
B737-900	1,232	859	2,521	3,226	2,865	2,901
B737 MAX	--	--	--	717	1,433	1,451
Subtotal - narrowbody	3,615	3,699	7,923	10,036	10,744	11,604
Regional jets						
CRJ-700	1,229	118	--	--	--	--
CRJ-900	--	1,694	2,161	717	--	--
ERJ-175	110	274	720	2,151	3,581	3,626
Subtotal - regional jets	1,339	2,086	2,881	2,867	3,581	3,626
Widebody						
A340-300	59	487	720	717	716	2,176
B747-400	282	286	--	--	--	--
B767-200/300	112	--	--	--	--	--
B777	426	431	1,441	1,434	1,433	1,451
B787-8	720	719	1,441	2,151	2,149	2,176
B787-9	--	--	--	--	--	--
Subtotal - widebody	1,599	1,923	3,601	4,301	4,298	5,802
Subtotal - International	**6,553**	**7,708**	**14,406**	**17,204**	**18,623**	**21,032**
Total - Passenger Airlines	**182,712**	**197,244**	**248,500**	**263,800**	**277,200**	**290,100**

Table 5-2 (page 3 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
Domestic						
Narrowbody						
A318	0.3%	1.5%	--%	--%	--%	--%
A319	3.5	2.4	0.6	2.4	0.5	0.5
A320	8.3	7.2	0.9	1.1	2.8	2.5
A320neo	0.0	0.0	1.4	--	--	--
A321	6.8	9.0	7.5	6.3	4.4	4.3
B717-200	0.2	0.8	1.4	1.6	1.6	1.5
B737-300/400/500/600	0.2	0.0	7.8	12.0	11.5	10.9
B737-700	31.6	29.1	4.6	7.2	10.7	10.6
B737-800	18.4	19.2	0.6	--	--	--
B737-900	9.7	8.6	28.3	18.2	4.5	4.1
B737 MAX	0.2	0.8	19.1	20.7	29.2	28.8
B757-200/300	2.0	1.9	9.1	17.3	16.8	16.5
CS100	–	0.0	–	2.7	4.4	5.3
MD-80	0.2	0.0	0.6	1.6	2.6	2.8
MD-90	0.6	0.1	2.0	0.5	--	--
Subtotal--narrowbody	81.9%	80.6%	84.1%	91.6%	89.0%	87.6%
Regional jets						
CRJ-100/200	0.3%	0.7%	--%	--%	--%	--%
CRJ-700	1.3	1.6	0.3	--	--	--
CRJ-900	0.6	0.2	–	–	–	–
ERJ-175	10.6	12.2	9.6	1.4	1.3	2.0
Subtotal--regional jets	12.8%	14.7%	9.9%	1.4%	1.3%	2.0%
Turboprop						
Q400	1.0%	0.4%	--%	--%	--%	--%
Widebody						
A330-200	0.4%	0.4%	0.3%	0.3%	0.3%	0.3%
B767-200/300	0.3	0.1	--	--	--	--
B787-8	0.0	0.0	--	0.3	2.7	2.9
Subtotal--widebody	0.7	0.4	0.3	0.5	3.0	3.1
Subtotal--Domestic	**96.4%**	**96.1%**	**94.2%**	**93.5%**	**93.3%**	**92.8%**

Table 5-2 (page 4 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
International						
Narrowbody						
A319	0.1%	--%	0.3%	0.3%	0.3%	0.3%
A320neo	0.0	0.0	--	--	--	--
A320	0.1	0.1	0.3	0.3	0.3	0.3
A321	0.3	0.3	0.6	0.4	0.3	0.3
B737-700	0.5	0.6	1.0	1.2	1.0	1.0
B737-800	0.3	0.4	1.0	1.4	1.6	1.8
B737-900	0.7	0.4	--	--	0.3	0.3
B737 MAX	--	--	--0.3	--0.3	--0.6	--0.6
Subtotal - narrowbody	2.0%	1.9%	3.2%	3.8%	3.9%	4.0%
Regional jets						
CRJ-700	0.7%	0.1%	--%	--%	--%	--%
CRJ-900	--	0.9	0.9	0.3	--	--
ERJ-175	--0.1	--0.1	--0.3	--0.8	--1.3	--1.3
Subtotal - regional jets	0.7%	1.1%	1.2%	1.1%	1.3%	1.3%
Widebody						
A340-300	--%	0.2%	0.3%	0.3%	0.3%	0.8%
B747-400	0.2	0.1	--	--	--	--
B767-200/300	0.1	0.0	--	--	--	--
B777	0.2	0.2	0.6	0.5	0.5	0.5
B787-8	0.4	0.4	0.6	0.8	0.8	0.8
B787-9	--	--	--	--	--	--
Subtotal - widebody	--0.9	--0.9	--1.4%	--1.6%	--1.6%	--2.0%
Subtotal - International	**--3.6%**	**--3.9%**	**--5.8%**	**--6.5%**	**--6.7%**	**--7.3%**
Total - Passenger Airlines	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Sources: *Historical* – San Diego County Regional Airport Authority records. *Forecast* – LeighFisher, April 2019.

Table 5-2

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
Domestic						
Narrowbody						
A318	499	3,020	--	--	--	--
A319	6,328	4,801	3,352	--	--	--
A320	15,161	14,132	16,700	17,164	12,020	10,220
A320neo	--	--	3,352	4,380	4,380	4,380
A321	12,354	17,699	18,168	29,815	31,608	31,025
A321neo (a)	--	--	10,398	16,568	24,570	29,565
B717-200	406	1,531	1,515	--	--	--
B737-300/400/500/600	312	--	--	--	--	--
B737-700	57,680	57,471	64,556	48,303	18,898	6,570
B737-800	33,660	37,950	42,855	48,175	65,543	79,205
B737-900	17,799	16,996	20,423	38,654	44,819	45,990
B-737 Max 7 (a)	--	--	--	7,200	12,410	15,330
B-737 Max 8 (a)	329	1,493	1,301	4,380	6,570	7,300
B757-200/300	3,733	3,680	4,980	1,736	--	--
A220-100 (a,b)	--	--	1,159	4,992	1,460	1,460
A220-300 (a,b)	--	--	1,460	1,979	7,300	6,570
MD-80	381	24	--	--	--	--
MD-90	1,053	260	--	--	--	--
Subtotal-- narrowbody	149,695	159,056	190,220	223,346	229,578	237,615
Regional jets						
CRJ-100/200	523	1,351	--	--	--	--
CRJ-700	2,335	3,146	819	--	--	--
CRJ-900	1,175	388	--	--	--	--
ERJ-175	19,408	23,975	23,201	4,193	2,920	5,110
Subtotal--regional jets	23,461	28,861	24,020	4,193	2,920	5,110
Turboprop						
Q400	1,769	699	--	--	--	--
Widebody						
A330-200	720	713	730	730	730	730
B767-200/300	532	146	--	--	--	--
B787-8	--	--	--	--	6,935	6,935
Subtotal--widebody	1,252	859	730	730	7,665	7,665
Subtotal-- Domestic	***176,176***	***189,475***	***214,970***	***228,269***	***240,163***	***250,390***

Table 5-2 (page 2 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
International						
Narrowbody						
A319	*122*	*49*	*--*	*--*	*--*	*--*
A320neo	*--*	*--*	*730*	*730*	*730*	*730*
A320	*185*	*223*	*--*	*--*	*--*	*--*
A321	*619*	*662*	*730*	*730*	*730*	*730*
B737-700	*889*	*1,095*	*1,460*	*1,302*	*859*	*730*
B737-800	*566*	*812*	*2,219*	*3,085*	*3,061*	*2,920*
B737-900	*1,232*	*859*	*1,396*	*2,596*	*3,338*	*4,380*
B-737 Max 7 (a)	*--*	*--*	*--*	*--*	*730*	*730*
B-737 Max 8 (a)	*--*	*--*	*--*	*730*	*730*	*730*
Subtotal-- narrowbody	*3,615*	*3,699*	*6,534*	*9,173*	*10,178*	*10,950*
Regional jets						
CRJ-700	*1,229*	*118*	*--*	*--*	*--*	*--*
CRJ-900	*--*	*1,694*	*2,047*	*730*	*--*	*--*
ERJ-175	*110*	*274*	*730*	*2,190*	*2,975*	*3,650*
Subtotal--regional jets	*1,339*	*2,086*	*2,777*	*2,920*	*2,975*	*3,650*
Widebody						
A340-300	*59*	*487*	*--*	*--*	*--*	*730*
B747-400	*282*	*286*	*730*	*730*	*730*	*1,460*
B767-200/300	*112*	*--*	*--*	*--*	*--*	*--*
B777	*426*	*431*	*730*	*730*	*730*	*730*
B787-8	*720*	*719*	*1,301*	*1,460*	*1,460*	*1,460*
B787-9	*--*	*--*	*730*	*1,228*	*1,460*	*2,190*
Subtotal-- widebody	*1,599*	*1,923*	*3,491*	*4,148*	*4,380*	*6,570*
Subtotal-- International	***6,553***	***7,708***	***12,802***	***16,241***	***17,533***	***21,170***
Total--Passenger Airlines	***182,712***	***197,244***	***227,772***	***244,510***	***257,696***	***271,560***

Table 5-2 (page 3 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Percent of total arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
Domestic						
Narrowbody						
A318	*0.3%*	*1.5%*	*--%*	*--%*	*--%*	*--%*
A319	*3.5*	*2.4*	*1.5*	*--*	*--*	*--*
A320	*8.3*	*7.2*	*7.3*	*7.0*	*4.7*	*3.8*
A320neo	*0.0*	*0.0*	*1.5*	*1.8*	*1.7*	*1.6*
A321	*6.8*	*9.0*	*8.0*	*12.2*	*12.3*	*11.4*
A321neo (a)	*--*	*--*	*4.6*	*6.8*	*9.5*	*10.9*
B717-200	*0.2*	*0.8*	*0.7*	*--*	*--*	*--*
B737-300/400/500/600	*0.2*	*--*	*--*	*--*	*--*	*--*
B737-700	*31.6*	*29.1*	*28.3*	*19.8*	*7.3*	*2.4*
B737-800	*18.4*	*19.2*	*18.8*	*19.7*	*25.4*	*29.2*
B737-900	*9.7*	*8.6*	*9.0*	*15.8*	*17.4*	*16.9*
B-737 Max 7 (a)	*--*	*--*	*--*	*2.9*	*4.8*	*5.6*
B-737 Max 8 (a)	*0.2*	*0.8*	*0.6*	*1.8*	*2.5*	*2.7*
B757-200/300	*2.0*	*1.9*	*2.2*	*0.7*	*--*	*--*
A220-100 (a,b)	*--*	*--*	*0.5*	*2.0*	*0.6*	*0.5*
A220-300 (a,b)	*--*	*--*	*0.6*	*0.8*	*2.8*	*2.4*
MD-80	*0.2*	*--*	*--*	*--*	*--*	*--*
MD-90	*0.6*	*0.1*	*--*	*--*	*--*	*--*
Subtotal-- narrowbody	*81.9%*	*80.6%*	*83.5%*	*91.3%*	*89.1%*	*87.5%*
Regional jets						
CRJ-100/200	*0.3%*	*0.7%*	*--%*	*--%*	*--%*	*--%*
CRJ-700	*1.3*	*1.6*	*0.4*	*--*	*--*	*--*
CRJ-900	*0.6*	*0.2*	*--*	*--*	*--*	*--*
ERJ-175	*10.6*	*12.2*	*10.2*	*1.7*	*1.1*	*1.9*
Subtotal--regional jets	*12.8%*	*14.7%*	*10.5%*	*1.7%*	*1.1%*	*1.9%*
Turboprop						
Q400	*1.0%*	*0.4%*	*--%*	*--%*	*--%*	*--%*
Widebody						
A330-200	*0.4%*	*0.4%*	*0.3%*	*0.3%*	*0.3%*	*0.3%*
B767-200/300	*0.3*	*0.1*	*--*	*--*	*--*	*--*
B787-8	*--*	*--*	*--*	*--*	*2.7*	*2.6*
Subtotal--widebody	*0.7%*	*0.4%*	*0.3%*	*0.3%*	*3.0%*	*2.8%*
Subtotal-- Domestic	***96.4%***	***96.1%***	***94.4%***	***93.4%***	***93.2%***	***92.2%***

Table 5-2 (page 4 of 4)

CONSTRAINED DEMAND SCENARIO OF PASSENGER AIRLINE AIRCRAFT OPERATIONS BY AIRCRAFT TYPE

San Diego International Airport

	Percent of total arrivals and departures					
	Historical		Constrained Demand Scenario			
Aircraft type	2017	2018	2023	2028	2033	2050
International						
Narrowbody						
A319	*0.1%*	*--%*	*--%*	*--%*	*--%*	*--%*
A320neo	*0.0*	*--*	*--*	*--*	*--*	*--*
A320	*0.1*	*0.1*	*0.3*	*0.3*	*0.3*	*0.3*
A321	*0.3*	*0.3*	*0.3*	*0.3*	*0.3*	*0.3*
B737-700	*0.5*	*0.6*	*0.6*	*0.5*	*0.3*	*0.3*
B737-800	*0.3*	*0.4*	*1.0*	*1.3*	*1.2*	*1.1*
B737-900	*0.7*	*0.4*	*0.6*	*1.1*	*1.3*	*1.6*
B-737 Max 7 (a)	*--*	*--*	*--*	*--*	*0.3*	*0.3*
B-737 Max 8 (a)	*--*	*--*	*--*	*0.3*	*0.3*	*0.3*
Subtotal-- narrowbody	*2.0%*	*1.9%*	*2.9%*	*3.8%*	*3.9%*	*4.0%*
Regional jets						
CRJ-700	*0.7%*	*0.1%*	*--%*	*--%*	*--%*	*--%*
CRJ-900	*--*	*0.9*	*0.9*	*0.3*	*--*	*--*
ERJ-175	*0.1*	*0.1*	*0.3*	*0.9*	*1.2*	*1.3*
Subtotal--regional jets	*0.7%*	*1.1%*	*1.2%*	*1.2%*	*1.2%*	*1.3%*
Widebody						
A340-300	*--%*	*0.2%*	*--%*	*--%*	*--%*	*0.3%*
B747-400	*0.2*	*0.1*	*0.3*	*0.3*	*0.3*	*0.5*
B767-200/300	*0.1*	*--*	*--*	*--*	*--*	*--*
B777	*0.2*	*0.2*	*0.3*	*0.3*	*0.3*	*0.3*
B787-8	*0.4*	*0.4*	*0.6*	*0.6*	*0.6*	*0.5*
B787-9	*--*	*--*	*0.3*	*0.5*	*0.6*	*0.8*
Subtotal-- widebody	*0.9%*	*0.9%*	*1.5%*	*1.7%*	*1.7%*	*2.4%*
Subtotal-- International	***3.6%***	***3.9%***	***5.6%***	***6.6%***	***6.8%***	***7.8%***
Total--Passenger Airlines	***100.0%***	***100.0%***	***100.0%***	***100.0%***	***100.0%***	***100.0%***

Note: Totals may not add due to rounding. Forecasts for 2023, 2028, and 2033 were interpolated from AAD DDFSs for 2018, 2024, 2030, and 2035.

(a) Equipment type not included in Table 4-5 for the unconstrained forecast.

(b) The CS100 aircraft shown in Table 4-5 was rebranded as the A220-100 in 2018 reflecting Airbus' majority stake in Bombardier's C Series program.

Sources: Historical—San Diego County Regional Airport Authority records and OAG Aviation Worldwide Ltd, online database, accessed April 2019. The percent distribution of OAG scheduled operations by equipment type were applied to Authority data for 2017 and 2018. Forecast—LeighFisher, April 2019.

Response to Comment R-PC023-17

The ADP specifically addresses the future accommodation of the aircraft fleet mix with the replacement of Terminal 1 and gate adjustments for larger aircraft at other terminal facilities. The final gate counts are not affected by these fleet mix adjustments as evidenced by the Design Day Gated Flight Schedules found in Appendix R-B. The No Project Alternative is also found to be able to fully gate the future schedules, albeit with higher gate utilization and added congestion.

Response to Comment R-PC023-18

This comment is referencing transit ridership estimates provided by SANDAG as part of the Airport Connectivity Study. The 30% transit mode share to the Airport consists of transit passengers transferring from bus, LRT, COASTER, and Amtrak service. It also includes passengers being dropped-off at the curbfront of the Central Mobility Hub. This curbfront would be available to TNC drivers, taxi cabs, and private vehicles. It also assumes Automated People Mover service to the terminals providing fast service at frequent intervals. To achieve this level of ridership, regional transit service hours would need to be expanded to accommodate early arrivals of passengers and airport workers.

Connections to the regional transportation system will continue to be reviewed and developed as part of the Airport Connectivity Subcommittee. Mitigation Measure MM-TR-LRP-1: Airport Regional Connections (applies to the proposed project), first presented on page ES-88 (Executive Summary) of the Recirculated Draft EIR, and Mitigation Measure MM-TR-LRP-2: Airport Regional Connections (applies to Alternative 4), first presented on pages H-126 to H-127 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR, state SDCRAA's commitment to participate in this effort to identify and fund connections to the regional transportation system.

Response to Comment R-PC023-19

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-20

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-21

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-22

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-23

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-24

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-25

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-26

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-27

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-28

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-29

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-30

Please see Response to Comment R-PC023-16 above.

Response to Comment R-PC023-31

As explained in Responses to Comments R-PC023-16 and R-PC023-19 to 30, the fleet mix information presented in Table 5-2 within Appendix R-B1, Aviation Activity Forecast, of the Recirculated Draft EIR, inadvertently had information from an outdated draft table and did not reflect the data that was developed as part of the Aviation Activity Forecast Update completed in April 2019. The fleet mix data that provided the basis of the technical analyses of the ADP, such as the air quality/greenhouse gas (See Appendix R-C, Air Quality and Greenhouse Gases, Tables C-1 through C-6 that include the correct fleet mix data used in the air quality and greenhouse gas analyses) and noise analyses (See Appendix R-G2, Noise, Tables 3 through 8 that include the correct fleet mix data used in the noise analyses), are consistent with the types of fleet mix assumptions reflected in Comments R-PC023-16 through R-PC023-30, as further explained in Response to Comment R-PC023-16 and R-PC023-19 to 30. The corrections to Table 5-2 are presented in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR. In summary, the fleet mix assumptions used for the aircraft noise contour calculations are consistent with the fleet mix information presented by the commenter and the aircraft noise contours presented in the Recirculated Draft EIR are considered valid.

Response to Comment R-PC023-32

The commenter is suggesting a development plan that would be a mix of, and modifications to, certain aspects of the proposed project along with elements of certain alternatives addressed in the Recirculated Draft EIR. Preserving and remodeling Terminal 1, along with certain "double-decking" features and an "extended stinger concourse," would be a variation of Alternatives 1 (No Project) and 2 (Reduced Scale of Development), and the proposed project. Pursuant to CEQA case law, an EIR does not, however, need to consider multiple variations on the range of alternatives evaluated in detail. (*Village Laguna of Laguna Beach Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1028.) Also, an EIR need not analyze alternatives that do not offer significant advantages over the alternatives presented in the EIR, or that constitute a different version of an alternative presented in the EIR. (*Sequoia Hills Homeowners Ass'n v. City of Oakland* (1993) 23 Cal.App.4th 7045.)

Response to Comment R-PC023-33

Please see Topical Response Aviation Noise regarding the forecasted increase in noise levels. As stated throughout Section 3.12.3.5, Project Impacts, of the Recirculated Draft EIR, it is important to note, for informational purposes, that the future aircraft noise levels at SDIA would be the same with or without the proposed project (i.e., there is no difference in aircraft noise impacts between the proposed project and the No Project Alternative).

Regarding environmental justice, please see Response to Comment R-PC018-13 regarding environmental justice associated with the proposed project.

Response to Comment R-PC023-34

Section 3.11, Land Use and Planning, of the Recirculated Draft EIR addresses the project's potential to be affected by climate-related sea level rise. Specifically, Section 3.11.4.2.6 describes SDCRAA's Climate Resilience Plan (CRP), which evaluates the Airport's potential exposure to future sea level rise and storm surge. Table 3.11-4 and Figures 3.11-9 and 3.11-10 in Section 3.11 of the Recirculated Draft EIR present various sea level rise scenarios at SDIA as identified in the CRP. Also, as described in Section 3.11.4.2.6 of the Recirculated Draft EIR, the CRP's vulnerability assessment of assets and operations identifies SDIA's assets, including the runway, that could be impacted by storm surge and high tides at various levels of sea level rise.

Regarding evaluation of sea level rise related to an underground rail connection, there is no underground rail connection included as part of the proposed project and, therefore, no analysis of this in the EIR for the Airport Development Plan is warranted or required.

Response to Comment R-PC023-35

A description of California Senate Bill 10 is included in Section 3.3, Greenhouse Gases and Climate Change, specifically Section 3.3.4.4, of the Recirculated Draft EIR. California Senate Bill 10 of 2007 (SB 10) requires that airport multimodal planning in San Diego County be conducted and coordinated by SDCRAA and San Diego Association of Governments (SANDAG). The main provisions of SB 10 are the development of the Regional Aviation Strategic Plan (RASP), led by SDCRAA, and an Airport Multimodal Accessibility Plan (AMAP), which was prepared by SANDAG to develop a multimodal strategy to improve transportation access to airports. Findings of the RASP and AMAP have been incorporated into the SANDAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the SANDAG Regional Plan,

According to the California High-Speed Rail Authority *Southern California at a Glance Fact Sheet* published in 2018 (available at: https://www.hsr.ca.gov/docs/communication/info_center/factsheets/Southern_California_Factsheet.pdf), the California High Speed Rail includes a future extension to San Diego and is considered part of Phase 2 of the High-Speed Rail Project, which would commence after completion of Phase 1. The timing of Phase 2 and the Los Angeles to San Diego section of the High-Speed Rail project is undefined and, therefore, was not considered specifically in the analyses. A terminal station near SDIA at an Intermodal Transportation Center (ITC) is envisioned as the connection in San Diego. The ITC was planned east of Pacific Highway between Sassafras Street and Washington Street for initial planning purposes; however, the High-Speed Rail Project team is still working to identify the best configuration for the Los Angeles to San Diego section.

SANDAG is considering a Central Mobility Hub that would serve COASTER and Amtrak trains, as well as buses and LRT lines at the NAVWAR site. COASTER and Amtrak trains would still continue to downtown, terminating at the Santa Fe Depot.

COASTER and Amtrak service will grow in the future, with or without the ADP or the Central Mobility Hub. The Recirculated Draft EIR evaluates railroad crossings, considering both increased train frequency and increased vehicular traffic to SDIA. These evaluations are contained on pages 3.14-234 to 3.14-237 in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR for the proposed project, and pages H-195 to H-198 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR for Alternative 4.

Response to Comment R-PC023-36

Please see Responses to Comments R-PC003-7, R-AR002-5, R-AS001-5, and R-AS001-6 regarding project funding.

Response to Comment R-PC023-37

SDIA has had a departure curfew since 1976 and is one of only a handful of U.S. airports with a mandatory curfew. Adopted as Authority Code 9.40 in 2003, it states that Stage 2 aircraft can depart from 7:00 a.m. to 10:00 p.m. (Stage 2 aircraft were phased out at SDIA as of January 1, 1999 for all regularly scheduled commercial, cargo, and commuter operators using aircraft weighing more than 75,000 pounds). Stage 3 aircraft can depart between 6:30 a.m. and 11:30 p.m. Life-flight and mercy flights are exempt from the curfew. Landings are permitted 24-hours a day. Engine run-ups above idle are only permitted between 6:30 a.m. and 11:30 p.m.

When a curfew violation occurs, the Curfew Violation Review Panel (CVRP) evaluates the violation and determines if a penalty is warranted. CVRP meetings are held every other month and are open to the public. The penalty structure is: $2,000 for the 1st violation in the six-month compliance period; $6,000 for the 2nd violation in the six-month compliance period; and, $10,000 for the 3rd violation in the six-month compliance period. Fine amounts are also increased by the operator's multiplier factor, which is the number of penalized violations that occurred by that operator during the previous 6-month compliance period. Collected fines are applied to the SDCRAA's general operating budget to help offset the costs of maintaining the State-mandated Airport Noise Mitigation Office.

The CVRP reports on each curfew violation and includes such information as:

- Flight information, including the operator, scheduled departure time, actual departure time, and aircraft type
- Background information provided by the operator to explain why the curfew was violated
- Transcription of FAA Air Traffic Control communications at the time surrounding the departure, including notification to the pilot that the aircraft is departing after the curfew and is subject to a penalty in accordance with the Airport Use Regulations
- Radar Flight Track
- Aircraft on departure showing noise level event

- Noise Level Summary identifying the noise events logged at remote noise monitoring stations as a result of the curfew violation
- Curfew Log identifying the arrivals and departures during the curfew period
- Emails and related documentation from the air carrier to support curfew violation information

The number of annual curfew violations that have occurred from 2012 through 2018 are as follows:

- 2012 – 36
- 2013 – 60
- 2014 – 47
- 2015 – 55
- 2016 – 84
- 2017 – 72
- 2018 - 60

Response to Comment R-PC023-38

The Airport Land Use Compatibility Plan (ALUCP) for SDIA is discussed on pages 3.11-13 and 3.11-14 in Section 3.11, Land Use and Planning, of the Recirculated Draft EIR.

> 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 on the Airport property 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."[40] Proposed development within the AIA is subject to a determination of consistency with the ALUCP, unless determined to be exempted. Figure 3.11-3 shows the extent of the SDIA ALUCP AIA.

[40] 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.

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, subject to a two-thirds vote of the local governing body, by making detailed findings that existing land use plans and regulations fulfill the objectives of the ALUC statute 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.

Consistency of the proposed project with the ALUCP is discussed on page 3.11-63 of the Recirculated Draft EIR. As discussed therein, 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")[41] 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 2030 conditions. This is considered a significant impact requiring mitigation. The impact would be eliminated through Mitigation Measure MM-LUP-1: Amendment of the SDIA Airport Land Use Compatibility Plan, presented on page 3.11-70 of the Recirculated Draft EIR Amendments to the ALUCP noise contours would result in modifications to the area subject to sound attenuation and avigation easement requirements.

Response to Comment R-PC023-39

Please see Response to Comment R-AL003-2.

[41] 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.

Response to Comment R-PC023-40

The Constrained Demand Scenario presented in Appendix D of Appendix R-B1, Aviation Activity Forecast, of the Recirculated Draft EIR identifies the likely fleet mix adjustments and increased load factor airline responses (Sections D.4.2 and D.4.3, respectively) to the runway-constrained activity. The resulting change in forecast operations and passengers are presented in Section 5, Constrained Demand Scenario. Figure 2-8, Constrained Demand Scenario of Enplaned Passengers, in Chapter 2, Project Description, of the Recirculated Draft EIR is a direct reflection of the ADP analysis.

Response to Comment R-PC023-41

There is neither a 2017 "actual" seat count nor a 2017 "forecast" seat count; hence, it is not possible to respond to the comment.

Response to Comment R-PC023-42

The Boeing B737NG and Airbus A320neo aircraft types represented in Table 4-5 of Appendix R-B are included to generally represent existing aircraft, serving existing SAN markets with operational frequency and seat capacity as represented by the individually identified aircraft types. While almost all aircraft operating today will likely be at or beyond their useful life by the out years of the forecast (2050), replacement aircraft are reasonably assumed to have similar operating characteristics and seat capacities as those identified in Table 4-5.

The British Airways Boeing 747-400 is not included in Table 4-5 but is included in the noise and air quality analysis given its seasonal service. British Airways seasonally trades off use of the Boeing 777-300ER.

Response to Comment R-PC023-43

Please see Responses to Comments R-AL003-6 and R-PC003-3.

Response to Comment R-PC023-44

Please see Response to Comment R-AL003-2.

Response to Comment R-PC023-45

The commenter is correct that direct service to East Coast destinations occur prior to 9 a.m. and between 11 a.m. and 2 p.m. Pacific Time. The general reference to flight time preferences reflect preferred departure times for major hubs like Denver, Chicago, Dallas, and Atlanta providing convenient connecting service to Eastern Time Zone cities. These departure times also reflect ground commute considerations within the San Diego region to reach SDIA for a flight. The purpose of Section D.4.1, Flight Scheduling Adjustments (De-peaking), in Appendix R-B1, Aviation Activity Forecast, of the Recirculated Draft EIR was to call attention to the limited opportunities for additional flights in the 9 a.m. to 11 a.m. time period and how the need for earlier and later flights will be required to meet traveler's demand for air service.

Response to Comment R-PC023-46

SDIA and other major airports have been monitoring the changes in travel patterns due to increased Transportation Network Companies (TNC) use. This has shifted traffic mode share from transit, taxi cabs, parking and drop-offs/pick-ups by friends/family to TNC operators. Initially, this caused an increase in congestion, because TNC drivers dropping-off passengers were not picking-

up passengers while at SDIA. Together SDIA and TNC companies made changes to lessen this inefficiency. SDIA designated a holding lot that TNC drivers use to park while waiting for a fare from an arriving passenger. TNC operators changed their procedures to prioritize pick-ups for TNC drivers who had dropped passenger(s) at SDIA and were in the holding lot. Based on data collected in October 2018, about 40-50% of TNC drivers dropping-off passengers are now picking-up passengers on the same trip during peak periods of airport arrivals and departures.

TNC and driverless vehicle use is likely to reduce the demand for passenger parking at SDIA. While passenger travel is increasing, the growth in parking needs will grow at a much slower rate. Similarly, the addition of public transportation connections to SDIA are expected to further decrease passenger car vehicles and complement TNC and driverless vehicle connections. TNC use has been in operation for several years and any mode shift from transit to TNC has likely occurred. The TNC and driverless vehicle options particularly help passengers that are not in vicinity to public transportation to have an alternative option to get to SDIA. Passengers in vicinity to public transportation connections to SDIA likely already use public transportation and would likely continue to utilize it instead of TNC and driverless vehicles.

Response to Comment R-PC023-47

It is acknowledged that the provision of bicycle facilities along North Harbor Drive and Pacific Highway will be of limited use to air travel passengers, due to the need to transport luggage. The Recirculated Draft EIR did not assume any reduction in vehicle trips for airport passenger travel due to upgraded bicycle facilities. Bicycle parking facilities will be provided within the Terminal 1 parking plaza for those who can use bicycles, particularly airport workers.

Bicycle facilities along North Harbor Drive and Pacific Highway are important from a regional and citywide perspective. Due to the location and size of the Airport, there are limited opportunities for bicyclists to travel to downtown from Point Loma or Midway/Old Town. North Harbor Drive and Pacific Highway are both corridors that have been designated by the City as critical bicycle facilities. Bicycle facility improvements are being made to North Harbor Drive and Pacific Highway to improve bicycle accessibility to the Airport, but more importantly, to complete missing facilities serving the surrounding communities.

Response to Comment R-PC023-48

The Washington Light Rail Transit (LRT) Trolley station was considered as a pick-up/drop-off point for airport passengers using rental car center buses, but the shuttle to the Old Town Transit Center (OTTC) was chosen as the preferred option. The Washington LRT Trolley station would only serve LRT riders, while the OTTC serves LRT, multiple bus routes, COASTER, and Amtrak riders.

Response to Comment R-PC023-49

The Midway/Pacific Highway and Centre City Community Plans propose one-way cycle tracks on both sides of Pacific Highway. Pacific Highway connects the communities on a roadway that has excess capacity, but also has high vehicular speeds. The cycle track would provide lateral separation of bicycle and vehicle traffic, as well as treatments such as traffic signal priority (early green indications for bicycles). SDCRAA is implementing improvements to SDIA's frontage along

Pacific Highway that implement the proposed cycle track to serve regional and community connections while accommodating vehicle travel to the Airport.

Response to Comment R-PC023-50

As indicated, the number of LRT, COASTER, and Amtrak trains are all expected to increase in the future, with or without the ADP. The Recirculated Draft EIR evaluates the impacts of the increase in train crossings and the increase in vehicles at rail crossings. The analysis of rail crossings is contained on pages 3.14-234 to 3.14-237 in Section 3.14, Traffic and Circulation, of the Recirculated Draft EIR for the proposed project, and pages H-195 to H-198 of Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR for Alternative 4. Delays at rail crossings are expected to increase.

As shown on Table 3.14-48 for the proposed project (page 3.14-236 of the Recirculated Draft EIR) and Table H-40 for Alternative 4 (pages H-196 to H-197 of Appendix R-H1 of the Recirculated Draft EIR), the vehicle hours of delay (VHD) with the project would not exceed the VHD threshold to warrant grade separation at any railroad crossing.

Response to Comment R-PC023-51

The proposed improvement to the Kettner Boulevard at W. Laurel Street intersection (Mitigation Measure MM-TR-I-1c first presented on page ES-82 (Executive Summary) of the Recirculated Draft EIR) would include asphalt overlay, restriping of lanes, new lane assignment signs, and traffic signal modifications.

Response to Comment R-PC023-52

Drivers currently use Palm Street as one of the routes to get to I-5 southbound from the Airport. Specifically, drivers use North Harbor Drive to W. Laurel Street to Pacific Highway to Palm Street to Kettner Boulevard, and then merge onto the southbound on-ramp. This route is anticipated to be more attractive to drivers in the future with implementation of the ADP. These changes require additional lanes to accommodate as discussed in Mitigation Measures MM-TR-I-1e: Improve the Intersection of Kettner Boulevard at Palm Street, and MM-TR-RS-4a: Improve Palm Street from Pacific Highway to Kettner Boulevard (see pages ES-83 and ES-86 of the Executive Summary, respectively). The traffic signal described in MM-TR-I-1e is needed to allow the right-turn movement from eastbound Palm Street to southbound Kettner Boulevard.

Drivers currently use Sassafras Street as one of the routes to get between I-5 and the Airport. This route is anticipated to have increased volumes in the future with implementation of the ADP and modifications to intersections with Pacific Highway are proposed to accommodate bicycle facilities. These changes require additional lanes as discussed in Mitigation Measures MM-TR-RS-1a: Improve Sassafras Street from Pacific Highway to Kettner Boulevard, and MM-TR-I-5a: Improve the Intersection of Pacific Highway at Sassafras Street / Admiral Boland Way (see pages ES-83 and ES-86 of the Executive Summary, respectively).

Response to Comment R-PC023-53

Grape Street is proposed to have four eastbound lanes and cycle tracks in the City's Downtown Mobility Plan. The parking would need to be removed on both sides to accommodate the City's plan for Grape Street. The proposed improvement to add vehicular capacity to Grape Street as part

of the ADP project mitigation (see Mitigation Measures MM-TR-RS-1b, MM-TR-RS-1c, and MM-TR-RS-1d first presented on pages ES-84 and ES-85 (Executive Summary) of the Recirculated Draft EIR) was based on the volume of ADP traffic that would be added to Grape Street. The City of San Diego requested that this reconfiguration to remove parking and add a travel lane and cycle track be done at the same time.

Response to Comment R-PC023-54

The proposed project nor the alternatives included in the Recirculated Draft EIR propose the rerouting of traffic along Columbia Street. As part of the 2024 improvements, the intersections of Laurel Street/Pacific Highway, Pacific Highway/Palm Street and Palm Street/Kettner Boulevard and the section of Palm Street between Pacific Highway and Kettner Boulevard would be improved, and capacity added, in order to reroute a portion of the traffic bound for I-5 South that currently utilizes Grape Street. Once improvements are in place and a portion of the traffic is rerouted (signage will be provided to direct some traffic), Waze and other GPS services would update to include this route option. Waze currently recognizes the Laurel-Pacific Highway-Palm-Kettner-I-5 route.

Response to Comment R-PC023-55

With implementation of Mitigation Measure MM-TR-I-1b: Improve the Intersection of Pacific Highway at West Laurel Street (see page 3.14-43 of the Recirculated Draft EIR), Laurel Street would be modified to accommodate a third eastbound lane. At Pacific Highway, the third lane would transition to a second left-turn lane for traffic turning from eastbound Laurel Street to northbound Pacific Highway. As shown on Table 3.14-16 on page 3.14-65 of the Recirculated Draft EIR, with the proposed improvements, the level of service (LOS) for the intersection of Pacific Highway at W. Laurel Street (Intersection 15) would improve from LOS E in both the airport and evening peak hours to LOS C in the airport peak hour and LOS D in the evening peak hour for the proposed project. Similarly, as shown on Table H-8 on page H-34 of Appendix R-H1 of the Recirculated Draft EIR, the proposed improvement would improve the peak hour level of service for the intersection of Pacific Highway at W. Laurel Street from LOS E to LOS D in both the airport and evening peak hours for Alternative 4.

From: Alan Gordon <agordonnoise@gmail.com>
Sent: Monday, November 4, 2019 3:01 PM
To: Airport Planning
Subject: Comment to the Recirculated Draft Environmental Impact Report Sch. No. 2017011053 # EIR-18-01

RECEIVED
NOV 04 2019
BY: .....

To the attention of the SDCRAA and Ted Anasis

With regard to the Recirculated Draft Environmental Impact Report (RDEIR) released on September 19, 20019 on the San Diego International Airport (SDIA) expansion project and Airport Development Plan Sch. No. 2017011053 # EIR-18-01, I strongly object to the increased noise over and around Pt. Loma resulting from the implementation of NexGen Metroplex and the increased frequency and noise that will be associated with the airport and gate expansion project. Before moving forward, a more thorough noise study should be conducted to assess and mitigate the noise impact on Pt. Loma from any increase in the number of departures and aborted landings at SDIA. Simple modifications, such as routing departing flights further offshore before turning South will reduce the predicted noise. Likewise, adhering to the JETTI waypoint will reduce the predicted noise. In addition, increasing the rate of assent of departing aircraft will increase the altitude of the aircraft as it passes over highly populated areas reducing the predicted noise.

R-PC024-1 R-PC 024-2 R-PC024-3

The RDEIR also appears to be based on radar and noise modeling data to predict the increased noise levels. One of the main points used to support implementing NexGen Metroplex was that aircraft are now equipped with satellite navigation equipment that provides more accurate location data of aircraft, so the EIR should be based on the more accurate satellite navigation data not radar data. In addition, NexGen was implemented back in 2015, and the EIR should be based on actual data collected from the noise monitoring system since the NexGen implementation.

R-PC024-4

The RDEIR does not address the impact that additional flights will have on the increased greenhouse gas emission and its affect on climate change. Also, the RDEIR does not address how to mitigate the environmental impact from rising sea levels due to climate change and the existing fuel farm at SDIA. The RDEIR also does not address increasing permanent, noise monitoring equipment to get more accurate noise data following implementation of NexGen so that there can be accurate, current, noise contour map data.

R-PC 024-5 R-PC 024-6 R-PC 024-7

I respectfully request that the SDCRAA take these serious concerns into consideration and take the necessary steps to mitigate commercial aircraft noise in, around, and over Pt. Loma and address these serious climate change issues.

R-PC024-8

Sincerely,

Alan Gordon

4404 Alhambra St.

San Diego, CA. 92107

COMMENT LETTER NO. R-PC024	Alan Gordon	November 4, 2019

Response to Comment R-PC024-1

Please see Response to Comment R-PC004-1.

Response to Comment R-PC024-2

As indicated in Section 2.5, Airport Development Plan Process, of the Recirculated Draft EIR, all aircraft flights anticipated to occur at SDIA in the future project horizon years (i.e., 2024, 2026, 2030, and 2035) would be the same with or without the proposed ADP. Relatedly, the future noise impacts associated with the No Project Alternative, as presented in Section 5.6.1.12, Noise, of the Recirculated Draft EIR, would be the same with or without the proposed project. The Recirculated Draft EIR evaluated the project's potential noise impacts on Point Loma and other areas around the airport, and that evaluation was based on a state-of-the art noise study.

It should be noted that under State CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."

Response to Comment R-PC024-3

The commenter suggests modifications to flight paths and departure procedures for noise abatement. In 1993, the FAA issued Advisory Circular (AC) 91-53A in an effort to standardize noise abatement departure procedures (NADPs). This AC describes acceptable criteria for two safe departure profiles known as the "close-in" and "distant" NADPs. The procedures are based on the proximity of noise sensitive uses, like homes and schools, to the departure end of an airport runway. The AC provides general guidance for departure procedures at all commercial airports, not just SDIA. In general, defined aircraft initiate thrust cutback at or above 800 feet above ground level and maintain speed and thrust criteria as described in the procedures to 3,000 feet, or until the aircraft has fully transitioned through its climb configuration. Ultimately, air carriers develop their own AC 91-53A–compliant procedures according to their operational specifications for each aircraft type. The use of NADPs is at the discretion of each air carrier. It is important to note that a power cut-back is not and could not be legally required by the SDCRAA as the operator of SDIA.

Implementation of the proposed project would not alter flight path procedures at SDIA. As described on page 3.12-23 of the Recirculated DEIR, flight path procedures are dictated by the FAA, taking into account considerations of operational, safety, and air traffic control procedures. Flight paths are not exact paths along the ground and a broadening of the flight paths may be observed as aircraft depart SDIA. Variables affecting flight path dispersion and aircraft altitude include, but are not limited to: (i) weather (e.g., winds aloft and temperature, which affect aircraft climb rates); (ii) air traffic volume; (iii) flight crew technique; (iv) aircraft type, speed, and weight; (v) instrument equipage; and, (vi) the FAA's separation or sequencing requirements.

An airport operator, which in this case is the SDCRAA, has no authority to regulate or modify flight paths. As indicated above, modifications to the flight path are outside the scope of the proposed project; and, SDCRAA, as the proprietor of SDIA, has no authority or control over aircraft in flight.

Rather, the Federal Aviation Administration (FAA) has exclusive regulatory jurisdiction over flight paths, and the pilot-in-command of each aircraft is responsible for safely maneuvering the aircraft in accordance with the FAA's airspace procedures. SDCRAA historically has and will continue to work with FAA and affected communities on matters concerning the utilization of airspace around SDIA. The following discussion provides additional information on the regulation of federal airspace, and existing and potential airspace procedures.

The U.S. Congress has enacted a comprehensive federal statutory scheme declaring that the United States possesses and exercises complete and exclusive national sovereignty over the airspace of the United States. (49 U.S.C. §40103.) To that end, Congress has delegated to the FAA the authority to regulate air commerce, promote air safety, oversee air traffic control, and regulate civil and military air operations. (49 U.S.C. §40101 et seq.)

Establishment of aircraft flight paths is the sole responsibility of the FAA (49 U.S.C. §40103(b)(2)):

The Administrator [of the FAA] shall prescribe air traffic regulations on the flight of aircraft (including regulations on safe altitudes) for –

(A) navigating, protecting, and identifying aircraft;

(B) protecting individuals and property on the ground;

(C) using the navigable airspace efficiently; and,

(D) preventing collision between aircraft, between aircraft and land or water vehicles, and between aircraft and airborne objects.

All other entities, including SDCRAA as the owner and operator of SDIA, are expressly prohibited by federal law from exerting any control over aircraft flight paths.

SDCRAA is the lead agency for this Recirculated EIR. Because the establishment of flight paths is solely under the control of the FAA, no changes to flight paths (vertical or horizontal) are contemplated by the proposed project, the alternatives, or the mitigation measures. Section 3.12.3.5.2.1 of the Recirculated Draft EIR presents a detailed discussion of potentially feasible mitigation measures that have been identified to address the significant aircraft noise impacts of the proposed project.

Therefore, although an airport may advocate for certain noise abatement flight paths to reduce noise, the request must be investigated for its impact on the National Airspace System Plan (NASP). Any new flight path procedures are implemented at the discretion of individual airlines after approval by the FAA. Additionally, the FAA, by law, has the sole authority to manage the Air Traffic Control (ATC) system and the navigable airspace in the United States; therefore, the SDCRAA cannot restrict access to "noisier" aircraft or dictate departure routes. Please see Response to Comment R-PC023-5. At SDIA and all commercial airports, from the time an aircraft departs the terminal and enters the taxiway and runway system, and throughout its flight to, and arrival at the gate of the destination airport, the aircraft moves only by instruction and permission of the FAA, and pursuant to the direction of FAA (not airport) personnel.

Response to Comment R-PC024-4

The general approach and noise modeling methodology is provided in Section 3.12.3.1 in Section 3.12, Noise, of the Recirculated Draft EIR. Additionally, Appendix R-G: Noise of the Recirculated Draft EIR includes further details related to noise modeling methodology used to determine both baseline and future noise impacts associated with the proposed ADP.

To clarify, the evaluation of project-related noise exposure levels due to SDIA aircraft operations utilized the latest version of the FAA Aviation Environmental Design Tool (AEDT), which for this project is Version 2d, since that was the latest version at the onset of the project. AEDT is a software system that models aircraft performance in space and time to estimate fuel consumption, emissions, noise, and air quality consequences.[42] AEDT has an extensive database of civilian and military aircraft noise characteristics and incorporates advanced plotting features. The software requires a variety of inputs in order to develop the average annual daily noise contours for both baseline and future scenarios, based upon the existing facilities at SDIA and the number and type of annual operations that were projected for each year and action plan.

AEDT utilizes data from the SDIA Aircraft Noise and Operations Maintenance System (ANOMS) to model existing baseline conditions. The ANOMS data used to model existing baseline conditions represented an average annual day for calendar year 2018. Future noise impacts are modeled based on forecast conditions, since ANOMS data cannot exist for operations that have not yet occurred. Pages 3.12-30 and 3.12-31 of the Recirculated Draft EIR provide additional context related to the ANOMS system and its relation to FAA local area radar data.

Response to Comment R-PC024-5

Section 3.3, Greenhouse Gases and Climate Change, of the Recirculated Draft EIR addresses potential impacts related to greenhouse gas emissions associated with increased aircraft operations at SDIA (see, e.g., Recirculated Draft EIR page 3.3-6, which discloses that the project's operational emissions profile includes emissions from aircraft; see also Table 3.3-5, which discloses emissions from the "Aircraft" source). As the comment offers no specific critique of the analysis provided in the Recirculated Draft EIR, no further response is required.

Response to Comment R-PC024-6

Rising sea level is a global occurrence and is not an impact that would be caused by the proposed project. Moreover, the Airport's exposure to sea level rise will not increase as a result of the proposed project or any of the alternatives. Nevertheless, the Recirculated Draft EIR discusses how the Airport might reduce its vulnerability to sea level rise. As described under the heading Sea Level Rise starting on page 3.11-58 in Section 3.11, Land Use and Planning, of the Recirculated Draft EIR, 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 at the Scripps

[42]U.S. Department of Transportation, Federal Aviation Administration. Aviation Environmental Design Tool webpage. Available: https://aedt.faa.gov/.

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 future impacts.

Response to Comment R-PC024-7

As explained in Section 3.12.3.2.3 of the Recirculated Draft EIR, specifically page 3.12-30 and 3.12-31, the existing SDIA Airport Noise and Operations Monitoring System (ANOMS) collects and analyzes flight data and correlates that data with noise events collected from 23 remote monitoring sites located within the noise impacted area surrounding SDIA. Permanent sites must be located where they are able to accurately separate SDIA aircraft noise events from the local ambient noises (military operations, road noise, etc.). One of the key components of the ANOMS system is that it matches aircraft noise events with FAA radar track information, which can only be done at locations where SDIA aircraft noise is the predominant noise source.

It is also worth noting that per Mitigation Measure MM-NOI-3, a mobile noise monitoring program will be established by SDCRAA to augment SDIA's existing permanent aircraft noise monitors at locations determined by an acoustical engineer.

Response to Comment R-PC024-8

The comment is noted. Please see Responses to Comments R-PC024-1 through R-PC024-7 above. In accordance with Section 15088 of the State CEQA Guidelines, the SDCRAA prepared responses to all comments received on the ADP Recirculated Draft EIR. The responses to comments on the Recirculated Draft EIR are included in the Final EIR and will be forwarded to the decision-makers for their review and consideration prior to taking any action on the SDIA ADP.

November 4, 2019

RECEIVED
NOV 04 2019
BY: .....

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

VIA email: Planning@san.org; Attention Ted Anasis.

RE: Draft Environmental Impact Analysis; SAN Airport Development Plan

Mr. Anasis,

The San Diego County Regional Airport Authority's ("SDCRAA") recently released a "Recirculated Draft Environmental Impact Report" ("DEIR") for the Airport Development Plan (ADP). I believe that this DEIR significantly fails in its analysis and in fulfilling your obligations to address ways to mitigate the increased commercial jet noise and related impacts that will result from the ADP, as well as providing acceptable and fully analyzed and disclosed alternatives to Alternative 1. R-PC025-1

As its base premise, SDCRAA is sponsoring its *illogical* position that the same amount of growth will occur "regardless of whether the Airport Development Plan ("ADP") is built or not", yet even so, it is promoting this $3 Billion ++ ADP ... all for the stated goal "***to enhance the passenger experience***". So, if you believe the premise, why spend $3billion to serve growth that is already coming, or that will accelerate that growth adding numerous negative health and environment impacts that you are not electing to mitigate? R-PC025-2

According to data published by SDCRAA, SDCRAA and the FAA have forecasted that **WITHIN 6 YEARS**, airport operations will increase by 15% to 259,000 annual operations. This is **an alarming average rate of one arrival or departure every 86 seconds, 17 hours a day, 365 days a year** and forecasts continued increases thereafter, towards an unrealistic and unsustainable 290,000 operations per year. This growth will dramatically and negatively impact Point Loma, Ocean Beach, Mission Beach, Pacific Beach, Bird Rock, La Jolla, South Park, Golden Hill, Park West, La Mesa and many more surrounding communities. These impacts, at what is already considered "*the busiest, most difficult, single runway in the world*", are ignored by the DEIR and blatantly dismissed as "unavoidable". Simply put, the significant environmental impacts from this ADP do not stop at the airport property line nor at an obsolete noise contour line, ...BUT THE ENVIRONMENTAL REPORT DOES. Therefore, I find this project frightening for its unmitigated impact on residents and the SDCRAA's complete disregard for the safety and well-being of its neighbors. R-PC025-3 R-PC025-4

While the SDCRAA goal is focused on the passenger experience, what does the ADP do to the "community's experience" and at what environmental, health and economic cost? Many of the ADP elements, such as 11 new gates, additional undisclosed overnight aircraft parking spots ("RON"), etc. will significantly accelerate the airport's growth rate to reach the airport's realistic operational capacity within 5 to 10 years. These elements are **are not fully disclosed by the DEIR, but result in**:

- multiple "significant but [allegedly] unavoidable" severe negative impacts to our communities, WITHOUT ANY REASONALBLE MITIGATION
- an increase of 3 times the current noise impacts on residents (5dB increase in CNEL) by 2026 (according to SDCRAA data) to areas within the 65 dB and louder CNEL contours alone, severely impacting thousands of residents
- causing extended periods with peak operations occurring every 72 seconds or less for hours, every day, all year long
- significantly greater **safety risks** from increased Missed Approaches ("wave offs" or "go arounds") which are currently rising back to peak levels and add to the traffic congestion and other highly negative impacts and safety concerns
- a material increase in evening and arrivals throughout the night, both before and during the departure curfew (11:30 pm to 6:30 am as curfew does not apply to arrivals); The report reveals that "implementation of the proposed project would cause a substantial increase in the number of night-time flight operations that produce Sound Exposure Levels *sufficient to awaken an increasing population* starting in 2024, however it deems this issue would be "significant", but "unavoidable"
- extending the non-stop morning departures well into mid-morning given increased inventory of aircraft available for departure
- more pollution and climate impacts from increased aircraft operations
- increase in World Health Organization ("WHO") recognized health risks caused by airplane noise and pollution
- higher airfares and fees as capacity gets tighter with greater arrival and departure delays
- an undisclosed increase in loud, low & slow flying wide body four engine aircraft

Additional inadequacies within the DEIR include:

The DEIR and SDCAA data note but unjustifiably accept that if the ADP moves forward, the 65dB-75dB noise contour directly around the airport will significantly expand, dramatically impacting 15,000 additional residents by 2026, **increasing their noise impacts by a factor of 3 times**. The noise will not stop at the airport boundaries: it will carry over to the surrounding communities.

The DEIR admits that there are sleep disturbance, stress and cardiology issues associated with jet noise, yet dismisses them.

R-PC025-5
R-PC 025-6
R-PC 025-7
R-PC 025-8
R-PC 025-9
R-PC025-10
R-PC 025-11
R-PC 025-12
R-PC 025-13
R-PC 025-14
R-PC 025-15
R-PC025-16
R-PC 025-17

Buried in the DEIR is the statement that while a "relationship between noise and health effects seems plausible, *it has yet to convincingly be demonstrated*" and "*it is not known whether changes in pulse rate and blood pressure cause harm or are a sign of harm.*" The medical community, however, thinks otherwise.

The DEIR notes that a 2018 World Health Organization study strongly recommended reducing noise exposure levels produced by aircraft to *below 45dB* during the daytime and below 40dB at night because of the causal relationship between noise and cardiovascular disease, sleep disturbances, cognitive impairment, adverse birth outcomes, mental health and quality of life. The DEIR also notes that there will be very "significant but unavoidable harm" to human health associated with the airport expansion, caused by increased jet noise due to more frequent flight operations during all hours. This includes significant risks of human physiological harm, stress, cardiac disease, and cancer.

The DEIR says that jet noise adversely affects children's' school performance for reading ability, concentration, motivation and long-term learning retention. <u>There are over 30 public and private schools, as well as multiple day care facilities, with thousands of students located within the 65-dB noise contour</u>.

The DEIR notes that the implementation of the ADP "would result in a significant cancer risk human health impact", but takes the position that while causing cancer is "significant" it is unavoidable" because SDCRAA wants "***to enhance the passenger experience***".

The DEIR discloses that the ADP will cause atmospheric environmental harm from greenhouse gas emissions and damage to environmentally sensitive areas and biodiversity.

The DEIR notes that the FAA's Reauthorization Act of 2018, as approved by Congress, <u>*requires*</u> additional noise studies to be completed, including a "health impact study" for many airports across the U.S., including San Diego International Airport. However, the SCDRAA\DEIR unilaterally concludes that "at this time, the effects of noise on cardiovascular health at noise levels below 65 CNEL dB are too speculative for further evaluation in this California Environmental Quality Assessment (CEQA) document", and proposes to push ahead with the ADP **in the face of scientific and peer-reviewed medical concerns for human health as well as the Congressional directive**.

These facts all confirm that the noise and associated negative health impacts from the ADP would be significant, however, **the DEIR determination that the "noise and negative health impacts are unavoidable" or that to study them is "too speculative" is fully inaccurate, irresponsible and unacceptable.**

The only material mitigation program offered by the SDCRAA and this DEIR is the "Quieter Home Program". This program provides funding and resources to provide sound insulation treatments to mitigate aircraft noise, thereby assisting eligible residents to replace windows and ventilations systems to allow them to remain inside the residence with all doors and

R-PC025-17 Cont'd
R-PC025-18
R-PC025-19
R-PC 025-20
R-PC025-21
R-PC025-22

windows closed, to mitigate aircraft noise. The program currently has a wait list of 1,370 approved homes. They have historically completed between 300 and 400 homes per year, generating a 3.5 to 4.5 year wait for the currently approved homes. Based upon the SDCRAA provided data, a pending boundary change will add up to approximately 2,500 eligible homes to the list. Through just 2026 (the next six years) the ADP impacts will also add up to approximately 7,305 eligible homes to the list. **This will drive the approved home wait list to 11,175 homes BY 2026**, or a **wait of between 27 and 37 years** for these newly added potentially eligible residents to be retrofitted. When adjusted for those not applying or those deemed ineligible upon testing, the wait list drops to 17-22 years for the 7,000 net homes. Program costs range from $15,000 to $70,000 per home, dependent upon non-historic, historic designation and single versus multi family. Therefore, **homes added via the boundary change and the ADP, when added to the current wait list will cost between $250 and $400 million in today's dollars to retrofit. This funding is fully reliant upon the subjective election of FAA's willingness and capacity to meet this ongoing need. This is clearly unsustainable. The DEIR must provide additional material and realistic mitigation efforts,** as well as funding alternatives for this program.

R-PC025-22 Cont'd

The DEIR is also particularly troubling considering the **total disregard** for the ongoing Flight Path & Procedure and Analysis and Part 150 Studies, which are currently evaluating proposed solutions to mitigate jet noise at SAN. The study of these proposals is projected to be completed in 2021. This effort should proceed to their conclusion *before* the DEIR and ADP are further considered, and implementation of the solutions derived from **these studies should be required conditions before any environmental impact report for the ADP is approved.**

R-PC025-23

Further, SDCRAA, the FAA and the ADP are focused on accelerating operational growth while serving the passengers with little to no regard for the impacts on those affected. The significant and harmful impacts and costs from this growth will be borne on the shoulders of the surrounding communities and the tens of thousands of residents and small businesses in La Mesa, La Jolla, Bird Rock, Pacific Beach and Mission Hills, and particularly South Park, Golden Hill and Park West, Balboa Park, Mission Beach, Ocean Beach and Point Loma. This will occur with no impactful mitigation from SDCRAA or the FAA, WHILE any economic benefits that fall to the region will be quickly capped by reaching operational capacity only a few years after completion of the $3Billion ++ dollar project, and decades before the financial burden on the region is repaid, **meanwhile driving greater revenues to the airlines and SDCRAA.**

R-PC025-24

Additionally, these unmitigated impacts, as represented by the SDCRAA data and the ADP's inadequate DEIR are in direct conflict with:

R-PC025-25

a) The Airport Authorities CEO stated commitment to *"[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation"* and,

b) The intent and purpose of Title 21 of the Cal. Code of Regulations, which provides regulations designed to cause SDCAA to work to "**diminish**" noise problems, to holding SDCAA

R-PC 025-26

responsible for "controlling and reducing the noise impact area in communities, to "promote its underlying purposes which are to protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors".

Therefore, our communities demand that SDCRAA "table" the Airport Development Plan and the Revised Draft Environmental Impact Report until:

SDCRAA completes the community involved Flight Procedure Analysis and Part 150 studies; support, promote and implement their noise abatement recommendations

SDCRAA publicizes a plausible and reasonable funding plan for the estimated $3Billion ++ in proposed project costs

Full satisfaction of all Title 21 provisions as a mandatory prerequisite for the ADP are added to move forward in any capacity

SDCRAA can provide meaningful and realistic mitigation for all impacted communities (inside and outside of 65 CNEL dB contour)

SDCRAA can provide realistic ADP alternatives that reduce the project scope; omit the gate increase, additional overnight aircraft parking and reduce or eliminate the SDCRAA office building

The World Health Organization and other recommended human health studies are completed and noise mitigation measures are implemented by SDCRAA to reduce or eliminate the "significant but [allegedly] unavoidable" human health risks

FAA\SDCRAA limits nighttime and morning flight operations to require stage 4 and stage 5

R-PC 025-26 Cont'd

R-PC025-27

Sincerely,

R. Casey Schnoor
4159 Hill St.
San Diego, CA 92107

COMMENT LETTER NO. R-PC025	Casey Schnoor	November 4, 2019

Response to Comment R-PC025-1

The comment appears to be a general introductory statement, which is followed by more specific concerns. Please see Responses to Comments R-PC025-2 through R-PC025-27 below.

Response to Comment R-PC025-2

The commenter's assertion that the proposed project would result in "numerous negative health and environment [sicl impacts that you are not electing to mitigate" is factually incorrect. In accordance with Section 15126.4 of the State CEQA Guidelines, the SDCRAA has proposed all feasible mitigation measures to address the significant impacts of the proposed project, including those with human health implications. The complete list of proposed mitigation measures in provided in Table ES-3 and Section ES.10.5 in the Executive Summary of the Recirculated Draft EIR. Pursuant to Public Resources Code Section 21081.6(a), the SDCRAA would adopt a mitigation monitoring and reporting program (MMRP) in connection with the approval of the ADP. The MMRP is a means to ensure compliance with the mitigation measures during project implementation.

Please also see Responses to Comments R-AL003-2, R-PC003-7, and R-PC006-3.

Response to Comment R-PC025-3

Please see Response to Comment R-PC003-6.

Response to Comment R-PC025-4

Please see Response to Comment R-AL003-13 regarding SDCRAA ongoing commitment to being a good neighbor to surrounding communities related to aircraft noise mitigation.

As discussed in Section 3.12, Noise, of the Recirculated Draft EIR, even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, noise impacts associated with operation of the proposed project would be significant and unavoidable.

Section 3.12.3.4 of the Recirculated Draft EIR identifies the thresholds of significance for evaluating aircraft noise impacts. As discussed, the proposed project would result in significant impacts related to aircraft noise if it would:

- Generate aircraft noise that would increase noise levels at exterior use areas of residences, schools, or places of worship to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition (Impact 3.12-1).
- Cause a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater, as compared to the existing (2018) baseline condition (Impact 3.12-2).
- Cause a 3.0 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, as compared to the existing (2018) baseline condition (Impact 3.12-3).
- Cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to the existing (2018) baseline condition (Impact 3.12-4).

- Cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population, as compared to the existing (2018) baseline condition (Impact 3.12-5).

Concerning Impact 3.12-1, airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition. Mitigation through soundproofing could reduce this impact, but it is uncertain whether all of the affected uses would qualify for soundproofing. As such, and as further described in Section 3.12.3.5.2 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making significance determinations, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.2.1 and Section 3.12.3.5.2.2 of the Recirculated Draft EIR, respectively.

Concerning Impact 3.12-2, there would be a 1.5 dB or more increase in noise sensitive areas being exposed to 65 CNEL or greater in 2024, 2026, 2030, 2035, and 2050 as a result of airport operations, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.3 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. As noted in this section of Recirculated Draft EIR, and for informational purposes only and not for purposes of making a significance determination, the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.3.1 and 3.12.3.5.3.2 of the Recirculated Draft EIR, respectively.

Related to Impact 3.12-3, implementation of the proposed project would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.4 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.4.1 and 3.12.3.5.4.2 of the Recirculated Draft EIR, respectively.

Concerning Impact 3.12-4, implementation of the proposed project would not cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to the existing (2018) baseline condition. As such, and as further described in Section

3.12.3.5.5 of the Recirculated Draft EIR, this would be a less than significant impact. As noted in this section of Recirculated Draft EIR, and for informational purposes only and not for purposes of making a significance determination, the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. No mitigation is required relative to this impact since the project would result in a less than significant impact.

Related to Impact 3.12-5, implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, and as further described in Section 3.12.3.5.6 of the Recirculated Draft EIR, this would be a significant and unavoidable impact. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis. Mitigation measures and significance of impact after mitigation are described in Section 3.12.3.5.6.1 and 3.12.3.5.6.2 of the Recirculated Draft EIR, respectively.

In conclusion, as stated in Section 3.12.7 of the Recirculated Draft EIR, noise impacts associated with operation of the proposed project would be significant and unavoidable although there would be no significant and unavoidable noise impacts associated with construction of the proposed project. It should be noted, for informational purposes only and not for purposes of making a significance determination, that the significant and unavoidable aircraft noise and roadway noise impacts associated with airport operations in the future would also occur even if the project was not implemented (i.e., there is no difference in operations-related noise impacts between the proposed project and the No Project Alternative).

Response to Comment R-PC025-5

Please see Response to Comment R-AL003-2. Responses to Comments R-PC025-6 to R-PC025-15 below address each of the commenter's bulleted points.

Response to Comment R-PC025-6

As discussed in Section 3.12, Noise, of the Recirculated Draft EIR, even with implementation of proposed Mitigation Measures MM-NOI-1 through MM-NOI-5, noise impacts associated with operation of the proposed project would be significant and unavoidable.

Response to Comment R-PC025-7

Please see Response to Comment R-AL003-4.

Response to Comment R-PC025-8

Please see Response to Comment R-AL003-2.

Response to Comment R-PC025-9

Please see Response to Comment R-PC003-3.

Response to Comment R-PC025-10

The commenter states that implementation of the proposed project would result in "a material increase in evening and arrivals throughout the night, both before and during the departure curfew (11:30 p.m. to 6:30 a.m. as curfew does not apply to arrivals)." As described in Section 2.5.1.2 of the Recirculated Draft EIR, operational constraints at SDIA affect aviation activity forecasts. SDIA's Airport Use Regulation restricts departures by any aircraft between the hours of 11:30 p.m. and 6:30 a.m. and gate departures between the hours of 11:15 p.m. and 6:15 a.m. There is no restriction on arrivals.

In regards to the commenter's point related to Impact 3.12-5, Section 3.12.3.5.6 of the Recirculated Draft EIR acknowledges that implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition. As such, this would constitute a significant impact.

The impacts analysis compares each future horizon year (i.e., 2024, 2026, 2030, 2035, and 2050) with implementation of the proposed project, based on a comparison to existing (2018) baseline conditions. It should be noted, for informational purposes only and not for purposes of making significance determinations, that the aircraft noise impacts in each future horizon year would be the same with or without the proposed project (i.e., the noise impacts without implementation of the proposed project in 2024, as well as in each subsequent horizon year, would be the same as with implementation of the project in that year), as further described in Chapter 5, Alternatives Analysis.

It should also be noted that it is not certain that the aforementioned increases in nighttime flights would result in additional nighttime awakenings. As described in Section 3.12.3.4.2 and indicated in Table 3.12-7 of the Recirculated Draft EIR, the relationship between exterior SEL values and awakenings is a matter of probability. For an exterior SEL of 80 dB, the estimated maximum probability of awakenings is between 1.9 percent and 2.5 percent with building windows closed and 5.1 percent with building windows open (i.e., interior noise levels are comparatively higher or lower, depending on whether windows are open or closed). For an exterior SEL of 90 dB, the estimated maximum probability of awakenings is between 3.8 percent and 5.1 percent with building windows closed and 7.9 percent with building windows open (i.e., interior noise levels are comparatively higher or lower, depending on whether windows are open or closed).

Based on information presented in Section 3.12.3.5.6.1 of the Recirculated Draft EIR, formulation of a mitigation measure specific to sleep disturbance is considered infeasible, which is the basis for concluding that the significant impacts related to sleep disturbance would be unavoidable. It is important to note that the subject increase in nighttime flights related to the NA80 and NA90 SELs is attributable to future growth in aircraft activity at SDIA that is projected to occur irrespective of whether the proposed project is implemented. As noted, there is no difference between the proposed project and the No Project Alternative relative to increases in nighttime flights related to

the NA80 and NA90 SELs. It should also be noted that although no feasible mitigation measures are available for this impact, the SDCRAA will continue to implement the many noise abatement measures and programs at SDIA that are described in Section 3.12.3.2.3 of the Recirculated Draft EIR, which serve to address existing and future aircraft noise impacts from SDIA operations, including, but not limited to, nighttime operations. Please see Response to Comment R-AL003-13 related to SDCRAA's commitment to being a good neighbor.

Response to Comment R-PC025-11

Please see Response to Comment R-AL003-2.

Response to Comment R-PC025-12

Project impacts related to air quality pollutants and climate change are addressed in the Recirculated Draft EIR; specifically, in Section 3.2, Air Quality, and Section 3.3, Greenhouse Gases and Climate Change. As the comment offers no specific critique of the subject analyses provided in the Recirculated Draft EIR, no further response is required.

Response to Comment R-PC025-13

Regarding the bullet point on "increase in World Health Organization ("WHO") recognized health risks caused by airplane noise and pollution", please refer to Topical Response TR-NOI-1: Health Effects of Noise.

Response to Comment R-PC025-14

Please see Response to Comment R-AL003-2.

Response to Comment R-PC025-15

Please see Response to Comment R-PC023-8.

Response to Comment R-PC025-16

Please see Response to Comment R-AL003-4.

Response to Comment R-PC025-17

Please refer to Topical Response TR-NOI-1: Health Effects of Noise.

Response to Comment R-PC025-18

Table 3.12-9 of the Recirculated Draft EIR provides information relative to other noise-sensitive uses, such as churches (places of worship), schools, libraries, hospitals, colleges, and historic uses, with comparisons between future years and baseline (2018) conditions, and, for informational purposes and not for purposes of making significance determinations, comparisons between the proposed project and no project scenarios in each future year. It includes the estimated number of schools within the aircraft noise contours.

Table 3.12-10 of the Recirculated Draft EIR indicates the existing amount of time that noise levels exceed certain levels at schools in the vicinity of SDIA. The data shows that most schools in the vicinity of SDIA do not experience substantial periods of time with exterior noise levels above 80 dB, which equates to a typical interior noise level of between 55 dB (windows closed0 and 65 dB (windows open). Speech interferences typically begins at 65 dBA, which is the level of normal conversation and for the purpose of the recirculated EIR, is considered to be the sound level above

which learning within a classroom setting could be adversely affected. As discussed in Section 3.12.3.5.5 of the of the Recirculated Draft EIR, implementation of the proposed project would not cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to the existing (2018) baseline condition. As such, this would be a less than significant impact.

Response to Comment R-PC025-19

The comment is incorrect in several ways and does not reflect the information in, and conclusions of, the Recirculated Draft EIR. Section 3.4, Human Health Risk, of the Recirculated Draft EIR addresses potential health impacts associated with construction and operation of the proposed project, including the potential for increased cancer risks, increased chronic (long-term) non-cancer health hazards, and increased acute (short-term) non-cancer health hazards. As clearly stated in the conclusion of that section, on page 3.4-24 of the Recirculated Draft EIR, "There would *not be significant and unavoidable impacts* (emphasis added) to human health risk associated with construction and operation of the proposed project." That conclusion applies to both cancer risks and non-cancer health hazards. Notwithstanding that there would be no significant and unavoidable impacts related to the human health, and contrary to the allegation in the comment, nowhere in the Recirculated Draft EIR do the analysis conclusions claim or suggest that significant and unavoidable cancer impacts are somehow justified in light of a specific objective(s) of the project, such as the objective to enhance the passenger experience.

In summarizing the nature, approach, and conclusions of the human health risk evaluation presented in the Recirculated Draft EIR, it should be noted that the human health risk calculation methodology utilized in the Recirculated Draft EIR analysis is consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines for evaluation of human health impacts. As described in Section 3.4.2.2, Exposure Locations, of the Recirculated Draft EIR, localized concentrations of toxic air contaminants were estimated at the same project fence-line locations and identified sensitive receptors as presented in Section 3.2, Air Quality. These modeled concentrations were used to estimate change in risk of adverse health effects. The magnitude of the change in risk determines the significance of health impacts associated with the proposed project. As disclosed in Section 3.4.6.1.6, Summary of Impacts, of the Recirculated Draft EIR, acute and chronic non-cancer health hazards of the proposed project would be less then significant for all potentially exposed populations. As reported in Section 3.4.6.1.10, Significance of Impact After Mitigation, cancer risks associated with the proposed project would be reduced to a level that is less than significant with implementation of Mitigation Measure MM-AQ/GHG-1, Ground Support Equipment Conversion, which would reduce operational emissions of toxic air contaminants associated with ground support equipment activity at SDIA. As indicated in Chapter 3, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR, Mitigation Measure MM-AQ/GHG-1 has been refined since publication of the Recirculated Draft EIR. The subject refinement to Mitigation Measure MM-AQ/GHG-1 accelerates the proposed conversion of certain types of GSE to hybrid electric or alternative fuel vehicles. Such refinement does not alter the conclusion that cancer risks associated with the proposed project would be reduced to a level that is less than significant, nor does it alter the final conclusion noted above that there would not be significant and unavoidable impacts to human health risk associated with construction and operation of the proposed project.

Response to Comment R-PC025-20

The content of this comment is the same as Comment R-PC020-4; please see Response to Comment R-PC020-4.

Response to Comment R-PC025-21

Please see Response to Comment R-AL003-12.

Response to Comment R-PC025-22

Please see Response to Comment R-PC018-4.

Response to Comment R-PC025-23

Please see Response to Comment R-AL003-15.

Response to Comment R-PC025-24

The comment is an opinion on the merits of the proposed project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Recirculated Draft EIR. (Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

Response to Comment R-PC025-25

Please see Response to Comment R-AL003-13.

Response to Comment R-PC025-26

Please see Response to Comment R-AL003-14.

Response to Comment R-PC025-27

Regarding the first point about a Flight Procedure Analysis and Part 150 studies, please see Responses to Comments R-AL003-10 and R-AL003-15.

Regarding the second point about project funding, please see Response to Comment R-PC003-7.

Regarding the third point about Title 21, please see Responses to Comments R-AL003-13 and R-AL003-14.

Regarding the fourth point about aircraft noise mitigation, please see Response to Comment R-PC001-1.

Regarding the fifth point about aircraft gates and remain overnight aircraft parking spaces, please see Response to Comment R-AL003-2.

Regarding the sixth point about health impacts of noise, please see Topical Response TR-NOI-1: Health Effects of Noise.

Regarding the seventh point about limiting flight operations to require the use of Stage 4 and Stage 5 aircraft engines, please see Responses to Comments R-AL003-13 and R-PC023-5.

Vanst Law
AndreaR@Vanstlaw.com | www.Vanstlaw.com
(858) 733-0002

November 4, 2019

By email only: planning@san.org

RECEIVED
NOV 04 2019
BY: .....

Ted Anasis
Manager, Airport Planning
San Diego County Regional Airport Authority
3225 N. Harbor Island Drive, 3rd Floor
San Diego, CA 92101

Re: Written Comments to the San Diego County Regional Airport Authority Recirculated Draft Environmental Impact Report analyzing the Airport Development Plan

Dear Mr. Anasis:

On behalf of my clients, Sunroad Enterprises and Sunroad Harbor Island Hotel, Inc. (together, "Sunroad"), I submit the following comments to the San Diego County Regional Airport Authority Recirculated Draft Environmental Impact Report analyzing the Airport Development Plan ("RDEIR").

Sunroad is party to an Exclusive Negotiating Agreement with the Unified Port of San Diego ("Port") to develop a hotel on East Harbor Island. In October 2019, the Port's Board of Commissioners approved Sunroad's design and directed staff to begin the environmental review process to support Sunroad's Coastal Development Permit application. Sunroad's hotel project is a probable future project and should have been included in the RDEIR's cumulative impacts analysis.

"[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." CEQA Guidelines § 15130(a)(1). That is, the RDEIR must analyze whether its impacts are cumulatively considerable when analyzed together with Sunroad's hotel project and others. Furthermore, the RDEIR must summarize effects of the related projects, analyze the cumulative contribution of the proposed project, and identify mitigation measures for that contribution. CEQA Guidelines § 15130(b).

The RDEIR identifies an additional 750-1,500 hotel rooms for East Harbor Island but does not summarize the effects of the project; quite the contrary, the RDEIR ignores any impacts. For example, the RDEIR traffic analysis does not assign any trips to the future hotel site. The cumulative impacts analysis cannot be appropriately comprehensive if it does not consider the potential trips from this probable future project. *See* CEQA Guidelines § 15130(b)(4) (requiring a summary of the expected environmental effects of related projects). The RDEIR cannot accurately determine whether the project's traffic impacts are cumulatively considerable without accurate traffic projections.

For these reasons, Sunroad respectfully requests the RDEIR be revised to include Sunroad's East Harbor Island hotel project in the cumulative analysis. Thank you for the ability to comment.

Sincerely,

Andrea Contreras Rosati

R-PC026-1

R-PC 026-2

COMMENT LETTER NO. R-PC026	Vanst Law on behalf of Sunroad Enterprises and Sunroad Harbor Hotel, Inc.	November 4, 2019

Response to Comment R-PC026-1

The Unified Port of San Diego ("Port") provided development assumptions for Harbor Island that were included in the cumulative impact analyses included in the Recirculated Draft EIR. Near-term projects were specifically added to the roadway network, while buildout projects were added to the regional forecast model for Year 2050. The Recirculated Draft EIR on page 4-6 in Chapter 4, Cumulative Impacts Analysis, indicates that Harbor Island may include the following growth: 750-1,500 hotel rooms, 40,000–140,000 square feet of retail/restaurant/services, and aquaculture/bluetech use, and 15-20% increase in vessel berthing. The Port did not identify specific developers nor access points. It is reasonable to assume that the Sunroad Harbor Island development was part of the near-term development provided by the Port.

The traffic analysis in Section 3.14, Traffic and Circulation, and Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR assumed that 1,500 hotel rooms, 140,000 square feet of shopping center use, and 200 new vessel berthing slips for Harbor Island. This development was calculated to add 18,220 daily trips to the study area roadway network for the Year 2030 condition. Exhibit M of Appendix R-H2, Proposed Project: Technical Memorandum, of the Recirculated Draft EIR contains the detailed trip generation assumptions for cumulative projects. Specific analyses at Harbor Island project driveways could not be completed, since there was no approved development projects or site plans at the time the Recirculated Draft EIR was being prepared (the Port advanced the Sunroad project for further studies on October 8, 2019, which was after the Recirculated Draft EIR was released for public review (September 19, 2019).

The traffic analysis generated trips for all identified cumulative development projects, assigned these trips to the study area network, and evaluated the baseline conditions with all known development and modelled growth. The combined effects of all known cumulative development were added to existing volumes and evaluated. The airport traffic growth was then added to the cumulative baseline and traffic conditions with the project were evaluated, including impacts and mitigation measures, where appropriate. The Sunroad Harbor Hotel was accounted for in the cumulative development projects addressed in the Year 2030, 2035, and 2050 scenarios of the Recirculated Draft EIR.[43]

Response to Comment R-PC026-2

For the reasons stated above in Response to Comment R-PC026-1, it is not necessary to revise the Recirculated Draft EIR.

[43] The projects included in the 2024 and 2026 scenarios were projects that were already in the pipeline with submitted development applications or soon to be under construction. The Port had indicated to SDCRAA that the Harbor Drive development, which includes the Sunroad Harbor Hotel, would occur within 10 years. Thus, it was placed in the 2030 scenario.

From: Gary Wonacott <wildcatwonacott@gmail.com>
Sent: Wednesday, November 6, 2019 11:35 AM
To: Airport Planning
Subject: Financial loss resulting from a constrained airport

Dear Sir:

I found a math error in the calculation of these projected losses. The last paragraph in the document should read:

FINANCIAL IMPACT OF CONSTRAINED LINDBERGH FIELD

In June of 2018, a report was published by a consultant to the Airport Authoritythat concluded that the contribution of SDIA to the economy is about $12B annually. A summary of the study is shown in Table 7. While there is a difference of opinion when the airport will become constrained, which ranges from 2023 to 2035, there is no doubt about the financial impact when this does happen. The difference between constrained and unconstrained enplanements after five and ten years is roughly 2.2 and 4.5 million passengers.

In 2018, the number of enplanements is about 12 million. The next question is what percent of the total $12 billion is directly related to the number of enplanements. Conservatively assuming from Table 7 that $9.1B relates directly to enplanements, then the loss in revenue to the San Diego region can be estimated at $.99 B after five years and $2. B after ten years.

Someone stated that the business community in San Diego is aware of this potential loss and is OK with it. I am not that sure this is the case.

R-PC027-1

SAN DIEGO INTERNATIONAL AIRPORT ECONOMIC IMPACT STUDY Prepared for: **SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY**
Third Floor, SDCRAA Administration Building 3225 North Harbor Drive, San Diego, CA 92101 619-400-2404 Prepared by: **CDM SMITH,** 8845 Governor's Hill Drive, Suite 430 Cincinnati, OH 45249
513-583-9800

RECEIVED
NOV 0 6 2019
BY: .....

COMMENT LETTER NO. R-PC027	Gary Wonacott	November 6, 2019

Response to Comment R-PC027-1

The comment offers an opinion on the merits of the proposed project and does not pertain to the environmental analysis in the Recirculated Draft EIR. No further response is required.