December 5, 2014

Ms. Kanani Brown
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Parking Plaza at Terminal Two, San Diego International Airport

Dear Ms. Brown:

Thank you again for arranging the meeting with Deborah Lee, Diana Lilly and you on October 29, 2014 to discuss the proposed parking plaza at San Diego International Airport. Attached is the coastal development permit application for a proposed parking plaza at Terminal Two, San Diego International Airport (SAN). A parking plaza was a project component originally included in the San Diego International Airport Master Plan that was adopted in 2008 by the SDCRAA. The Board of the SDCRAA has directed staff to develop a three-level parking plaza with 3,000 spaces at Terminal Two.

If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.

Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

TA/Ijt

Dist: Deborah Lee, San Diego Coast District (without attachments)

Attachments:

A: CDP Application for Parking Plaza
B: Project Description, Site Plans, Architectural Renderings, Height Analysis and Views
1. INTRODUCTION

The San Diego International Airport Master Plan Final Environmental Impact Report (FEIR) provides a comprehensive analysis and disclosure of potential environmental effects associated with implementation of various improvement projects identified in the Airport Master Plan (AMP) for the San Diego International Airport (SDIA). Many elements of the AMP have been completed or are underway. An additional AMP project which was evaluated in the FEIR, the Terminal 2 Parking Structure (Project), is currently proposed for construction. The purposes of this Addendum are (1) to document the review that the San Diego County Regional Airport Authority (SDCRAA) has undertaken to assess the Project in relation to the FEIR and current conditions, and (2) to substantiate the conclusion, based on substantial evidence presented in this Addendum and attachments, that there are no substantial changes to the Project, no substantial changes in circumstances, and no new information indicating that there would be new significant impacts or a substantial increase in the severity of any previously disclosed significant impacts which would require major revisions to the FEIR. Because no major changes to the AMP FEIR are required pursuant to this framework, the preparation of a Supplemental or Subsequent EIR is not required pursuant to the California Environmental Quality Act (CEQA); codified as Public Resources Code, Section 21000 et seq.

California Environmental Quality Act Requirements

CEQA requires public agencies to analyze and consider the environmental consequences of their decisions to approve development projects over which they exercise discretion. CEQA achieves this objective by requiring agencies to prepare Environmental Impact Reports (EIRs) for projects with the potential to cause significant impacts on the physical environment. EIRs are public documents that assess environmental effects related to the planning, construction, and operation of a project, and indicate ways to reduce or avoid possible environmental damage. An EIR also discloses growth-inducing impacts, effects found not to be significant, significant cumulative impacts, and significant impacts that cannot be avoided, if any. The purpose of an EIR is to inform. EIRs are not policy documents that recommend project approval or denial.

As lead agency, the SDCRAA prepared an FEIR (State Clearinghouse # 2005091105) that was certified in 2008 for the Airport Master Plan in compliance with CEQA and CEQA Guidelines (California Code of Regulations, Section 15000 et seq., as amended). The FEIR included both Program- and Project-level analyses. The FEIR evaluated, at a Program level, the potential short-term and long-term, direct, indirect, and cumulative environmental impacts associated with the

Page 1
airport uses designated by the Airport Land Use Plan in the AMP. In addition, the FEIR provided
a Project-level analysis for the Airport Implementation Plan that included specific improvements
proposed in the AMP for near-term construction and operation to meet aviation demand through
2015 at the San Diego International Airport (SDIA). The currently proposed Terminal 2 Parking
Structure was addressed in the FEIR at the Project-level analysis, while also being accounted for
in the Program-level analysis as part of the overall Land Use Plan proposed for the airport. The
Program-level analysis in the FEIR considered additional improvements to meet aviation
demand beyond 2015, with such additional improvements being subject to further planning
efforts and related environmental documents, although the Program-level analysis in the FEIR
did include those additional improvements in the evaluation of potential environmental impacts
through the year 2030.

Section 21166 of CEQA (the statute) sets forth the requirements for how a lead agency is to
consider changes to a proposed project or its circumstances or the availability of new information
that occurs after an EIR for the project has been completed, and Section 15162 of the State
CEQA Guidelines reiterates those requirements, along with additional guidance.

Section 21166 of CEQA states:

When an environmental impact report has been prepared for a project pursuant to this division,
no subsequent or supplemental environmental impact report shall be required by the lead agency
or by any responsible agency, unless one or more of the following events occurs:

(a) Substantial changes are proposed in the project which will require major revisions of the
environmental impact report.

(b) Substantial changes occur with respect to the circumstances under which the project is
undertaken which will require major revisions in environmental impact report.

(c) New information, which was not known and could not have been known at the time the
environmental impact report was certified as complete, becomes available.

Section 15162 of the State CEQA Guidelines indicates that:

(a) When an EIR has been certified or a negative declaration adopted for a project, no
subsequent EIR shall be prepared for that project unless the lead agency determines, on the
basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the
previous EIR ... due to the involvement of new significant environmental effects or a
substantial increase in the severity of previously identified significant effects;
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

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

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete ... shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR should be prepared “if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” When an Addendum is prepared, the decision-making body must consider the Addendum with the EIR prior to making a decision on the Project. Although, pursuant to State CEQA Guidelines Section 15164(c), an addendum to an EIR need not be circulated for public review, this Addendum to the San Diego International Airport AMP FEIR, along with the FEIR itself, is available for public review:

- on the Airport Authority website at www.san.org
- at the San Diego County Regional Airport Authority offices located in the Commuter Terminal at San Diego International Airport, 3225 North Harbor Drive, San Diego, CA during the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday.

2. PROJECT BACKGROUND AND PROJECT DESCRIPTION

A. Project Background

The AMP FEIR was certified on May 1, 2008, by the SDCRAA Board. Since that time, SDCRAA has steadily followed through with implementation of the AMP, including
construction and operation of improvements contemplated in the Airport Implementation Plan to meet 2015 aviation demands, and has also completed further planning and completion of environmental documents for airport improvements to meet longer term demands. The following summarizes the AMP progress to date.

The Green Build

The Green Build, completed in August 2013, is the largest improvement project in SDIA’s history. The Green Build includes many of the improvements identified in the Airport Implementation Plan, which was addressed in the Project-level analysis of the AMP FEIR. The Green Build is helping to meet the airport’s current and future demand for travel, improving customer service, and serving as an economic stimulus for the San Diego region. A $1 billion project, completion of The Green Build provided the following improvements at San Diego International Airport:

- 10 new gates to reduce terminal congestion and provide expanded, more comfortable passenger waiting areas
- New aircraft parking and replacement Remain-Over-Night aircraft parking apron
- New apron and aircraft taxi lane
- Enhanced curbside check-in, allowing passengers to print boarding passes, check baggage and view gate information at an easy-to-use curbside kiosk before entering the terminal
- Dual-level roadway to relieve curb-front traffic congestion by separating arriving and departing passengers
- More security lanes to improve flow of passengers through the terminal
- Expanded concession area providing more dining and shopping options
- Nation’s largest airport USO Center

Completion of the Green Build improvements has been instrumental in helping to accommodate increasing aviation demands at the airport, providing more efficient airport operations and better passenger service and experience. In conjunction with implementation of the AMP, through The Green Build and otherwise, SDCRAA has successfully implemented several programs for reducing the airport’s environmental impacts, including, but not limited to, designing the project to meet at Leadership in Energy and Environmental Design (LEED) Platinum certification which was awarded in 2014 as the first-ever Platinum airport terminal in the world, and implementation of the airport’s Air Quality Management Plan.

Construction and operation of the Terminal 2 Parking Structure is one of the few major improvements within the Airport Implementation Plan that remains to be implemented, which,
similar to The Green Build improvements completed to date, is intended and designed to meet the near-term (2015) aviation demands anticipated for the airport.

North Side Improvements

The North Side Improvements at SDIA include improvements identified in the AMP FEIR as part of the Land Use Plan, which were addressed in the FEIR at a Program-level analysis. As contemplated in the AMP FEIR, those improvements underwent additional planning subsequent to certification of the FEIR in 2008, and an additional environmental document was completed. Specifically, a Supplemental EIR (SEIR; August 2011) for CEQA compliance and a related Environmental Assessment (September 2013) for NEPA compliance were prepared for the projects primarily in the northeast portion of SDIA. The North Side Development includes a number of improvements, some of which have been constructed, and some of which are still to be constructed:

- Receiving and Distribution Center – a 21,000-square-foot central delivery location for food, beverage, retail, and other goods. The center helps reduce traffic on surrounding roadways by centralizing all truck deliveries. Airport vehicles are then used to deliver materials via airport roadways. This eliminates 50 to 75 truck trips on Harbor Drive each day.
- Rental Car Center – a facility to house many of the rental car companies serving SDIA in a single building. This will dramatically reduce rental car traffic on Harbor Drive and the number of shuttle buses circulating around the airport.
- Fixed-Base Operator (FBO) Complex – a larger, more environmentally friendly facility to replace the existing FBO complex and maximize airfield space. The FBO complex provides hangars, fueling and other services for general aviation aircraft.
- Roadway Improvements – several projects that will improve traffic and access to the north side of the airport. These include expansion of the Washington Street entrance roadway at Pacific Highway; widening of Sassafras Street north of Pacific Highway; and a new terminal link roadway for rental car and parking shuttle buses, which will remove traffic from Laurel Street and North Harbor Drive.

The construction timeline for the North Side Improvements is as follows:

- 2012 - Construction began for the receiving and distribution center and Washington Street entrance roadway and intersection; receiving and distribution center completed in November 2012
- 2013 - Washington Street roadway improvement completed; construction began on fixed-based operator building and rental car center; SAN Park Pacific Highway relocated farther north to allow for development of rental car center
• 2014 - Fixed-based operator building will be completed; Sassafras Street improvements will be completed; work begins for terminal link roadway
• 2016 - Rental car center will be completed; terminal link roadway will be completed

As evidenced above, implementation of the SDIA AMP, as approved in 2008, has steadily progressed over the past six years with major improvements completed or in progress for enabling the airport to meet increasing aviation demands in an effective and timely manner. Implementation of the proposed Terminal 2 Parking Structure is an integral part of that ongoing program as envisioned and addressed in the SDIA AMP FEIR.

B. Project Description

The proposed Project for the purposes of this Addendum is the construction of the multi-level parking structure adjacent to Terminal 2 that is described in Section 4.1.2.5 (page 4-5) of the AMP FEIR and addressed at a Project-level analysis in the FEIR. The parking structure would be located directly south of the existing Terminal 2 and north of Harbor Drive (Figure 1, Project Location).

As noted above, being part of the Airport Implementation Plan presented and addressed in the FEIR, the multi-level parking structure is intended and designed to accommodate future growth of passengers expected through 2015. The Project will address the public parking deficiency at Terminal 2 that was anticipated in the FEIR upon completion of Terminal 2 West which was part of The Green Build by converting existing surface parking to the proposed parking structure (Figure 2, Site Plan). This area is relatively small and constrained, thus the only available mechanism for providing the required parking in the immediate vicinity of the terminal is through construction of a multi-level parking structure. As described in the AMP FEIR and is still the case for the current proposal, the parking structure will be constructed up to 5 levels to provide up to 5,000 parking spaces, for a net total of 4,300 additional parking in the terminal area. The parking structure is expected to be up to 50 feet in height to accommodate up to 5 levels of parking spaces and an additional 15 feet to account for ancillary features such as elevator infrastructure and potential installation of photovoltaic panels (Figure 3, Parking Structure Massing).

Vehicle access would be provided to a second-level departure curb as contemplated in the AMP EIR. The second-level departure curb was constructed as an adjacent stand-alone facility as part of The Green Build. A commercial vehicle curb accommodating shuttles, buses, taxis, and share-ride vans is located on the first level. Existing elevated pedestrian walkways would connect the second level of the parking structure with the upper level Terminal 2 ticketing facilities. The proposed parking structure would be constructed directly adjacent and abutting to the second-level departure curb and connect via elevated pedestrian walkways and elevators to Terminal 2.
The parking structure will be accessed from North Harbor Drive via an expanded roadway loop, that has already been constructed and that itself was included in the FEIR. The parking structure would be located in the center of that roadway loop. Vehicles approaching the terminal area would be directed to parking or passenger pick-up and drop-off well in advance of decision points in the roadway. Roadways considered in the AMP FEIR and since constructed as part of the AMP will eliminate the need for vehicles to utilize the first-level arrival curbside roadway to enter structures or surface parking areas.

Design and construction of the parking structure will accommodate existing major utilities located beneath the proposed footprint (see Figure 2). This could include re-routing utilities or constructing the structure in a design that would bridge over these major utilities. Construction of the parking structure will be performed in accordance to all applicable mitigation measures in the AMP FEIR.

3. ENVIRONMENTAL REVIEW OF THE PROJECT

The following analysis addresses the currently proposed Project (Terminal 2 Parking Structure) in light of the CEQA evaluation criteria described above in Section 1, relative to whether there is any basis under those CEQA criteria to require a supplemental or subsequent EIR for the project. Based on the Project description presented above in Section 2.B., there is substantial evidence to support the conclusion that no substantial changes have occurred relative to the location, function, and basic design characteristics of the proposed Project since the FEIR was certified; hence, no further analysis is provided herein regarding the criterion in Section 1 of whether there have been substantial changes in the project that require major revisions to the FEIR.

Based on the Project description, and the analysis in the FEIR, the potential impacts on aesthetics and traffic related to the Project are considered to be most relevant to the Addendum analysis.

The discussion presented in this section focuses on potential environmental impacts related to aesthetics and traffic. For purposes of this Addendum, all other environmental topic areas evaluated in the FEIR were reviewed through use of an Environmental Review Checklist. The Environmental Review Checklist provided as Appendix A to this Addendum follows the basic format of a typical CEQA Initial Study environmental analysis checklist, but has been tailored to address each such environmental topic relative to the CEQA criteria presented above in Section 1.

The information and findings for each of the two key environmental topic areas are summarized in the analyses that follow.

Given the size and location of the proposed parking structure, the FEIR anticipated that it would be visible from off-airport public view locations. The evaluation of aesthetic impacts below
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

considers whether there have been substantial changes in circumstances under which the Project will be undertaken; specifically, what changes have occurred in the existing visual/aesthetic setting of the Project area subsequent to the FEIR analysis and also what changes have occurred in certain planning documents, such as the Port Master Plan, used in the FEIR analysis of aesthetic impacts. The analysis then considers whether any such changes in circumstances would result in new or substantially more severe significant impacts to aesthetic or visual resources from the Project, beyond what was identified in the FEIR.

The evaluation below related to potential traffic impacts responds to the availability of new information that was not known, and could not have been known, in 2008 when the FEIR was certified. Specifically, data regarding future regional traffic anticipated to occur around the airport, as well as throughout the county, is derived from the regional traffic model developed and maintained by the San Diego Associations of Governments (SANDAG). SANDAG periodically updates the regional traffic model based on changes in conditions over time and more current traffic projection data. For the AMP FEIR, long-term traffic volumes were obtained from the SANDAG Series 10 model. That version of the regional traffic model has been updated twice since then, with the current version being SANDAG Series 12. Given that the AMP FEIR includes an analysis of potential long-term impacts that may result from airport-related traffic (i.e., in the year 2030), including with and without AMP-related changes in traffic, an evaluation was completed to assess whether the differences future traffic volumes in the SANDAG Series 12 traffic model compared to the SANDAG Series 10 traffic volumes would result in new significant traffic impacts or a substantial increase in the severity of previously identified significant traffic impacts. Additionally, the traffic impacts evaluation presented below addresses whether existing traffic volumes around the airport have substantially changed subsequent to certification of the FEIR in 2008. Specifically, the traffic volumes for existing conditions addressed in the FEIR are based on 2005 data, and there is now more current traffic volume information available from 2013 traffic counts. As further explained below, the additional evaluation of potential traffic impacts based on new data focuses on those roads and intersections, as specifically identified in the FEIR traffic analysis, that are in proximity to, and are most likely to be affected by, the proposed parking structure. In addition to the availability of new information, the additional evaluation presented below takes into consideration changes in circumstances, such as completion of AMP improvements that would tie into the proposed parking structure (i.e., dual-level roadway nearby).

A. Aesthetics

Existing Environmental Setting

Section 5.13.4 of the AMP FEIR provides a summary of the environmental setting, including the Project site and surrounding area at the time FEIR was prepared. Subsequent to the certification
of the FEIR, certain AMP improvements have been constructed. New facilities most applicable to the Project are Terminal 2 West and the adjacent dual-level roadway with upper-level lanes that are dedicated to departing passengers, who walk across a sky bridge to reach the terminal, and lower-level lanes that are dedicated to arriving passengers.

Final Environmental Impact Report

The AMP FEIR addressed the laws, plans, policies, and guidelines that the Project is subject to relative to aesthetics. This regulatory framework forms the basis for determining how the Project could affect visual resources. The FEIR also evaluated neighborhood character, landform, and light and glare issues. The visual resources assessment presented key views and assessed the potential for significant impacts to these views using a weighting factor system (low – minor adverse change, medium – moderate adverse change which would result in a less than significant visual impact, and high – major adverse change which would result in a significant visual impact that required mitigation measures). The FEIR’s 23 key views were assessed with “low” to “medium” changes: no significant impacts were identified for the key views, and no mitigation was necessary. The FEIR concluded that the proposed buildings would be similar to existing buildings in terms of height, mass, scale, materials, and architectural style and that the improvements of the Airport Land Use Plan would not conflict with the current character of the area. The FEIR also concluded that landform impacts would be minimal, and that potential impacts from increased overall nighttime lighting would be minimized by light fixtures that direct light downward. The conclusion of the FEIR is that construction and operation of the Airport Land Use Plan would not have a project-specific or cumulative significant impact on visual resources and no mitigation was necessary.

Proposed Project

As described on page 5.13-7 of the AMP FEIR, existing visual resources within the SDIA area consist of natural and human-made features. Natural visual features include the San Diego Bay, the Pacific Ocean, and distant views of the Point Loma peninsula. The human-made features include Spanish Landing Park, the downtown skyline, and historic structures located on the east side of the Marine Corps Recruit Depot (MCRD) San Diego. The FEIR evaluated potential impacts from 23 key view locations, 13 of which are located around the project sites (Key Views 1 through 8, and 19 through 23; refer to Figures 5.13-1 through 5.13-10 and Figures 5.13-20 through 5.13-24, respectively, of the AMP FEIR). The analysis of potential impacts at these view locations includes general consideration of the types of uses envisioned in the Airport Land Use Plan. The FEIR analysis provides a more detailed discussion of impacts related to improvements proposed under the Airport Implementation Plan.

The SDIA is in an urbanized area, surrounded by existing commercial, industrial, and military uses; Spanish Landing Park; the San Diego Bay; and roadways, roadway ramps. Scenic vistas in
the area are focused toward the south of the SDIA toward the bay, the downtown skyline, and the Point Loma peninsula rather than toward the airport. Views of the SDIA from passing motorists, pedestrians, and cyclists along Harbor Drive are intermittent due to intervening mature trees partially lining Harbor Drive and from roadway ramps. The proposed parking structure maximum footprint (see Figure 2) extends closer to Harbor Drive than the building footprint analyzed in the FEIR. Views toward the parking structure would be predominantly from motorists traveling along Harbor Drive. Project visibility for such viewers would be limited by the screening described above and the combination of the speed of travel and focus on driving. Additionally, the Project’s height and scale would be the same as that analyzed in the FEIR. As such, the location of the structure slightly closer to Harbor Drive would not be visibly different. Therefore, the visual quality of the view from Harbor Drive to the airport would essentially be the same as that analyzed in the FEIR.

The Port Master Plan (October 2012) guides the land use and policies for areas adjacent to SDIA. The Port Master Plan, Planning District 2, Lindbergh Field / Harbor Island, Precise Plan (Port Master Plan, Figure 8) identifies two areas of scenic views near the SDIA: southerly views from both Spanish Landing toward the San Diego Bay, and from Harbor Island, also toward the bay. These views are to the south, in the opposite direction as the Project site and therefore are not within the viewshed of these scenic views. Implementation of the Project would not significantly alter the nature and character of this existing view. As such, the conclusion remains that the potential impact would be less than significant.

The proposed parking structure would be the same height and in the same location as the parking structure analyzed in the FEIR. Although the building footprint could be slightly different than that illustrated in the FEIR, the overall visual impact of the proposed structure would be the same: the building would replace a surface parking lot, would have the same visual mass, and would be designed to complement existing airport structures, most particularly Terminal 2 West. Views of the parking structure from areas to the west (Liberty Station and the former Naval Training Center) would be partially or totally screened by the terminal building or by intervening trees. The significance of potential impacts to this view is rated low (FEIR Table 5.13-1) because the viewscape is of airport-related uses. Likewise, views of the Project site from areas to the south are partially to fully blocked by mature trees and/or roadway ramps, and the significance of potential impacts to this view is rated low to medium. Therefore, the visual character or quality of the Project site and its surroundings would not be substantially degraded by construction of the parking garage, and impacts would be less than significant.

Findings

The currently proposed Project, a five-story parking structure adjacent to Terminal 2, is addressed as a component of the AMP and the potential aesthetic impacts of the Project, as
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

summarized above, are consistent with the AMP FEIR’s conclusions on visual quality impacts to scenic vistas, scenic resources, or the visual character or quality of the site. The Project conforms to the existing regulatory framework including the Port Master Plan, California Coastal Act, and City of San Diego Community Plans and policies as it pertains to visual resources. The Project also is consistent with view corridor preservation analysis in the AMP FEIR. The comparison of anticipated plan conformance and aesthetic resources impacts of the Project with the impacts disclosed in the FEIR support the required CEQA findings below. Specifically, none of the conditions defined in Section 21166 of CEQA and in Sections 15162 of the State CEQA Guidelines that would require preparation of a subsequent or supplemental EIR have been met.

No Substantial Change in Circumstances Requiring Major EIR Revisions. Substantial evidence in the record indicates that there are no substantial changes in the circumstances, as related to aesthetic and visual impacts, under which the proposed Project would be undertaken that would require major changes to the certified FEIR to account for new significant impacts or a substantial increase in the severity of previously identified impacts.

No New Information Showing New or Greater Significant Effects. This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the FEIR was certified indicating that a new significant effect not reported in the certified FEIR may occur. There is no substantial new information that there would be substantially greater significant aesthetic effects than those identified in the certified FEIR.

No New Information Showing Ability to Reduce Significant Effects Identified in Previous EIR. Since the Project would not result in significant impacts with respect to plan conformance and aesthetics or visual resources, no alternatives or alterations to the Project are necessary.

B. Traffic

Existing Environmental Setting

Section 5.3.4 of the AMP FEIR contains a summary of the environmental setting at the time the FEIR was prepared. Subsequent to the certification of the FEIR, certain AMP improvements have been constructed. New facilities most applicable to the Project are Terminal 2 West and the adjacent dual-level roadway with upper-level lanes that are dedicated to departing passengers, who walk across a sky bridge to reach the terminal, and lower-level lanes that are dedicated to arriving passengers.

Final Environmental Impact Report

Section 5.3, Traffic and Circulation, of the AMP FEIR describes the general approach and methodology, regulatory framework, significance criteria, and traffic and circulation impacts
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

associated with the Airport Implementation Plan (with Parking Structure), which assumed that
all components of the Airport Implementation Plan would be constructed, including a “new five-
level parking structure with approximately 5,000 spaces and associated vehicle circulation
serving Terminal Two.” Airport trip generation and terminal distribution resulting from the
Airport Implementation Plan were estimated (FEIR Tables 5.3.18 and 5.3.19, respectively) to
determine potential traffic impacts, with “existing” condition year 2005 and future conditions for
the years 2010, 2015, and 2030.

Street segment and intersection impacts were identified by comparing traffic conditions under
the Proposed Airport Implementation Plan (With Parking Structure) against traffic conditions
under the No Project Alternative. Street segments that would experience significant impacts in
the year 2030 include segments of Sassafras Street, Kettner Boulevard, North Harbor Drive,
Grape Street, Hawthorn Street, Laurel Street, and India Street.

The FEIR presents measures to mitigate impacts on street segments and intersections. Mitigation
measures for street segments are presented in the FEIR Section 5.3.8.1, Street Segments,
Proposed Airport Implementation Plan (with Parking Structure) (page 5.3-132) and Proposed
Airport Land Use Plan (page 5.3-145). Mitigation measures for intersections are presented in the
FEIR Section 5.3.8.2, Intersections, Proposed Airport Implementation Plan (with Parking
Structure) (page 5.3-163 and 5.3-170) and Proposed Airport Land Use Plan (page 5.3-166).

The FEIR concluded that although “mitigation measures would reduce traffic impacts to a level
of less than significant, the roadway segments, intersections, arterial roadways, and freeway
ramps and operations are within the legal authority, responsibility, and jurisdiction of the City of
San Diego or Caltrans, not SDCRAA. As such, SDCRAA lacks the legal authority to ensure that
these other agencies will implement the mitigation measures necessary to render the traffic
impacts less than significant. If these agencies do not implement the mitigation measures
identified and adopted by SDCRAA, it is possible that the traffic impacts of the Project will
remain significant after Project implementation.”

Proposed Project

The location of the proposed parking structure, the number of parking spaces, the basic design,
and function, as currently proposed, are substantially the same as that described in the FEIR. The
FEIR used traffic volumes from 2005 to characterize existing conditions in the traffic analysis.

Comparison of 2005 (Existing Conditions) Traffic Volumes to 2013 Traffic Volumes

To determine if the 2005 traffic volumes used to characterize existing conditions have
substantially changed since the certification of the FEIR, a comparison was made to traffic
volumes used in the 2013 SDIA Airport Development Plan (ADP) Traffic Study, which were
counted in May 2013, provided as Appendix B, Traffic Volumes Memorandum. For those street
segments and intersections where an increase in traffic volumes was identified between 2005 and 2013, the resultant Level of Service (LOS)\(^1\) for the affected facility was assessed to determine whether it would operate at an acceptable LOS. AM and PM peak hour intersection volumes from 2005 and 2013 were compared (see Appendix B, Tables 1 and 2, respectively). Of the intersections compared, AM peak hour intersection volumes were on average 2.17 percent higher in 2013 compared to 2005, with the most apparent increases at the intersections along Harbor Drive between Harbor Island Drive and Rental Car Road. PM peak hour intersection volumes were on average 15.48 percent higher in 2013, with increases at the intersections along North Harbor Drive between Spanish Landing and Laurel Street. While AM and PM peak hour intersection volumes have increased at several intersections, all intersections where increases occur were calculated to operate at LOS C or better under Year 2013 conditions, which is considered an acceptable level of service. Therefore, no new significant impacts are expected to occur.

A comparison of street segment Average Daily Traffic (ADT) volumes between 2005 and 2013 also was made (see Appendix B, Table 3). Under that comparison, the traffic volumes were lower in 2013 by an average of 4.23 percent, although the ADT volumes along some segments have increased. While volumes have increased along several segments of North Harbor Drive, all segments where increases occur were calculated to operate at LOS D or better, which was also the case in the SDIA Master Plan FEIR analysis (i.e., no significant impacts under either scenario). Therefore, no new or substantially more severe significant impacts are expected to occur from implementation of the currently proposed Project.

**Comparison of 2010 (No Project Alternative) Traffic Volumes to 2013 Traffic Volumes**

The AMP FEIR includes evaluation of environmental effects associated with the No Project Alternative, which provides a general indication of future environmental impacts and conditions projected to occur in the absence of SDIA AMP improvements. Inasmuch as traffic volumes at intersections and street segments around the airport would have increased between 2005 and 2013 even if there were no AMP improvements, a comparison was made between the forecasted Year 2010 No Project Alternative traffic volumes and the 2013 SDIA ADP Traffic Study volumes described above. Although the FEIR also includes traffic volume projections for 2015 under the No Project Alternative, a comparison between the 2010 No Project Alternative traffic volumes and the 2013 traffic volumes is considered to be more conservative, given that the 2015 No Project Alternative projections would be higher than those of 2010.

---

\(^1\) Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment or intersection under various traffic volume loads. It provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions.
Similar to the 2005-2013 traffic volumes comparison above, AM and PM peak hour intersection volumes from the 2010 No Project Alternative and 2013 SDIA ADP Traffic Study were compared (see Appendix B, Tables 1 and 2, respectively). Of the intersections compared under this scenario, AM peak hour intersection traffic volumes were on average 11.71 percent lower in 2013 compared to the traffic volumes anticipated in the FEIR to occur by 2010 under the No Project Alternative, although the volumes at some intersections have increased. However, all intersections were calculated to operate at LOS C or better, which was also the case in the AMP FEIR analysis (i.e., no significant impacts under either scenario). PM peak hour intersection traffic volumes would be on average 19.37 percent lower in 2013 compared to the traffic volumes anticipated in the FEIR to occur by 2010 under the No Project Alternative, with no increases shown at any intersection. Based on the above comparison between 2013 traffic volumes and the traffic volumes projected in the FEIR for the No Project Alternative in 2010, no new or substantially more severe significant impacts are expected to occur.

A comparison of street segment Average Daily Traffic (ADT) volumes between the 2010 No Project Alternative and 2013 traffic volumes also was made (see Appendix B, Table 3). Under that comparison, the traffic volumes were lower in 2013 by an average of 12.04 percent, although the volumes along some segments have increased. While volumes have increased along several segments of North Harbor Drive, all segments where increases occur were calculated to operate at LOS D or better, which was also the case in the SDIA Master Plan FEIR analysis (i.e., no significant impacts under either scenario). Therefore, no new or substantially more severe significant impacts are expected to occur from implementation of the currently proposed project.

Comparison of SANDAG Series 10 and Series 12 Long-Term (2035) Traffic Volumes

The FEIR used long-term traffic volumes obtained from the SANDAG Series 10 (Year 2030) traffic model to determine potential significant impacts to the surrounding roadway network due to the SDIA Master Plan. To determine if the forecast volumes have changed substantially since the document was certified, a comparison was made to the most recent available SANDAG Series 12 (Year 2035) traffic model volumes (Appendix B, Table 4). The forecasted Series 12 volumes are lower as compared to Series 10 volumes by an average of 36.47 percent. Therefore, the use of the Series 10 Year 2030 traffic volumes can be considered conservative; no new significant impacts are identified. Additionally, although significant impacts to street segment operations in 2030 were identified in the AMP FEIR for the following segments of North Harbor Drive: Terminal 1 to Winship Lane; Winship Lane to Rental Car Road; Rental Car Road to Laurel Street; and, Laurel Street to Hawthorn Street, the use of the Series 12 data would result in lower future traffic volumes on those segments (Appendix B, Table 4). As such, use of the Series 12 Year 2035 traffic volumes would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts.
Findings

The currently proposed Project, a five-story parking structure adjacent to Terminal 2, is addressed in the 2008 FEIR as a component of the AMP and the potential traffic impacts presented in the FEIR are not substantially increased by the availability of new traffic-related information. Based on the substantial evidence presented above, the specific findings regarding the FEIR traffic impacts analysis are as follows:

No Substantial Change in Circumstances Requiring Major EIR Revisions. Substantial evidence in the record indicates that there are no substantial changes in the circumstances, as related to existing and future traffic volumes, under which the proposed Project will be undertaken that require major changes to the certified FEIR to account for new significant impacts or a substantial increase in severity of previously identified significant impacts.

No New Information Showing New or Greater Significant Effects. This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the FEIR was certified indicating that a new significant effect not reported in the certified FEIR may occur. There is no substantial new information that there would be substantially greater significant traffic impacts than those identified in the certified FEIR.

No New Information Showing Ability to Reduce Significant Effects Identified in Previous EIR. Since the Project would not result in new significant traffic impacts or a substantial increase in the severity of previously identified significant traffic impacts, for which mitigation measures presented in the FEIR would reduce those impacts to less than significant, no alternatives or alterations to the Project are necessary.

C. Other Environmental Topics

As noted above, all other environmental topic areas which were evaluated in the FEIR were reviewed for the Project through use of an Environmental Review Checklist, provided as Appendix A to this Addendum, which addresses each such other environmental topic relative to the CEQA criteria presented in Section 1.

Findings

Based on the Project Description and Background in Section 2 above, and the information in Appendix A, and otherwise in this Addendum, the findings are as follows:

No Substantial Change in Project Requiring Major EIR Revisions. Substantial evidence in the record indicates that there are no substantial changes proposed in the Project, that would require major changes to the certified FEIR due to the involvement of new significant
environmental effects or a substantial increase in the severity of previously identified significant effects related to any of the other environmental topics.

No Substantial Change in Circumstances Requiring Major EIR Revisions. Substantial evidence in the record indicates that there are no substantial changes in the circumstances, as related to any of the environmental topics, under which the proposed Project would be undertaken that would require major changes to the certified FEIR to account for new significant impacts or a substantial increase in the severity of previously identified impacts.

No New Information Showing New or Greater Significant Effects. This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the FEIR was certified indicating that a new significant effect not reported in the certified FEIR may occur. There is no substantial new information that there would be substantially greater significant effects related to the other environmental topics than those identified in the certified FEIR.

No New Information Showing Ability to Reduce Significant Effects Identified in Previous EIR. Since the Project would not result in significant impacts with respect to the other environmental topics, no alternatives or alterations to the Project are necessary.

4. CONCLUSION

The information and analysis in this Addendum has been undertaken, pursuant to the provisions of CEQA and the CEQA Guidelines, to provide decision makers with a factual basis for determining whether any substantial modifications to the Project, substantial changes in circumstances, or receipt of new information not available during preparation of the FEIR would require additional review or preparation of a subsequent or supplemental EIR.

Based on substantial evidence provided herein, as further supported by the attached appendices, implementation of the proposed Terminal 2 Parking Structure project is adequately addressed by the SDIA AMP FEIR, and none of the conditions warranting preparation of a supplemental or subsequent EIR, as set forth in CEQA Section 21166 and State CEQA Guidelines Section 15162 exist. Pursuant to Section 15164 of the State CEQA Guidelines, preparation of an Addendum to the AMP FEIR fully satisfies the CEQA review requirements for the project.
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

Figures:
Figure 1: Project Location
Figure 2: Site Plan
Figure 3: Parking Structure Massing

Appendices:
Appendix A: Environmental Review Checklist
Appendix B: Traffic Volumes Memorandum
FIGURES
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN
Source: Tucker Sadler 2014
Scale: Not to Scale

PARKING STRUCTURE MASSING

Figure 3
APPENDIX A: ENVIRONMENTAL REVIEW CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN
APPENDIX A: ENVIRONMENTAL REVIEW CHECKLIST
ADDITIONAL TO THE FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. AESTHETICS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.13, Aesthetics, of the AMP FEIR addresses potential impacts to aesthetic resources from implementation of the AMP. That section cross-references Section 5.12, Light Emissions, of the EIR relative to light and glare impacts. The proposed parking structure would be the same height and in the same general location as that described in the EIR. The maximum building footprint could encompass a slightly different area than that presented in the Airport Implementation Plan (FEIR Figure 4.2) and may be located somewhat closer to Harbor Drive.

a. Would the project have a substantial adverse effect on a scenic vista?

As described on page 5.13-7 of the AMP FEIR, existing visual resources within the SDIA area consist of natural and human-made features. Natural visual features include the San Diego Bay, the Pacific Ocean, and distant views of the Point Loma peninsula. The human-made features include Spanish Landing Park, the downtown skyline, and historic structures located on the east side of the Marine Corps Recruit Depot (MCRD) San Diego. The EIR evaluated potential impacts from 23 key view locations, 13 of which are located around the project sites (Key Views 1 through 8, and 19 through 23; refer to Figures 5.13-1 through 5.13-10 and Figures 5.13-20 through 5.13-24, respectively, of the AMP FEIR). The analysis of potential impacts at these view locations includes general consideration of the types of uses envisioned in the Airport Land Use Plan. The FEIR analysis provides a more detailed discussion of impacts related to improvements proposed under the Airport Implementation Plan.

The SDIA is in an urbanized area, surrounded by existing commercial, industrial, and military uses; Spanish Landing Park; the San Diego Bay; and roadways, roadway ramps. Scenic vistas in the area are focused toward the south of the SDIA toward the bay, the downtown skyline, and the Point Loma peninsula rather than toward the airport. Views of the SDIA from passing motorists, pedestrians, and cyclists along Harbor Drive are intermittent due to intervening mature trees partially lining Harbor Drive and from roadway ramps. Although the proposed parking structure could possibly be closer to Harbor Drive than the building footprint analyzed in the FEIR, the Project’s height and scale would be relatively the same, and the visual quality of the view from Harbor Drive to the airport would essentially be the same as that analyzed in the FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

The Port Master Plan (October 2012) guides the land use and policies for areas adjacent to SDIA. The Planning District 2, Lindberg Field / Harbor Island, Precise Plan (Port Master Plan, Figure 8) identifies two areas of scenic views near the SDIA: views from Spanish Landing toward the San Diego Bay, and views from Harbor Island also toward the bay. These views are to the south, in the opposite direction as the project site.

The Project would not have a substantial effect on a scenic vista, and impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is an existing surface parking lot and is devoid of any trees, rock outcroppings, or other such scenic resources. There are no historic buildings at, or adjacent to, the project site. The nearest designated state scenic highways to the project site are the portion of State Route 163 that runs through Balboa Park and State Route 75 (Silver Strand Highway and San Diego - Coronado Bridge). These scenic highways are too far from the project site to allow views of the new parking structure.

The City of San Diego Progress Guide and General Plan Update designates North Harbor Drive in the project area as a Scenic Highway. Views of the project site from this roadway are dominated by existing airport improvements in the foreground. Implementation of the Project would not significantly alter the nature and character of this existing view. As such, the conclusion remains that the potential impact would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

As summarized above, the AMP FEIR provides a general program level of consideration of visual impacts associated with the Airport Land Use Plan and a more detailed evaluation of impacts associated with improvements under the Airport Implementation Plan.

The proposed parking structure would be the same height and in the same location as the parking structure analyzed in the FEIR. Although the building footprint could be slightly different than that illustrated in the FEIR, the overall visual impact of the proposed structure would be the same: the building would replace a surface parking lot, would have the same visual mass, and would be designed to complement existing airport structures, most particularly Terminal 2 West. Views of the parking structure from areas to the west (Liberty Station and the former Naval Training Center) would be partially or totally screened by the terminal building or by intervening trees. The significance of potential impacts to this view is rated low (FEIR Table 5.13-1) because the viewscape is of airport-related uses. Likewise, views of the project site from areas to the south are partially to fully blocked by mature trees and/or roadway ramps, and the significance of potential impacts to this view is rated low to medium. Therefore, the visual character or quality of the project site and its surroundings would not be substantially degraded by construction of the parking garage. Impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is
undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

As cross-referenced in Section 5.13 of the AMP FEIR, Section 5.12, Light Emissions, addresses potential lighting and glare impacts associated with development at SDIA. The AMP FEIR analysis of impacts associated with new development, such as that associated with the Airport Implementation Plan, indicates light and glare associated with the SDIA project site is presently generated by building and exterior sources to protect and secure people, property, and the air transportation system. Implementation of the Airport Implementation Plan, as addressed within the AMP FEIR, would result in greater amounts of light emanating from interior and exterior sources. The addition of the currently proposed improvements to the Airport Implementation Plan would materially alter the essence and conclusions of the AMP FEIR analysis. Additionally, inclusion of the following measures from the AMP FEIR as components of the Project would reduce impacts to a less than significant level.

- The light fixtures specified for the project design must comply with the standard of the Illuminating Engineer Society for full cutoff capability.

- Exterior lighting must be designed and located as to avoid intrusive effect on runway operations, so as not to result in an air safety hazard. Lighting fixtures must use shielding, if necessary, to prevent spill lighting on adjacent off-site uses.

Relative to construction-related impacts, page 5.12-3 of the AMP FEIR indicates that construction activities could create light or glare impacts during both daylight and no-daylight hours if safety and security lights were not positioned correctly. With the following measure as a component of the Project during construction, those impacts would be reduced to a less than significant level.

- During construction activities, the construction contractor shall ensure that temporary construction-related lighting shall be arranged so that direct rays would not shine on or produce glare for adjacent street traffic, or community, biological, or scientific resources.

The impacts analysis concludes on page 5.12-4 of the AMP FEIR that, because the AMP project includes improvements (i.e., features and measures incorporated into the project to reduce environmental impacts) to ameliorate the effects of light and glare from additional illumination at SDIA resulting from the Project and from construction activities, there would be a less than significant impact due to light emissions.

The AMP FEIR analysis summarized above is fully applicable to the Project and adequately addresses potential light and glare impacts. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST

ADDENDUM TO THE FEIR FOR THE

SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

II. AGRICULTURE AND FOREST RESOURCES

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?

Discussion:

Section 5.21, Effects Not Found to be Significant, of the AMP FEIR, specifically page 5.21-2, provides a discussion regarding agricultural land. The following summarizes the basis for such a conclusion that new development at SDIA would not affect agricultural and forestry resources.

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

SDIA is underlain by artificial fill and bay deposits, neither of which is identified in the Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance by the United States Department of Agriculture. Further, SDIA is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. Urban Land is land that is primarily covered by buildings, streets, and sidewalks, and, hence, it is unavailable for agricultural activity. Made Land consists of smooth, level areas that have been filled with excavated and transported soil material, paving material, and soil material dredged from lagoons, bays, and harbors, which also is unavailable for agricultural activity. As such, implementation of the Project would have no impact on farmland. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No agricultural resources or operations exist within the project limits or adjacent areas. The project site is not zoned for agricultural use but is designated for airport uses; and no Williamson Act contracts apply to the project site. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
The project site is not zoned for forest land, timberland, or Timberland Protection. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No forest land exists within the project limits or adjacent areas. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

e. Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No agricultural or forest land resources or operations exist within the project limits or adjacent areas. No further analysis is warranted. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

III. AIR QUALITY

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.5, Air Quality, of the AMP FEIR addresses potential impacts to air quality from implementation of the AMP. Section 5.16, Human Health Risk Assessment (HHRA), of the AMP FEIR addresses potential human health risk impacts from implementation of the AMP, including as related to emissions of hazardous air pollutants. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The analysis and conclusions of the AMP FEIR relative to air quality impacts related to operational emissions are considered to be applicable to, and adequate for, the improvements included in the Project. Implementation of the Project would not substantially increase the amounts of construction-related emission addressed in the FEIR. This is because implementation of the Project is anticipated to occur after the peak construction period assumed in the FEIR.

The AMP FEIR analysis addresses construction-related emissions associated with the proposed development of improvements anticipated to occur within five years after approval of the AMP (2008). The improvements included the projects originally assumed within the Airport Implementation Plan, which comprise the vast majority of the projects in the AMP. The FEIR analysis concludes that construction emission would be less than applicable threshold of significance, although emission of oxides of nitrogen (NOX), particulate matter of a size 10 microns or less in diameter (PM10), and particulate matter of a size 2.5 microns or less in diameter (PM2.5) would come within 10 percent of significance thresholds. As indicated in Table 5.5-46 of the FEIR, the highest levels of air pollutant emissions are expected to occur within the second, third, and fourth years after approval of the AMP, with a notable drop in construction emissions starting in the fourth year and a major drop in emission in the fifth year. Construction of the parking structure would not occur until sometime after the completion of other major improvements. As such, the FEIR analysis of construction-related emissions is considered to already provide a conservative estimate of potential air quality impacts; therefore, construction-related impacts on an applicable air quality plan would be less than significant.

The FEIR includes a delineation of the federal, state, and local regulatory framework applicable to the AMP, including the Airport Land Use Plan. The FEIR indicates that implementation of the Airport Land Use Plan, which includes the parking structure, would result in exceedence of the threshold of significance for emission loads of NOx in 2030 compared to the No Project Alternative. As indicated in Sections 5.5.6.5 and 5.5.6.6 of the FEIR, implementation of either the Airport Land Use Plan or the No Project Alternative would exceed the threshold of significance for concentrations of NO2, PM10, and PM2.5. All the exceedances are attributable primarily to emission from aircraft operations, which,
for the most part, are not within the control of SDCRAA, and form the associated ground support equipment (GSE) operations.

Regarding operational emissions related to the Airport Implementation Plan, as described in Section 5.5.6.1 of the FEIR, the estimated emission loads and concentrations for 2015 and 2030 are generally comparable to those of the Airport Land Use Plan and the No Project Alternative. Conclusions regarding significant air quality impacts associated with the Airport Land Use Plan, understanding that the improvement within the Airport Improvement Plan are a subset of, and comprise the vast majority of, the land uses and improvements contemplated in the Airport Land Use Plan. The emissions and associated exceedances identified in the FEIR for both the Airport Implementation Plan and the Airport Land Use Plan are driven primarily by aircraft operations and associated GSE operations. The conclusion of the FEIR analysis, presented on page 5.5-41 of the FEIR, indicates that implementation of the Project, including the Airport Implementation Plan and the Airport Land Use Plan, would not conflict with or obstruct implementation of an applicable air quality plan; however, significant impacts from NOX emissions were identified as being unavoidable. That conclusion would not change with the implementation of the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality or a substantial increase in the severity of previously identified significant air quality impacts requiring major revisions of the certified FEIR.

b. **Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

The AMP FEIR analysis indicates that concentrations of ambient air pollutant emission associated with implementation of the Airport Land Use Plan and Airport Implementation Plan would not exceed National Ambient Air Quality Standards, but would exceed California Ambient Air Quality standards for NOX, PM10, PM2.5. Such exceedances would occur in the future even if the parking structure were not constructed, based on anticipated increases in aircraft operations. Implementation of the Project would not result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation. The Project would not materially change the air pollutant emission and concentrations, and the associated significance conclusions, presented in the FEIR. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality or a substantial increase in the severity of previously identified significant air quality impacts requiring major revisions of the certified FEIR.

c. **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?**

As indicated in Section 5.5.8 of the AMP FEIR, the estimated amounts emissions from NOX, volatile organic compounds (VOC), and carbon monoxide (CO) emission from aircraft and GSE associated with the SDIA are well within the amounts contained in the current Ozone State Implementation Plan (SIP) and CO Maintenance Plan for San Diego County. Therefore, the emission associated with planned improvements to SDIA, including the proposed parking structure, in combination with all the emissions from other sources in the area, are fully accounted for and are not expected to impede the area’s progress toward attaining National Ambient Air Quality Standards and California Ambient Air Quality Standards for these pollutants. The Project would not materially change the cumulative air quality impacts conclusions of the FEIR analysis: impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality requiring major revisions of the certified FEIR.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

As described in the AMP FEIR (page 5.5-11), sensitive receptors in proximity to the SDIA include school and residential areas of Liberty Station, Spanish Landing Park and the recreation area along Navy Lagoon, Marine Corps Recruit Depot, and the U.S. Coast Guard. Other receptors were placed along the airport property boundary about 1,000 feet apart as a means of identifying areas of highest pollutant concentrations whether or not the public had access. The FEIR air quality analysis estimates future concentrations at these receptors assuming build out of the uses included in the Airport Land Use Plan, with the highest concentrations for the modeling years 2015 and 2030 (FEIR Tables 5.5-30 and 5.5-4, respectively). Such exceedances also would occur under the Airport Implementation Plan and the No Project Alternative. These conclusions and supporting analysis would not be materially changed by the Project; impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality or a substantial increase in the severity of previously identified significant air quality impacts requiring major revisions of the certified FEIR.

As described in the Section 5.16 of the AMP FEIR, the level of significance for acrolein as determined by the HHRA is above the CEQA threshold of significance and cannot be mitigated to levels below significant and are thus unavoidable. Acrolein is a possible non-cancer health hazard usually limited to eye irritation formed during the combustion of fossil fuels, wood, tobacco, and from the heating of cooking oils. The implementation of mitigation measures described in the AMP FEIR will further reduce the potential impacts on the health of nearby receptors. Included in these mitigation measures is development of the multi-level parking structure and associated features which will enhance traffic circulation, lessen stop and go driving, and reduce excess motor vehicle idling. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality or a substantial increase in the severity of previously identified significant air quality impacts requiring major revisions of the certified FEIR.

e. Would the project create objectionable odors affecting a substantial number of people?

Given the basic nature and location of the project site, construction and operation of a parking structure would not create objectionable odors affecting a substantial number of people. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on air quality requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

IV. BIOLOGICAL RESOURCES

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.8, Biotic Communities / Endangered and Threatened Species, of the AMP FEIR addresses potential impacts to biotic resources including listed species and Section 5.9, Wetlands, of the AMP FEIR addresses potential impacts to wetland resources from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Project.

a. **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

As indicated on page 5.8-1 of the AMP FEIR, the vast majority of SDIA is developed or highly disturbed and devoid of any sensitive biotic resources. One exception is the California least tern nesting area in the southeast portion of SDIA. The proposed parking structure is in the southwestern portion of the airport and, as such, potential impacts to the California least tern nesting area would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.

b. **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

As indicated on page 5.9-2 of the AMP FEIR, there are currently no wetlands (i.e., riparian habitat) at SDIA. (It should be noted that although the FEIR notes the presence of a small disturbed wetlands area within the former NTC parcel, that disturbed wetlands no longer exists.) There is no other sensitive natural community at SDIA. As such, no impact to wetlands would occur from the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDITIONAL FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

As noted above, there are no wetlands near the currently proposed improvements; hence, no impact would occur. Therefore, the project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of one area in the southeastern portion of the airport (i.e., the California least tern nesting area. This area does not support any movement of species. No impact would occur from the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As noted above, the vast majority of SDIA is developed or highly disturbed, with the exception of one area in the southeastern portion of the airport. Those areas do not support any resources that are subject to local policies or ordinances such as a tree preservation policy or ordinance. No impact would occur from the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.

f. Would the project conflict with the provisions of an adopted habitat conservation plan; natural communities conservation plan; or any other approved local, regional, or state habitat conservation plan?

As indicated on page 5.8-6 of the AMP FEIR, SDIA is not within an adopted habitat management plan or natural communities conservation plan. Although the airport is within the municipal limits of the City of San Diego, and the City is a participating jurisdiction in the San Diego Multiple Species Conservation Program (MSCP), State Tidelands along San Diego Bay are specifically excluded from the MSCP. These State Tidelands are addressed in the San Diego Bay Integrated Natural Resources Management Plan, which was prepared by the U.S. Navy and the Port of San Diego; however, that plan does not focus on "developed fill areas" such as SDIA, nor does it provide applicable guidance for the development of SDIA or the former Teledyne Ryan leasehold. As such, no impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on biological resources requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDITION TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

V. CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.7, Historic, Architectural, Archaeological, Paleontological, and Cultural Resources, of the AMP FEIR addresses potential impacts to such resources from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. **Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA §15064.5?**

As shown on Figure 5.711 of the AMP FEIR, none of the architectural resources evaluated for significance are not within or adjacent to the project site. Development of the parking structure would not impact historic resources. No impact is expected to occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on cultural resources requiring major revisions of the certified FEIR.

b. **Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA §15064.5?**

As indicated on page 5.7-10 of the AMP FEIR, no archaeological sites have been identified within the SDIA Master Plan project area. The current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, archaeological resources would not be anticipated in the project area; no impact is expected to occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on cultural resources requiring major revisions of the certified FEIR.

c. **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

As indicated on page 5.7-10 of the AMP FEIR, the SDIA Master Plan area is built on what was originally mudflats and bay. Decades of dredging and placement of fill soils have built up the airport area to its current topography. Based on this, there is no potential for paleontological resources within the project area and no impact is anticipated to occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the
circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on cultural resources requiring major revisions of the certified FEIR.

d. **Disturb any human remains, including those interred outside of formal cemeteries?**

As noted above, the current topography of the project area has been achieved through decades of dredging and placement of fill soils in an area of bay and mudflats. Based on this, human remains would not be anticipated in the project area. No impact is expected to occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on cultural resources requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

VI. GEOLOGY AND SOILS

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report? □ No □

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report? □ No □

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts? □ No □

Discussion:

Section 5.14, Geology and Soils, of the AMP FEIR addresses potential impacts related to these environmental factors from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project expose people, or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

As indicated on page 5.14-7 of the AMP FEIR, there are no active or potentially active faults known to underlie SDIA and adjacent areas; however, several designated Earthquake Fault Zones occur in proximity to the south and east, raising the possibility that unknown faults may underlie the project site. The potential for seismically-induced ground rupture is considered less than significant because: 1) the probability of a seismic event of sufficient magnitude to induce surface rupture occurring within the SDIA Airport Land Use Plan area is considered low; 2) project-specific geotechnical investigations required for all development projects would include a fault evaluation study for all proposed structures intended for human occupancy (as previously defined), and would either verify that active faults are not present or that adequate buffers occur, or would identify additional measures to address associated potential impacts (e.g., relocating structures to provide appropriate buffers); and 3) said geotechnical investigations would identify design and construction measures to address potential ground rupture effects for additional proposed facilities such as utilities and pavement, including efforts such as the use of engineered fill (e.g., proper composition and placement methodology), appropriate subgrade design and reinforced concrete, and shorter pipeline lengths with flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards such as Uniform Building Code (UBC), Greenbook, and/or American Society for Testing and Materials (ASTM) are incorporated into project design and construction, potential impacts related to seismically induced ground rupture would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under
which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

ii. Strong seismic ground shaking?

As described on pages 5.14-7 and 5.14-8 of the AMP FEIR, estimated ground acceleration (shaking) levels within and around SDIA could potentially result in significant impacts to proposed facilities such as structures, foundations, or utilities, depending on site- and event-specific factors such as event duration, motion frequency, and underlying soil/geologic conditions. The project design for new development at SDIA, including the Project, however, would incorporate measures to accommodate projected seismic loading, pursuant to the recommendations in the required site-specific geotechnical investigation, as well as existing regulatory/industry standards such as the UBC, Greenbook, and/or ASTM International. Specific measures from the noted standards (and/or other pertinent sources) that may be used in the project design to accommodate seismic loading include proper fill composition, depth, moisture content, and compaction (pursuant to ASTM requirements); use of properly reinforced concrete and masonry; anchoring (or other means for securing applicable structures); and use of appropriate pipeline materials and/or flexible joints. Assuming that the results of the described geotechnical investigation, as well as appropriate elements of regulatory/industry standards, are incorporated into project design and construction, potential impacts related to seismically induced ground acceleration would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

iii. Seismic-related ground failure, including liquefaction?

As indicated on page 5.14-8 of the AMP FEIR, SDIA and vicinity are within an area considered to have a generally high potential for liquefaction. The project design for any new development at SDIA, including the Project, would incorporate measures to address potential liquefaction and related effects, pursuant to recommendations in the required site-specific geotechnical investigation and the previously noted regulatory/industry standards. In the event certain standard measures to remediate liquefaction effects such as ground modification (e.g., dynamic compaction) or the use of deep foundations are determined to be infeasible, additional equally effective measures would be employed as described in the AMP FEIR. Assuming that the results of the required geotechnical investigation, as well as appropriate elements of regulatory/industry standards, are incorporated into project design and construction, potential impacts related to seismically induced liquefaction and related effects would be avoided or reduced below a level of significance. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

iv. Landslides?

As indicated on page 5.14-9 of the AMP FEIR, SDIA and adjacent areas exhibit generally level and low-lying topography, which is not subject to a significant risk from landslides. No impacts would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is
undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project result in substantial soil erosion or the loss of topsoil?

As indicated on page 5.14-10 of the AMP FEIR, construction activities associated with all new development at SDIA would increase the potential for soil erosion and sedimentation; however, as cross-referenced to Section 5.8, Hydrology and Water Quality, of the AMP FEIR, such activities would be subject to National Pollution Discharge Elimination System (NPDES) control requirements, as administered through SDIA Stormwater Management Plans (SWMP). Those measures would serve to reduce erosion and sedimentation impacts to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Is the project located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

See discussions above regarding liquefaction and landslide hazards. Page 5.14-9 of the AMP FEIR addresses other geotechnical issues such as expansive soils, corrosive soils, and compressible materials. The subject analysis concludes that, with implementation of measures recommended in the required project-specific geotechnical investigations, potential impacts would be reduced to a level that is less than significant. The analysis and conclusions summarized above apply equally to improvements contemplated in the Airport Implementation Plan and in the Airport Land Use Plan; hence, are considered sufficient for the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d. Is the project located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

See above.

e. Would the project have soils that are incapable of supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

SDIA and adjacent areas use the City's sanitary sewer system, not septic tanks or other alternative wastewater disposal system. No impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
### VII. GREENHOUSE GAS EMISSIONS

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Are substantial changes proposed in the project that will</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>require major revisions of the environmental impact report?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>circumstances under which the project is undertaken that</td>
<td></td>
<td></td>
</tr>
<tr>
<td>will require major revisions in environmental impact report?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Has new information of substantial importance become</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>available indicating new or substantially greater significant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>impacts or new/different mitigation measures or alternatives</td>
<td></td>
<td></td>
</tr>
<tr>
<td>for significant impacts?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Discussion:

Section 5.19, Greenhouse Gas Emissions, of the AMP FEIR addresses potential impacts related to these environmental factors from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

**a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

There were no CEQA guidelines for determining significance criteria for greenhouse gas (GHG) emissions at the time the FEIR was prepared. GHG emissions were calculated for the FEIR analysis through the use of input data such as activity levels or material throughput rates (e.g., fuel usage, vehicle miles traveled) that were applied to appropriate emission factors (e.g., in units of GHG emissions per gallons of fuel). The input parameters used in the assessment of GHG emissions were similar to those used in support of the emissions inventory of criteria pollutants (e.g., CO, NO₂, VOC), which were addressed in Section 5.5, Air Quality, of the FEIR. As such, the land use and development assumptions used in the air quality analysis also are reflected in the GHG analysis, which includes the proposed parking structure. The GHG emissions associated with the Project, therefore, are accounted for in the FEIR. Impacts associated with GHG emissions resulting from Project implementation would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

**b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Subsequent to the completion of the FEIR, the SDCRAA and the California Attorney General entered into a Memorandum of Understanding (MOU) calling for the implementation of specific measures to control GHG emissions associated with the SDIA, including those addressed in the AMP. The GHG control measures identified in the MOU are as follows:

1. Reduction in aircraft on-the-ground energy usage
   a. Landside power and preconditioned air (PCA) at all new gates
   b. Retrofit existing gates with landside power and PCA
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDITION TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

c. Provision of landside power at all new cargo facilities and hangars
d. Retrofit all existing cargo facilities and hangars with landside power
e. Cargo and general aviation aircraft use of landside power
f. Aircraft movements

2. Reduction of landside energy usage
   a. Replacement of existing tow vehicles with electric or alternative fuel aircraft pushback tractors
   b. Replacement of shuttles with electric or alternative fuel vehicles

3. Use of green materials and sustainable design
   a. Use of cool roofs (or solar panels) and cool pavements
   b. Construct all new facilities to meet LEED (Leadership in Energy and Environmental Design certification (or equivalent) with a target of Silver or better

4. Use of green construction methods and equipment
   a. Use of construction equipment running on alternative fuels or particulate traps

5. Coordination and encouragement of tenants to address GHG
   a. Recycling
   b. Sale of unleaded mogas (motor gasoline)
   c. Reduction of carbon footprint

The MOU was one of the first of its kind for airports in California, and the provisions of the MOU were integrated into the subsequent development of an Air Quality Management Plan (AQMP) for SDIA. The AQMP provides a comprehensive program for implementation of the GHG control measures recommended in the MOU, as well as measures for the control and reduction of criteria pollutants. The AQPM complements several other environmental initiatives that SDCRAA has planned or in place for SDIA, such as the Airports Council International North America (ACI-NA) Sustainability Initiative and the SDCRAA Sustainability Policy. These environmental initiatives, along with various state and regional environmental initiatives, provide additional measures for the control and reduction of GHG. Section 5 of the AQMP lists tasks that specifically address the GHG control measures described in the MOU and outlines the recommended means and timeframes for implementing those measures. The following summarizes the recommended tasks related to implementation of the MOU measures, many of which have been completed or are ongoing.

MOU Measure 1a-e – Reduction in Aircraft On-the-ground Energy Usage
- Meet with airlines and cargo operators regarding the MOU and plans to implement landside power and PCA.
- Design landside power and PCA, if applicable, into all improvements at terminals, cargo facilities, and general aviation facilities.
- Incorporate landside power and PCA into the design of the Terminal 2 West expansion.
- Lease agreements, other enforceable agreements, and the airport’s operation manual should include statements that the landside power and PCA shall be used as soon as possible upon arrival at the gate, unless there are safety considerations.
- Engineering staff will be updated on any recondition or refurbishing project that would require the incorporation of landside power and PCA.
- Track and quantify GHG emission reductions associated with landside power and PCA.
MOU Measure 1f – Aircraft Movements

- Coordinate with Air Transport Associations (ATA), airlines, and the Federal Aviation Association (FAA) regarding practical measures that can be implemented to reduce GHG emissions associated with aircraft movements.
- Select alternatives to reduce aircraft movement emissions by 20 percent by 2015.
- Prepare a report for the public identifying and evaluating GHG emissions associated with aircraft movement at SDIA by January 1, 2010. Implement recommended actions addressed in the report. Continue to track and quantify GHG emission reductions associated with aircraft movement and submit in annual report.

MOU Measure 2a – Replacement of Existing Tow Vehicles with Electric or Alternative Fuel Aircraft Pushback Tractors

- Meet with ATA, airlines, and the FAA regarding pushback tractors and conversion to electric or alternative fuels.
- Conduct annual GSE surveys to determine the number of vehicles that are reaching the end of their useful lives and to make sure that each vehicle is properly permitted.
- Work with airlines and ATA to research the commercial availability and safety of electric and alternative fuel pushback tractors as well as the necessary operations associated with such procedures.
- Determine viability of electric or alternative fuel pushback tractors for use at SDIA.
- Work with federal, state, and local agencies to take advantage of funding programs that can be used to offset the cost to install electric recharging and alternative fuel fueling stations.
- If electric or alternative fuel pushback tractors are not viable or a reasonable alternative is not available, the SDCRAA shall confer with the Attorney General’s office for a deferral of this MOU specific measure.

MOU Measure 2b – Replacement of Shuttles with Electric or Alternative Fuel Vehicles

- Develop incentive program regarding conversion of airport shuttles.
- Meet with shuttle operators regarding the conversion of alternative fuels and incentive programs.
- Shuttle operators will submit written requests or concerns regarding the incentive program to the SDCRAA.
- Work with SANDAG, Clean Energy, San Diego County Air Pollution Control District, and other stakeholders to develop necessary infrastructure to support alternative fuels.
- Track and quantify GHG emission reductions associated with shuttle conversion to alternative fuels.

MOU Measures 3a and b – Use of Green Materials and Sustainable Design

- Meet with planning and engineering staff to detail that these requirements are being met at SDIA.
- Incorporate sustainable technologies into capital projects.
- Track and quantify GHG emission reductions associated with the use of green materials and sustainable design.

MOU Measure 4 – Use of Green Construction Methods and Equipment

- Meet with planning and engineering staff to reaffirm use of green construction methods and equipment.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

- Develop specifications for construction methods and equipment.
- Enforce any non-compliance with the construction specifications.
- Document carbon dioxide equivalents (CO₂e) being reduced for each project by use of green construction methods compared to traditional means.

MOU Measure 5 – Coordination and Encouragement of Tenants to Address GHG

- Meet with planning and engineering staff on a semi-annual basis to discuss the recycling program and ways to increase the recycling efforts.
- Develop an educational program for recycling at the airport.
- Meet with tenants and other stakeholders to promote recycling at the airport.
- Meet with general aviation operators to evaluate alternatives to leaded avgas (aviation gasoline) and the potential number of aircraft that can utilize unleaded avgas.
- Document recycling efforts, type, and quantity of recycled materials, and amount (CO₂e) being reduced compared to baseline scenario in which waste was landfilled.

For each category of MOU measures, the AQMP identifies the obstacles to implementation that must be considered relative to further defining the feasibility, means and methods, and timing of the specific tasks summarized above. The FEIR evaluation of GHG includes those associated with the Project. With the subsequent completion of the MOU and AQMP described above, which set forth numerous measures for the control and reduction of GHG emissions at SDIA, the GHG associated with the parking structure, as well as for the airport overall, would be less than those presented in the FEIR. Impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

VIII. HAZARDS AND HAZARDOUS MATERIALS

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report? ☐ ☒

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report? ☐ ☒

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts? ☐ ☒

Discussion:

Section 5.15, Hazards and Hazardous Materials, of the AMP FEIR addresses potential impacts related to hazardous materials from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Project.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

As indicated on page 5.15-4 of the AMP FEIR, a variety of hazardous materials typically associated with the operation of a commercial airport, including those of airport tenants, are used at SDIA. Such use and activities are strictly regulated by numerous federal, state, and local safety regulations. Because the Airport Land Use Plan, which includes the type of use proposed for the airport under the Project, would not involve the generation, use, or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport, the Project would not create additional long-term risks to the public or the environment from these substances. Potential impacts would, therefore, be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact or a substantial increase in the severity of previously identified significant impacts requiring major revisions of the certified FEIR.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As indicated above, a variety of hazardous materials are used at SDIA, and such use is strictly regulated by numerous federal, state, and local safety regulations. The Airport Land Use Plan, which includes the types of uses proposed for the airport under the Project, would not involve the generation, use, or storage of hazardous materials in quantities or types that are substantially different from those that are currently associated with the airport. Development of new facilities at the airport would be subject to current safety management requirements and design standards that serve to minimize, if not avoid, the potential for the occurrence of, and significant hazards from, upset and accident conditions. Potential impacts would, therefore, be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no
substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

There are no existing or proposed schools within 0.25 mile of the project site. The nearest school is Explorer High Tech High, which is approximately 0.60 mile northwest of the project site. There would be no impact on schools. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d. Is the project located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As described on page 5.15-5 and shown in Figure 5.15-1 of the AMP FEIR, there are 15 sites and facilities at and near SDIA that are known, or have the potential, to contain hazardous wastes or environmental contamination. Relative to the Project, this includes two sites and facilities in the western portion of the airport near the project site. As more fully described on pages 5.15-8 through 5.15-10 of the AMP FEIR, the eight sites/facilities include the following:

<table>
<thead>
<tr>
<th>Name</th>
<th>General Location</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Former NTC Inactive Landfill - Site No. 1</td>
<td>Southwest sector of airport, north of Harbor Dr., east of Navy Lagoon, and west of Terminal 2 West</td>
<td>52-acre site formerly used by NTC and MCRD from the 1940s to 1971 as a municipal landfill for consumer waste, burn ash, and construction debris. The site was remediated in 2009 and is the location of Terminal 2 West, a surface parking lot, and an airplane tarmac.</td>
</tr>
<tr>
<td>Former Rental Car Facility Fuel Farm - Site No. 2</td>
<td>Southwest sector of airport, north of Harbor Dr. and south of Terminal 2 West</td>
<td>2-acre site formerly used as a rental car facility and contained underground storage tanks. The building and tanks have been removed and the site is now covered by an asphalt roadway and parking lot. Residual soil/groundwater contamination remains in place.</td>
</tr>
</tbody>
</table>

Figure 5.15-2 of the AMP FEIR shows the location of the development uses proposed for the airport relative to the two sites/facilities described above. As indicated on page 5.15-11 of the AMP FEIR, since such sites/facilities occur at or near the proposed development area, "plans are already in place or under development to avoid or mitigate any potential impacts associated with these sites." Potential impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The Project would occur within the SDIA boundary. Development of the parking structure, which was generally contemplated in the Airport Land Use Plan, is subject to numerous design and operational requirements, particularly those set forth by the FAA, specifically intended and designed to address potential safety hazards. As described on page 5.2-15 of the AMP FEIR, the Airport Land Use Compatibility Plan (ALUCP) for SDIA, which aims to protect public health and safety from noise and other hazards related to the operation of SDIA, indicates that the Airport Land Use Plan would be
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

compatible with the goal of the ALUCP. A similar analysis for the Airport Implementation Plan is provided on page 5.2-19 of the AMP FEIR and finds, for essentially the same reasons as indicated above for the Airport Land Use Plan, the potential impacts would be less than significant. The Project would be consistent with the Airport Land Use Plan and has the same basis for conclusions as the Airport Implementation Plan. As such, potential airport-related safety impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The project is not within the vicinity of a private airstrip. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Page 5.15-11 of the AMP FEIR states that there are no potential hazards to public safety or impairment to emergency response or evacuation plans associated with the Airport Land Use Plan, based largely on the fact that the Project would not involve the generation, use, or storage of hazardous materials in quantities or types that are substantially different from those that currently exist. Page 5.15-13 of the AMP FEIR states that same conclusion for the Airport Implementation Plan for essentially the same reason. The Project is a type of use proposed in the Airport Land Use Plan. Potential impacts associated with the Project would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

h. Would the project expose people or structures to the risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is within an existing urban industrial environment dominated by concrete and asphalt, well removed from wildlands. There is no fire hazard relative to wildlands. No impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
IX. HYDROLOGY AND WATER QUALITY

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?


b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?


c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?


Discussion:

Section 5.6, Hydrology and Water Quality, of the AMP FEIR addresses potential impacts related to surface hydrology and water quality from implementation of the AMP. Section 5.14, Geology and Soils, of the AMP FEIR includes a discussion of groundwater from implementation of the AMP. The following evaluates the extent to which those analyses apply to the Project.

a. Would the project violate any water quality standards or waste discharge requirements?

As indicated on page 5.6-10 of the AMP FEIR, all future development is subject to the Airport Stormwater Management Plan (SWMP). This would include improvements in the Project area. The SWMP incorporates the terms of the General Industrial Storm Water Permit, which satisfies construction general permit requirements. The SWMP requires that all municipal activities, inclusive of new development, provide for Best Management Practices (BMPs); therefore, impacts relative to construction, grading, and erosion and sedimentation would be less than significant. No further analysis is warranted.

The Airport Land Use Plan encompasses the former General Dynamics Facility, the Landmark Aviation Fixed Base Operator General Aviation Facilities site, and the TDY complex. While these sites have the potential for existing soil contamination, as described in Section 5.15 of the AMP FEIR, any improvements to these areas, including those associated with the Project, would require additional coordination with review agencies to limit potential for surface, aquifer, and ground water contamination. Such coordination and follow-up would address water quality standards and serve to reduce potential water quality impacts to a level that is less than significant. No further analysis is warranted.

With regard to urban runoff associated with future use of the site, as discussed on page 5.6-10 of the AMP FEIR, the Airport Land Use Plan, which includes the types of uses proposed for the Project, would be implemented by the SDCRAA. Such implementation would include provisions to meet the requirements of the SDIA SWMP, which would result in a less than significant impact on urban runoff. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

As indicated on page 5.14-5 of the AMP FEIR, shallow, unconfined groundwater has been reported at depths of between 5 and 12 feet below the surface at SDIA. Groundwater levels within SDIA are generally static due to the proximity of the bay and lack of substantive withdrawals (i.e., through wells and/or pumping), although aquifer levels can vary locally in accordance with mean high tide elevations and diurnal tidal fluctuations. Overall groundwater movement in the site and vicinity is west and south toward San Diego Bay, although this movement also may vary locally.

With the possible exception of temporary construction-related dewatering of shallow groundwater, if required for development of the proposed improvements, approval and implementation of the Project would not involve withdrawal of groundwater. Development of the project site could add a very minor amount of new impervious surface area, which would reduce on-site surface water infiltration and groundwater recharge. This impact would be less than significant, given that the vast majority of the site is already, and has long been, paved. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site?

There are no streams of rivers at or near the project site. The development area is flat and is currently used for surface parking. Implementation of the Project may involve some minor rerouting of surface flows, based on the location and orientation of the new structure, but is not expected to result in any appreciable change in surface drainage patterns. Potential impacts to surface drainage patterns would be less than significant, and no further analysis is warranted.

Regarding the potential for the project to result in substantial erosion or siltation, please see the discussion above in Section VI (b.) of this Initial Study. As indicated, potential impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site?

As indicated above, there are no streams or rivers at the project site, and the vast majority of the site has been previously developed. Implementation of the Project would not result in a substantial increase in the rate or amount of surface runoff that would result in flooding. Potential impacts to surface drainage volumes would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

See discussions above in Sections VIII (a.), (c.), and (d.). Potential impacts to surface drainage volumes would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

f. Would the project otherwise substantially degrade water quality?

See discussion above in Section VIII (a). Potential impacts to water quality would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

g. Would the project place housing within a 100-year flood plain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The Project does not entail the construction of housing. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

h. Would the project place within a 100-year flood plain structures that would impede or redirect flood flows?

As indicated on page 5.6-9 of the AMP FEIR, virtually all of SDIA is mapped as Zone X, "areas determined to be outside the 500-year floodplain." As shown on Figure 5.6-2 of the AMP FEIR, approximately 8.9 acres of the former TDY property is within the mapped 100-year floodplain and could experience up to one foot of flooding during a 100-year storm. The project site is not within this 100-year flood plain; therefore there would be no impact. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

There are no levees or dams at or near SDIA that pose a potential for flooding at the project site; no impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

j. Would the project contribute to inundation by seiche, tsunami, or mudflow?

SDIA is not near any confined water bodies posing a seiche hazard, nor is it near hillside areas posing a mudflow hazard. As indicated on page 5.6-9 of the AMP FEIR, tsunamis associated with seismic activity are a potential flood hazard; however, the highest recorded tsunami in San Diego Bay was approximately 5 feet from peak to trough, which would not affect SDIA. As such, potential impacts would be less than significant. Therefore, the Project does not require substantial revisions of
the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

X. LAND USE AND PLANNING

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
<td>☑</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.2, Land Use Planning, of the AMP FEIR addresses potential impacts related to land use plans and land use compatibility from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project physically divide an established community?

The Project would all occur within the boundaries of the airport and would be comparable to, and compatible with, the other airport-related uses that currently exist. Relative to the Project, existing off-airport uses adjacent to the western portion of the airport include the Spanish Landing Park, Harbor Island Marina, and Harbor Island to the south; MCRD to the west and north, and Liberty Station to the west. Implementation of the Project would not physically divide an established community; there would be no impact. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The AMP FEIR analyzed the compatibility of the Airport Land Use Plan, which includes the type of use associated with the Project, with numerous land use plans, policies, and regulations. Those plans, policies, and regulations include the California Tidelands Trust; the California Coastal Act; the SDIA Airport Land Use Compatibility Plan; the San Diego Port Master Plan / California Coastal Act; the City of San Diego Strategic Framework element; City of San Diego Community Plans including those for the Peninsula, Uptown, Midway-Pacific Highway Corridor, and Downtown Community Plan Areas; North Bay Redevelopment Plan, Naval Training Center (NTC) Redevelopment/Reuse Plan; NTC Precise Plan and Local Coastal Program; San Diego Airport Approach Overlay Zone; and City of San Diego Airport Environs Overlay Zone (AEOZ). The AMP FEIR evaluation related to each of these land use plans, policies, and regulations found that approval of the then proposed Airport Land Use Plan would not result in any significant conflicts. The AMP FEIR analysis of the land use plan compatibility of the Airport Implementation Plan also concluded that no significant conflicts would occur, in most cases because the improvements proposed in the Airport Implementation Plan were consistent with the Airport Land Use Plan. In other cases, since the proposed uses were airport-
related; since SDIA has long been an airport and was accounted for in applicable planning
documents; and since all new development would be subject to airport-related development
standards, the conclusion was that no significant land use conflicts would occur. That analytical
framework and basis for conclusions also would apply to the improvements associated with the
Project. Potential impacts would be less than significant. Therefore, the Project does not require
substantial revisions of the environmental impact report and no changes occur with respect to the
circumstances under which that project is undertaken. Further, there is no substantial new information
that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project conflict with any applicable habitat conservation plan or natural
communities conservation plan?

The project involves development proposed in the western portion of SDIA, which is in a highly
urbanized setting that is devoid of biological resources. As discussed above in Section IV (f.), the
Project is not located within any habitat conservation plan or natural communities’ conservation plan.
There would be no impact related to such a plan. Therefore, the Project does not require substantial
revisions of the environmental impact report and no changes occur with respect to the circumstances
under which that project is undertaken. Further, there is no substantial new information that there
would be a new significant impact requiring major revisions of the certified FEIR.
XI. MINERAL RESOURCES

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report? [No]

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report? [No]

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts? [No]

Discussion:

Section 5.21, Effects Not Found to be Significant, of the AMP FEIR, specifically page 5.21-2, provides a discussion of mineral resources. The following summarizes that discussion, as applicable to the Project.

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

SDIA is underlain by artificial fill and bay deposits and is designated as 'Urban Land' and 'Made Land' by the United States Department of Agriculture. SDIA is not listed as a mineral resource recovery site. As such, SDIA does not contain a known mineral resource of value to the region or residents of California. Implementation of the Project would have no impact on mineral resources. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact on mineral resources requiring major revisions of the certified FEIR.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

See above.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

XII. NOISE

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.1, Noise, of the AMP FEIR addresses potential impacts related to noise, including from aircraft, surface traffic (i.e., motor vehicles on nearby roadways), and construction from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

With regard to potential impacts from aircraft noise, the AMP FEIR states: "Aircraft noise analysis is limited to the Proposed Airport Implementation Plan as the land uses within the Proposed Airport Land Use Plan would have a less than significant impact on airfield operations. Specifically, while additional cargo facilities are included with the North Area projects, aircraft operations, including nighttime cargo operations, are not forecasted to increase for a given year due to the Proposed Airport Land Use Plan." (See pages 5.1-6 and 5.1-14 of the AMP FEIR). The Project is consistent with the land use assumptions of the Airport Land Use Plan; hence, the AMP FEIR conclusion that potential aircraft noise impacts would be less than significant is still valid and applicable. No further analysis of this aspect of noise impacts is warranted.

With regard to potential impacts from surface traffic noise, the AMP FEIR analysis includes traffic from the near-term development of uses under the Airport Implementation Plan as well as from the longer-term build out of uses under the Airport Land Use Plan. As indicated on page 5.1-28 of the AMP FEIR, comparison of peak hour L_{eq} noise level increases for AMP build out with peak hour L_{eq} for the No Project Alternative (i.e., the comparison basis for assessing the potential for significant impacts) indicates a maximum increase of 0.7 dBA, which is less than significant. Relative to impacts measured in terms of Community Noise Equivalent Level (CNEL), the completion of the AMP improvements is assessed as having a less than significant noise impact because it would only incrementally increase daily noise (compared to the No Project Alternative) by 0.7 CNEL. At only one location would the increase compared to the existing condition be in excess of 3.0 dBA L_{eq}, and this location is adjacent to an industrial facility (Solar Turbine) and commercial uses. The land use for the Project is similar to that assumed in the AMP FEIR for the Airport Land Use Plan; however, the amount of development currently proposed is less than originally assumed. Specifically, the Airport Land Use Plan in the AMP FEIR anticipates the multi-level parking structure that would provide approximately 5,000 parking spaces on five levels (see Section 4.1.2.5). As such, traffic generation associated with the current proposal would be less than that estimated in the AMP FEIR, and the associated increases in surface traffic noise levels also would be less than calculated in the AMP.
APPENDIX A: ENVIRONMENTAL CHECKLIST

ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

FEIR. The surface traffic noise impacts associated with implementation of the Project would, therefore, be less than significant. No further analysis of this aspect of noise impacts is warranted.

With regard to potential impacts from construction noise, Section 5.1.4 of the AMP FEIR provides an estimate of construction noise levels based on a typical mix of construction equipment. This mix of equipment includes pile drivers, which typically have the highest noise levels and the greatest potential to result in noise impacts on nearby noise sensitive uses. As indicated in Table 5-1.16 on page 5.1-31 of the AMP FEIR, the maximum noise levels produced by pile drivers would be approximately 69.2 dB at a distance of 1,000 feet from the source. The nearest residences to the project site are multi-family units approximately .5 mile to the west in the Liberty Station development. The threshold of significance for construction noise is 75 dB in residential areas. As such, the maximum noise level estimated for construction activities would not exceed 75 dB in residential areas. It also should be noted that the construction noise would be lower than the aircraft noise and highway noise that occurs in the residential areas near the construction zones. Due to the louder noise levels and more frequent events that occur with aircraft operations and surface vehicle traffic and in consideration of the logarithmic quantities of noise measured in decibels (see Section B.1.1 of Appendix B of the AMP FEIR), aircraft and highway noise would continue to be the determinative sources in the noise environment. Thus, the ambient noise levels would not be expected to increase due to the construction activity. Based on the above, the construction work associated with the improvements contemplated under the Project would cause less than significant impacts in regard to noise. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

As indicated on page 5.1-30 of the AMP FEIR, construction work would not be expected to result in excessive ground-borne vibration to home sites. This is considered particularly true for the improvements contemplated under the Project, given that the distant to the nearest residence is approximately 0.5 mile. Potential vibration impacts associated with project construction would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

See discussion above in Section XI (a.).

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

See discussion above in Section XI (a.).

e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The Project is located at SDIA. There would be no people residing at the project site, and potential noise exposure impacts to surrounding areas are discussed in Section XI (a.) above (i.e., less than significant). People working at the project site would be exposed to noise levels typical of an airport.
Such noise exposure is regulated by state and federal Occupational Safety and Health Administration (OSHA) standards. Potential impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The project is not within the vicinity of a private airstrip. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
XIII. POPULATION AND HOUSING

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.4, Population and Housing, of the AMP FEIR addresses potential population and housing impacts from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

As indicated on page 5.4-3 of the AMP FEIR, implementation of the land use and development plans contemplated under the AMP would not significantly affect population or housing. Developing SDIA with the proposed land use would not displace any residents or residences because the Project location currently contains airport or aviation industrial uses. The planned development also would not generate enough new employment opportunities at SDIA to affect the job/housing balance or induce growth that would affect this balance (see also Section 6.2, Growth-Inducing Impacts, of the AMP FEIR). Additionally, the level of improvements proposed at SDIA would not be such to entice new residents to the San Diego area, thereby creating a need for new housing. These conclusions in the AMP FEIR, which apply to the overall land use and development plans for SDIA overall, also would apply to improvements contemplated under the Project; population and housing impacts would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The Project area is part of an airport. There is no housing on the site. No housing would be displaced by the Project. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
c. Would the project displace a substantial number of people, necessitating the construction of replacement housing elsewhere?

See above.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDITIONAL TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

<table>
<thead>
<tr>
<th>XIV. PUBLIC SERVICES</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.17, Public Services, of the AMP FEIR addresses potential impacts related to fire protection and law enforcement. Section 5.18, Recreation, addresses potential impacts related to parks and recreation. Section 5.21, Effects Not Found to be Significant, discusses environmental impacts determined during the Notice of Preparation (NOP) process for the AMP DEIR to not be significant, including those related to schools and libraries. The following evaluates the extent to which these analyses apply to the Project.

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

The AMP FEIR addresses potential impacts to fire protection services relative to required fire flow, response distance, and time from existing fire stations and the respective fire department's judgment for needs in the area. As indicated on page 5.17-40 of the AMP FEIR, new development proposed at SDIA is expected to have sufficient fire flow, given the capacity of the water lines serving SDIA. This includes the 12- to 18-inch water mains at SDIA and the secondary system of water laterals branching off of the primary system, which consists of 8- to 16-inch water lines providing service to the terminals and apron areas, as well as the adjacent TDY facilities along Harbor Drive. Of particular note with regard to fire protection is a 10-inch fire service water line surrounding the fuel storage tank farm connected along the north side of the main runway to a 16-inch ductile iron fire service. This 16-inch fire service extends along the access road between MCRD and the former General Dynamics site, where it joins a 12-inch main near the intersection of Washington Street and Pacific Highway.

While additional aircraft movements, passenger activity, and cargo facility development would potentially increase the potential for fires and airfield incidents, standard procedures for plan review would ensure that new construction is developed in conformance with the Uniform Fire Code, the SDF Code, FAA Codes, and other applicable standards. As such, new development would have adequate fire hydrants, fire flow, fire prevention and warning systems, and fire equipment access to all structures and areas of the property.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

The San Diego Fire Department's (SDFD's) response time is a function of the type of emergency and the equipment required; for example, it would take more time to get larger equipment to the site than smaller equipment. It is expected that the Airport Station and Stations 1, 3, and 8, with mutual aid from Stations 4, 5, 7, 11, 15, 20 and 22 would continue to provide fire protection services on the airfield and at the airport and maintain adequate response times and service levels. In addition, the SDFD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in aircraft types, increases in aircraft movements and passenger activity. No new firefighting facilities are expected to be constructed, and there would be no need for existing fire stations to be relocated.

The traffic congestion associated with the demolition and construction of major projects within and adjacent to SDIA property would have the potential to hamper or delay emergency response. However, temporary roadway Level of Service (LOS) deficiencies associated with compromised emergency response would be minimized through implementation of a construction traffic management plan, which would be prepared and implemented as appropriate for each project. This would ensure proper advanced coordination with SDFD and planning of detours and emergency access routes to maintain response times.

Based on the above factors, new development at SDIA, including that contemplated in the Airport Land Use Plan such as the proposed parking structure, would result in less than significant impacts on fire protection and emergency medical (i.e., paramedic) services. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

Police protection?

As described on page 5.17–43 of the AMP FEIR, the San Diego Harbor Police Department (SDHPD) would be expected to incur both short- and long-term impacts related to the construction and operation of new development planned for SDIA. Short-term impacts would include increase in emergency calls during construction, reports and investigations of construction thefts, and required plan checks and physical inspections; these are addressed below. Long-term (i.e., operational) impacts would include increases in calls for service, business watch and other crime prevention services, and increases in case reports. Such new development would not, however, adversely affect the airport substation's protection or operational activities (e.g., through physical impacts to the substation or restrictions in station personnel's access to airport facilities). Due to the level of security provided at SDIA for civil aviation protection reasons, incidents of theft, destruction, or damage at SDIA facilities and to employee vehicles and property are not expected to increase as a result of new development. The proposed development of additional on-airport parking would result in an increase in the number of vehicles parked on-site, which in turn could potentially result in a corresponding increase in vehicle-related incidents (e.g., thefts and break-ins). Overall, however, new development would not result in a significant increase in required law enforcement workload. Furthermore, given the amount of new development anticipated to occur at SDIA and considering that the first response would be from the SDHPD substation at the airport, the new development would not measurably affect Priority 1 response time goals. In addition, the SDHPD would continue to conduct ongoing reviews of staffing and equipment levels in relation to the proposed development and any changes in activities at the airport.

During periods of demolition and construction within and adjacent to SDIA property, construction activities and associated traffic congestion would have the potential to increase response times and increase traffic patrol and other law enforcement activities. These potential impacts would be addressed through coordination and planning with law enforcement and fire protection agencies to reduce effects from construction on traffic, emergency access, and response times. The standard
procedures for plan review also would address coordination with local law enforcement agencies to ensure that measures, such as detour plans, scheduling, and traffic control, are implemented where needed to avoid congestion that would hamper emergency response.

Based on the factors discussed above, new development contemplated to occur at SDIA, including the Project, would have a less than significant impact on law enforcement. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

**Schools?**

As indicated in Section 5.21.5 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for schools deal mainly with residential developments that could influence school enrollment. The Project at SDIA does not include any residential development. Additionally, it would not directly impact any schools; that is, all improvements would be physically on existing airport property. No significant noise changes were determined due to the development proposed at SDIA, nor is it growth inducing, as detailed in Chapter 6, Other Effects of the Project, of the AMP FEIR. As such, future development at SDIA, including under the Project, would not impact school enrollment. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

**Parks?**

See discussion below in Section XIV (a.).

**Other public facilities?**

As indicated in Section 5.21.6 on page 5.21-2 of the AMP FEIR, guidelines from the City of San Diego on significance criteria for libraries deal mainly with residential developments that could influence library use. The Project at SDIA does not include any residential development. Also, it is physically on existing airport property and would not include occupation or closure of any libraries. The proposed development at SDIA is not growth inducing, as detailed in Chapter 6, Other Effects of the Project, of the AMP FEIR, and therefore, would not impact library use. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

XV. RECREATION

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>❌</td>
</tr>
</tbody>
</table>

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report? ☐ ❌

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report? ☐ ❌

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts? ☐ ❌

Discussion:

Section 5.18, Recreation, of the AMP FEIR addresses potential impacts related to parks and recreation from implementation of the AMP. The following evaluates the extent to which that analysis applies to the Project.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As discussed on page 5.18-3 of the AMP FEIR, new development planned to occur at SDIA, including the Project, would not generate increased numbers of visitors to San Diego. Similarly, the employment opportunities created by the expansion of the existing airport facilities would be minor in comparison to the regional labor market and would not be expected to draw new residents to the San Diego area. Accordingly, the new development is not expected to induce new growth within the region that would create an increased demand for parks or other recreational resources.

The development of SDIA in accordance with the Airport Land Use Plan, which would include the proposed parking structure, would not result in any direct impacts to park or recreational facilities. The expansion of SDIA would be limited to former aviation industrial Port Tideland leaseholds and a portion of the former NTC that has already been transferred to SDCRAA. No airport facilities would be expanded into existing or planned recreational areas.

New development would not generate noticeable changes in noise contours off airport. Accordingly, there would be no noise-related effects to the recreational facilities near the airport or under its approach and departure flight paths. Based on the above, improvements contemplated under the Project would have a less than significant impact on recreation. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

See above.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

<table>
<thead>
<tr>
<th>XVI. TRANSPORTATION/TRAFFIC</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Discussion:

Section 5.3, Traffic and Circulation, of the AMP FEIR addresses potential traffic impacts from implementation of the AMP. A technical memorandum was prepared by Linscott, Law & Greenspan in June 2014 (included as Appendix B, Traffic Volumes Memorandum) to determine if the existing and forecasted long-term traffic volumes presented in the FEIR have changed substantially since the document was certified in 2008.

a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The location the proposed parking structure, the number of parking spaces, the basic design, and function, as currently proposed, are the same as that described in the FEIR. The FEIR used traffic volumes from 2005 to determine potential significant impact to the surrounding roadway network resulting from implementation of the AMP.

Comparison of 2005 (Existing Conditions) Traffic Volumes to 2013 Traffic Volumes

To determine if the 2005 traffic volumes used to characterize existing conditions have substantially changed since the certification of the FEIR, a comparison was made to traffic volumes used in the 2013 SDIA Airport Development Plan (ADP) Traffic Study, which were counted in May 2013, provided as Appendix B, Traffic Volumes Memorandum. For those street segments and intersections where an increase in traffic volumes was identified between 2005 and 2013, the resultant Level of Service (LOS)\(^1\) for the affected facility was assessed to determine whether it would operate at an acceptable LOS. AM and PM peak hour intersection volumes from 2005 and 2013 were compared (see Appendix B, Tables 1 and 2, respectively). Of the intersections compared, AM peak hour intersection volumes were on average 2.17 percent higher in 2013 compared to 2005, with the most apparent increases at

---

\(^1\) Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment or intersection under various traffic volume loads. It provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

the intersections along Harbor Drive between Harbor Island Drive and Rental Car Road. PM peak hour intersection volumes were on average 15.48 percent higher in 2013, with increases at the intersections along North Harbor Drive between Spanish Landing and Laurel Street. While AM and PM peak hour intersection volumes have increased at several intersections, all intersections where increases occur were calculated to operate at LOS C or better under Year 2013 conditions, which is considered an acceptable level of service. Therefore, no new significant impacts are expected to occur.

A comparison of street segment Average Daily Traffic (ADT) volumes between 2005 and 2013 also was made (see Appendix B, Table 3). Under that comparison, the traffic volumes were lower in 2013 by an average of 4.23 percent, although the ADT volumes along some segments have increased. While volumes have increased along several segments of North Harbor Drive, all segments where increases occur were calculated to operate at LOS D or better, which was also the case in the SDIA Master Plan FEIR analysis (i.e., no significant impacts under either scenario). Therefore, no new significant impacts are expected to occur from implementation of the currently proposed project.

Comparison of 2010 (No Project Alternative) Traffic Volumes to 2013 Traffic Volumes

The AMP FEIR includes evaluation of environmental effects associated with the No Project Alternative, which provides a general indication of future environmental impacts and conditions projected to occur in the absence of SDIA AMP improvements. Inasmuch as traffic volumes at intersections and street segments around the airport would have increased between 2005 and 2013 even if there were no AMP improvements, a comparison was made between the forecasted Year 2010 No Project Alternative traffic volumes and the 2013 SDIA ADP Traffic Study volumes described above. Although the FEIR also includes traffic volume projections for 2015 under the No Project Alternative, a comparison between the 2010 No Project Alternative traffic volumes and the 2013 traffic volumes is considered to be more conservative, given that the 2015 No Project Alternative projections would be higher than those of 2010.

Similar to the 2005-2013 traffic volumes comparison above, AM and (PM peak hour intersection volumes from the 2010 No Project Alternative and 2013 SDIA ADP Traffic Study were compared (see Appendix B, Tables 1 and 2, respectively). Of the intersections compared under this scenario, AM peak hour intersection traffic volumes were on average 11.71 percent lower in 2013 compared to the traffic volumes anticipated in the FEIR to occur by 2010 under the No Project Alternative, although the volumes at some intersections have increased. However, all intersections were calculated to operate at LOS C or better, which was also the case in the AMP FEIR analysis (i.e., no significant impacts under either scenario). PM peak hour intersection traffic volumes would be on average 19.37 percent lower in 2013 compared to the traffic volumes anticipated in the FEIR to occur by 2010 under the No Project Alternative, with no increases shown at any intersection. Based on the above comparison between 2013 traffic volumes and the traffic volumes projected in the FEIR for the No Project Alternative in 2010, no new significant impacts are expected to occur.

A comparison of street segment Average Daily Traffic (ADT) volumes between the 2010 No Project Alternative and 2013 traffic volumes also was made (see Appendix B, Table 3). Under that comparison, the traffic volumes were lower in 2013 by an average of 12.04 percent, although the volumes along some segments have increased. While volumes have increased along several segments of North Harbor Drive, all segments where increases occur were calculated to operate at LOS D or better, which was also the case in the SDIA Master Plan FEIR analysis (i.e., no significant impacts under either scenario). Therefore, no new significant impacts are expected to occur from implementation of the currently proposed project.
Comparison of SANDAG Series 10 and Series 12 Long-Term (2030) Traffic Volumes

The FEIR used long-term traffic volumes obtained from the SANDAG Series 10 (Year 2030) traffic model to determine potential significant impacts to the surrounding roadway network due to the SDIA Master Plan. To determine if the forecast volumes have changed substantially since the document was certified, a comparison was made to the most recent available SANDAG Series 12 (Year 2035) traffic model volumes (Appendix B, Table 4). The forecasted Series 12 volumes are lower as compared to Series 10 volumes by an average of 36.47 percent. Therefore, the use of the Series 10 Year 2030 traffic volumes can be considered conservative; no new significant impacts are identified. Additionally, although significant impacts to street segment operations in 2030 were identified in the AMP FEIR for the following segments of North Harbor Drive: Terminal 1 to Winship Lane; Winship Lane to Rental Car Road; Rental Car Road to Laurel Street; and, Laurel Street to Hawthorn Street, the use of the Series 12 data would result in lower future traffic volumes on those segments (Appendix B, Table 4). As such, use of the Series 12 Year 2030 traffic volumes would not result in a substantial increase in the severity of previously identified significant impacts.

Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

As indicated on page 5.3-23 of the FEIR, the San Diego Association of Governments (SANDAG) is the designated Congestion Management Agency for the San Diego region. Congestion Management Plan (CMP) arterials designated by SANDAG are part of the overall CMP system, which include those roadways that serve the highest level of regional traffic, serve major regional facilities, and provide significant inter-community traffic service and freeway congestion relief. Street segments near the project site designated as CMP Arterials include North Harbor Drive, Grape Street, Hawthorn Street, and Pacific Highway. The traffic impacts associated with implementation of the Project have been addressed and disclosed in FEIR and updated in Appendix B. The impacts to the CMP would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Project would be constructed on the south side of Terminal 2 West, to the south of the main SDIA runway. The parking structure would not conflict with air traffic patterns. No impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Implementation of the Project would involve construction of a parking structure on an existing SDIA surface parking lot. No new roadways or intersections would be designed or constructed. The proposed parking structure is consistent with other airport uses and is compatible with the adjoining airport terminal. As such, no impact would occur. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

e. Would the project result in inadequate emergency access?

Implementation of the Project would include construction of new facilities. As indicated on page 5.17-44 of the AMP FEIR, development plans would be reviewed by the San Diego Harbor Police Department (SDHPD) and City of San Diego Fire-Rescue Department (SDFD), and other agencies to help ensure compliance with all applicable codes, ordinances, policies, and standards. Such review would include verification that adequate emergency access is provided and maintained. As such, potential impacts related to emergency address would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The Project would not conflict with adopted policies, plans, or programs supporting public transit, or bicycle or pedestrian facilities. No barriers to pedestrian or bicycle circulation are anticipated, and the Project would not decrease the performance or safety of such facilities. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
APPENDIX A: ENVIRONMENTAL CHECKLIST
ADDENDUM TO THE FEIR FOR THE
SAN DIEGO INTERNATIONAL AIRPORT MASTER PLAN

XVII. UTILITIES AND SERVICE SYSTEMS

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

a) Are substantial changes proposed in the project that will require major revisions of the environmental impact report?  ☐  ☒

b) Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in environmental impact report?  ☐  ☒

c) Has new information of substantial importance become available indicating new or substantially greater significant impacts or new/different mitigation measures or alternatives for significant impacts?  ☐  ☒

Discussion:

Section 5.11, Utilities and Service Systems, of the AMP FEIR addresses potential impacts related to energy (electricity and natural gas), telecommunication systems, water demand/supply and systems, sewer, and solid waste from implementation of the AMP. The following evaluates the extent to which the analyses pertaining to the questions posed below apply to the Project.

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

As indicated below in Section XVI (b.), implementation of the Project would result in a less than significant increase in wastewater volumes generated at the airport that would be subject to payment of applicable sewer capacity fees. Based on the nature of the currently proposed improvements, implementation of the Project would have no effect on the wastewater treatment requirements set forth by the state Regional Water Quality Control Board-San Diego Region for the City of San Diego. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As indicated below in Sections XVI (d.) and (e.), implementation of the Airport Land Use Plan, which includes the currently proposed use, would not have a significant impact on existing water or wastewater systems. The Project would not require or result in the construction of new water or wastewater treatment plants or expansion of existing facilities. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
c. Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As indicated above in Section VIII (e.), the Project's potential impacts to surface drainage volumes would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

A Water Supply Assessment by the City of San Diego Water Department specifically found that adequate water supply would be available for development proposed at SDIA - see page 5.11-11 of the AMP FEIR. This includes the uses assumed for the Airport Land Use Plan, which includes the Project. In terms of the water delivery or conveyance system, the Project may result in an increased demand for water, which would require an extension of water conveyance facilities on SDIA. Such utility extensions are typical for most new development projects. As such, the Project's potential impacts related to water supply and water systems are assessed as less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

e. Has the wastewater treatment provider, which serves or may serve the project, determined that it has adequate capacity to serve the projected demand of the project in addition to the provider's existing commitments?

Development of SDIA in accordance with the proposed Airport Land Use Plan, which includes the type of land use contemplated under the Project, would result in additional wastewater-generating facilities (e.g., sinks, toilets). The Project could generate new uses at SDIA with an associated (but unquantified) increase in wastewater generation. As discussed on page 5.11-12 of the AMP FEIR, this increase in wastewater generation would not, however, be significant because of the wastewater treatment capacity available to SDIA and because of the airport's location near large San Diego Metropolitan Wastewater Department (SDMWWD) wastewater collection pipelines and Pump Station No. 2. As a result, little-to-no off airport infrastructure would be required to convey increased wastewater flows from SDIA to the SDMWWD sewer system and the Point Loma Wastewater Treatment Plant. Capacity impacts to SDMWWD wastewater treatment facilities would be offset through payment of applicable sewer capacity fees, to the extent required by law. Potential sewer system impacts related to implementation of the Project, being accounted for within the Airport Land Use Plan, would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

f. Is the project served by a landfill with sufficient permitted capacity to accommodate the solid waste disposal needs of the project?

Operation of the new development proposed at SDIA is anticipated to result in an increase of solid waste generated at SDIA. This increase would be negligible in comparison to the available disposal capacity described on pages 5.11-7 and 5.11-8 of the AMP FEIR. Construction activities would result in a temporary increase of solid waste generation at SDIA. However, disposal options would be identified in a Solid Waste Management Plan in advance of all activities to minimize the amount of
debris directed to local landfills. At least 50 percent of all waste generated during construction activities would be recycled in accordance with the City of San Diego’s Construction and Demolition Debris Diversion Ordinance. As indicated on page 5.11-13 of the AMP FEIR, future development proposed at SDIA would have a less than significant impact on the solid waste disposal system. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

The disposal of municipal (non-hazardous) waste would occur at Miramar Landfill in accordance with applicable state and local requirements (there are no applicable federal requirements - see Section 5.11.2.3 of the AMP FEIR for discussion of the regulatory framework related to solid waste generation/disposal). Any hazardous waste resulting from construction, demolition, and operations at SDIA would not be disposed at Miramar Landfill and would instead be disposed at a landfill approved to receive hazardous waste, as required by local and state regulations, or otherwise treated/managed in accordance with federal, state, and local requirements (see Section 5.15.2 of the AMP FEIR for discussion of the regulatory framework applicable to hazardous wastes). The Project’s potential impacts related to the regulation of solid waste would be less than significant. Therefore, the Project does not require substantial revisions of the environmental impact report and no changes occur with respect to the circumstances under which that project is undertaken. Further, there is no substantial new information that there would be a new significant impact requiring major revisions of the certified FEIR.
December 23, 2014

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

Re: Coastal Development Permit Application #6-14-1886

Dear Mr. Anasis:

Commission staff has reviewed your application for the construction of a three-level parking structure at Terminal Two of the San Diego International Airport (Airport), and determined that additional information is necessary in order to properly review this application. Please provide the following:

1. A detailed explanation of the traffic impacts that would result from the proposed project. The addendum to the Final EIR of the Airport Master Plan states that traffic impacts resulting from the Airport Implementation Plan (with parking structure) would be reduced to a level of less than significant with the implementation of mitigation measures, and that without these mitigation measures, the traffic impacts would remain significant. Please provide detailed information on the status of the implementation of these mitigation measures. In addition, please provide an update on the status of the Airport’s ongoing coordination with local transit authorities and other stakeholders (e.g. MTS, NCTD, SANDAG, San Diego Unified Port District) to minimize traffic impacts through the use of alternative transportation modes that decrease dependency on the single-occupancy vehicle (e.g. shuttle, buses, trolley, train).

2. An updated inventory of all parking spaces at San Diego International Airport, including existing and proposed number of parking spaces, description of parking usage, and current and projected parking demand.

3. Although the submitted visual renderings illustrate that public views of the San Diego Bay will not be adversely impacted, North Harbor Drive is designated as a scenic roadway. Please clarify whether any architectural/visual treatment or landscaping (e.g., ivy, trees with large canopies) is proposed to screen and/or break up the façade of the southern side of the structure facing North Harbor Drive. In addition, please indicate whether alternatives that would reduce the bulk and scale of the structure, as it presents to those traveling on North Harbor Drive, have been considered to protect the existing character of this scenic coastal roadway.

4. On Page 3 of the submitted Coastal Development Permit application, please include the breakdown of building area versus landscaped area for the proposed project area.
5. Grading plan, which includes information regarding where the graded material will be disposed of.

6. Copy of any local discretionary approvals or other agency permits required for this project.

7. List of interested parties.

Please do not limit your submittal to the above mentioned items. You may submit any information which you feel may help Commission staff gain a clear understanding of the scope of your project.

When all required information is received, reviewed by staff and found to be adequate to analyze the project, your application will be filed and scheduled on the next available Commission agenda. If you have any questions, please feel free to call me.

Sincerely,

Tinya Hoang
Coastal Program Analyst
Hi Ted,

Thank you very much for your email. Okay, we will work towards the April or May meeting depending on the submission of the additional material.

I have a question related to understanding the parking demand. For your previous CDP application for the Terminal 2 expansion, it is my understanding that it was decided that the parking structure would not be needed at that time, based on feedback from regional transit agencies, residents surrounding the airport and private parking operators. Could you please explain what has changed since that time and why it is needed now? Feel free to answer this as part of your response package.

Thank you again for inviting me to the Airport Transit Committee meeting. It was very informative.

I look forward to receiving the additional materials.

Thanks,
Tinya

---

Hi Tinya:

Thanks again for attending the Airport Transit Committee meeting last week. It is helpful to have input from all the agencies.

Regarding the parking plaza application, I have consulted with our Environmental Affairs department and the completion of the water quality analysis report. The draft water quality analysis report is still under preparation and they won’t have the final report for distribution by next week. In addition, the Airport Authority will not be able to complete the application materials and submit all the materials requested in time for your staff recommendation for a March meeting. Working towards the April or May 2015 meetings would allow us sufficient time to complete responses to your questions and submit with time for the CCC to review.

In regards to your question, the parking plaza and the related CEQA/Environmental Review was completed in July 2014 and was reviewed and discussed at our July Board meeting. We are not aware of any opposition to the project, other than the off-airport parking operators of three parking structures which may be opposed to long-term parking facilities being developed on the airport. The proposed parking plaza is intended to be used by airport passengers who are parking for a short-term (1-2 days) or with those with mobility/access necessity in the terminal area. The parking rates are structured in that manner with terminal parking presently $30 each day and long-term parking priced at $13 per day.
March 20, 2015

FILE COPY

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

Re: Coastal Development Permit Application #6-14-1886

Dear Mr. Anasis:

Commission staff has reviewed the materials submitted in response to our letter dated December 23, 2014 for the above cited permit application to construct a three-level parking structure at Terminal Two of the San Diego International Airport (Airport). The following information is still needed in order to properly review this application:

1. In our previous letter dated December 23, 2014, we requested information on the traffic impacts that are anticipated from the additional 1,755 parking spaces proposed. However, the addendum to the Final EIR addresses the traffic impacts of the previously planned 5-story parking structure. Therefore, please provide a traffic analysis specifically for the proposed project, addressing traffic on North Harbor Drive. As a part of this analysis, please describe what traffic mitigation measures will be implemented in order to minimize traffic impacts related to the new parking structure and the status of any mitigation measures in the traffic mitigation plan that are associated with the proposed project (e.g., North Harbor Drive improvements). Also, please include the existing level of service of North Harbor Drive and the projected level of service of North Harbor Drive with the proposed parking structure.

2. Please provide an inventory of all airport parking lots, including the number of existing public parking spaces, description of parking usage, and current and projected parking demand for all parking lots.

In your letter, you indicate that you are proposing 3,076 spaces, of which 3,000 are in the parking plaza, and that 76 existing spaces will remain adjacent to the USO facility. However, on the floor plans for levels 1, 2, and 3 (Sheets 14, 15, 16), the parking summary shows a total of 2,971 stalls. In addition, the floor plans also appear to show 70 surface parking spaces by the USO facility rather than 76 spaces. The plans also show 53 additional surface parking spaces that will be provided just east of the parking plaza, on the “pervious pavers.” These numbers do not total to 3,076 spaces. In our phone conversation, you stated that the number of spaces has not been finalized, but that the numbers you provided in your letter would be the maximum for the project. Please provide an approximate time when the numbers will be finalized. In addition, you also stated that the parking spaces adjacent to the USO facility are not all public. Please provide us with the number of public parking spaces.
3. On Page 3 of the submitted Coastal Development Permit application, please include the breakdown of building area versus landscaped area for the proposed project area.

4. Based on your description of the parking structure and preliminary landscaping plan, it appears that no visual treatments or landscaping will be used on the southern side of the structure to screen the façade facing North Harbor Drive. While the project will not block views of the bay or the San Diego skyline, other projects in the area have been required to use architectural/visual treatment and landscaping to screen and/or break up the façade. Please examine the feasibility of using a plant palette with trees that have larger canopies or ivy on the façade of the structure in order to provide screening and soften the potential visual impacts.

5. Copy of any local discretionary approvals or other agency permits required for this project.

In addition, on February 26, 2015, a water quality analysis was provided. Based on our water quality specialist’s review, additional information is needed. Please provide the following:

- Please provide information on whether the soils underlying the site and the hydrology are favorable to infiltration of parking lot runoff, and whether the treatment BMPs are designed as flow-through or infiltration BMPs.

- Please show how runoff will flow into the storm drains and BMPs.

- Please examine the feasibility of 1) the consolidation of the outfalls to the bay, 2) treatment of runoff up to the 95th percentile storm event and 3) treatment of runoff from any adjacent, untreated airport roads or parking areas.

- Please provide information on how the covered parking area (1st and 2nd level parking) will be plumbed (e.g., trench drains at the entries and a connection to the sanitary sewer).

- Please state whether all the runoff will flow into vault-type media filters (Con-tech). It is unclear whether or not there is more than one existing filter. Please clarify.

- Please explain whether redundant runoff treatment has been considered (e.g., bioswale draining to media filter) for greater protection.

- It is unclear if the project will use permeable pavement concrete or pavers. Table 1 of the water quality analysis does not agree with the stormwater concept plan (Sheet 11). Please also determine whether 1) it possible to have landscaped ‘treatment’ BMPs on the upper deck, 2) the area of permeable surface has been maximized, and 3) other proposed impervious surfaces can be made permeable.
• Please describe how lot-sweeping be handled given that it is occupied/active 24/7 and how trash will be addressed besides sweeping.

When all required information is received, reviewed by staff and found to be adequate to analyze the project, your application will be filed and scheduled on the next available Commission agenda. If you have any questions, please feel free to call me at (619) 767-2370.

Sincerely,

[Signature]

Tinya Hoang
Coastal Program Analyst
March 26, 2015

Ms. Tinya Hoang
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Parking Plaza at Terminal Two, San Diego International Airport
Application No. 6-14-1886

Dear Ms. Hoang:

In response to your request for additional information, the San Diego County Regional Airport Authority (SDCRAA) has prepared this letter to provide information regarding:

- Traffic Analysis and Mitigation;
- Inventory of Airport Parking;
- Feasibility of Screening Façade with Plant Material; and
- Feasibility of Terracing the Structure.

**Traffic Analysis and Mitigation**

An extensive traffic analysis analyzing all of the project components of the proposed Airport Master Plan, including the parking plaza, was prepared and adopted in the 2008 San Diego International Airport Master Plan Final Environmental Impact Report (FEIR). The FEIR and the appendices have been provided in an electronic format to the California Coastal Commission and available as a free download at the Airport website (www.san.org under Environmental Affairs/CEQA + NEPA). The FEIR evaluated a proposed Airport Master Plan alternative with a five-level/5,000 space parking plaza and an Airport Master Plan alternative without a five-level/5,000 space parking plaza for all street segments, intersections, rail crossings, and freeway segments surrounding the airport, including North Harbor Drive, through the year 2030.

The FEIR concluded that there was not a substantial difference in the traffic impacts between the two parking plaza alternatives because the primary driver to vehicle trips generated at the airport is determined by increases in airline passenger volumes, and not the number of parking spaces available at the airport. As airline passenger volumes were forecast to increase through 2030, vehicle trips will increase irrespective of the available parking at the airport. If airport parking is not available in the terminal areas, airline passengers will change modes to be picked
up and dropped off at the curbfront by family/friends or at the transit plazas in taxis and shared ride shuttle vans. This creates increased vehicle trips as each pick up and drop off generates additional vehicle trips.

The traffic analysis in the FEIR evaluates the worst-case traffic impacts for the proposed Airport Master Plan with a parking plaza of five-level/5,000 spaces. The current proposed project for a three level/3,000 space parking plaza relies upon the same traffic analysis in the FEIR and includes the same impacts and related mitigation measures as identified in the FEIR. The FEIR includes all of the levels of service identified in five year increments from 2010, 2015, 2020, 2025 and 2030 for all the street segments and intersections on North Harbor Drive stretching from Rosecrans to Grape Street. Please incorporate by reference the FEIR for the specific levels of service for each street segment and intersection which are included in Section 5.3 Traffic and Circulation (Pages 5.3-1 through 5.3-182) and Appendix D – Traffic and Circulation (Pages D-1 through D-285).

In addition, the 2008 San Diego International Airport Master Plan Final Environmental Impact Report (FEIR) included a traffic mitigation plan, which was attached to the March 6, 2015 response letter. This traffic mitigation plan is for the preferred alternative, which includes the parking plaza. Seventeen (17) road improvements to street segments and intersections were identified from 2010 to 2030 serving airport-generated traffic. The majority of the road improvements were identified as being needed in the 2025 to 2030 timeframe.

SDCRAA provided the traffic mitigation plan, construction plans and specifications, and cost estimates to the City of San Diego, Caltrans and SANDAG who included the 17 road improvements in their Regional Transportation Plan (RTP). The agency responsible for each improvement must be determined through collaboration between SDCRAA and the City of San Diego, considering legal restrictions on using airport funds off airport. The SDCRAA can fund improvements located at the first traffic nodes adjacent to the airport. Therefore, SDCRAA can fund the intersection improvements at the airport’s entrances, including on North Harbor Drive and Pacific Highway. The road improvements to street segments and intersections are listed in the attached Table 1. SDCRAA staff will continue to work with the City of San Diego to determine the appropriate funding agency for the remaining improvements.

Inventory of Airport Parking

The following table provides an inventory of all airport public parking lots including the location/type of use and the number of existing public parking spaces.
To determine current parking demand, an analysis was conducted by aviation consulting firm Leigh Fisher Associates and presented to the SDCRAA. Close-in parking is used primarily by 1) airport users assisting or picking up air passengers who must park in the terminal area parking but remain for less than 3 hours and 2) business travelers that park for the average of 2-3 days. The analysis concludes:

- 7,000 total parking spaces are required within walking distance of the airport terminals by 2035;
- 3,000 spaces are needed for Terminal Two airport users immediately; and
- A parking structure is required to provide these terminal areas parking spaces.

The current capacity of the Terminal Two close-in surface parking lot is 1,323 spaces. As stated above, the parking requirements identified a current need for 3,000 parking spaces in front of the terminal, leaving a current deficiency of 1,753 parking spaces. The proposed plaza would initially displace 1,247 parking spaces in its construction footprint, but allow 76 existing surface spaces to remain that are located below the elevated ramps roadway adjacent to the United Service Organization (USO) facility. An additional 1,753 parking spaces would be added with the proposed parking plaza resulting in the total number of close-in parking spaces at Terminal Two to 3,076.

The following table summarizes the existing and proposed close-in Terminal Two parking spaces:

<table>
<thead>
<tr>
<th>Terminal Two Close-In Parking Spaces</th>
<th>Existing</th>
<th>Add/(Reduce)</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface</td>
<td>1,323</td>
<td>(1,247)</td>
<td>76</td>
</tr>
<tr>
<td>Plaza</td>
<td>0</td>
<td>3,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Total</td>
<td>1,323</td>
<td>1,753</td>
<td>3,076</td>
</tr>
</tbody>
</table>
Feasibility of Screening Façade with Plant Materials

The parking plaza will not alter or block views from the North Harbor Drive scenic corridor to the coastal resources of San Diego Bay or the downtown skyline. Existing airport circulation roadways and retaining walls are located directly south of the proposed parking, limiting views of the proposed parking plaza from the North Harbor Drive scenic corridor when looking away from San Diego Bay to the north towards the airport. As depicted in the adopted Airport Master Plan, the proposed parking plaza will be integrated into the airport ground transportation facilities as designated parking for airport users in the terminal area. The proposed project will construct a parking structure on the same footprint as the existing surface parking area and utilize the existing entrance and exit roads on the airport.

Based upon the designated location between the elevated departure road/curbfront and the airport circulation roadways and retaining walls, it is not feasible to screen the façade of the parking plaza with planted trees for the following reasons. First, there are not sufficient landscape areas available between the proposed parking plaza and the existing roadways/retaining walls to accommodate the planting of numerous trees with large canopies to screen the façade of the parking plaza. The landscape areas are intended to serve the primary purpose of water retention and drainage with suitable plant materials that would not impede drainage. Second, the plant palette implemented at the Terminal Two expansion (Green Build) was selected because they are drought-tolerant vegetation and trees (i.e. three species of palm, olive trees) that consume less water from the previous plant materials that were planted prior to 1998 in the Terminal Two area. To introduce trees with large leafy canopies to serve as a screening facade would increase water consumption for landscaping and require larger landscape areas reducing the effectiveness of using the limited space as an effective drainage basin. Finally, trees with large leafy canopies would have to be closely planted and with increased frequency to form a vegetation screen. Trees with multiple branches require frequent maintenance to reduce debris and maintain safety over the airport circulation roads. While palm trees and olive trees will be used in the landscaping area between the parking plaza and the retaining walls, they will not provide a broad leafy canopy or be able to fully screen the second and third levels of the parking plaza.

Potential vertical screening elements using vegetation were considered and evaluated for the parking plaza. These concepts included adhering vegetation or planted material on the façade walls of the parking plaza to form a “living wall” or constructing planter boxes on the second and third levels that would contain cascading plant materials to screen the façade. These concepts were not feasible for the following reasons. First, planter boxes containing vegetation, soil and water would require additional structural treatments, supports and irrigation systems increasing the size and cost of the parking plaza exterior walls. Second, a large
"living wall" across a large vertical expanse would require substantial water use for frequent irrigation to maintain leafy foliage to serve as a visual screen. Finally, large walls of vegetation become an attractant for vectors, such as rats to forage and habitat. For these reasons, attaching or growing vegetation along the façade of the parking plaza was not a feasible option because it would increase the size of the parking plaza as well as increase water consumption and potential safety risks.

Feasibility of Terracing the Structure

Several alternative parking structures with three to five levels of parking were evaluated. One goal of the design was to maximize the footprint of the existing surface parking lot without impacting the existing airport roadway, circulation and entrance/exits. A second goal of the design was to minimize the number of levels and not exceed the height of the elevated departure road shade canopies nor the roof line of Terminal Two. A third goal of the design was to minimize the walking distances for airport users from the parking spaces on the upper levels of the parking plaza to the access points at Terminal Two.

To achieve these design goals, it was determined that the optimal parking plaza would be three levels that would maximize the footprint of the existing surface area and have the fewest number of levels. It was determined that constructing a terraced or stepped structure with a lower façade along North Harbor Drive and increased levels closer to Terminal Two would not be feasible for several reasons. First, adding a fourth or fifth level to the parking plaza would require additional ramps or helixes for vehicle access to the additional parking levels. These alternatives would yield fewer numbers of parking spaces on the fourth and fifth levels as a trade-off for eliminating or setting back the levels along the North Harbor Drive façade. Second the additional floors would exceed the height of the elevated departure curbfront and Terminal Two, reducing or eliminating the views to San Diego Bay and the skyline from the terminal and elevated curbfront locations. Finally, adding fourth and fifth parking levels would increase walking distances and require additional vertical conveyance capacity in elevators and escalators, increasing the travel time and walk distances for airport users. For these reasons, constructing a terraced or stepped structure was not feasible because it would increase the overall height of the parking plaza and reduce the efficiency for airport users.
If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.

Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

Attachment: Table 1 – Traffic and Circulation Mitigation Measures
<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Project Status</th>
<th>Mitigation Measures</th>
<th>Level of Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Traffic and Circulation (Section 5.3)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along Sassafras</td>
<td>2010</td>
<td>MM5.3-1 Sassafras Street between Pacific Highway and Kettner Boulevard – Construct</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Street between Kettner Boulevard and Kettner Boulevard would increase to 0.99 from 0.94</td>
<td>No</td>
<td>one additional eastbound travel lane for a total of two westbound and two eastbound</td>
<td></td>
</tr>
<tr>
<td>under the No Project Alternative</td>
<td></td>
<td>travel lanes between Pacific Highway and Kettner Boulevard.</td>
<td></td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along Sassafras</td>
<td>2010</td>
<td>MM5.3-2 Sassafras Street between Kettner Boulevard and India Street – Construct one</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Street between Kettner Boulevard and India Street would increase to 1.36 from 1.32 under</td>
<td>No</td>
<td>additional eastbound travel lane for a total of one westbound and two eastbound</td>
<td></td>
</tr>
<tr>
<td>the No Project Alternative</td>
<td></td>
<td>travel lanes between Kettner Boulevard and India Street.</td>
<td></td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along Kettner</td>
<td>2015</td>
<td>MM5.3-3 Kettner Boulevard between Sassafras and Palm Streets – Construct one</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Boulevard between Sassafras Street and Palm Street would increase to 1.02 from 0.99 under</td>
<td>No</td>
<td>additional travel lane for a total of four travel lanes one-way between Sassafras and</td>
<td></td>
</tr>
<tr>
<td>the No Project Alternative</td>
<td></td>
<td>Palm Streets.</td>
<td></td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along North</td>
<td>2030</td>
<td>MM5.3-4 North Harbor Drive between Terminal One Access and Winship Lane - Construct</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Harbor Drive between Terminal One Access and Winship Lane would increase to 1.01 from 0.94</td>
<td>No</td>
<td>one additional travel lane for a total of nine lanes. This segment is currently a</td>
<td></td>
</tr>
<tr>
<td>under the No Project Alternative</td>
<td></td>
<td>maximum eight-lane configuration per the City’s roadway classification for Primary</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Arterial. A new roadway classification would be required and corresponding capacity</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>values defined to analyze the impact of the added lane.</td>
<td></td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along North</td>
<td>2030</td>
<td>MM5.3-5 North Harbor Drive between Winship Lane and the Rental Car Road - Construct</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Harbor Drive between Winship Lane and the Rental Car Road would increase to 1.03 from 0.97</td>
<td>One Additional</td>
<td>one additional travel lane for a total of nine lanes. This segment is currently a</td>
<td></td>
</tr>
<tr>
<td>under the No Project Alternative</td>
<td>Westbound Lane</td>
<td>maximum eight-lane configuration per the City’s roadway classification for Primary</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Under</td>
<td>Arterial. A new roadway classification would be required and corresponding capacity</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Construction</td>
<td>values defined to analyze the impact of the added lane.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>in 2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>Year</td>
<td>Completed?</td>
<td>Mitigation Measures</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------------------</td>
<td>------</td>
<td>------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between the Rental Car Road and Laurel Street would increase to 1.79 from 1.73 under the No Project Alternative</td>
<td>2030</td>
<td>One Additional Westbound Land from US Coast Guard Crossing to Rental Car Road Under Construction in 2015</td>
<td>MM5.3-6 North Harbor Drive between the Rental Car Road and Laurel Street.</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along North Harbor Drive between Laurel Street and Hawthorn Street would increase to 1.27 from 1.22 under the No Project Alternative</td>
<td>2030</td>
<td>No</td>
<td>MM5.3-7 North Harbor Drive between Laurel Street and Hawthorn Street - Construct one additional travel lane for a total of seven lanes between the Rental Car Road and Laurel Street.</td>
</tr>
<tr>
<td>As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along Grape Street would increase to 1.17 from 1.13, between North Harbor and Pacific, to 1.5 from 1.46 between Pacific and Kettner, and to 1.69 from 1.66, between Kettner and I-5.</td>
<td>2030</td>
<td>No</td>
<td>MM5.3-8 Grape Street between North Harbor Drive and I-5 - Construct one additional travel lane for a total of four lanes which would require prohibiting parking on one side of Grape Street.</td>
</tr>
<tr>
<td>As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along Hawthorn Street would increase to 1.20 from 1.18, between North Harbor and Pacific, to 1.06 from 1.03 between Pacific and Kettner, and to 1.69 from 1.66, between Kettner and I-5.</td>
<td>2030</td>
<td>No</td>
<td>MM5.3-9 Hawthorn Street between North Harbor Drive and I-5 - Construct one additional travel lane for a total of four lanes which would require prohibiting parking on one side of Hawthorn Street.</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along Kettner Boulevard between Washington and Sassafras Streets would increase to 1.14 from 1.11 under the No Project Alternative</td>
<td>2030</td>
<td>No</td>
<td>MM5.3-10 Kettner Boulevard between Washington and Sassafras Streets - Construct one additional travel lane for a total of four travel lanes one-way between Washington and Sassafras Streets.</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along Laurel Street between the Pacific Highway and Kettner Boulevard would increase to 1.15 from 1.13 under the No Project Alternative</td>
<td>2030</td>
<td>No</td>
<td>MM5.3-11 Laurel Street between the Pacific Highway and Kettner Boulevard - Reclassify from 4-Lane Collector to 4-Lane Major between the Pacific Highway and Kettner Boulevard.</td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>Project Status</td>
<td>Mitigation Measures</td>
<td>Level of Significance After Mitigation</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------------</td>
<td>----------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the volume to capacity ratio along India Street between Laurel and Palm Streets would increase to 2.68 from 2.64 under the No Project Alternative</td>
<td>2030 No</td>
<td>MM5.3-12 India Street between Laurel and Palm Streets - Construct one additional travel lane and increase to a total of three one-way lanes and would require prohibiting on-street parking between Laurel and Palm Streets.</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>As compared to the No Project Alternative, under the Proposed Airport Implementation Plan the volume to capacity ratio along India Street would increase to 2.11 from 2.09, between Palm and Sassafras, and to 2.42 from 2.41 between Sassafras and Washington.</td>
<td>2030 No</td>
<td>MM5.3-13 India Street between Palm and Washington Streets - Construct one additional travel lane and increase to a total of four one-way lanes which would require prohibiting on-street parking between Palm and Washington Streets.</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the intersections of Hawthorn Street and North Harbor Drive would operate at a Level Of Service F and E, AM and PM respectively without mitigation.</td>
<td>2030 No</td>
<td>MM5.3-14 Hawthorn Street and North Harbor Drive - Restripe the westbound left turn lane to a shared left and right turn lane.</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the intersections of Grape Street and Kettner Boulevard would operate at a Level Of Service E (PM) without mitigation.</td>
<td>2030 No</td>
<td>MM5.3-15 Grape Street and Kettner Boulevard - Add an exclusive southbound left turn lane.</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the intersections of Sassafras Street and Kettner Boulevard would operate at a Level Of Service F (PM) without mitigation.</td>
<td>2030 No</td>
<td>MM5.3-16 Sassafras Street and Kettner Boulevard - Change cycle length from 70 seconds to 90 seconds.</td>
<td>Less Than Significant</td>
</tr>
<tr>
<td>Under the Proposed Airport Implementation Plan the intersections of Grape Street and I-5 Southbound On-Ramp would operate at a Level Of Service F (PM) without mitigation.</td>
<td>2030 No</td>
<td>MM5.3-17 Grape Street and I-5 Southbound On-Ramp - Optimize signal timing.</td>
<td>Less Than Significant</td>
</tr>
</tbody>
</table>
Hello Tinya:

Attached is a response letter providing responses to request for information regarding:
- Traffic Analysis and Mitigation;
- Inventory of Airport Parking;
- Feasibility of Screening Façade with Plant Material; and
- Feasibility of Terracing the Structure.

Also if you would like to incorporate by reference or review the traffic analysis in the FEIR or Appendices, it is posted on the Airport Authority website:
http://www.san.org/Airport-Projects/Environmental-Affairs#San-Diego-International-Airport-Master-Plan-Final-EIR-258

If you would like the FEIR and Appendices on a CD, please let me know and I can send one to you.

Thank you for your all your kind assistance,

Ted Anasis, AICP
Manager | Airport Planning
T 619.400.2478
tanasis@san.org

www.san.org |  
San Diego County Regional Airport Authority, P.O. Box 82776, San Diego, CA 92138-2776

Hi Ted,

I would like to check if you received my letter last Friday and if you are able to provide some of the responses to me by tomorrow, since our May staff recommendation meeting is this Friday.

Thank you,
Tinya
To: 'Anasis Ted'
Subject: SDIA parking plaza

Hi Ted,

Thank you for the phone call on Wednesday. Please find attached our letter in response to the new materials that you submitted.

Please let me know if you have any questions.

Thanks,
Tinya

---

Tinya Hoang
Coastal Program Analyst

California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
(619) 767-2370
Tinya.Hoang@coastal.ca.gov
STAFF REPORT: REGULAR CALENDAR

Application No.: 6-12-065
Applicant: San Diego County Regional Airport Authority
Agent: Ted Anasias
Location: San Diego International Airport, San Diego, San Diego County (APNs 760-039-62, 760-039-09)

Project Description: Construct new stormwater system to serve the north side of airport to include a 1,300 linear ft., 36-in. diameter storm drain; pump station; and 6,900 linear ft., 30-in. diameter force main that will connect to an existing storm drain that discharges into the Navy Boat Channel via an existing outfall.

Staff Recommendation: Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The San Diego County Regional Airport Authority proposes construction of a stormwater system to serve the north side of the San Diego International Airport. The north side of the airport consists of a consolidated Rental Car Center, a Fixed Based Operator facility, an access and circulation roadway, economy surface public parking lot (SAN Park Pacific Highway), and an air cargo facility. While the applicant asserts that the existing stormwater infrastructure is capable of serving the north side of the airport, the proposed project is preferred because it will
provide additional flooding encroachment protection for the airfield and reduce the airport's
dependence on the aging, overcapacity, and potentially contaminated existing storm drains. The
project, including construction staging, will be completely contained on airport property and the
majority of the development will be installed underground.

As originally submitted, the project included construction of a new storm drain outfall to the
Navy Boat Channel that would have resulted in permanent impacts to approximately 570 sq. ft.
of intertidal mudflat and shallow subtidal unvegetated habitat, as well as potential impacts to
subtidal vegetated habitat (eelgrass). However, at the request of Commission staff, the applicant
conducted a detailed Alternatives Analysis to identify an alternative that further minimizes
impacts to coastal resources. As a result, the applicant revised the project to utilize an existing
storm drain outfall approved and constructed as part of a previous coastal development permit
(ref. to CDP #6-08-066) for the Terminal 2 West Apron expansion -- instead of constructing a
new one. The revised project does not require any work in the water/tidal area or disturbance of
the Navy Boat Channel.

As revised, the proposed project does not raise any major Coastal Act issues; however, in order
to minimize any potential adverse impacts to water quality within the adjacent Navy Boat
Channel and San Diego Bay, Commission staff is recommending Special Condition #1 that
requires the submission, review, and written approval of final plans, prior to the issuance of the
subject coastal development permit. In addition, Special Condition #2 requires the preparation
These conditions will ensure any potential adverse impacts to water quality are avoided during
and post construction.

Commission staff recommends approval of coastal development permit application 6-12-065, as
conditioned.
TABLE OF CONTENTS

I. MOTION AND RESOLUTION ................................................................. 4
II. STANDARD CONDITIONS ............................................................... 4
III. SPECIAL CONDITIONS ................................................................. 5
IV. FINDINGS AND DECLARATIONS .................................................... 7
    A. Project Description & Background ........................................... 7
    B. Water Quality & Marine Resources ......................................... 9
    C. Biological Resources ........................................................... 11
    D. Visual Resources ................................................................. 12
    E. Growth Inducement ............................................................... 13
    F. Local Coastal Planning .......................................................... 13
    G. California Environmental Quality Act ..................................... 14

APPENDICES
Appendix A – Substantive File Documents

EXHIBITS
Exhibit 1 – Vicinity Map
Exhibit 2 – Aerial Map
Exhibit 3 – Site Plan
I. MOTION AND RESOLUTION

Motion:

I move that the Commission approve Coastal Development Permit 6-12-065 subject to the conditions set forth in the staff recommendation.

Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves Coastal Development Permit 6-12-065 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Final Plans.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final project plans for the proposed development. Said plans shall be in substantial conformance with the revised plans submitted on February 5, 2014 by the applicant.

   The permittee shall undertake the development in accordance with the approved plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. **Erosion Control & Construction BMPs Plan.**

   **A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit, for review and approval of the Executive Director, an Erosion Control and Construction Best Management Practices plan, prepared by licensed professional\(^1\). The licensed professional shall certify in writing that the Erosion Control and Construction Best Management Practices (BMPs) plan is in conformance with the following requirements:

   1. **Erosion Control Plan**

      (a) The plan shall delineate the areas to be disturbed by grading or construction activities and shall include any temporary access roads, staging areas and stockpile areas.

      (b) Include a narrative report describing all temporary run-off and erosion control measures to be used during construction.

      (c) The plan shall identify and delineate on a site or grading plan the locations of all temporary erosion control measures.

      (d) The plan shall specify that should grading take place during the rainy season (November 1 – March 31) the applicant shall install or construct temporary sediment basins (including debris basins, desilting basins or silt traps); temporary

---

\(^1\) A licensed professional may be a California Registered Professional Civil Engineer, Geologist or Engineering Geologist, Hydrogeologist, or Landscape Architect, qualified to complete this work.
drains and swales; sand bag barriers; silt fencing; stabilize any stockpiled fill with geofabric covers or other appropriate cover; install geotextiles or mats on all cut or fill slopes; and close and stabilize open trenches as soon as possible.

(c) The erosion control measures shall be required on the project site prior to or concurrent with the initial grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during construction. All sediment should be retained on-site, unless removed to an appropriate, approved dumping location either outside of the coastal zone or within the coastal zone to a site permitted to receive fill.

(f) The plan shall also include temporary erosion control measures should grading or site preparation cease for a period of more than 30 days, including but not limited to: stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.

2. Construction Best Management Practices

(a) No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion.

(b) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project.

(c) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.

(d) All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day.

(e) The applicant shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction.

(f) Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required.

(g) All stock piles and construction materials shall be contained so that materials cannot be conveyed to drain inlets and any waterway, and shall not be stored in contact with the soil.

(h) Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems.
(i) The discharge of any hazardous materials into any receiving waters shall be prohibited.

(j) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible.

(k) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity.

(l) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

B. The final Erosion Control and Construction Best Management Practices Plan shall be in conformance with the site/development plans approved by the Coastal Commission. Any changes to the Coastal Commission approved site/development plans required by the consulting civil engineer/water quality professional shall be reported to the Executive Director. No changes to the Coastal Commission approved final site/development plans shall occur without an amendment to the coastal development permit, unless the Executive Director determines that no amendment is legally required.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION & BACKGROUND

The San Diego International Airport Master Plan, Final Environmental Impact Report (certified May 2008) and the Supplemental Environmental Impact Report (certified September 2011) analyzed the following airport improvements and facilities to be constructed on the north side of the San Diego International Airport (the majority of which have already been reviewed and approved by the Commission), collectively referred to as the “northside improvements”:

- General aviation/Fixed Base Operator facility (CDP #6-12-088)
- Relocated “SAN Park Pacific Highway” public parking lot (CDP #6-13-0245)
- Consolidated Rental Car Center (CDP #6-13-011)
- Terminal link roadway (CDP #6-13-011)
- On-airport circulation road (CDP #6-13-0245)
- Future air cargo warehouse
- Utilities to serve the northside improvements including storm drain, water, sewer, natural gas, electric and communications infrastructure
The proposed project is for the construction of a stormwater system to serve the north side of the airport and consists of a 1,300 linear ft., 36-in. diameter storm drain; a pump station; and 6,900 linear ft., 30-in. diameter force main that will connect to an existing storm drain that discharges into the Navy Boat Channel via an existing outfall. The project, including construction staging, will be completely contained within airport limits and the majority of the storm drain will be installed underground. Each of the components of the proposed stormwater system is described in greater detail below:

- **Linear Storm Drain** – Approximately 1,300 linear feet of 36-inch diameter gravity storm drain will originate at the North Side Interior Roadway and terminate at the pump station. The gravity storm drain will be located underneath the existing air cargo area; therefore, it will be constructed using trenchless technology methods.

- **Pump Station** – A 25 cubic-feet per second capacity stormwater pump station will consist of a large concrete structure and wet well, two low-flow and two high-flow pumps, an intake bar screen, and a discharge manifold with isolation valves. All pump station facilities will be installed underground, with the top slab of the pump station wet well at grade. An emergency generator and electrical panel will be installed above ground and will be about 7 feet high. The pump station will be located southeast of the Air Traffic Control Tower.

- **Force Main** – Approximately 6,900 linear feet of 30-inch diameter pressurized pipe (force main) will begin at the pump station, traverse south and then west, where it will parallel the runway. At the end of the runway, the force main will turn south towards the existing 60-inch diameter storm drain constructed as part of the Terminal 2 West Apron expansion. The force main will be constructed using conventional cut-and-cover methods.

- **Connect to Terminal Development Program (TDP) Outfall** – The force main will connect to an existing 60-inch diameter TDP storm drain constructed as part of the Terminal 2 West Apron expansion. The connection will be made by constructing a new manhole in the storm drain, which will be located on airport property. The force main will be pressurized from the pump station until it discharges into the new manhole, where it will flow by gravity from that point on. The existing TDP pipe outfalls to the Navy Boat Channel west of the airport. The existing outfall consists of a 60-inch diameter pipe and rip-rap that extends into the channel. There will be no modifications made to the existing outfall.

The proposed stormwater system will serve the north side of the airport located north of Taxiway C and bounded on the west by the Marine Corp Recruit Depot and on the north and east by Pacific Highway. The north side of the airport encompasses approximately 107 acres and consists of a Rental Car Center, Fixed Base Operator facility, access and circulation roadway, economy surface public parking lot, and an air cargo facility. The airfield pavement areas encompass approximately 25 acres and the remaining 82 acres are non-airfield development. The purpose of the proposed project is to discharge storm water runoff from the non-airfield (82 acres) portion of the north side development area. The existing storm drain facilities will remain
in place and in use by the City of San Diego for off-airport properties located north and east of Pacific Highway.

Although the proposed project site is owned by the Port of San Diego, it is presently leased to the San Diego County Regional Airport Authority (Airport Authority) through the year 2068. The San Diego International Airport was previously under the coastal permit jurisdiction of the Port of San Diego and the standard of review was the certified Port Master Plan; however, state legislation transferred authority over airport property to the newly created Airport Authority in January 2003. Thus, the San Diego International Airport is now within the Coastal Commission’s permit jurisdiction and the Chapter Three policies of the Coastal Act are the standard of review.

**B. WATER QUALITY & MARINE RESOURCES**

Section 30230 of the Coastal Act states:

*Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

Section 30231 of the Coastal Act states:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Currently, stormwater from the north side of the airport is captured by an onsite stormwater collection system and conveyed by the existing storm drain system to a 42-inch, 54-inch, or 60-inch storm drain pipe. The 42-inch storm drain pipe discharges into the downtown anchorage of San Diego Bay, just south of the airport. The 54-inch and 60-inch storm drain pipes discharge into Convair Lagoon which also flows into the San Diego Bay south of the airport. These storm drains were installed over 50 years ago by the City of San Diego, which is also responsible for maintaining them, and have deteriorated over time. These storm drains convey storm flows from a substantial amount of off-airport properties located north and east of Pacific Highway, with only 6% of storm water flows that utilize these drains originating from the airport.
Although the applicant has confirmed that the existing stormwater infrastructure is capable of serving all of the northside improvements, the applicant has also indicated that the proposed system is preferred for several reasons. First, the existing storm drains running through the airport were constructed during the hydraulic filling of San Diego Bay that relocated the shoreline from its original location (close to the existing Pacific Highway) to its current location south of Harbor Drive. The placement of the hydraulic fill forced the storm drain profiles to be very flat with little to no slope. These flat slopes allow a significant tidal influence throughout the majority of the storm drain facilities. This tidal influence has significant impacts on the conveyance capacity of the existing storm drain systems and with sea-level rise the conveyance capacity is likely to be reduced in the future. Second, the Airport Authority needs to mitigate potential flooding on the airport that currently disrupts airport operations during occasional storm events. Flooding can cause delays and even closure of critical facilities in extreme storm events. Third, the Airport Authority intends to mitigate potential storm water pollutants generated from current and historical activities at the airport. Last, it is the Airport Authority’s long term goal to minimize or eliminate the co-mingling of airport stormwater flows with offsite flow in the City of San Diego drainage systems. By removing connections to the off-site City owned storm drain systems, the airport is able to monitor and manage stormwater flows and water quality improvements on its own without having to involve the City.

As originally submitted, the project included construction of a new storm drain outfall to the Navy Boat Channel west of the airport. The outfall consisted of 24 feet of reinforced concrete pipe, non-grouted rip rap, filter fabric, grouted rip rap and a “Tideflex” check valve. Approximately 2,500 cu. ft. of rip rap would have been required surrounding the outfall for an area of approximately 800 sq. ft. This new outfall would have resulted in permanent impacts to approximately 570 sq. ft. of intertidal mudflat and shallow subtidal unvegetated habitat. These impacts would have occurred as a result of placement of riprap to dissipate energy and prevent erosion at the proposed storm drain outlet. Additionally, there would have been temporary impacts to a small amount of intertidal/shallow sub-tidal riprap revetment associated with its removal and replacement during installation of the storm drain outfall. Further, unanticipated impacts during construction could have occurred to subtidal vegetated habitat (eelgrass) though increased turbidity associated with the in-water construction work or from accidental damage during placement of the riprap energy dissipator.

At the request of Commission staff, the applicant conducted a detailed alternatives analysis and examined the feasibility of other project alternatives that would minimize or eliminate impacts to coastal resources, including water quality and marine resources within the Navy Boat Channel. As part of this analysis, three different alternatives for discharging stormwater flows from the north side of the airport were examined, including: 1) maintaining existing discharge patterns and outfalls, 2) relocating discharge point to west side of airport using new outfall structure, and 3) relocating discharge point to west side of airport using existing outfall structure. The analysis concluded that the alternative that connected to the existing outfall was most feasible. As a result, the applicant revised the project to utilize the existing storm drain outfall approved and constructed as part of a previous coastal development permit (ref. to CDP #6-08-066) for the Terminal 2 West Apron expansion – instead of constructing a new one. All other aspects of the project remain the same. The revised project does not require any work in the water/tidal area or
disturbance of the Navy Boat Channel; thus, if constructed as proposed, there are also no anticipated long-term impacts on water quality and/or marine resources within the Navy Boat Channel or adjacent San Diego Bay.

The water quality analysis conducted by the applicant concluded that the additional (diverted) stormwater flow will not have a significant impact on the water quality of the Navy Boat Channel. During storm events when flows peak, sessile intertidal organisms, such as barnacles and limpets, can avoid osmotic shock by either eliminating exposure using innate adaptive mechanisms (shell closure) or by osmoregulation. Similarly, mobile species that are adapted to estuarine environments are tolerant to lower salinity conditions, whereas species that are not easily eliminate exposure through avoidance immediately surrounding the outfall.

In addition, all of the development on the north side of the airport has been designed to ensure that potential adverse impacts to water quality in the adjacent San Diego Bay are minimized by incorporating best management practices and low impact development features into the project design. For example, the development on the north side of the airport has a comprehensive onsite stormwater collection system (catch basins, bio-retention ponds, down drains connecting to lateral pipes, self-retaining landscaped areas, underground detention basins) to reduce stormwater flows and remove pollutants from runoff prior to discharge to the storm drain.

While the applicant has submitted preliminary project plans, Special Condition #1 requires the submission of final plans, for the review and written approval of the Executive Director, prior to the issuance of the coastal development permit, to ensure they are in substantial conformance with the approved plans. In addition, because project construction could result in short-term water quality impacts, if not conducted using appropriate BMPs, Special Condition #2 is recommended to ensure protection and maintenance of quality of coastal waters during the construction phase of the project. These conditions will ensure any potential adverse impacts to water quality are avoided during and post construction. Additionally, the proposed project, including all those aspects related to water quality, has been reviewed by the Commission’s Water Quality technical staff, who has found the project meets water quality standards. Therefore, the Commission finds that the development, as conditioned, conforms to Sections 30230 and 30231 of the Coastal Act.

C. Biological Resources

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.
While the project site is not considered an environmentally sensitive habitat area (ESHA), the site is located in close proximity to the San Diego Bay, an area used by a variety of coastal birds including the endangered California least tern (Exhibit 1). Development adjacent to public land and coastal waters must be designed to prevent impacts which would significantly degrade the area, so it is compatible with the continuance of the habitat, as required by Section 30240 of the Coastal Act.

Listed under the Federal and California State Endangered Species Act since 1972, the California least tern (Sternula antillarum browni, “tern”) is a migratory bird species that has managed to find suitable habitat at several locations at the airport. Typically, terns prefer to nest in small, scattered clusters on natural or artificial open areas near estuaries, bays, or harbors where small fish are abundant. At the airport, terns have nested on the sand and gravel in five oval areas between the runway and airplane taxiways since 1970. To protect the terns, the airport has developed a California Least Tern Protection Program with guidelines for all airport, tenant, and contractor activities during the nesting season, including: prohibiting any activities within the least tern ovals themselves; reducing vehicle speed near the least tern ovals to 15 miles per hour; minimizing potential construction impacts by focusing lights away from the tern ovals during night-time activities and lowering any equipment having a height of 25 feet or greater at the close of each construction day to prevent predation; and properly disposing of trash and keeping outdoor trash dumpsters covered so as not to attract any least tern predators. As a result of the Airport Authority’s efforts, nest numbers at the airport have gradually increased since the late 1990s and the site is considered to be one of the most productive least tern nesting sites in Southern California.

The applicant has confirmed that the proposed stormwater system is located over a mile from the nesting habitat for the endangered California least tern and will not disturb or adversely impact the terns. In addition, the Commission’s staff ecologist has reviewed the project and has concurred that the project will not result in negative impacts to any biological resources, including the terns. Therefore, the Commission finds that the development, as conditioned, conforms to Section 30240 of the Coastal Act.

**D. VISUAL RESOURCES**

Section 30251 of the Coastal Act states, in part:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas...

The proposed project will be completely contained within the limits of the airport and the majority of the stormwater system will be underground and not result in any visual impacts once
construction is completed. The only component of the project that will be above grade is a portion of the pump station – the electrical equipment and emergency generator will be approximately 7 ft. high – however, due to its location southeast of the air traffic control tower, it will not block or obstruct any coastal views. Therefore, the Commission finds that the development, as conditioned, conforms to Section 30251 of the Coastal Act.

E. GROWTH INDUCEMENT

Section 30254 of the Coastal Act states, in part:

New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Given that the proposed development involves the construction of new storm drain facilities, the question arises to whether the project is growth inducing. To be found consistent with Section 30254 of the Coastal Act, the Commission must find that the project is being proposed to serve existing development or that if it would accommodate new development, such development must be at planned and approved densities. In this case, the project involves installation of a new storm drain facility to replace other existing facilities to limit the potential for flooding on the airport and address the protection of water quality. While the project does include a new storm drain pipe, it will only accommodate current and/or planned development on the northside of the airport. Therefore, the proposed storm drain improvements should not have a significant overall inducement to growth within the coastal zone, and the development is consistent with section 30254 of the Coastal Act.

F. LOCAL COASTAL PLANNING

The San Diego International Airport was previously under the coastal permit jurisdiction of the Port of San Diego and the standard of review for coastal development permits was the certified Port Master Plan. However, state legislation which took effect in January 2003 transferred authority over airport property to the newly created San Diego County Regional Airport Authority. Thus, the San Diego International Airport is now within the Commission’s permit jurisdiction. Although the Airport is not anticipated to be subject to a LCP, approval of this project, as conditioned, will not prejudice the preparation of a LCP consistent with the requirements of Chapter Three. As discussed above, the proposed project is consistent with the Chapter Three policies of the Coastal Act.
G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the Chapter Three policies of the Coastal Act. Mitigation measures, including conditions addressing water quality will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.
APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

Draft Outfall Alternatives Analysis, prepared by Kimley-Horn and Associates, Inc., dated January 2014; Final Supplemental Environmental Impact Report, SDCRAA #EIR-10-01, State Clearinghouse No. 2005091105, Airport Master Plan, San Diego International Airport, dated August 2011; Final Environmental Impact Report, SDCRAA #EIR-06-01, State Clearinghouse No. 2005091105, Airport Master Plan, San Diego International Airport, dated April 2008; Coastal Development Permit #6-09-015; Coastal Development Permit #6-12-014; Coastal Development Permit #6-12-088; Coastal Development Permit #6-13-011; Coastal Development Permit #6-13-0245
March 6, 2015

Ms. Tinya Hoang
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Parking Plaza at Terminal Two, San Diego International Airport
Application No. 6-14-1886

Dear Ms. Hoang:

In response to your request for additional information, the San Diego County Regional Airport Authority (SDCRAA) has prepared this letter to provide information regarding:

- Overview/History;
- Traffic Impacts and Mitigation;
- Parking Demand/Requirements;
- Airport Transit Coordination;
- Aesthetics/Architectural Treatments;
- Grading Plan; and
- List of Interested Parties.

Overview/History

Overview: The parking plaza at Terminal Two was a project component originally included in the San Diego International Airport Master Plan that was adopted in 2008 by the SDCRAA. At that time, the parking plaza featured five levels and 5,000 spaces. The Board of the SDCRAA has now directed staff to develop a three-level parking plaza with 3,000 spaces at Terminal Two, instead of the larger project originally included in the Airport Master Plan.

History: In 2009, the California Coastal Commission approved CDPs No. 6-08-066 and 6-09-015 for the Airport Master Plan which included the expansion of Terminal 2 with the project entitled the Green Build. In 2013, the California Coastal Commission approved CDP No. 6-13-011 for the Rental Car Center together with a terminal link road to connect the north side with the terminals. Additional projects on the northside also included expanded parking. The SDCRAA delayed the expansion of structured parking at the site of the proposed parking plaza until such time as the
alternative parking was approved. That alternative parking has been implemented and is operational as a long-term economy parking lot.

In May 2008, the SDCRAA adopted the San Diego International Airport Master Plan which originally included a parking structure at Terminal Two as part of the Proposed Airport Implementation Plan. The Proposed Airport Implementation Plan included the following project elements in the terminal area on the southside of the airport: an expansion of Terminal Two with 10 new jet gates; aircraft parking and replacement remain-over-night aircraft parking apron; aircraft apron and aircraft taxilane; a second level elevated departure road and curbfront; vehicle circulation and a five level parking structure serving Terminal Two. Additional project elements were identified on the northside of the airport including relocated vehicle parking and general aviation facilities. The adopted Airport Master Plan forecast an annual growth rate of passengers of approximately 2-3%. All airport facility requirements were calculated based upon this forecast growth rate.

Also in May 2008, the SDCRAA certified a Final Environmental Impact Report for the San Diego International Airport Master Plan which included feasible alternatives including one alternative of the Proposed Airport Implementation Plan with a parking structure of five levels/5,000 parking spaces and one alternative without a parking structure. All alternatives were evaluated in accordance with CEQA in the Final EIR certified May 1, 2008 (State Clearinghouse No. 2005091105). After certifying the Final EIR in 2008, the SDCRAA determined to proceed with implementation of the Proposed Airport Implementation Plan alternative without a parking structure.

All of the project elements were constructed and are currently in operation with the exception of a parking structure serving Terminal Two. In 2013 when the project elements were placed into operation (titled the Green Build), it was immediately observed that the existing surface parking lot at Terminal Two was not adequate to meet the parking demand for those airport users which need to park in close proximity to Terminal Two. Further, parking demand in the existing surface parking lot peeks each week between Monday through Friday, with 90-100% capacity experienced on Tuesday, Wednesdays, and Thursday of each week. This results in airport users that drive their vehicles are unable to find available parking spaces in Terminal Two. These airport users must circulate to other parking facilities or arrange to be dropped off and picked up at the terminal curbfront.

From 2008 to 2014, the annual growth rate of passengers has been 1-2%. An updated passenger forecast was prepared for the next phase of master planning at San Diego International Airport predicts approximately 1-2% annual growth in passengers through the planning horizon year of 2035.
In 2014, the SDCRAA determined that the demand for parking spaces at Terminal Two would best be served by implementing a parking plaza. An Addendum to the 2008 Final EIR was prepared evaluating the parking plaza as was previously described. The Addendum to the 2008 Final EIR was adopted by the SDCRAA on July 7, 2014. Further, the SDCRAA directed staff to prepare a design for a parking plaza at Terminal Two that was three levels and 3,000 parking spaces. This parking plaza is a reduction of the original project component (five levels/5,000 parking spaces) by two levels and 2,000 fewer parking spaces based upon the updated annual growth in passengers and a reduced demand for terminal area parking.

Traffic Impacts and Mitigation

The 2008 San Diego International Airport Master Plan Final Environmental Impact Report (FEIR) included a traffic mitigation plan, which is attached as Attachment A. This traffic mitigation plan is for the preferred alternative, which included the parking structure. Seventeen (17) road improvements to street segments and intersections were identified in 5-year increments from 2010 to 2030 serving airport-generated traffic. The majority of the road improvements were identified as being needed in the 2025 to 2030 timeframe.

SDCRAA provided the traffic mitigation plan, construction plans and specifications, and cost estimates to the City of San Diego, Caltrans and SANDAG who included the 17 road improvements in their Regional Transportation Plan (RTP). The agency responsible for each improvement must be determined through collaboration between SDCRAA and the City of San Diego, considering legal restrictions on using airport funds off airport. The SDCRAA can fund improvements located at the first traffic nodes adjacent to the airport. Therefore, SDCRAA can fund the intersection improvements at the airport’s entrances, including on North Harbor Drive and Pacific Highway. These road improvements to street segments and intersections include a new fourth westbound lane on North Harbor Drive as part of the link road for the Rental Car Center by November 2015. SDCRAA staff will continue to work with the City of San Diego to determine the appropriate funding agency for the remaining improvements.

Parking Demand/Requirements

The SDCRAA has goals and strategies to achieve the highest level of internal and external customer satisfaction and operate the airport in a safe, secure, environmentally-sound, effective and efficient manner. Air passengers regularly express frustration that there is insufficient parking in front of the passenger terminals. This is reflected in SAN’s quarterly air passenger satisfaction surveys, which shows that passengers regularly rate satisfaction of SAN parking well below the rest of the services and facilities at the airport. The 2013 survey results indicate
satisfaction with airport parking at 51% and satisfaction of the rest of the airport’s functions at 79%.

To determine current parking demand, an analysis was conducted by aviation consulting firm Leigh Fisher Associates and presented to the SDCRAA. Close-in parking is used primarily by 1) airport users assisting or picking up air passengers who must park in the terminal area parking but remain for less than 3 hours and 2) business travelers that park for the average of 2-3 days. The analysis concludes:

- 7,000 total parking spaces are required within walking distance of the airport terminals by 2035;
- 3,000 spaces are needed for Terminal Two airport users immediately; and
- A parking structure is required to provide these terminal areas parking spaces.

The current capacity of the Terminal Two close-in surface parking lot is 1,323 spaces. As stated above, the parking requirements identified a current need for 3,000 parking spaces in front of the terminal, leaving a current deficiency of 1,753 parking spaces. The proposed plaza would initially displace 1,247 parking spaces in its construction footprint, but allow 76 existing surface spaces to remain that are located below the elevated ramps roadway adjacent to the United Service Organization (USO) facility.

The following table summarizes the existing and proposed close-in Terminal Two parking spaces:

<table>
<thead>
<tr>
<th>Terminal Two Close-In Parking Spaces</th>
<th>Existing</th>
<th>Add/(Reduce)</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface</td>
<td>1,323</td>
<td>(1,247)</td>
<td>76</td>
</tr>
<tr>
<td>Plaza</td>
<td>0</td>
<td>3,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Total</td>
<td>1,323</td>
<td>1,753</td>
<td>3,076</td>
</tr>
</tbody>
</table>

Airport Transit Coordination

In 2010, the SDCRAA prepared an Airport Transit Plan that evaluates possible transit programs that enhance passenger and employee connections to SAN. These programs include:

- Potential remote transit stations along the Interstate 5 and 15 corridors to provide a park and ride service from North San Diego County to SAN;
- Northside improvements (Rental Car Center / future pedestrian bridge to Intermodal Transit Center);
- Bus service to northside improvements on a dedicated terminal link road that will provide free transit connection to the Palm Street light rail station, including a covered bus enclosure for transit passengers.

In 2015, the SDCRAA is preparing an update to the Airport Transit Plan to evaluate if additional programs can be identified and implemented that will improve the connections for passengers and employees to SAN. The update to the Airport Transit Plan includes coordination with the regional transportation and transit agencies including FAA, SANDAG, MTS, NCTD, Caltrans, the City of San Diego and the Port of San Diego as well as participation by the California Coastal Commission. The update to the Airport Transit Plan is anticipated in late 2015.

Aesthetics/Architectural Treatments

The goals of design for the parking plaza are to seamlessly integrate into the existing terminal and roadway facilities. Terminal Two has a modern design aesthetic that uses glass and steel to create a terminal that allows natural light but covers passengers at the curbfront from direct sun and rain. Terminal Two uses elevated canopies that have been designed in shapes similar to modern jet wings taking flight. Further the elevated departure road and curbfront was designed to be set back from Terminal façade to allow for the natural light and blue skies characteristic of San Diego weather to greet them as they enter or depart the Terminal. The elevated departure roadway also has two sets of canopies at the departure curbs that use a bright white tensile fabric to create pavilions that allow for natural light but protect passengers from direct sun and rain. The parking plaza will be integrated into the site to seamlessly blend with the existing Terminal and roadway.

Views of the parking plaza will be limited to passengers using the facility and will be integrated into the design of the airport facilities. The parking plaza will not be designed to stand out or look different from the building materials already used on the airport. Existing airport circulation roadways and retaining walls located directly south of the parking plaza will not be altered and will serve to limit views of the parking plaza from the North Harbor Drive scenic corridor. The parking plaza will not alter or block views from the North Harbor Drive scenic corridor to the coastal resources of San Diego Bay or the downtown skyline. Several porches and outlooks will be integrated into the third level of the parking plaza to allow the public and airport users panoramic views from the elevated parking plaza to San Diego Bay and the downtown skyline. These porches are envisioned as a defined balcony or outlook with seating to allow for users to enjoy views and photographs from an elevation and viewpoint that does not presently exist on the surface parking spaces.
The parking plaza architecture will utilize building materials and finishes similar to the existing airport terminals and elevated departure roadway. In addition, three light wells and cut-outs will allow natural light and air to circulate into the parking plaza. The parking plaza will also be designed with modern parking technologies, i.e. smart parking, that will inform users of the number of available parking spaces, use red/green lights above parking spaces to visually indicate available parking, and have dynamic signs at vehicle entrance points to communicate to drivers the levels that parking spaces are available. This serves to reduce the amount of unnecessary vehicle movements and circulating hunting for an available space, as well as reduce idling vehicle emissions.

The parking plaza structure will have a third-level roof deck of 30 feet and a parapet wall of 34 feet above ground surface. The parking plaza will have shade canopies of 45 feet and several elevator towers of 48 above ground surface. Light poles on the third level will be located at 60 feet above ground surface and would be the highest appurtenances located on the parking plaza. For comparison purposes, the parking plaza would not exceed the height of the existing elevated roadway support structures (the white pavilions) which are located at 62 feet above ground surface.

Alternatives to a parking plaza structure with three levels were considered but the dimensions between the airport terminal and the elevated departure roadway and North Harbor Drive would not allow the quantity of parking spaces that are required within close proximity to Terminal 2 without utilizing a structure with a façade along North Harbor Drive.

**Grading Plan**

The SDCRAA has prepared a grading plan for the proposed parking plaza that is included as Attachment B.

**List of Interested Parties**

The SDCRAA has prepared a list of interested parties and included as Attachment C.

If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.

Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority
Attachment A: Airport Master Plan Traffic Mitigation Plan
Attachment B: Grading Plan
Attachment C: List of Interested Parties
<table>
<thead>
<tr>
<th>NAME</th>
<th>TITLE</th>
<th>AGENCY</th>
<th>ADDRESS</th>
<th>CITY</th>
<th>STATE</th>
<th>ZIP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Captain T.H. Farris</td>
<td>Commander, Sector San Diego</td>
<td>US Dept of Homeland Security</td>
<td>US Coast Guard</td>
<td>San Diego</td>
<td>CA</td>
<td>92101</td>
</tr>
<tr>
<td>Bill Figge</td>
<td>Deputy District Director of Planning</td>
<td>Dept of Transportation</td>
<td>Planning Division</td>
<td>San Diego</td>
<td>CA</td>
<td>92110</td>
</tr>
<tr>
<td>Susan Baldwin</td>
<td>Senior Planner</td>
<td>SANDAG</td>
<td>401 &quot;B&quot; Street, Ste. 800</td>
<td>San Diego</td>
<td>CA</td>
<td>92101-4231</td>
</tr>
<tr>
<td>Lorie Zapf</td>
<td>Councilmember District 2</td>
<td>City of San Diego</td>
<td>District 2</td>
<td>San Diego</td>
<td>CA</td>
<td>92101</td>
</tr>
<tr>
<td>Myra Hermann</td>
<td>Senior Environmental Planner</td>
<td>City of San Diego, Developmt Svcs</td>
<td>Environmental Analysis Section</td>
<td>San Diego</td>
<td>CA</td>
<td>92101-4155</td>
</tr>
<tr>
<td>Jason Giffen</td>
<td>Director</td>
<td>SD Unified Port District</td>
<td>Environmental &amp; Land Use Mgmt</td>
<td>P.O. Box 120488</td>
<td>San Diego</td>
<td>CA</td>
</tr>
<tr>
<td>James H. McCollum</td>
<td>Manager, Principal Projects</td>
<td>Solar Turbines Incorporated</td>
<td>P.O. Box 85376</td>
<td>San Diego</td>
<td>CA</td>
<td>92106-5376</td>
</tr>
<tr>
<td>Sharon Cloward</td>
<td>Executive Director</td>
<td>Port Tenants Association</td>
<td>2390 Shelter Island Drive, Ste. 210</td>
<td>San Diego</td>
<td>CA</td>
<td>92106</td>
</tr>
<tr>
<td>Bruce Coons</td>
<td>Executive Director</td>
<td>Save Our Heritage Organisation</td>
<td>2476 San Diego Avenue</td>
<td>San Diego</td>
<td>CA</td>
<td>92110</td>
</tr>
<tr>
<td>Jim Melios</td>
<td>S Pts/Middletown Business/Prop Ownr Assoc</td>
<td></td>
<td>1901 First Avenue, Ste. 420</td>
<td>San Diego</td>
<td>CA</td>
<td>92101</td>
</tr>
<tr>
<td>Chair</td>
<td>Little Italy Association of San Diego</td>
<td></td>
<td>2816 Normal Street</td>
<td>San Diego</td>
<td>CA</td>
<td>92103</td>
</tr>
<tr>
<td>Mike Singleton</td>
<td>Chair</td>
<td>Mission Hills Residents Group</td>
<td>c/o KTU+A</td>
<td>San Diego</td>
<td>CA</td>
<td>92103</td>
</tr>
<tr>
<td>Lara Gates</td>
<td>President</td>
<td>Mission Hills Town Council</td>
<td>325 W. Washington Street, Ste. 2-159</td>
<td>San Diego</td>
<td>CA</td>
<td>92103</td>
</tr>
<tr>
<td>Melanie Nickel</td>
<td>Chair</td>
<td>North Bay Community Planning Group</td>
<td>3446 Hancock Street #C</td>
<td>San Diego</td>
<td>CA</td>
<td>92110</td>
</tr>
<tr>
<td>Thurston Coe</td>
<td>Chair</td>
<td>Old Town Community Planning Committee</td>
<td>2836 Juan Street</td>
<td>San Diego</td>
<td>CA</td>
<td>92110</td>
</tr>
<tr>
<td>Geoff Page</td>
<td>Chair</td>
<td>Peninsula Community Planning Board</td>
<td>P.O. Box 7994</td>
<td>San Diego</td>
<td>CA</td>
<td>92107</td>
</tr>
<tr>
<td>Leo Wilson</td>
<td>Chair</td>
<td>Uptown Planners</td>
<td>536 Maple Street, #202</td>
<td>San Diego</td>
<td>CA</td>
<td>92103</td>
</tr>
</tbody>
</table>
Captain T.H. Farris  
Commander, Sector San Diego  
US Dept of Homeland Security  
US Coast Guard  
2710 N. Harbor Drive  
San Diego, CA 92101

Ms. Lorie Zapf  
Council Member District 2  
City of San Diego  
202 "C" Street, MS #10A  
San Diego, CA 92101

Mr. James H. McCollum  
Manager, Principal Projects  
Solar Turbines Incorporated  
P.O. Box 85376  
San Diego, CA 92186-5376

Mr. Jim Mellos  
5 Points/Middletown Business/Property Owners Association  
1901 First Avenue, Ste. 420  
San Diego, CA 92101

Ms. Lara Gates  
President  
Mission Hills Town Council  
325 W. Washington St, Ste. 2-159  
San Diego, CA 92103

Mr. Geoff Page  
Chair  
Peninsula Community Planning Board  
P.O. Box 7994  
San Diego, CA 92167

Mr. Bill Figge  
Deputy District Director of Planning  
Dept of Transportation  
Planning Division  
4050 Taylor Street, MS-240  
San Diego, CA 92110

Ms. Myra Herrmann  
Senior Environmental Planner  
City of San Diego, Devel Svcs Dept  
Environmental Analysis Section  
1222 First Avenue, MS 501  
San Diego, CA 92101-4155

Ms. Sharon Cloward  
Executive Director  
Port Tenants Association  
2390 Shelter Island Drive, Ste. 210  
San Diego, CA 92106

Chair  
Little Italy Association of San Diego  
1668 Columbia Street  
San Diego, CA 92101

Ms. Melanie Nickel  
Chair  
North Bay Community Planning Group  
3446 Hancock Street #C  
San Diego, CA 92110

Mr. Leo Wilson  
Uptown Planners  
536 Maple Street, #202  
San Diego, CA 92103

Ms. Susan Baldwin  
Senior Planner  
SANDAG  
401 "B" Street, Ste. 800  
San Diego, CA 92101-4231

Mr. Jason Giffen  
Director  
Environmental & Land Use Mgmt  
SD Unified Port District  
P.O. Box 120488  
San Diego, CA 92112-0488

Mr. Bruce Coons  
Executive Director  
Save Our Heritage Organisation  
2476 San Diego Avenue  
San Diego, CA 92110

Mr. Mike Singleton, Chair  
Mission Hills Residents Group  
c/o KTU+A  
3916 Normal Street  
San Diego, CA 92103

Mr. Thurston Coe  
Chair  
Old Town Comm Plng Comm  
2836 Juan Street  
San Diego, CA 92110
Hello Tinya:

Attached is the information response letter and attachments which include:

- Airport Master Plan Traffic Mitigation Measures (this is a large file and could not be emailed)
- Grading Plan
- List of Interest Parties

A hard copy of the letter and all three attachments have also been mailed to you.

Please contact me if you have any further questions.

Thank you,

Ted Anasis, AICP
Manager | Airport Planning
T 619.400.2478
tanasis@san.org

San Diego County Regional Airport Authority, P.O. Box 82776, San Diego, CA 92138-2776
EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Greg Cox

1) Name or description of project: San Diego Int'l Airport - Terminal 2 Parking Plaza

2) Date and time of receipt of communication: April 13, 2016 at 3:00pm

3) Location of communication: San Diego

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Mike Kulis

5) Identity of person(s) on whose behalf communication was made:
   San Diego County Regional Airport Authority

6) Identity of persons(s) receiving communication: Greg Murphy, for Greg Cox

7) Identity of all person(s) present during the communication:
   Mike Kulis and Ted Anasis

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Greg Murphy on my staff received a briefing from Mike Kulis and Ted Anasis, representing the San Diego County Regional Airport Authority. They went through a project briefing book that was previously submitted to staff for the proposed Terminal 2 Parking Plaza. The parking structure would be built according to LEED standards, including 30 Electric Vehicle Charging stations and stormwater retention measures, and would allow for the future installation of a solar panel canopy. They said the project would provide 3,000 much needed short-term parking stations, and would utilize state-of-the-art parking management software.

4/14/15
Date

Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.
April 13, 2015

FILE COPY

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

Re: Coastal Development Permit Application #6-14-1886

Dear Mr. Anasis:

Thank you for your letters dated March 6, 2015 and March 26, 2015, regarding the above-referenced submittal by the San Diego Regional Airport Authority (SDRAA) for the construction of a three-level parking structure at Terminal Two of the San Diego International Airport (Airport). Commission staff has reviewed your letters in response to our non-filing letters, dated December 23, 2014 and March 20, 2015, and continues to find that additional information is necessary in order to properly review this application. Therefore, at this time, the subject submittal is still deemed to be incomplete. Please provide the following information:

1. In two letters to the Commission, dated March 27, 2009 and June 4, 2009, regarding the coastal development permit application for the Terminal Two expansion (CDP No. 6-09-15), the Airport Authority indicated that the Authority would not be constructing a parking structure at Terminal Two for a number of reasons, including feedback from the regional transportation agencies and the public, who were concerned about increased traffic. In addition, it was stated that a shortfall in on-site parking would result in a shift to public transit, shared vehicle rides, and off-airport parking facility shuttles; the Authority also indicated that additional parking facilities may not be needed in the future if the demand for parking is met by increased transit use by airport passengers. Specifically, in the March 27, 2009 letter, it states "[p]erhaps the most ‘leading edge’ of this project is the assumption of increasing reliance on public transportation to serve airport passengers. In coordination with the City of San Diego and the San Diego Association of Governments (SANDAG), this will be a major airport terminal expansion encouraging airport users to utilize existing public transportation rather than expand vehicle parking.” Therefore, based on this statement and the findings of approval for CDP No. 6-09-15 for the Terminal Two expansion, it was staff’s understanding that the Airport supported the strategy recommended by the regional transportation agencies and interested stakeholders to reduce reliance on the availability of vehicle parking at the airport in order to reduce airport-related vehicle trips and traffic congestion on North Harbor Drive.
For the Commission, a primary concern is the impact of airport-related trip generation to major coastal access routes such as North Harbor Drive. North Harbor Drive serves as a primary access route not only to the Airport but to and along the Bayfront promenade, Harbor Island, the sportsfishing interests, Shelter Island, Cabrillo Monument, Point Loma and many other coastal destinations. The Airport Authority specifically deleted the parking structure in the original application for Terminal Two construction and represented that diversion of airport patrons to alternate transit and/or off-site parking reservoirs would serve to lessen trips on North Harbor Drive. Although it was noted that the Airport had a current deficiency of 2,800 parking spaces that was forecast to grow to 5,000 spaces needed by 2030, the decision was still made by the Authority to delete the originally planned parking structure. It was noted at that time that 6,000 parking spaces existed in long-term parking facilities located off-site and operated by private entities.

In the more recent response letters, dated March 6, 2015 and March 26, 2015, the immediate need for 3,000 spaces was identified based on the parking analysis by Leigh Fisher Associates. However, in the previous letter, dated June 4, 2009, the Airport had already identified a deficiency of 2,800 parking spaces, but did not pursue construction of a parking structure, and stated that airport users would shift to alternate transportation modes. In the March 6, 2015 letter, it is stated that almost immediately with the start of operations at Terminal Two in 2013, the existing surface parking at Terminal Two was not adequate to meet parking demand and that airport users had to circulate to other parking facilities, use public transit, or arrange to be dropped off and picked up at the terminal. However, based on the Authority’s correspondence in 2009, it was anticipated that a shift to alternative transportation modes would occur and a parking structure was not needed. There is no substantiated explanation for the different conclusions. Furthermore, in May 2008, the adopted SDIA Master Plan forecast an annual growth rate of passengers at approximately 2 – 3%. In the response letter, dated March 6, 2015, it is noted that from 2008 to 2014, the annual growth rate of passengers, inclusive of Terminal Two operation, has been 1 – 2% and therefore below the original forecasts. In addition, it is stated that an “updated passenger forecast was prepared for the next phase of master planning at San Diego International Airport predicts approximately 1 – 2% annual growth in passengers through the planning horizon year of 2035.” Therefore, current projections for passenger growth clearly fall within the Master Plan forecast when no parking structure was proposed. It appears that a change occurred with the certification of the 2014 Addendum to the 2008 Final EIR but there is no substantiation provided to date.

Please explain in greater detail why the Airport is now pursuing the construction of a parking structure, what specific circumstances have changed, and whether alternatives to the proposed parking structure (e.g. increased public transit, increased shuttles to other airport parking lots, construction of a consolidated parking structure located on Pacific Highway or other options) have been considered to offset parking demand at Terminal Two and minimize traffic impacts on North Harbor Drive. If a comprehensive alternatives analysis has not been conducted, please do so and provide a detailed analysis of the feasibility of alternatives including: 1) no project
and increased alternate transit use (both public and commercial entities); 2) parking structure located at Pacific Highway; and 3) a smaller structure with less bulk and scale at Terminal Two. Please be sure to update the inventory of off-site commercial parking facilities and also provide a copy of the parking analysis conducted by Leigh Fisher Associates.

2. In our previous letters, we requested information regarding the anticipated traffic impacts that would result from the proposed project, including the existing level of service (LOS) on North Harbor Drive and the projected LOS with the proposed parking structure. The response letter, dated March 26, 2015, referred to the FEIR to compare traffic between the Airport Implementation Plan with and without the parking structure. However, the FEIR uses outdated information, such as the 2004 San Diego International Airport passenger forecasts, traffic count data prepared in 2004, and the Series 10 Regional Transportation Plan. Although the Addendum to the EIR examined updated traffic counts and models, only the existing traffic volumes for North Harbor Drive were examined. There was no analysis of the LOS along North Harbor Drive with a parking structure. Therefore, please provide the existing LOS and the projected LOS with the proposed parking structure for North Harbor Drive that uses the most recent data available. Please be sure to include an analysis of summertime and weekend traffic counts in this review and explain in greater detail how traffic on North Harbor Drive will be impacted, with a focus on accessibility for coastal visitors, not just airport users.

3. An inventory of only the existing public parking spaces at the Airport was provided; however, the description of parking utilization (i.e. occupancy rates), and current and projected parking demand for all Airport Authority controlled parking lots was not provided. As requested in both our letters, please provide this information. The utilization rates and occupancy patterns for all of the Airport’s parking facilities is necessary to understand if there is capacity in those lots that could be utilized to address any parking deficiency at Terminal Two. Alternate transit opportunities to other Airport managed parking facilities could provide relief. In this vein, please address the impediments to using alternate transit, such as concerns about shuttle reliability and accessibility; poor shuttle frequency; absence of assistance with luggage and limited traveler services, that diminish its use. Please explain what the Airport Authority is doing and could do to encourage the use of alternate transit in its operations.

In addition, please confirm when the total number of parking spaces associated with this project will be finalized. Please confirm the breakdown of the parking spaces within the parking structure, the spaces reserved for the USO facility, and the reconfigured surface spaces outside the parking structure.

4. Please provide an update on the status of the measures in the Airport Transit Plan. Special Condition No. 6 of CDP No. 6-09-15 required an updated, comprehensive Transit Plan and annual status reports, which should include at a minimum: 1) An evaluation of the progress made with MTS or by the applicant in providing a direct airport bus or shuttle from the Old Town Station for the use of airport visitors; 2) An
evaluation of the progress made with MTS or by the applicant in adding direct airport bus or shuttle linkages to Lindbergh Field from the existing San Diego Trolley stations located inland of Pacific Highway between Old Town Station and the Santa Fe Station; and 3) An evaluation of progress made with MTS in expanding MTS direct bus service to Lindbergh Field including, but not limited to, expanding MTS bus routes and/or existing service from weekends only to weekday service. Also, please provide a copy of the latest Airport Transit Plan and any reports that have been prepared subsequently.

5. On Page 3 of the submitted application, please include the breakdown of building area or hardscape versus landscaped area for the proposed project area. In addition, please provide a breakdown of the pervious area versus the impervious area.

6. In the most recent response, it is stated that using large canopy trees is not feasible due to increased watering concerns. The following trees are drought-tolerant trees that could provide screening: Torrey pines, Coast live oak, California bay, and California sycamore. Please examine the feasibility of using these trees. In addition, the proposed project includes vertical vegetation in the light wells of the parking structure. Therefore, please explain whether similar vertical vegetation could be used on the façade of the structure in order to provide screening and soften the potential visual impacts.

7. Please provide a visual simulation of the parking structure from the perspective of vehicle passengers and pedestrians traveling on North Harbor Drive. The submitted Visual Analysis includes several simulations of the proposed parking structure from a distance; however, a visual simulation that depicts the structure from a closer perspective, directly adjacent to North Harbor Drive, will help illustrate the potential visual impacts of the proposed parking structure.

8. Copy of any local discretionary approvals or other agency permits required for this project.

In addition, on February 26, 2015, a water quality analysis was provided. Based on our water quality specialist’s review, additional information is needed. As requested in our March 20, 2015 letter, please provide the following:

- Please provide information on whether the soils underlying the site and the hydrology are favorable to infiltration of parking lot runoff, and whether the treatment BMPs are designed as flow-through or infiltration BMPs.

- Please show how runoff will flow into the storm drains and BMPs.

- Please examine the feasibility of 1) the consolidation of the outfalls to the bay, 2) treatment of runoff up to the 95th percentile storm event and 3) treatment of runoff from any adjacent, untreated airport roads or parking areas.
• Please provide information on how the covered parking area (1st and 2nd level parking) will be plumbed (e.g., trench drains at the entries and a connection to the sanitary sewer).

• Please state whether all the runoff will flow into vault-type media filters (Contech). It is unclear whether or not there is more than one existing filter. Please clarify.

• Please explain whether redundant runoff treatment has been considered (e.g., bioswale draining to media filter) for greater protection.

• It is unclear if the project will use permeable pavement concrete or pavers. Table 1 of the water quality analysis does not agree with the stormwater concept plan (Sheet 11). Please also determine whether 1) it possible to have landscaped ‘treatment’ BMPs on the upper deck, 2) the area of permeable surface has been maximized and 3) other proposed impervious surfaces can be made permeable.

• Please describe how lot-sweeping will be handled given that it is occupied/active 24/7 and how trash will be addressed besides sweeping.

Please do not limit your submittal to the above mentioned items. You may submit any information which you feel may help Commission staff gain a clear understanding of the scope of your project. When all required information is received, reviewed by staff, and found to be adequate to analyze the project, your application will be filed and scheduled on the next available Commission agenda. If you have any questions, please feel free to call me at the above office.

Sincerely,

[Signature]

Tinya Hoang
Coastal Program Analyst
Subject: RE: SDCRAA-Parking Plaza

-----Original Message-----
From: Andi Culbertson [mailto:mac@aculbertsonlaw.com]
Sent: Wednesday, April 15, 2015 10:31 AM
To: Lee, Deborah@Coastal
Cc: Anasis Ted
Subject: SDCRAA-Parking Plaza

Dear Deborah -

Thank you for your time in discussion yesterday afternoon. I have spoken with Ted, and here is the update on the parking plaza project:

1. Ted will have a table prepared depicting the trips generated by the new 1700 spaces (remember that there are already 1300 spaces in the surface lot so the difference in the structure is 1700 additional spaces) and calculate the offset in traffic on North Harbor Drive as a result of the relocation of the rental car component, north area parking, the interior road to carry passengers to and from the terminals and the transit patronage. We believe it is important to consider these numbers in their appropriate context, as the increase of 1700 spaces does not actually add trips to North Harbor Drive.

2. Ted will have an analysis prepared of the capacity and utilization of airport parking lots. As we discussed, the airport is at saturation on Tuesdays, Wednesdays and Thursdays. We will provide a few pictures to show you the lengths to which people will go to park in front of Terminal 2 when there are no parking spaces available. The only “airport-controlled” parking lots we have are the existing one where the plaza will be built, one to the south that is long term parking, and the new one in the north area that is served by the interior circulation road. We should be able to give you a table showing the saturation, but a parking review (like a monitor counting spaces and cars over a period of time) is not available.

We ask that you consider that the Authority would not spend millions of dollars to build a parking structure if they did not need it. They are the actual experts in what they need since they are the operators of the airport.

3. We discussed landscaping for screening. First, the Authority is developing facade treatments as they have in other buildings; the design has not yet been selected but there will be facade treatment. Second, vegetation - such as the trees that are suggested in the letter - will interfere with the bioswale performance. Since this is a tight spot, and the roots of the suggested trees are extensive (that’s why they are drought tolerant), our water quality people do not believe that the bioswale will perform as well. Given that we are doing facade treatment, and that the traveller (even a bicyclist or walker) is not looking at a “coastal view” when looking at the airport, we request that our proposal be considered sufficient as proposed.

4. You and your staff will receive a revised water quality report and cover letter addressing the outfall issue shortly, probably this week. It will be responsive to the CCC’s recent letter. However, we believe the outfall question is both beyond the scope of this project, and in any event was asked and answered in connection with the force main project as we discussed. We agree and understand that staff turnover might have obscured this past analysis, so we are pointing to it in our cover letter transmitting the water quality report, including the concurrence by the CCC with our alternatives analysis in its findings on the force main. We also want to point out that the parking plaza is located in an area served by already-installed improvements for water quality approved in connection with the Terminal 2 expansion. We believe that this needs to be recognized by the CCC staff in that much of the treatment devices are already in place.
5. Ted and I will prepare an explanation to lead you and your staff through the history of how we have arrived at the conclusion that the parking plaza is necessary. We will explain what we thought was going to occur when we abandoned the structure in 2009, and explain how our assumptions about transit - through no fault of the Authority - have not reached the numbers that we thought they would, likely due to the fact that transit schedules are controlled by others and do not operate at the hours required by some prospective patrons. Operationally, we need the parking plaza and its additional 1700 spaces, irrespective of transit or other options. We ask that this be considered also in light of the trips that we have taken off North Harbor drive in connection with the interior road and the rental car center relocation.

Ted and I are available to meet on the following dates:

Wed. April 22
Friday April 24
Monday April 27
Tuesday April 28

I hope that one of these days will work for you! Let me know if you wish to talk this afternoon.

Thanks,

Andi Culbertson
April 24, 2015

Ms. Tinya Hoang
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Parking Plaza at Terminal Two, San Diego International Airport
Application No. 6-14-1886

Dear Ms. Hoang:

In response to your request for additional information, the San Diego County Regional Airport Authority (SD CRAA) has prepared this letter to provide information regarding the following items identified in the April 13, 2015 letter:

- Item #5 - Information regarding building vs. landscaped areas as well as impervious vs. pervious areas; and
- A revised water quality analysis addressing all eight bulleted comments.

Building/hardscape versus landscaped area

As a modification to Page 3 of the submitted application, the following provides the existing and proposed conditions as depicted in Figures in Attachment A:

<table>
<thead>
<tr>
<th>Description</th>
<th>Existing Condition (Acres)</th>
<th>Proposed Condition (Acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asphalt Concrete Pavement</td>
<td>9.30</td>
<td>0.66</td>
</tr>
<tr>
<td>Concrete Hardscape</td>
<td>0.28</td>
<td>0.75</td>
</tr>
<tr>
<td>Existing Building</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>Parking Plaza Structure</td>
<td>-</td>
<td>7.99</td>
</tr>
<tr>
<td>Landscape Area</td>
<td>1.27</td>
<td>1.47</td>
</tr>
<tr>
<td>Pervious Paver</td>
<td>0.65</td>
<td>0.63</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>11.54</strong></td>
<td><strong>11.54</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description</th>
<th>Existing Condition (Acres)</th>
<th>Proposed Condition (Acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impervious Cover</td>
<td>9.62</td>
<td>9.44</td>
</tr>
<tr>
<td>Pervious Cover</td>
<td>1.92</td>
<td>2.10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>11.54</strong></td>
<td><strong>11.54</strong></td>
</tr>
</tbody>
</table>

As provided in the above table, the project proposes a net reduction in the amount of impervious area over the existing conditions and increases pervious areas by 0.18 acre.
Revised water quality analysis

A revised water quality analysis is included as Attachment B that addresses the additional information requested by the Coastal Commission’s water quality specialist. Of particular note, is the determination that the consolidation of the outfalls to San Diego Bay is not feasible. This aspect deserves special attention as it has been addressed in a previous permit. Moreover, it is not related to the proposed project, which is a parking structure in an area designated by the Airport Master Plan for vehicle parking. Evaluating the consolidation of these many outfalls is beyond the scope of this project and would require multi-jurisdictional coordination including the RWQCB, the City of San Diego, and the Port of San Diego. It should be remembered that this airport was originally constructed prior to World War II, and that many facilities under the airport complex date from periods prior to 1970.

In connection with CDP #6-12-065 which addressed a storm drain, and was related to the issue of outfalls, the SDCRAA – at CCC staff request – prepared an alternatives analysis to the proposed project, including addressing the question of whether outfalls could be consolidated and/or eliminated. The analysis disclosed several critical obstacles to the outfall elimination idea, not the least of which is that remedial construction would require construction under the only runway at the airport. As the airport operates on a 24-hour basis, such construction would require closing the airport. The duration of closure is unknown, as the operation of heavy aircraft at the airport could be compromised during construction below the airfield. Fortunately, the North Area force main project was able to reduce the flows to outfalls to San Diego Bay, as opposed to the Navy Channel, by treating and diverting such flows to the outfall approved in connection with the Terminal 2 expansion (CDP #06-09-15), which is a modern form of outfall. The force main project and North Area improvements also substantially reduced flows over what is occurring now by low impact development (LID) methods.

The CCC staff report for the force main concurred in the alternatives analysis that the airport-wide elimination of outfalls was infeasible (Staff report 2-20-2014, pages 9-11). In summary, numerous constraints affect the ability of the SDCRAA to even undertake an outfall elimination project even if the airfield and runway were not compromised. The storm drain and outfall system beneath the Airport was constructed and maintained by the City of San Diego and serves water drainage areas uphill from the Airport that flow to San Diego Bay in stormwater drains below the airfield system that was improved prior to the creation of the Port of San Diego in 1963 and the creation of the SDCRAA in 2003. The existing outfalls serve multiple residential and commercial areas upgradient from the Airport and flow below the runway and under the Airport onto the Port of San Diego and to outfalls to San Diego Bay. Therefore, it is not fully within the power of the SDCRAA to independently “close” certain outfalls, as they are not owned or operated by the SDCRAA. Importantly, the existing outfalls are located off the Airport in areas that are not even under the jurisdictional control of the SDCRAA.

In considering water quality issues with respect to the proposed project, it is important to consider that the proposed project is located within the terminal and roadway improvements implemented from 2009 to 2013 to capture and filter stormwater from the existing surface parking area. These improvements were part of a comprehensive program to treat storm
flows on the south side of the airport and were sized to accommodate this proposed parking plaza site. Further, the parking plaza footprint and drainage area is served by three existing media filters, fulfilling the maximum requirements of the Coastal Commission and the RWQCB.

The proposed parking plaza is regulated under three existing stormwater permits:

<table>
<thead>
<tr>
<th>Stormwater Permits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction General Permit (SWRCB Water Quality Order No. 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-006-DWQ)).</td>
</tr>
<tr>
<td>San Diego RWQCB, Order No R9-2013-0001, NPDES No. CAS0109266 (referred to as the San Diego Municipal Separate Storm Sewer Permit (MS4 Permit)).</td>
</tr>
</tbody>
</table>

In conclusion, the water quality management approach for the parking plaza meets all reasonable and feasible water treatment requirements. The SDCRAA has fulfilled all of the requirements of the applicable regulations in pursuing the parking plaza, and is deriving benefit from improvements already granted by the Coastal Commission in connection with the Terminal Two expansion. This "continuum" of improvements implemented in early stages of the airport’s reconstruction must not be forgotten as the Airport implements additional features within these areas, which the improvements were intended, in part, to address.

If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.

Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

Attachment A – Existing and Proposed Conditions (Figures 1 and 2)
Attachment B – Revised Water Quality Analysis

Dist:
Kanani Brown (without attachments)
Deborah Lee (without attachments)
Memorandum

Date: April 28, 2015
To: Tinya Hoang, California Coastal Commission
From: Ted Anasis, Manager, Airport Planning
Subject: Parking Plaza at Terminal Two, San Diego International Airport
Application No. 6-14-1886

In reference to my letter dated April 24, 2015 (response to your request for additional information), attached please find corrected versions of Figure 1 and Figure 2.

If you have any questions, please contact me at tanasis@san.org or at (619) 400-2478.

TNA/ljt

Attachments:
1) Figure 1, Preliminary Impervious Cover Analysis – Existing Conditions
2) Figure 2, Preliminary Impervious Cover Analysis – Proposed Conditions
Dear Deborah and Kanani:

The San Diego County Regional Airport Authority (SDCRAA) has submitted written responses to all questions raised by the CCC staff in their letters of December 23, 2014, March 20, 2015, and April 13, 2015. In anticipation of our upcoming meeting, the San Diego County Regional Airport Authority would like to assist by summarizing the analyses that was provided in our response letters. This email is intended to address a consistent theme in the CCC letters which may belie a misunderstanding of the population of users for the proposed parking plaza. The relation of regional transit to this service population is extremely important to understand, and also differentiate between other service populations. For this reason, SDCRAA wishes to restate and emphasize the differences.

The proposed parking plaza is aimed at serving the needs of residents of San Diego who use the airport and require terminal area parking. These residents are not candidates to use transit or long-term parking that requires a shuttle ride to the terminals. It is not likely to be used by tourists or visitors, as they will use other means of transportation (rental cars, taxis, hotel shuttles, etc.). For this reason, it is critical to distinguish between the various public transportation systems available, and whether the patrons of those systems would be potential users of the parking plaza. If these types of patrons are not potential users of the parking plaza, there is no relevance to whether that type of public transportation system exists or not. For example, Civic San Diego is considering an on-call demand shuttle for downtown patrons within the limits of the downtown central business district. This service does not extend to the airport in the current configuration under study, but even if it did, the user - a tourist or visitor who arrived by air - would not use the parking plaza in any event. Therefore, whether the downtown on-call shuttle is established or not has no bearing whatsoever on the need for the parking plaza. It is simply a different service population.

A more relevant comparison is what the SDCRAA has presented in its original documentation and supplemental responses. The closure of the Terminal Two surface parking area during the Green Build/Terminal Two expansion construction resulted in no measurable increase in public transit usage on the Route 992 bus that is operated by MTS along Broadway/Santa Fe Depot to the airport. But more importantly, the closure resulted in increases in the number of vehicle trips to and from the airport on North Harbor Drive from 2009 to 2013 as airport patrons chose to use “rides” from family and friends, shuttles, taxis, transportation network companies and other means to reach the airport. As compared with a terminal area parking who generates one trip to the airport on departure, and one trip out of the airport upon returning to SAN, not providing adequate terminal area parking actually results in four vehicle trips for an arriving and departing passenger to SAN: two trips to the airport to drop off a departing resident passenger and two vehicle trips to pick up the arriving resident passenger. Therefore, the parking plaza will actually reduce the vehicle trips that occurred when the terminal area parking lot was closed. An analysis of this was provided in an technical memo from Leigh Fisher Associates attached to the SDCRAA response letter. The airport patrons' resistance or choice
not to use public transit in this “real world” actual condition demonstrates that a segment of the resident passenger patronage wishes to drive to the airport, park, take their trip, and drive out. This is the service population that the SDCRAA is addressing by providing a net increase of 1700 terminal area spaces with the proposed parking plaza. A “no project” alternative to the proposed parking plaza will not increase public transit use for residents. As demonstrated from 2009 to 2013, not providing adequate terminal area parking resulted in increased vehicle trips to the terminal curbside for passengers who could not find parking and began using other means to get to the airport. Therefore, on the basis of this substantial evidence, there is little correlation between increases or decreases in transit use to the airport and the use of the parking plaza.

We have 2012 data, which is when existing spaces were unavailable due to construction.

The SDCRAA hopes this summary is helpful and we look forward to discussing with you at our upcoming meeting. Please contact me if you have any further questions.

Thank you,

Ted Anasis, AICP
Manager | Airport Planning
T 619.400.2478
tanasis@san.org

www.san.org | Facebook | Twitter
San Diego County Regional Airport Authority, P.O. Box 82776, San Diego, CA 92138-2776
(MAP) in 2010 to 28.2 MAP in 2030. This represents an increase in trip generation of approximately 6,300 ADT or 4.7% from the No Project Alternative in 2030. Trips from most airport modes were estimated to increase relative to origin and destination passenger growth. However, schedule driven modes such as public buses, and airport operated inter-terminal, employee and public parking shuttles were estimated to grow at a slower rate as many of these shuttles currently operate with excess capacity to maintain a set schedule. This results in a slight decrease in the trip generation rate from 1.86 to 1.82 in 2010 and 2030, respectively. This has also been demonstrated by a historical downward trend witnessed at SDIA.

### Table D-38

**2010-2030 Airport Trip Generation – Proposed Airport Implementation Plan**

(With Parking Structure)

<table>
<thead>
<tr>
<th>Activity</th>
<th>2005</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Airport Passenger Activity Level</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Million Annual Passengers (MAP)</td>
<td>17.4</td>
<td>19.5</td>
<td>22.8</td>
<td>25.1</td>
<td>26.6</td>
<td>28.2</td>
</tr>
<tr>
<td>Million Annual O&amp;D Passengers</td>
<td>18.7</td>
<td>18.6</td>
<td>21.8</td>
<td>24.0</td>
<td>25.4</td>
<td>27.0</td>
</tr>
<tr>
<td>Daily O&amp;D Passengers</td>
<td>45,830</td>
<td>51,076</td>
<td>59,770</td>
<td>66,220</td>
<td>70,553</td>
<td>74,199</td>
</tr>
<tr>
<td><strong>Airport Trip Generation (1)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Daily</td>
<td>85,100</td>
<td>94,600</td>
<td>109,500</td>
<td>129,900</td>
<td>128,500</td>
<td>135,000</td>
</tr>
<tr>
<td>In</td>
<td>42,600</td>
<td>47,350</td>
<td>54,800</td>
<td>60,500</td>
<td>64,300</td>
<td>67,550</td>
</tr>
<tr>
<td>Out</td>
<td>42,500</td>
<td>47,250</td>
<td>54,700</td>
<td>60,400</td>
<td>64,200</td>
<td>67,450</td>
</tr>
<tr>
<td>AM Peak Hour</td>
<td>3,180</td>
<td>3,530</td>
<td>4,095</td>
<td>4,550</td>
<td>4,800</td>
<td>5,070</td>
</tr>
<tr>
<td>In</td>
<td>1,720</td>
<td>1,955</td>
<td>2,265</td>
<td>2,500</td>
<td>2,650</td>
<td>2,790</td>
</tr>
<tr>
<td>Out</td>
<td>1,420</td>
<td>1,575</td>
<td>1,830</td>
<td>2,050</td>
<td>2,150</td>
<td>2,280</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td>3,245</td>
<td>3,620</td>
<td>4,190</td>
<td>4,650</td>
<td>4,950</td>
<td>5,205</td>
</tr>
<tr>
<td>In</td>
<td>1,500</td>
<td>1,675</td>
<td>1,840</td>
<td>2,150</td>
<td>2,300</td>
<td>2,415</td>
</tr>
<tr>
<td>Out</td>
<td>1,745</td>
<td>1,945</td>
<td>2,250</td>
<td>2,500</td>
<td>2,650</td>
<td>2,790</td>
</tr>
<tr>
<td><strong>Trip Rate</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Daily</td>
<td>1.86</td>
<td>1.85</td>
<td>1.83</td>
<td>1.83</td>
<td>1.82</td>
<td>1.82</td>
</tr>
</tbody>
</table>

O&D = origin and destination

Numbers may not add due to rounding.

(1) Includes terminals and associated facilities, SAN Park lots, rental car facilities on Rental Car Road, Employee Lot 8 on Harbor Island Drive, and north area. Does not include private vehicle trips to private off-airport parking and rental car facilities, but includes shuttle trips between these facilities and the terminals.


Under existing conditions, Terminal 1 accommodates approximately 54% of the passenger activity. The Implementation Plan would shift passenger activity to Terminal 2 (East and West) accommodating 51% of passenger activity in 2010, and up to 56% in 2030, as shown in Table D-39. The distribution of passengers (and traffic) among terminals would differ among the alternatives, as shown in Table D-42. Under existing conditions, the distribution of SDIA passengers among the terminals is approximately 55% at Terminal 1, 40% at Terminal 2 (East and West), and 5% at the Commuter Terminal. Under the No Project Alternative, the passenger split would be approximately 50%, 45%, and 5% at Terminal 1, Terminal 2 (East and West), and the Commuter Terminal, respectively, in 2015.

The change in passenger distribution between terminals would result in redistribution of traffic at the terminal access driveways along North Harbor Drive. However, the change in passenger distribution would not affect the traffic pattern outside of the study area which is assumed to be the same as the No Project Alternative.
5-22-15 Meeting

ITEMS TO DISCUSS

• Need for Terminal Area Parking
• Traffic on North Harbor Drive with Rental Car Center and Parking Plaza
• Transit
• Construction Schedule for Parking Plaza
Need for Terminal Area Parking

LeighFisher Associates presented to SDCRAA Board:

• SAN needs 7,000 total spaces required within walking distance of the terminals by 2035
• Terminal Area Parking is needed for airport users that are not candidates for long-term parking with a shuttle or transit.
• SAN needs 3,000 spaces at Terminal Two immediately
• The parking structure will have smart parking technology and guidance systems to move parkers quickly to available spaces.
SAN has an observable close-in parking problem

Terminal Two - June 2014

Parking on Fire Lane  Parking in thru lanes  Parking at ends of rows
SAN has an observable close-in parking problem
Terminal Two - June 2014

Driving over fixed cones  Double parked on red curb  Driving over fixed cones
## Traffic on North Harbor Drive

with Rental Car Center and Parking Plaza

<table>
<thead>
<tr>
<th>Year</th>
<th>Description</th>
<th>Daily ADT</th>
<th>ADTs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>Existing ADT on North Harbor Drive (from 2008 EIR) Rental Car Road to Laurel Street Segment</td>
<td>7,644 daily 2,790,000 annual</td>
<td>74,100</td>
</tr>
<tr>
<td>2013</td>
<td>Existing ADT on North Harbor Drive Rental Car Road to Laurel Street Segment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>Rental Car Center related trips removed from North Harbor Drive Rental Car Road to Laurel Street Segment</td>
<td>470 daily 172,000 annual</td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>Parking Plaza trips removed from North Harbor Drive Rental Car Road to Laurel Street Segment when 1700 additional parking spaces provided at Terminal Two</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>Forecast ADT on North Harbor Drive when Rental Car Center and Parking Plaza both in operations</td>
<td></td>
<td>65,986</td>
</tr>
<tr>
<td>2020</td>
<td>Forecast ADT on North Harbor Drive (from 2008 EIR)</td>
<td></td>
<td>116,100</td>
</tr>
</tbody>
</table>

Based on 2014 transactions
FY 2014 Annual Rental Car and Rental Car Courtesy Vehicle Trips on Harbor Drive

Rental car courtesy vehicles

Companies on Harbor Drive
Companies located elsewhere

Rental cars

Source: LeighFisher, based on FY 2014 rental car transaction and courtesy vehicle information provided by SDCRAA.

How 2.7 M annual calculated
# Construction Schedule

<table>
<thead>
<tr>
<th>Description</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Commission Hearing</td>
<td>July 10, 2015</td>
</tr>
<tr>
<td>Board Approval of Design-Builder</td>
<td>July 23, 2015</td>
</tr>
<tr>
<td>Contracting Period</td>
<td>August - September 2015</td>
</tr>
<tr>
<td>Design/Pre-Construction</td>
<td>October - November 2015</td>
</tr>
<tr>
<td>Construction</td>
<td>December 2015 to April 2017</td>
</tr>
<tr>
<td>Final Testing of Smart Parking Technologies and Activation of Parking Plaza</td>
<td>May 2017</td>
</tr>
<tr>
<td>Parking Plaza Opening</td>
<td>June 2017</td>
</tr>
</tbody>
</table>
May 26, 2015

FILE COPY

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

Re: Coastal Development Permit Application #6-14-1886

Dear Mr. Anasis:

Thank you for your letters dated April 24, 2015 and May 4, 2015 in response to our April 13, 2015 letter, regarding the above-referenced submittal by the San Diego County Regional Airport Authority (Airport Authority) for the construction of a three-level parking structure at Terminal Two of the San Diego International Airport (Airport). In addition, thank you for meeting with us on May 22, 2015 to discuss the subject project. Based on review of these letters and the discussion at our May 22, 2015 meeting, additional information is necessary in order to properly review this application. Therefore, at this time, the subject submittal is still deemed to be incomplete.

As we expressed in our 5/22/15 meeting, the principal Chapter Three policies of the Coastal Act that must be evaluated with this proposal include Section 30210 (maximize access); Section 30231 (water quality protection); Section 30251 (scenic resources/public view preservation); Section 30252 (maintain and enhance public access through alternate transit) and Section 30253 (promote air quality; energy conservation and reduce vehicle miles traveled). In order to evaluate these issues, please provide the following information:

1. The provided Leigh Fisher memorandum relies upon the results of a 2012 International Airport Passenger Intercept Survey and data from fiscal year 2011. Please provide a copy of this survey, as well as the methodology, number of people surveyed, and all results of the survey. The 2012 survey was conducted during construction of the Terminal Two expansion when close-in parking at the terminal was unavailable and thus represents a period when there was a greater parking constraint than exists today. Given the particular parking deficits and operational constraints present during that construction period, it is likely that user responses could have been skewed. Therefore, please provide more up-to-date data and surveys that better represent existing conditions including, but not limited to, how passengers are accessing the Airport, annual transactions and annual parking transactions.

2. On Page 4 of the provided Leigh Fisher memorandum, it states that the demand for close-in parking currently exceeds capacity and is expected to continue to exceed capacity in the future; however, it does not identify how the immediate demand for
an additional 1,441 parking spaces was determined. Please provide a detailed analysis of how this figure was calculated. In addition, as part of the Airport Development Plan, the Airport Authority projects that the Airport will require 7,300 close-in (walkable) parking spaces and 3,800 remote (shuttled) parking spaces for a total of 11,100 total on-airport parking spaces by 2031-2049. Please explain how the Airport Authority anticipates meeting this future demand.

3. Thank you for providing the average daily peak occupancies for the Terminal One, Terminal Two East, Terminal Two West, Harbor Drive, and Pacific Highway parking lots located on Airport property. Please provide information on the Airport Authority’s existing parking management program for each of these lots including, but not limited to, shuttle services, shuttle frequencies, patron assistance, marketing, price structure, etc. Figure 1 on Page 12 of the provided Leigh Fisher memorandum shows that the average daily peak occupancy rate for Terminal Two West is extremely low (only 19-35%) despite being situated in close proximity to the terminal. Please examine the feasibility of implementing parking management strategies (e.g. shuttle provision, reduced pricing or increased marketing) to increase utilization of the existing parking lot to help meet the demand for close-in parking in the interim.

4. Projections regarding the number of Rental Car Center related trips and the number of parking plaza related trips that are anticipated to be removed from North Harbor Drive were presented on Slides 5-6 of the presentation from our May 22, 2015 meeting. Please provide a detailed description of the data and calculations used to determine these projections. As part of this description, please identify whether the projections include any increase in trips from customers switching from remote parking to close-in parking, as assumed in Tables 6 and 7 of the provided Leigh Fisher memorandum.

5. The Airport Authority’s May 4, 2015 letter states the proposed project would not result in a “significant impact” to level of service (LOS); however, in order to understand the potential traffic impacts, a detailed analysis of the existing LOS compared with the corresponding future LOS on all segments of North Harbor Drive – with and without the proposed 3,000 space parking structure – is required. As discussed at the May 22, 2015 meeting, please use the most up-to-date data to provide an accurate baseline of existing traffic conditions (average daily trips (ADT) and associated LOS) on all segments of North Harbor Drive, as well as an estimate of the ADT and associated LOS with the proposed 3,000 space parking structure and without the proposed 3,000 space parking structure. As a part of this traffic analysis, please provide a detailed discussion of the data, modeling, and assumptions used.

Although the Airport Authority has previously referred us to Tables 3 and 4 in Appendix B of the 2014 Addendum to the EIR, these tables do not provide enough information to determine if there will be any changes in the LOS on North Harbor Drive and were compiled based upon traffic analysis conducted for a much larger 5,000 parking structure. For example, while Table 3 provides the ADT volumes from 2013, the associated LOS is only provided for four of the street segments on
North Harbor Drive. While Table 4 provides the future ADT volumes with the parking structure for 2035 (using the SANDAG Series 12 model), the associated LOS is only provided for one of the street segments on North Harbor Drive. According to the memorandum prepared by Linscott Law & Greenspan, Table 4 is intended to demonstrate the impacts of the implementation of the Master Plan and compares the future 2035 Parking Structure Alternative with the 2030 No Project Alternative from the 2008 SDIA Master Plan EIR. However, it is unclear whether the assumptions associated with each of these underlying models is the same and whether they are appropriate to use for the subject project since circumstances have changed – specifically, the subject project includes 2,000 less parking spaces than the structure modeled for in the EIR.

Please do not limit your submittal to the above mentioned items. You may submit any information which you feel may help Commission staff gain a clear understanding of the scope of your project. When all required information is received, reviewed by staff, and found to be adequate to analyze the project, your application will be filed and scheduled on the next available Commission agenda. In addition, while not a filing requirement, it would be helpful to explain how the Airport Authority is addressing the Governor's new order to further reduce greenhouse gases in association with major facility improvements. Thank you in advance for your assistance. If you have any questions, please feel free to call me at the above office.

Sincerely,

[Signature]

Kanani Brown
Coastal Program Analyst III
May 4, 2015

Ms. Tinya Hoang  
California Coastal Commission  
San Diego Area  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 92108-4421

RE: Parking Plaza at Terminal Two, San Diego International Airport (SDIA)  
Application No. 6-14-1886

Dear Ms. Hoang:

In response to your request for additional information via letter dated April 13, 2015, the San Diego County Regional Airport Authority (SDCRAA) has prepared this letter to provide information regarding:

- #1 – Parking facility demand;  
- #2 – Traffic analysis;  
- #3 – Parking inventory;  
- #4 – Airport Transit Plan update;  
- #6 – Screening feasibility;  
- #7 – Visual simulations; and  
- #8 – Local discretionary approvals/permits.

Responses to Items #5 (building and landscape areas) and comments on the water quality analysis were addressed in a separate response letter dated April 24, 2015.

#1 – Parking Facility Demand

First, SDIA closely monitors its parking needs and is in the best position to evaluate whether terminal area parking needs are being met. SDIA’s experience over the last years has shown a need for this facility based upon: a) the parking facility needs identified in the adopted 2008 Airport Master Plan; and b) annual customer surveys that identify the need for expanded terminal area parking by Airport users. With all due respect, while the Airport will provide the explanation for the basis of its decision, the Airport also possesses the unique expertise, as a public agency and operator of the Airport, to make this judgment. The response to the CCC request is made in this light. A memorandum report has been prepared by LeighFisher (LF) to address the questions regarding parking facility demand (Attachment A). LF provides planning services to SDIA regarding airport terminal and ground transportation systems.
Some background is considered necessary to place the information in the attached memorandum in the appropriate context. The SDCRAA supports the use of transit to SDIA for passengers and employees. However, the SDCRAA does not have jurisdiction or purview over the regional transportation systems nor can it mandate that passenger or employees use transit to the Airport, particularly when transit services are not operating in the early mornings, evenings or weekends when both passengers with luggage and employees must connect to the airport.

In 2009, the SDCRAA Board determined not to pursue the parking plaza but there was no determination to “delete” or never pursue a planned parking structure in the future — the implementation was simply delayed. Further, the assertion of the CCC staff that because “projections for passenger growth clearly fall within the Master Plan forecast when no parking structure was proposed” that there is no demand for additional terminal parking is incorrect.

Between 2009 and 2014, annual passenger volumes have increased, but between 2009 and 2013 the SAN terminal area parking was closed at Terminal Two to allow for the construction of the elevated departure roadway. This allowed an opportunity to record what occurred without that terminal parking in relation to transit ridership. During that time, there was no observable increase in the daily ridership of the Route 992 bus to SAN which is the connection to the MTS and NTCD transit system. However, there was increased vehicle congestion at the curbside from passengers being picked up and dropped off. The airport is pursuing the terminal area parking to serve its airport passengers who are not candidates to use transit or remote parking facilities when traveling through the airport. It is noteworthy that the airport terminal parking is at capacity and beyond during the high travel days, namely Tuesdays, Wednesdays and Thursdays, but not on weekends or summer holidays.

While the Airport Authority supports the use of transit to San Diego International Airport, the Airport Authority cannot mandate employees or passengers to use transit to the airport. It should be noted that San Diego airport is a transportation system connecting to the state, national and international air service system. All the Bayfront facilities mentioned in the CCC letter are visited by airport passengers who arrive to the San Diego region via SDIA to visit the Bayfront promenade (including cruise ships), and the hotels, restaurants and recreation opportunities on Harbor Island, Shelter Island and Cabrillo Monument.

#2 - Traffic Analysis

An extensive traffic analysis analyzing all of the project components of the proposed Airport Master Plan, including the parking plaza, was prepared and adopted in the 2008 San Diego International Airport Master Plan Final Environmental Impact Report (FEIR). The FEIR evaluated a proposed Airport Master Plan alternative with a five-
level/5,000 space parking plaza and an Airport Master Plan alternative without a five-level/5,000 space parking plaza for all street segments, intersections, rail crossings, and freeway segments surrounding the airport, including North Harbor Drive, through the year 2030. There were other alternatives considered but eliminated for further consideration because they did not meet the purpose and need of the proposed project as described in Chapter 4, Proposed Project and Alternatives. As allowed by CEQA, the FEIR was incorporated by reference in the 2014 Addendum to the EIR.

The 2014 Addendum to the EIR included an analysis of the Airport Master Plan alternative with a proposed 5,000 space parking structure. Tables 3 and 4 included in the 2014 Addendum to the EIR include the average daily trip (ADT) volumes for North Harbor Drive in 2013 and the future years 2030 and 2035 with a proposed 5,000 space parking structure (2014 Addendum to the EIR – Appendix B, Traffic Volumes Memorandum prepared by URS/Linscott, Law & Greenspan, Pages 1-10). As cited in the 2014 Addendum to the EIR and substantiated in the LF memorandum included as Attachment A, the proposed project does not generate average daily vehicle trips that would result in a significant impact to Level of Service for AM peak hour intersection volumes, PM peak hour intersection volumes or street segments on North Harbor Drive. There is not more recent data to evaluate as the analysis does not result in a substantial increase in the traffic volumes with the implementation of the proposed parking structure. Those volumes were based upon a 5,000 space parking structure and are anticipated to be less with a 3,000 space parking structure.

These facts are important because, as shown by the attached data, the impacts of the facility – albeit larger – have already been considered and there are no changed circumstances to suggest that the conclusions in the FEIR no longer are accurate.

#3 - Parking Inventory

Attachment A provides an analysis of the parking inventory for facilities, including utilization and occupancy rates that are under the control of SDIA.

The total number of parking spaces associated with the Terminal Two close-in parking spaces are finalized and explained below. The current capacity of the Terminal Two close-in surface parking lot is 1,323 spaces. As stated above, the parking requirements identified a current need for 3,000 parking spaces in front of the terminal, leaving a current deficiency of 1,753 parking spaces. The proposed plaza would initially displace 1,247 parking spaces in its construction footprint, but allow 76 existing surface spaces to remain that are located below the elevated ramps roadway and parking circulation areas. An additional 1,753 parking spaces would be added with the proposed parking plaza, resulting in the total number of
close-in parking spaces at Terminal Two to 3,076 and available for airport passenger parking. An additional 34 surface spaces are depicted in the site plans but are not available as terminal close-in parking for airport passengers. These surface spaces are to be retained and designated for emergency, airport security, maintenance personnel, and airport volunteers. These volunteers include the Traveler's Aid/Airport Ambassadors and the United Service Organizations (USO), which is the largest USO in an airport and provides volunteer services to U.S. Service personnel and veterans when travelling through SDIA.

The following table summarizes the existing and proposed close-in Terminal Two parking spaces, including surface and structured parking spaces:

<table>
<thead>
<tr>
<th></th>
<th>Terminal Two Close-In Parking Spaces</th>
<th>Add/(Reduce)</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Surface</strong></td>
<td>Existing 1,323</td>
<td>Add/(Reduce)</td>
<td>76</td>
</tr>
<tr>
<td><strong>Plaza</strong></td>
<td>0</td>
<td>3,000</td>
<td>3,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1,323</td>
<td>1,753</td>
<td>3,076</td>
</tr>
</tbody>
</table>

Surface spaces not available as terminal close-in parking and designated for emergency, airport security, maintenance and airport volunteers.

#4 – Airport Transit Plan Update

Attachment B includes the Airport Transit Plan and a status report of efforts to increase transit connectivity to SDIA.

#6 – Screening Feasibility

The landscape architect preparing the plant palette for the Green Build and the Northside Improvements/Rental Car Center has reviewed the four trees suggested by CCC staff as suitable for placement within the landscape area between the proposed parking plaza and the existing airport circulation road. The landscape architect determined that the California sycamore is a riparian tree and is suitable to include on the slopes and in the basin to be used for storm water detention without decreasing the functionality of the detention basin. The Coast live oak and the California bay are suitable in the perimeter areas not used for storm water detention. The following Special Condition is volunteered by the Authority for inclusion in the project description for the Coastal Development Permit.

The landscape area serving as a storm water detention area directly between the Parking Plaza and the airport circulation road will include drought-tolerant trees (California sycamore, Coast live oak and/or California bay) as selected and placed by a licensed landscape architect to screen and soften the south
façade of the parking structure and maintain the functionality of the storm water detention area.

A point of clarification, the three light wells within the parking plaza will have some landscaped areas, but the vegetation is not intended to be vertical and will be planted on the first floor of the light well as its purpose is to allow natural light and air circulation.

#7 – Visual Simulations

Additional visual simulations from the perspective of a vehicle passenger and pedestrian traveling on North Harbor Drive have been prepared and incorporated with the previous simulations and included as Attachment C. The visual simulations demonstrate that the views to the proposed parking plaza are for those views looking away from the coastal resources of San Diego Bay and are shielded by the existing airport circulation roads and retaining walls.

#8 - Local Discretionary Approvals/Permits

The only local approvals/permit that will be obtained is a ministerial construction permit to be obtained from the City of San Diego specifically because the SDCRAA does not have building inspection services and utilizes the City of San Diego expertise to review, inspect and approve a building permit and occupancy permit. That building permit will not be granted until the final building plans are submitted to the City of San Diego.

If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.

Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

Dist:  Kanani Brown (w/ attachments)
       Deborah Lee (w/ attachments)

Attachment A – LeighFisher Memorandum
Attachment B – Status Report - Airport Transit Plan
Attachment C – Visual Simulations
Hi Ted,

Please see the below questions for our discussion tomorrow. Not all of these are necessary to file the CDP application, but they will help us as we move forward in determining the staff recommendation and potential special conditions. Due to the short notice, we do not expect you to have all the answers by tomorrow, but wanted to get these on your radar ASAP. Thanks in advance! Talk to you tomorrow.

1. As mentioned previously, the airport has limited control over alternative transit service to the airport. However, please identify how the airport is supporting and advocating for the improvement and development of transit links to the airport to the maximum extent feasible. For example, at the last SD Airport Transit/Roadway Committee Meeting, it was identified that the pedestrian improvements that are necessary to connect the Midletown trolley stop to the future rental car center shuttle stop are not planned to be completed until 6 months (or later) after the opening of the rental car center – what kind of follow up has the airport undertaken since then to prioritize this project? Has there been any coordination with the project proponent (SANDAG) or the permitting authorities (Caltrans/City of San Diego) to ensure that the new transit link to the airport and the associated improvements will be completed together, resulting in an inviting, accessible experience for potential transit users which will help minimize energy consumption and VMT to the airport? What kind of public outreach/education campaign, if any, is planned to publicize this new transit link?

2. What events has the airport allowed special event parking for? How many spaces were available for special event parking? How often does the airport anticipate using the proposed parking structure for special events? Please provide a copy of your parking management program and the provisions related to special event parking.

3. How will the airport manage parking during construction of the Terminal Two parking facility? It there a parking management program that you can provide? Does the parking management program include a component that encourages and supports the new transit link from the trolley?

4. The table on Page 12 of the June 3, 2015 letter forecasts ADT as 65,986 in 2017 based on Leigh Fisher calculations however the 2008 EIR forecasts ADT of 116, 100 in 2020. Please explain the reason for this extreme increase within a short three year timeframe.

5. At our last meeting, the airport committed to extrapolating projections from the LOS/ADT from the FERIs to approximate potential traffic impacts from the proposed project due to the changed circumstances – a 2,000 space smaller parking structure than originally planned for. Please provide. The June 3, 2015 letter states that because the proposed structure will have fewer spaces, it
will have fewer impacts; however, based on the premise in the EIR, each parking space results in a reduction in trips to the airport – so the impact of a smaller structure would be an increase in number of trips compared to that projected. Thus, the statement that a smaller structure will have fewer impacts needs to be further explained.

6. Review of the LOS across the four Airport Plans (No Project Alternative, Airport Implementation Plan without Parking Structure, Airport Implementation Plan with Parking Structure, and Airport Land Use Plan with Parking Structure) through years 2015-2030 shows that multiple street segments along North Harbor Drive will have a reduction in LOS with the proposed parking structure. These segments include:
   o West of NTC
   o T2 Access – Harbor Island
   o Harbor Island – T1 Access
   o T1 Access – Winship
   o Winship – Rental Car Rd
   o Hawthorn – Grape

   It seems as though this reduction in service may have potential impacts to public access along Harbor Drive. Please explain this reduction in LOS projected for with the parking structure, since the ADT is supposed to reduce with the opening of the Rental Car Center and additional parking spaces. How does the airport propose to mitigate for these impacts?

Again, I just want to make it clear that we do not expect you to have all the answers to these questions tomorrow, but that there may likely be some follow-up needed.

Thanks,

Kanani Brown
Coastal Program Analyst III
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
kanani.brown@coastal.ca.gov
(619) 767-2370
ATTACHMENT D

Demand Analysis for Terminal Area Parking
Date       June 2, 2015
To        Ted Anasis, San Diego County Regional
           Airport Authority
cc        Julie Gueho, Leigh Fisher
From      Gavin Duncan

Subject   Parking Demand Methodology, Airport Development Plan

This memorandum summarizes the methodology used to estimate future public parking requirements at San Diego International Airport as part of the on-going Airport Development Plan.

The goal of the public parking facility requirements is to identify, for each planning activity level and forecast scenario, the number of parking spaces needed to meet the demand projected for close-in parking at each terminal and remote parking, regardless of location (the Airport currently provides remote parking in 3 separate parking facilities).

In 2012, the Airport provided public parking in the following facilities:

- Terminal 1 Lot (1,195 spaces)
- SAN Park NTC 1 Lot (1,285 spaces)
- SAN Park NTC 2 Lot (1,350 spaces) – temporary facility
- Commuter Terminal Lot (185 spaces)
- SAN Park Harbor Drive Lot (350 spaces)
- SAN Park Pacific Highway Lot (2,200 spaces)

In addition, there are approximately 6,000 privately-operated, off-Airport, parking spaces serving Airport parking customers.

These conditions, however, reflected an atypical situation because construction of the Green Build required the closure of the Terminal 2 Lot, which was offset by the development of the SAN Park NTC 2 Lot. The absence of close-in, walkable parking serving Terminal 2 meant that in 2012, an unusually low share of public parking spaces on the Airport were available for customers desiring close-in parking spaces within a reasonable walking distance of a terminal building. Therefore, it was determined that public parking requirements should be based on 2009 conditions, a year that (a) had no unusual impacts to parking supply and (b) served an annual passenger volume similar to that of the Baseline.

In addition, based on historical data and observations that the Terminal 1 and 2 lots are frequently full, it is likely that there are potential Airport parkers who have elected to not park at the Airport due to the chronic lack of available close-in parking spaces. Because close-in spaces were not available, customers willing to pay for such spaces elected to park in less-desirable facilities or use other access modes (i.e., taxicabs and private vehicles picking up and dropping off at the curbside). These customers represent a ‘latent demand’ for close-in public parking at the Airport that would materialize were sufficient close-in spaces available.

Public parking requirements are based on:

- A design-day peak occupancy reflecting typical busy days in each public parking facility in 2009
- A design-day overnight occupancy, which identifies spaces occupied by airline passengers leaving their vehicle at the Airport during their trip

- An estimate of the latent demand for close-in parking

- Assumptions regarding the share of the total parking market to be accommodated on-Airport and the share of on-Airport spaces to be provided in close-in, walkable facilities.

**Baseline Design Day Peak Occupancy**

Future requirements are based on a ‘design day’ that represents the parking demand for a typical busy day during the year, but does not represent the highest day of the year. At an airport, there may often be a limited number of days, such as holidays, where parking demand is significantly higher than during all other days of the year. Airport operators often elect to not plan for permanent parking facilities (such as garages and paved surface lots) that would accommodate the highest days of the year because some of those spaces would rarely be used and thus, not generate revenue sufficient to justify paying to construct the space. Therefore, the design day is used as the level of demand an airport aims to accommodate with permanent parking facilities. Baseline design day peak occupancy was determined by evaluating the observed midday and overnight occupancies for all Airport-operated public parking facilities, for each day in 2009.

Figure 1 depicts the observed overnight occupancies for all Airport-operated public parking facilities, combined, for each day in 2009. The observed occupancies, when sorted highest to lowest (regardless of when they occurred during the year), form the S-curve shape shown on Figure 1. The ‘design day’ value was selected by identifying the point on the left side S-curve where the slope transitioned from vertical to horizontal. This point represents the occupancy value that is exceed by a very limited number of days (such as holidays), but where using a lower value would mean many additional days would exceed the ‘design day’.
The point identified on the S-curve, 4,050 occupied parking spaces, was selected as the design day occupancy value for overnight parking. There are approximately 10 days where overnight occupancies were noticeably higher that the selected value whereas a reduction in the selected value would mean there would be many additional days where overnight occupancy exceeded the design day value.

For each day of the year in 2009, the observed overnight occupancy (for all combined facilities) was subtracted from the observed midday peak occupancy (for all combine facilities) for the next day. These values predominately represent spaces occupied by parkers who either (a) were picking up or dropping off airline passengers or (b) were airline passengers parking at the Airport for a trip where they departed and returned during the same day. Figure 2 depicts the calculated quantity of these spaces for all Airport-operated public parking facilities, combined, for each day in 2009. The calculated quantities, when sorted highest to lowest (regardless of when they occurred during the year), form the S-curve shape shown on Figure 2. The S-curve on Figure 2 does not have the distinct transition point present on the curve shown on Figure 1. Therefore, the 'design day' value was selected to be the 30th-highest value, which also corresponds to the value for an average Wednesday during the peak month (July).
As shown, it was determined that the design day should assume 1,190 parking spaces occupied by parkers parking at the Airport for less than one day. Analysis of historical transaction-by-duration data indicates that of these occupied spaces, approximately 825 were filled by parkers picking up or dropping off passengers (parking durations of 4 hours or less) and 365 were filled by airline passengers parking for the duration of their trip. These two separate populations of less-than-one-day parkers were separated because those picking up and dropping off passengers will likely require facilities located within a convenient walk of a terminal building while those parking for the duration of their trip could potentially be accommodated in facilities located further away (i.e., in facilities requiring a shuttle ride to and from the terminal).

In addition, there are approximately 6,000 off-Airport, privately-operated parking spaces serving Airport passengers. Based on discussions with Airport staff and observations conducted during the conduct of the Five-Year Ground Transportation Management Plan prepared for the Airport in 2009, it is estimated
To: Ted Anasis (June 2, 2015)
From: Gavin Duncan
Subject: Parking Demand Methodology, Airport Development Plan

that during typical busy (non-holiday periods), the off-Airport parking facilities are approximately 80% full, equating to approximately 4,800 occupied parking spaces.

Therefore, the Baseline design day parking demand calculation is that there were 825 spaces occupied by parkers picking up and dropping off airline passengers and 9,215 (4,415 on-Airport and 4,800 off-Airport) spaces occupied by airline passengers parking their vehicle at or near the Airport for the duration of their trip.

Requirements Methodology

At airports, public parking growth does not typically exactly mirror growth in annual enplanements. Rather, parking demand more often grows in proportion to growth in daily or weekly passengers. As such, public parking requirements are assumed to increase at the same rate as daily passengers. The methodology used to estimate future public parking requirements is as follows:

- Identify Baseline design day occupied spaces (see prior section)
- Increase Baseline peak occupied spaces to reflect the estimated latent demand for close-in parking facilities
- Identify the share of the total long-duration (parkers parking for the duration of their trip) parking market to be accommodated on the Airport (as opposed to in privately-operated off-Airport facilities)
- For on-Airport spaces serving long-duration parkers, identify the share of spaces provided in close-in, walkable facilities versus those provide in facilities requiring a shuttle bus ride to and from a terminal building
- Increase Baseline peak occupied spaces at the same growth projected for daily passengers
- Add a 10% allowance, or ‘circulation factor’, to account for a parker’s inability to locate an available parking space in a large, very full, parking facility.

Latent Demand Estimate

As described above, it is likely that there is latent demand for close-in parking at the Airport that historically has not been accommodated due to frequently-full conditions in the Terminal 1 and 2 lots. Were sufficient parking spaces available near the terminal buildings, it is assumed these customers would eventually choose to park at the Airport. This section presents an estimate of the number of additional spaces that would be required to meet the space demand created by those customers.

Figures 3 and 4 present the daily observed peak occupancy in the Terminal 1 and Terminal 2 lots, respectively, during each lot’s peak month in 2009.
Figure 3
DAILY PEAK OCCUPANCY, BY WEEK, TERMINAL 1 LOT, OCTOBER 2009
San Diego International Airport

Source: San Diego County Regional Airport Authority.
As shown, the Terminal 1 Lot experienced its fullest days during Tuesdays, Wednesdays, and Thursdays and frequently filled to capacity. In contrast, the Terminal 2 Lot experienced its fullest days during Wednesdays and Thursdays but only reached capacity during one week of the month. Therefore, it is assumed that the Terminal 2 Lot represents unconstrained (or nearly unconstrained) conditions.

Also shown in Figures 3 and 4 is that for the Terminal 2 Lot the difference in occupancy between the weekend and midweek is greater than the corresponding difference at the Terminal 1 Lot. While this could result from multiple unique characteristics of each terminal (such as the split of business versus leisure passengers or the presence of Southwest Airlines in Terminal 1), it also reflects the artificial constraint on midweek demand at the Terminal 1 Lot due to the lack of sufficient parking spaces. Therefore, it is assumed that the relationship between midweek peak occupancy and weekend peak occupancy at the Terminal 2 Lot reflects the ratio that would be realized at the Terminal 1 Lot if sufficient capacity was available.
To:        Ted Anasis (June 2, 2015)
From:    Gavin Duncan
Subject:  Parking Demand Methodology, Airport Development Plan

2009 Terminal 2 Lot peak occupancies for Wednesdays and Thursdays were compared against peak occupancies for the prior Sunday and subsequent Saturday. For Wednesdays and Thursdays where Terminal 2 Lot peak occupancy approached capacity, the mid-week to weekend occupancy ratio typically varied between 1.54 and 1.66. Based on historical observations that the Terminal 2 Lot periodically reaches capacity and therefore could have latent demand, it was determined that the 1.66 ratio of mid-week to weekend occupancy be applied to observed weekend occupancies to estimate an unconstrained midweek demand (and therefore, identify the latent demand).

By applying the mid-week to weekend occupancy ratio to the busy month for the Terminal 1 and 2 lots, it was calculated that there was latent demand at the Terminal 1 Lot for approximately 492 spaces (a 41% increase over existing capacity) and latent demand at the Terminal 2 Lot for approximately 105 spaces (an 8% increase over existing capacity).

Of this latent demand, it is likely that some customers would switch from other parking products (such as the remote SANPark products or off-Airport facilities). As part of the 2012 passenger survey, passengers who had elected not to park were asked about their willingness to use close-in Airport parking facilities were sufficient capacity available. For respondents who said they would be willing to use close-in parking, their current mode choices were used to estimate the distribution of where the latent demand might come from. Table 1 summarizes the estimated sources for the 597 spaces of estimated latent demand.

### Table 1
**ESTIMATED SOURCES FOR LATENT PARKING DEMAND:**
San Diego International Airport

<table>
<thead>
<tr>
<th>Spaces of latent parking demand</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New long-duration spaces</strong></td>
</tr>
<tr>
<td>Private vehicles using curbside</td>
</tr>
<tr>
<td>Taxicab / limousine</td>
</tr>
<tr>
<td>SanPARK facilities</td>
</tr>
<tr>
<td>Off-Airport parking</td>
</tr>
<tr>
<td><strong>New short-duration spaces</strong></td>
</tr>
<tr>
<td>Private vehicles using curbsides</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

Source: LeighFisher, November 2012, from data provided by the San Diego County Regional Airport Authority.
Airport Goals for Public Parking

This section presents assumptions regarding the share of long-duration parking to be accommodated on-Airport and the share of on-Airport long-duration parking to be accommodated close to the terminal buildings.

Airport Share of Long-Duration Parking Spaces

Based on peak occupancy data for on-Airport parking facilities and estimates of peak occupancy for off-Airport parking facilities, approximately 48% of the occupied spaces associated with long-duration parkers are in facilities owned by the Airport. Adjusting for the estimated latent demand, 51% of the occupied spaces associated with long-duration parkers would be in facilities owned by the Airport. It is suggested that the Airport seek to accommodate 60% of the market as insurance against potential reductions in off-Airport parking capacity (off-Airport parking spaces can be removed from the market if the land is converted to another use). Given the limited land available on-Airport, a share exceeding 60% is not suggested.

Close-in Share of On-Airport Parking Spaces

Currently, 100% of occupied short-duration (parkers picking up and dropping off airline passengers) parking spaces are provided close-in (sufficiently close to a terminal building that customers can walk between their parking space and a terminal building). 44% of occupied on-Airport long-duration spaces are provided close-in. It is suggested that the Airport seek to accommodate 60% of the on-Airport long-duration spaces close-in, adjacent to the terminal buildings. This value allows accommodation of the latent demand for close-in parking, results in an overall improved level-of-service for customers (i.e., more spaces located in a convenient location), and reduces reliance on shuttle busing.

Requirements

Table 2 summarizes the total estimated requirements for public parking.
As shown, by PAL 14, up to 4,750 additional spaces could be required on-Airport, of which the vast majority is required close-in near the terminal buildings.

Table 3 summarizes the close-in parking requirements, by terminal, based on forecasts of daily air passenger traffic, by terminal.

<table>
<thead>
<tr>
<th>Terminal 1</th>
<th>Assumed daily passengers</th>
<th>Required close-in spaces</th>
<th>PAL 10</th>
<th>PAL 12</th>
<th>PAL 14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terminal 1</td>
<td>33,313</td>
<td>41,209</td>
<td>47,902</td>
<td>53,906</td>
<td></td>
</tr>
<tr>
<td>Terminal 2</td>
<td>22,289</td>
<td>25,212</td>
<td>29,592</td>
<td>33,406</td>
<td></td>
</tr>
</tbody>
</table>

As shown, approximately 4,500 spaces will be required to serve Terminal 1 and 2,800 will be required to serve Terminal 2. Given the limited land available, this parking will likely be provided in a garage. While the full Terminal 2 demand is not expected to appear until later in the planning period, current plans for Terminal 1 anticipate the near-term closure of the existing Terminal 1 surface lot to facilitate construction of a new terminal. It is recommended that the Airport develop the additional Terminal 2 parking capacity prior to closure of Terminal 1 to ensure the availability of parking during construction. Furthermore, the Terminal 2 parking capacity should be located within the terminal loop roadway to allow its use by customers wishing to park while picking up and dropping off passengers using Terminal 1.
ATTACHMENT E

Summary of SAN Parking Services
San Diego County Regional Airport Authority  
Summary of SAN Parking Services  
May 26, 2015

San Diego International Airport (SAN) offers a wide range of parking services designed to meet the needs of every customer. All located on airport property, SAN’s five public parking lots include short-term and long-term options at a variety of price points, from budget to premium.

SAN’s parking lots offer the quickest access to the terminals, with dedicated parking lot shuttles circulating on a continual basis. All of SAN’s lots are completely fenced, well-lit and patrolled by security services at all times.

All lots offer 24-hour service, including battery charging, roadside assistance and towing.

Parking Options in Detail

Valet

For the fastest access to the terminals, SAN offers valet service curbside at Terminal 1 and Terminal 2. Amenities available to valet customers include car wash/detailing, oil change, and other services. Arriving customers can text an attendant upon landing and have their car waiting curbside. Walking time to the terminal is one minute or less.

Terminal 1, Terminal 2 and Commuter Terminal

SAN offers three parking lots immediately outside each of the terminals that offer fast access at competitive hourly or daily rates. These lots are ideal for people coming to the airport to meet arriving passengers. They feature electric vehicle (EV) charging stations and two payment options: pay-on-foot kiosks or attendant booths at each exit. All of these lots take cash or credit cards for payment. Walking time to the respective terminal is one to five minutes.

Long Term Lot

The Long Term Lot on Harbor Drive balances quick access with value pricing. Just a three-to-five minute ride on a dedicated shuttle to the terminals, customers can take advantage of the Long Term Lot’s convenient location, covered shuttle stops and low rates.
Economy Lot

The Economy Lot on Pacific Highway (on SAN’s north side) features the lowest prices of any on-airport parking lot. Customers can reserve parking online at this lot, and also take advantage of online coupons to save even more. Once parked, customers are a 5-10 minute shuttle ride from their terminal.

Cell Phone Lot

Those picking up an arriving passenger can wait for up to an hour free of charge in SAN’s Cell Phone Lot on Harbor Drive, adjacent to the Long Term Lot. This cuts down on airport traffic by eliminating the need to circle the airport while picking up. The lot features everything someone might need while waiting, including flight information boards, vending machines and restrooms. Travel time to the terminals is five minutes or less.

Programs in Development

SAN is currently developing the following programs related to the parking lots:

- Online reservation system for Terminal 1 and Terminal 2 lots.
- Customer loyalty program that offers rewards and incentives for frequent customers.
- Additional coupons and pricing offers to make the lots even more accessible.
- Collaborative advertising (web, print, radio) with airlines and concessioners.
ATTACHMENT F

Table/Photos of Terminal Two Parking, Summer 2014
### Attachment F

**SAN Terminal One and Terminal Two East Parking Data for Summer 2014**

<table>
<thead>
<tr>
<th>Month</th>
<th>6AM</th>
<th>9AM</th>
<th>12PM</th>
<th>3PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jun-14</td>
<td>6AM</td>
<td>9AM</td>
<td>12PM</td>
<td>3PM</td>
</tr>
<tr>
<td>Tuesday 6/3/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Wednesday 6/4/15</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Tuesday 6/10/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Wednesday 6/11/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Thursday 6/12/14</td>
<td>T1: 100%</td>
<td>T2 East: 95%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Tuesday 6/17/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Wednesday 6/18/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Thursday 6/19/14</td>
<td>T1: 100%</td>
<td>T2 East: 94%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Tuesday 6/24/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Wednesday 6/25/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Thursday 6/26/14</td>
<td>T1: 100%</td>
<td>T2 East: 86%</td>
<td>T1: 100%</td>
<td>T2 East: 86%</td>
</tr>
<tr>
<td>Jul-14</td>
<td>6AM</td>
<td>9AM</td>
<td>12PM</td>
<td>3PM</td>
</tr>
<tr>
<td>Wednesday 7/9/14</td>
<td>T1: 100%</td>
<td>T2 East: 98%</td>
<td>T1: 100%</td>
<td>T2 East: 98%</td>
</tr>
<tr>
<td>Tuesday 7/15/14</td>
<td>T1: 100%</td>
<td>T2 East: 97%</td>
<td>T1: 100%</td>
<td>T2 East: 97%</td>
</tr>
<tr>
<td>Wednesday 7/16/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Thursday 7/17/14</td>
<td>T1: 100%</td>
<td>T2 East: 89%</td>
<td>T1: 100%</td>
<td>T2 East: 89%</td>
</tr>
<tr>
<td>Tuesday 7/22/14</td>
<td>T1: 100%</td>
<td>T2 East: 94%</td>
<td>T1: 100%</td>
<td>T2 East: 94%</td>
</tr>
<tr>
<td>Wednesday 7/23/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Tuesday 7/29/14</td>
<td>T1: 100%</td>
<td>T2 East: 91%</td>
<td>T1: 100%</td>
<td>T2 East: 91%</td>
</tr>
<tr>
<td>Wednesday 7/30/14</td>
<td>T1: 100%</td>
<td>T2 East: 93%</td>
<td>T1: 100%</td>
<td>T2 East: 93%</td>
</tr>
<tr>
<td>Aug-14</td>
<td>6AM</td>
<td>9AM</td>
<td>12PM</td>
<td>3PM</td>
</tr>
<tr>
<td>Tuesday 8/5/14</td>
<td>T1: 100%</td>
<td>T2 East: 85%</td>
<td>T1: 100%</td>
<td>T2 East: 85%</td>
</tr>
<tr>
<td>Wednesday 8/6/14</td>
<td>T1: 100%</td>
<td>T2 East: 95%</td>
<td>T1: 100%</td>
<td>T2 East: 95%</td>
</tr>
<tr>
<td>Tuesday 8/12/14</td>
<td>T1: 100%</td>
<td>T2 East: 93%</td>
<td>T1: 100%</td>
<td>T2 East: 93%</td>
</tr>
<tr>
<td>Wednesday 8/13/14</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
<td>T1: 100%</td>
<td>T2 East: 100%</td>
</tr>
<tr>
<td>Date</td>
<td>6AM</td>
<td>9AM</td>
<td>12PM</td>
<td>3PM</td>
</tr>
<tr>
<td>-------------------</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>------</td>
</tr>
<tr>
<td>Thursday 8/14/14</td>
<td>100%</td>
<td>85%</td>
<td>100%</td>
<td>85%</td>
</tr>
<tr>
<td>Tuesday 8/19/14</td>
<td>100%</td>
<td>91%</td>
<td>100%</td>
<td>91%</td>
</tr>
<tr>
<td>Wednesday 8/20/14</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Thursday 8/21/14</td>
<td>100%</td>
<td>92%</td>
<td>100%</td>
<td>92%</td>
</tr>
<tr>
<td>Tuesday 8/26/14</td>
<td>100%</td>
<td>88%</td>
<td>100%</td>
<td>88%</td>
</tr>
<tr>
<td>Wednesday 8/27/14</td>
<td>100%</td>
<td>90%</td>
<td>100%</td>
<td>90%</td>
</tr>
<tr>
<td>Sep-14</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thursday 9/4/14</td>
<td>100%</td>
<td>98%</td>
<td>100%</td>
<td>98%</td>
</tr>
<tr>
<td>Tuesday 9/9/14</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Wednesday 9/10/14</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Tuesday 9/16/14</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Wednesday 9/17/14</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Thursday 9/18/14</td>
<td>100%</td>
<td>96%</td>
<td>100%</td>
<td>96%</td>
</tr>
<tr>
<td>Tuesday 9/23/14</td>
<td>100%</td>
<td>93%</td>
<td>100%</td>
<td>93%</td>
</tr>
<tr>
<td>Wednesday 9/24/14</td>
<td>100%</td>
<td>96%</td>
<td>100%</td>
<td>96%</td>
</tr>
<tr>
<td>Thursday 9/25/14</td>
<td>100%</td>
<td>91%</td>
<td>100%</td>
<td>91%</td>
</tr>
<tr>
<td>Tuesday 9/30/14</td>
<td>100%</td>
<td>90%</td>
<td>100%</td>
<td>90%</td>
</tr>
</tbody>
</table>
SAN has an observable close-in parking problem
Terminal Two - June 2014

Parking on Fire Lane  Parking in thru lanes  Parking at ends of rows
SAN has an observable close-in parking problem

Terminal Two - June 2014

Driving over fixed cones  Double parked on red curb  Driving over fixed cones
Thank you Keri.
On Jun 24, 2015, at 10:09 AM, Robinson, Keri@Coastal <Keri.Robinson@coastal.ca.gov> wrote:

Hi Ted and Keith,

I hope you are doing well. Thank you for your responses. We will review the materials and will contact you soon to discuss them.

Attached is the filed as complete letter. Please let me know if you need anything else.

Thanks,

Keri Robinson
Coastal Planner
Phone: (619) 767-2370
Email: keri.robinson@coastal.ca.gov

---

From: Anasis Ted [mailto:tanasis@san.org]
Sent: Tuesday, June 23, 2015 3:30 PM
To: Wilschetz Keith; Brown, Kanani@Coastal; Robinson, Keri@Coastal
Cc: Woodson Jeffrey; Andi Culbertson (mac@aculbertsonlaw.com)
Subject: RE: Comparison of N. Harbor Drive traffic with proposed parking structure

Kanani: Will you send written confirmation of our application complete?
Ted

---

Sent from my Verizon Wireless 4G LTE smartphone

---

Original message

From: Wilschetz Keith <kwilsche@san.org>
Date: 06/23/2015 2:31 PM (GMT-05:00)
To: Kanani.brown@coastal.ca.gov, Keri.robinson@coastal.ca.gov
Cc: Anasis Ted <tanasis@san.org>, Woodson Jeffrey <jwoodson@san.org>, "Andi Culbertson (mac@aculbertsonlaw.com)" <mac@aculbertsonlaw.com>
Subject: Comparison of N. Harbor Drive traffic with proposed parking structure

<image001.gif>
Dear Ms. Brown and Ms. Robinson:

Attached are four (4) traffic analysis tables that compare traffic on N. Harbor Dr. with and without a parking structure in front of Terminal 2. These tables analyze the potential impacts using several different sources and viewpoints. Two conclusions are apparent and are reached in every comparison:

1. **There is No Significant Impact on N. Harbor Dr. traffic due to a parking structure in front of Terminal 2.**

2. **The reduction in trips on N. Harbor Dr. due to the Rental Car Center (=7,644 daily trips) more than offsets any potential increase in N. Harbor Dr. trips due to the parking structure (=300 – 800 daily trips).**

The four tables are:

- **Table 1:** Analysis of a 5,000 space parking structure with data from the 2008 EIR, not accounting for N. Harbor Dr. trip reduction due to Rental Car Center

- **Table 2:** Analysis of a 3,000 space parking structure, using data extrapolated from the 2008 EIR, not accounting for N. Harbor Dr. trip reduction due to Rental Car Center

- **Table 3:** Analysis of a 3,000 space parking structure, using data from a 2015 analysis from Leigh Fisher Associates, not accounting for N. Harbor Dr. trip reduction due to Rental Car Center

- **Table 4:** Analysis of a 5,000 space parking structure, using N. Harbor Drive traffic forecasts that account for the most recent traffic counts on N. Harbor Drive increased by the rate of growth identified in the 2008 EIR, and accounting for N. Harbor Dr. trip reduction due to Rental Car Center

When reviewing the tables, important considerations are:

- Tables 1, 2, and 3 compare the N. Harbor Drive traffic in the “With Parking Structure” scenario to the “Without Parking Structure” scenario from the Airport Implementation Plan in the 2008 Master Plan EIR. The Airport Implementation Plan is the only Plan in the 2008 EIR that compares these two important scenarios. Therefore, even though it does not account for a reduction in N. Harbor Drive trips due to the Rental Car Center, this comparison is the most illustrative for showing the impact of a parking structure.
The tables focus on North Harbor Drive between Laurel St. and Rental Car Road, because this segment is representative of all North Harbor Drive street segments near the airport. This segment was also used in CCC Staff Report 6-09-15, Public Access/New Development/Traffic, Page 8.

The table formats were used in the California Coastal Commission Staff Report for Terminal 2 West Project Application 6-09-15, August 2009. Therefore, we are using this format for consistency and ease of your review.

Additional information is also provided in the footnotes contained within each table.

Please review these tables and contact us to discuss. We would like to get your questions resolved immediately so this project can be on the August CCC agenda.

Sincerely,
Keith

Keith Wilschetz
Director | Airport Planning & Noise Mitigation
T 619.400.2461 | M 619.952.0847 | F 619.400.2459
kwilsche@san.org

<image002.png>

www.san.org | <image003.png> <image004.png> <image005.png>

San Diego County Regional Airport Authority, PO BOX 82776, San Diego, CA 92138

<6-14-1886 SDIA Parking Structure Filed complete letter.pdf>
<table>
<thead>
<tr>
<th>Year</th>
<th>LOS F (6x6)</th>
<th>LOS F (7x4)</th>
<th>LOS F (6x4)</th>
<th>LOS F (5x3)</th>
<th>LOS F (4x2)</th>
<th>LOS F (3x1)</th>
<th>Daily Airport Trip Generation Rate</th>
<th>Daily Airport Trip Generation Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
</tr>
<tr>
<td></td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
</tr>
<tr>
<td></td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
</tr>
<tr>
<td></td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
</tr>
<tr>
<td></td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
<td>1.52</td>
</tr>
</tbody>
</table>

*Note: The table represents the daily airport trip generation rate for various LOS F scenarios across different years.*

**Legend:**
- **LOS F:** Level of Service and Facility
- **Daily Airport Trip Generation Rate:** The estimated number of daily airport trips generated.
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>Significant Impact Criteria for Structure/Classification</th>
<th>LOS E Capacity/With Parking</th>
<th>LOS F (Page D-107)</th>
<th>LOS F (Page D-107)</th>
<th>LOS F (Page D-107)</th>
<th>LOS F (Page D-107)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2013</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2020</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2025</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2030</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2035</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2040</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2045</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
<tr>
<td>2050</td>
<td></td>
<td>Significant Impact Criteria for Structure/Classification</td>
<td>93,000</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
<td>72,300</td>
</tr>
</tbody>
</table>

*Explanation: Extrapolation from analysis of 5,000 space structure in 2008 San Diego International Airport Master Plan EIR.*

Table 2

**Airport Implementation Plan**

*Extrapolation from analysis of 5,000 space structure in 2008 San Diego International Airport Master Plan EIR.*
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>Impact</th>
<th>V/C Difference</th>
<th>ADT</th>
<th>Structure 2/</th>
<th>N. Harbor Dr.</th>
<th>Structure 2/</th>
<th>Daily North Harbor Drive Traffic</th>
<th>Source</th>
<th>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>2012</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>2011</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>2010</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>2009</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>2008</td>
<td>Category</td>
<td>Impact</td>
<td>V/C Difference</td>
<td>ADT</td>
<td>Structure 2/</td>
<td>N. Harbor Dr.</td>
<td>Structure 2/</td>
<td>Daily North Harbor Drive Traffic</td>
<td>Source</td>
<td>2008 EIR, Appendix D, Table D-40. This ADT does not include the rental car center removal of 7,644 ADT on N. Harbor Drive.</td>
</tr>
<tr>
<td>Year</td>
<td>Scenario</td>
<td>6:00 AM to 9:00 AM</td>
<td>9:00 AM to 12:00 PM</td>
<td>12:00 PM to 3:00 PM</td>
<td>3:00 PM to 6:00 PM</td>
<td>6:00 PM to 9:00 AM</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>------</td>
<td>----------</td>
<td>---------------------</td>
<td>---------------------</td>
<td>---------------------</td>
<td>---------------------</td>
<td>---------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2030</td>
<td>Daily North Harbor Drive Traffic</td>
<td>60,000 / 6 Lane Prime &amp; LOS F</td>
<td>79,000 / 7.664 (ADT)</td>
<td>73,000 / 7.664 (ADT)</td>
<td>86,300 / 7.664 (ADT)</td>
<td>90,000 / 7.664 (ADT)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2025</td>
<td>Daily North Harbor Drive Traffic</td>
<td>60,000 / 6 Lane Prime &amp; LOS F</td>
<td>72,000 / 7.664 (ADT)</td>
<td>70,000 / 7.664 (ADT)</td>
<td>82,500 / 7.664 (ADT)</td>
<td>86,000 / 7.664 (ADT)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>Daily North Harbor Drive Traffic</td>
<td>60,000 / 6 Lane Prime &amp; LOS F</td>
<td>69,500 / 7.664 (ADT)</td>
<td>67,000 / 7.664 (ADT)</td>
<td>79,000 / 7.664 (ADT)</td>
<td>82,500 / 7.664 (ADT)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2017</td>
<td>Daily North Harbor Drive Traffic</td>
<td>60,000 / 6 Lane Prime &amp; LOS F</td>
<td>69,500 / 7.664 (ADT)</td>
<td>67,000 / 7.664 (ADT)</td>
<td>79,000 / 7.664 (ADT)</td>
<td>82,500 / 7.664 (ADT)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>Daily North Harbor Drive Traffic</td>
<td>60,000 / 6 Lane Prime</td>
<td>69,500 / 7.664 (ADT)</td>
<td>67,000 / 7.664 (ADT)</td>
<td>79,000 / 7.664 (ADT)</td>
<td>82,500 / 7.664 (ADT)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(Existing N. Harbor Dr. Traffic Volumes with Rate of Growth from 2008 Master Plan ER, Considering Rental Car Center Impacts)

Table 4 5,000 Space Parking Structure Analysis
APPLICATION STATUS LETTER - FILED COMPLETE

June 24, 2015

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

RE: Application No. 6-14-1886

Dear Mr. Anasis:

Your Coastal Commission application was filed on June 17, 2015, and has been scheduled tentatively for a Commission hearing on August 12-14, 2015 in San Diego. This tentative scheduling information is being provided for your convenience and is subject to change. Written notification of final scheduling of the hearing, along with a copy of the staff report, will be mailed to you approximately 10 days prior to the hearing.

If you have any questions regarding your application, please contact me at the address and phone number listed above.

Sincerely,

Keri Robinson
Coastal Planner

cc: File
June 29, 2015

Ms. Sherilyn Sarb
California Coastal Commission
San Diego Coast District Office
7575 Metropolitan Drive #103
San Diego, CA 92108

RE:  Traffic Impacts of Terminal 2 Parking Plaza

Dear Ms. Sarb:

California Coastal Commission staff has asked the San Diego County Regional Airport Authority to provide data that identifies the potential traffic impact of a proposed Parking Plaza in front of San Diego International Airport's Terminal 2. In response, please see the attached four (4) comparison tables, which compare traffic on N. Harbor Drive with and without a Terminal 2 parking structure. These tables analyze the potential impacts using several different sources and viewpoints.

When reviewing this data, two conclusions are apparent and are reached in every comparison:

1. There is No Significant Impact on N. Harbor Dr. traffic due to a parking structure in front of Terminal 2.

2. The reduction in trips on N. Harbor Dr. due to the Rental Car Center (= 7,644 daily trips) more than offsets any potential increase in N. Harbor Dr. trips due to the parking structure (= 300 – 800 daily trips).

The four tables are:

- **Table 1**: Analysis of a 5,000 space parking structure with data from the 2008 EIR, not accounting for N. Harbor Dr. trip reduction due to the Rental Car Center
- **Table 2**: Analysis of a 3,000 space parking structure, using data extrapolated from the 2008 EIR, not accounting for N. Harbor Dr. trip reduction due to the Rental Car Center
- **Table 3**: Analysis of a 3,000 space parking structure, using data from a 2015 analysis from Leigh Fisher Associates, not accounting for N. Harbor Dr. trip reduction due to Rental Car Center
• **Table 4:** Analysis of a 5,000 space parking structure, using N. Harbor Drive traffic forecasts that account for the most recent traffic counts on N. Harbor Drive increased by the rate of growth identified in the 2008 EIR, and accounting for N. Harbor Dr. trip reduction due to Rental Car Center

When reviewing the tables, important considerations are:

• The traffic analysis and table formats were used in the California Coastal Commission Staff Report for Terminal 2 West Project Application 6-09-15, August 2009. Therefore, we are using this format for consistency and ease of your review.

• The tables focus on N. Harbor Drive between Laurel St. and Rental Car Road, because this segment is representative of all N. Harbor Drive street segments near the airport. This segment was also used in CCC Staff Report 6-09-15, Public Access/New Development/Traffic, Page 8.

• Additional information is also provided in the footnotes contained within each table.

• The Leigh Fisher analysis, which has been previously forwarded to you and is summarized in Table 3, reflects their conclusion that the parking structure will reduce traffic on N. Harbor Drive by 470 trips per day. The 2008 EIR, which has also been forwarded to you and is reflected in Tables 1, 2, and 4, reflects the EIR consultant’s conclusion that the parking structure would increase traffic on N. Harbor Drive by 300 – 800 trips per day. Either way, the increase or decrease would be nominal (less than 1% of total traffic), and both analyses conclude that the impacts from a parking structure in front of Terminal 2 would be insignificant.

• Tables 1, 2, and 3 compare the N. Harbor Drive traffic in the “With Parking Structure” scenario to the “Without Parking Structure” scenario from the Airport Implementation Plan in the 2008 Master Plan EIR. The Airport Implementation Plan is the only Plan in the 2008 EIR that compares these two important scenarios. Therefore, even though it does not account for a reduction in N. Harbor Drive trips due to the Rental Car Center, this comparison is the most illustrative for showing the impact of a parking structure.

Although the Rental Car Center, which is funded completely by the airport, was not included in the Airport Implementation Plan, this important project will remove 7,644 trips per day from N. Harbor Drive when it opens in January 2016. This reduction is significant for N. Harbor Drive, as it accounts for over 10% of the 74,100 trips per day currently using this
road. In addition, in connection with the Terminal 2 expansion, the airport is currently building an additional lane on westbound N. Harbor Drive to help improve capacity on westbound through lanes and reduce the friction associated with congestion. Together, these features will greatly improve conditions on N. Harbor Drive. This fact is acknowledged in the CCC's own findings in association with the Rental Car Center staff report.

- The 2008 EIR analyzes traffic in the existing and future conditions with respect to the projects contemplated at that time. Specifically, the 2008 EIR analyzes a larger parking plaza (5,000 spaces) than is actually being proposed (3,000 spaces). Even with a 5,000 space structure, the EIR concluded that there was no significant impact to N. Harbor Drive as a result of its construction. This conclusion was not disputed by the Coastal Commission. There is no airport of this size in California that does NOT have a parking structure of this type.

- Also, the unanticipated recession from 2008 through 2013 had an impact on N. Harbor Drive traffic, which was not reflected in the 2008 EIR. This economic event significantly delayed several non-airport projects contemplated along N. Harbor Drive outside airport boundaries, reduced the airport passenger growth, and reduced ambient traffic growth. While this growth is still expected to occur, it is significantly delayed, making actual volumes on N. Harbor Drive lower than were projected in the 2008 EIR. This is reflected in attached Table 4.

While the airport understands and acknowledges that the CCC staff must consider the effect of traffic on access to the coast, as well as minimization of Vehicle Miles Traveled (VMT), it is a fact that the airport itself is a visitor access facility as well as a hub for residents of San Diego County to use the airport for business and leisure purposes. Nothing in the Coastal Act prevents this type of use.

We believe that the airport has done the utmost in improving conditions along N. Harbor Drive in ways that have not been proposed—let alone undertaken—by any other agency. To whatever extent the CCC believes, in spite of data to the contrary, that the parking plaza creates traffic, it must also be acknowledged that, 1) the airport at its sole expense has already undertaken projects that will dramatically decrease traffic and traffic congestion along N. Harbor Drive, and 2) the airport is itself a visitor-serving facility with traffic associated with that function (about 58% of air passengers are visitors rather than residents).
If you have any questions, please contact me at (619) 400-2444.

Sincerely,

[Signature]

Thella F. Bowens
President/CEO
San Diego County Regional Airport Authority

Dist: Kanani Brown, California Coastal Commission
      Keri Robinson, California Coastal Commission
      Jeffrey Woodson, SDCRAA
      Angela Shafer-Payne, SDCRAA
      David Boenitz, SDCRAA
      Keith Wilschetz, SDCRAA
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>N. Harbor Dr. without Parking Structure 1</th>
<th>ADT/V/C Difference</th>
<th>N. Harbor Dr. with Parking Structure 2</th>
<th>Roadway Classification/ LOS E Capacity</th>
<th>Criteria for Significant Impact 3</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>74,100</td>
<td>1.23 V/C</td>
<td>LOS F</td>
<td>-</td>
<td>-</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td></td>
<td>Daily Airport Trip Generation Rate</td>
<td>1.83 (Page D-104)</td>
<td>-</td>
<td>1.83 (Page D-69)</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2015</td>
<td>Daily Airport Trip Generation</td>
<td>109,500 (Page D-104)</td>
<td>-</td>
<td>109,500 (Page D-69)</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>93,500</td>
<td>1.56 V/C</td>
<td>LOS F (Page D-106)</td>
<td>300 ADT/ &lt;0.01 V/C</td>
<td>93,800</td>
<td>1.56 V/C</td>
</tr>
<tr>
<td>2020</td>
<td>Daily Airport Trip Generation Rate</td>
<td>1.82</td>
<td>-</td>
<td>-</td>
<td>1.83</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily Airport Trip Generation</td>
<td>120,650 (Page D-104)</td>
<td>-</td>
<td>120,900</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>102,200</td>
<td>1.70 V/C</td>
<td>LOS F (Page D-106)</td>
<td>400 ADT/ &lt;0.01 V/C</td>
<td>102,600</td>
<td>1.71 V/C</td>
</tr>
<tr>
<td>2025</td>
<td>Daily Airport Trip Generation Rate</td>
<td>1.82</td>
<td>-</td>
<td>-</td>
<td>1.82</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily Airport Trip Generation</td>
<td>128,200 (Page D-104)</td>
<td>-</td>
<td>128,500</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>105,700</td>
<td>1.76 V/C</td>
<td>LOS F (Page D-107)</td>
<td>700 ADT/ &lt;0.01 V/C</td>
<td>106,400</td>
<td>1.77 V/C</td>
</tr>
<tr>
<td>2030</td>
<td>Daily Airport Trip Generation Rate</td>
<td>1.81</td>
<td>-</td>
<td>-</td>
<td>1.82</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily Airport Trip Generation</td>
<td>134,600 (Page D-104)</td>
<td>-</td>
<td>135,000</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>106,700</td>
<td>1.78 V/C</td>
<td>LOS F (Page D-107)</td>
<td>800</td>
<td>107,500</td>
<td>1.79 V/C</td>
</tr>
</tbody>
</table>

Footnotes
1/ Source: 2008 EIR, Appendix D, Table D-40. This ADT does not include the Rental Car Center removal of 7,644 ADT on N. Harbor Drive.
2/ Source: 2008 EIR, Appendix D, Table D-60
3/ Shown for information purposes only, as Criteria for Significance in EIR compares "With Project" to "No Project" scenarios
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>Airport Implementation Plan</th>
<th>Roadway Classification/ LOS E Capacity</th>
<th>Criteria for Significant Impact 3/</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>N. Harbor Dr. without Parking Structure 1/</td>
<td>ADT 4/ V/C Difference</td>
<td>N. Harbor Dr. with Parking Structure 2/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>74,100</td>
<td>1.23 V/C</td>
<td>LOS F</td>
<td>–</td>
</tr>
<tr>
<td>2015</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>93,500</td>
<td>1.56 V/C</td>
<td>LOS F (Page D-106)</td>
<td>180 ADT/ &lt;0.01 V/C</td>
</tr>
<tr>
<td>2020</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>102,200</td>
<td>1.70 V/C</td>
<td>LOS F (Page D-106)</td>
<td>240 ADT/ &lt;0.01 V/C</td>
</tr>
<tr>
<td>2025</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>105,700</td>
<td>1.76 V/C</td>
<td>LOS F (Page D-107)</td>
<td>180 ADT/ &lt;0.01 V/C</td>
</tr>
<tr>
<td>2030</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>106,700</td>
<td>1.78 V/C</td>
<td>LOS F (Page D-107)</td>
<td>480 ADT/ &lt;0.01 V/C</td>
</tr>
</tbody>
</table>

**Footnotes**

1/ Source: 2008 EIR, Appendix D, Table D-40. This ADT does not include the Rental Car Center removal of 7,644 ADT on N. Harbor Drive.

2/ Source: Project without Parking Structure (shown in 2/) plus ADT (shown in 4/).

3/ Shown for information purposes only, as Criteria for Significance in EIR compares “With Project” to “No Project” scenarios, not “With Parking Structure” to “Without Parking Structure” scenarios.

4/ 3,000 space parking structure project contribution calculated using the proportionality between 5,000 space parking structure ADT.
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>N. Harbor Dr. without Parking Structure 1/</th>
<th>ADT 4/ V/C Difference</th>
<th>N. Harbor Dr. with Parking Structure 2/</th>
<th>Roadway Classification/ LOS E Capacity</th>
<th>Criteria for Significant Impact 3/</th>
<th>Significant impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>74,100 1.23 V/C LOS F</td>
<td>–</td>
<td>–</td>
<td>6-lane Prime / 60,000</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>2015</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>93,500 1.56 V/C LOS F (Page D-106)</td>
<td>(470) ADT/ (0.001) V/C</td>
<td>93,030 1.55 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2020</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>102,200 1.70 V/C LOS F (Page D-106)</td>
<td>(470) ADT/ (0.001) V/C</td>
<td>101,730 1.69 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2025</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>105,700 1.76 V/C LOS F (Page D-107)</td>
<td>(470) ADT/ (0.001) V/C</td>
<td>105,230 1.75 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2030</td>
<td>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</td>
<td>106,700 1.78 V/C LOS F (Page D-107)</td>
<td>(470) ADT/ (0.001) V/C</td>
<td>106,230 1.77 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
</tbody>
</table>

**Footnotes**

1/ Source: 2008 EIR, Appendix D, Table D-40. This ADT does not include the Rental Car Center removal of 7,644 ADT on N. Harbor Drive.

2/ Source: Project without Parking Structure (shown in 1/) minus 470 ADT (shown in 4/)

3/ Shown for information purposes only, as Criteria for Significance in EIR compares “With Project” to “No Project” scenarios, not “With Parking Structure” to “Without Parking Structure” scenarios.

4/ 3,000 space parking structure analysis conducted by LFA in May 2015 shows a reduction of 470 ADT on N. Harbor Drive.
<table>
<thead>
<tr>
<th>Year</th>
<th>Daily North Harbor Drive Traffic (Rental Car Road to Laurel Street)</th>
<th>N. Harbor Dr. without Parking Structure 1/</th>
<th>Traffic Reduction due to RCC 2/</th>
<th>Parking Plaza ADT 3/</th>
<th>N. Harbor Dr. with Parking Structure 4/</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>74,100 1.23 V/C LOS F</td>
<td>–</td>
<td>–</td>
<td>–</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td>2017</td>
<td>76,800 1.28 V/C LOS F (Page D-106)</td>
<td>(7,644) ADT</td>
<td>300 ADT</td>
<td>69,500 1.16 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2020</td>
<td>78,900 1.32 V/C LOS F</td>
<td>(7,644) ADT</td>
<td>400 ADT</td>
<td>71,700 1.20 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2025</td>
<td>82,500 1.38 V/C LOS F</td>
<td>(7,644) ADT</td>
<td>700 ADT</td>
<td>75,200 1.25 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
<tr>
<td>2030</td>
<td>86,300 1.44 V/C LOS F</td>
<td>(7,644) ADT</td>
<td>800 ADT</td>
<td>79,500 1.33 V/C LOS F</td>
<td>6-lane Prime / 60,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Greater than 0.01 V/C at LOS F</td>
<td>NO</td>
</tr>
</tbody>
</table>

**Footnotes**

1/ ADT derived based on information in 2008 EIR on future rate of traffic growth on N. Harbor Drive (= 0.9%/year).

2/ ADT reduction on North Harbor Drive due to RCC construction = (7,644) ADT

3/ Parking Plaza Average Daily Traffic (ADT) based on information in the 2008 Master Plan EIR

4/ Project without Parking Structure ADT (1/) minus RCC ADT (2/) plus Parking Structure ADT (3/)

5/ Shown for information purposes only, as Criteria for Significance in EIR compares "With Project" to "No Project" scenarios, not "With Parking Structure" to "Without Parking Structure" scenarios
June 3, 2015

Ms. Kanani Brown
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Response to Fourth Incomplete letter for Application No. 6-14-1886
Parking Plaza at Terminal Two, San Diego International Airport (SDIA)

Dear Ms. Brown:

Thank you for meeting the San Diego County Regional Airport Authority (SDCRAA) staff on May 22, 2015, with Deborah Lee, Tinya Hoang, and Keri Robinson. In response to your fourth application incomplete letter dated May 26, 2015, SDCRAA has prepared this letter to provide information regarding the following issues and information that was requested:

1. Airport passenger surveys available to the public;
2. Justification of demand for terminal area parking;
3. Parking management programs (including the shuttle experience);
4. Traffic reductions in light of the rental car center; and
5. Detailed traffic explanation requested by California Coastal Commission (CCC) staff of existing documents available to the public and transmitted to the CCC since 2008.

In addition, the airport agreed to specify the sections of the Airport website that address transit opportunities for the public. MTS Route 992 is allowed to operate within the airport complex at baggage claim for both pick-ups and drop-offs. Attached is a map on the airport website that depicts the MTS Route 992 bus stops at terminal curbsfronts (Attachment A).

Introduction and Overview of Data Presented

Throughout this process, the airport has striven to answer the questions posed by CCC staff, even when these questions appeared to be aimed at whether the decision of the airport to build a parking plaza was reasonable, as opposed to the whether the parking plaza could be found consistent with the California Coastal Act. A consistent theme in the comments has been whether the airport could entirely avoid the construction of a parking structure by further reliance on transit.
The airport does not control transit routing or timing, nor is it authorized by the Public Utilities Commission to operate transit lines. Simply put, there is insufficient transit service to SDIA for transit to be a reasonable alternative to parking. Further, there is no indication that San Diego's transit providers are planning to significantly enhance transit service to SDIA in the future.

The airport has, and will continue to, support transit to the airport to the maximum extent possible. For example, SDCRAA allows transit bus service Metropolitan Transit System Route 992 priority access at all terminal curbsfronts for passenger and employee pick-up and drop-offs. All other buses, shuttles and taxis must pick-up and drop-off passengers at the transit plazas at Terminals One and Two. Therefore, public transit is extended a priority location that is not enjoyed by other shuttles and taxis. Further, the airport will be offering shuttle service to the airport terminals along the link road near the trolley station as well as providing transit information and links on the Authority website to the airport users, as was agreed to in connection with the rental car center CDP (Attachment A).

The airport sees the relevant California Coastal Act Chapter 3 policies as Sections 30252 and 30253. In particular, the adequacy of parking at the airport (Sec. 30252(4)) and the past actions and present proposals of the airport to remove traffic from the most desirable coastal roads (Sec. 30252) have acted together to improve public access to this area of the coast, as explained in more detail herein. The airport cannot command patrons to use public transit as a condition to using the airport. In terms of airport employees, and as explained in previous response, the transit routes and service do not often operate at the times when airport employees need to be present at the airport. Therefore, because of these constraints, and its limited ability to influence potential transit patrons, the airport is at the absolute limit in connecting its operation to public transit.

Moreover, the airport has an obligation to serve those who do not choose public transit. The table below shows that of the top ten airports in California in terms of passenger service, San Diego is one of the few airports that does not have close-in, structured parking (Please see response to Item #2, infra). This is key, because close-in, structured parking makes parking spaces available and close to the terminal for those airport patrons who are time sensitive or have mobility issues. This also allows patrons to drive themselves and park at the airport for their flights, which generates only one round trip to the airport, instead of having another party drop off and pick them up, doubling the trips in and out of the airport and unnecessarily adding demand to desirable coastal roads, primarily North Harbor Drive. For this reason, the airport believes that such "shuttling" trips will be substantially reduced or eliminated by the parking plaza. While the airport serves both residents and visitors, San Diego region residents are the population most likely to use the parking plaza.
Even if this were not the case, it is important to evaluate the parking plaza in its appropriate context. The airport is constructing a rental car center approved by the CCC. This rental car center relocates the primary operations and vehicle trips generated by five rental car companies off of Harbor Island East, providing shorter and direct access from Interstate 5 via Pacific Highway. Moreover, to shuttle all airport passengers who are renting cars, the airport is constructing an internal link roadway that allows a fleet of alternative fuel shuttle buses to directly travel between the terminals and the rental car center on airport property, avoiding critical and congested public street segments and intersections in the coastal zone, such as North Harbor Drive. The rental car center and its associated shuttle bus will remove 7,644 average daily trips from North Harbor Drive. Combined with the reduction in 470 average daily trips from North Harbor Drive directly attributed to the increase in Terminal Two area parking with the parking plaza, the rental car center and parking plaza will reduce 8,114 average daily trips on North Harbor Drive. Therefore, more than transit use, the airport will accomplish a 8,114 average daily trip reduction on North Harbor Drive by its efforts when both facilities are operational as forecast by 2017. Given the fact that volumes on North Harbor Drive at present exceed 79,000 vehicles, this reduction is on the order of 10%. This is a dramatic reduction not possible to make for other uses along North Harbor Drive. We strongly believe that this fact alone should be the primary fact driving consistency with the noted Chapter 3 policies.

As explained at our May 22, 2015 meeting, the construction schedule for this parking plaza, given the delays in determining the application complete, will result in closure of the parking at Terminal Two for two consecutive summer seasons, instead of the one 2016 summer season as planned, unless the matter is heard at the July meeting. The summer season is the airport’s busiest time of use by both visitors and residents for multiple weeks. Further, the summer is also the time that the airport may allow parking to be made available on a “space available” basis during special events in the coastal zone on Saturdays and Sundays (weekends), increasing visitation to the coast. Therefore, there is a pressing need for a July hearing. The construction schedule attached demonstrates this statement (Attachment B).

In light of this information and the extremely long process to deem this application complete, SDCRAA requests that we receive a response to this letter by the end of the week and be scheduled for the July 2015 Coastal Commission hearing.

1. **Airport Passenger Surveys**

The CCC staff requested the results of the 2012 passenger survey (informally called the “intercept” survey) which was prepared to gain an understanding of SDIA
passenger profile characteristics, and trip origin locations, and gather ground access and parking data to understand modal choices and preference involved in accessing SDIA. The 2012 airport passenger survey is the best available source of information on existing travel behavior of airport passengers at SDIA. The survey gathered responses from 7,929 passengers and included questions about mode choice, parking attitudes and habits, and home or lodging location. The following describes the methodology in detail, the number of people surveyed and the results of the survey. A summary presentation of the 2012 survey is included in Attachment C.

Methodology and Number of People. The methodology for the 2012 airport passenger survey was designed to be comprehensive, statistically accurate and provide representative data. The survey was completed in May and June of 2012 and collected responses from 7,929 travelers, including 3,369 San Diego-area residents and 4,560 visitors. Responses were weighted to account for sampling bias. The analysis identified travel corridors based on respondents' reported zip code or hotel location. For the 53% of visitors who did not stay in a hotel, the analysis assumed the same geographic distribution of lodging locations as that of residents' home locations. This was deemed reasonable because 85% of visitors who did not stay at a hotel stayed at a private residence, just slightly less than the share of residents who reported arriving at the airport from a private residence (90%).

Corridors were defined by first narrowing the response sample to the zip codes in which 10 or more respondents reported living or staying, or approximately 80 San Diego-area zip codes. The analysis then broke the zip codes into broad corridors, not based on traditional transit shed of 0.5 to 5 miles but based on broad directionality.

Results of the Survey. The transportation-relevant findings included the following key points:

- Most passengers access the airport by private vehicle, whether by driving themselves, getting dropped off, or using a rental car;
- While the San Diego area is generally characterized by low-density development patterns, airport-related travel demand is clustered in a few broad corridors. In particular, the nearly 50% of visitors reported staying in hotels clustered in a few discrete areas, most notably downtown San Diego and the Gaslamp District. Hotel-related demand accounts for roughly 18 percent of all airport-related travels and demand related to the San Diego Convention Center, cruise ships and downtown residences and offices accounting for approximately 22% of all travel to and from the airport;
- The Interstate 5 corridor north of the airport contributes significant airport demand, particularly among residents; and
Nearly a quarter of respondent home or hotel locations were located in broad areas around existing MTS trolley routes, MTS on-board survey data and information on employee home locations from airport transit planning effort shows that most employees live in the southern part of the San Diego region, near the Blue Line trolley.

The 2012 passenger survey was prepared to gain an understanding of SDIA passenger profile characteristics, trip origin locations, and gather ground access and parking data to understand modal choices and preference involved in accessing SDIA. Having been conducted within the last three years, the 2012 passenger survey represents existing conditions for San Diego International Airport. The May 26 letter implies that passenger responses are skewed. This is an incorrect assertion because the Terminal One surface lot remained open during the Green Build and served over 60% of the passengers as both Southwest and United Airlines operated in Terminal One until the Green Build opened in 2013. It should be noted that the 2012 passenger survey has been reviewed by other transportation and transit agencies, as well as used as a basis for the Airport Transit Plan Update and there has not been implication that the data is outdated or skewed.

In addition, the Airport conducts quarterly passenger surveys to gauge customer satisfaction levels and benchmark results against other peer airports of similar characteristics to SDIA. Attached are the results of the annual 2014 (conducted all four quarters of 2014) and the first quarter of 2015 surveys. The survey results indicate that parking at SDIA continued from 2012 through 2014/2015 as one of the airport items that scores the lowest in terms of satisfaction with the airport experience. This parking need was identified in 2008 with the adopted Airport Master Plan and the passenger surveys reveal that the principal resident complaint is parking that is inconvenient to the terminals.

Attachment C includes the summary results for the 2012 survey (which has been made available publicly) and the results of the quarterly surveys for 2014 and first quarter 2015 surveys.

2. Demand for Terminal Area Parking

In addition to the 2012-2015 passenger surveys, the airport conducted further analysis as to the demand for parking. Although the CCC staff requested this analysis at the meeting of May 22, it was in fact attached to the May 4, 2015 response letter. LeighFisher (LF) prepared the memorandum attached to the May 4, 2015 response letter to address the traffic impacts of the parking plaza. The section that CCC cites as starting on page 4 is in no way intended to address the parking demand projections used to identify the need for 3,000 parking spaces at Terminal Two. Rather, the section summarizes the methodology used for the sole purpose of
estimating hourly and daily traffic impacts associated with the incremental additional capacity provided by the 3,000-space parking plaza. For that purpose, LF identified that (a) during a typical busy day, of the 3,000 spaces in the parking plaza, up to 1,441 would be occupied by vehicles currently unable to park in the Terminal Two surface lot due to insufficient capacity; and (b) these vehicles are currently using curbside or other parking facilities instead. Thus, changes in volumes on Harbor Drive due to the increased availability of parking would be due only to changes in behavior by drivers using the 1,441 spaces of incremental additional capacity.

Attachment D provides the detailed analysis and calculations used by LF to develop the public parking requirements used for the Airport Development Plan. These requirements were based on existing parking demands, assumptions regarding existing unmet parking demand, future airport activity growth, and assumptions regarding additional capacity needed to improve the airport customers’ ability to locate available spaces in a very full parking facility. As shown on Table 3 of Attachment D, this analysis determined 2,800 close-proximity public parking spaces would be required to serve Terminal Two by the end of the planning period. This number was increased to 3,000 in anticipation of the closure of the existing Terminal One surface parking lot during Terminal One redevelopment (during which the parking plaza would need to accommodate parking demand for both Terminal One and Two). This result corroborates with the 2012 and ongoing passenger reactions to the lack of terminal parking.

Further, the near-term closure of the existing Terminal One surface parking lot will be required to construct a replacement for Terminal One and provide a second level departure curb. Therefore the airport must develop the additional Terminal Two parking capacity prior to the closure of Terminal One to ensure the availability of parking during construction. Given the airport passenger increases over time, this is not a wasteful step, but rather one which intelligently accounts for the needs over time and allows those needs to be monitored as the changes to Terminal One occur, so that a right-sized facility is ultimately programmed for Terminal One.

As the airport has begun to develop the next master plan at SDIA (called the Airport Development Plan or ADP), the airport continues to implement the previously-adopted 2008 Master Plan, which includes a parking structure serving Terminal Two. The ADP has already identified the need for even more parking over time to serve future facilities at Terminal One. Several alternatives are under consideration by the SDCRAA for the ADP and no decisions or actions have been taken to date, as public input is a necessary element to the consideration. It is not anticipated that a discretionary action for approval of an alternative will be made by the Airport Authority until at least 2016.
Turning to a more obvious aspect of airport operations, it must be recognized that SDIA is the third busiest airport in the State of California in passenger service after LAX and SFO respectively, with over 17 million annual passengers served. SDIA is one of three top 10 California airports that does not provide terminal area parking in structures (see table below). Of the top five airports, it is the only one that is not served by a major transit system and does not have a parking structure (i.e., Oakland is served by BART).

<table>
<thead>
<tr>
<th>Rank by Passengers Served</th>
<th>California Airport</th>
<th>Million Annual Passengers 2013 (Source: Airports Council International)</th>
<th>Close-In Parking Structure(s) on Airport?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Los Angeles (LAX)</td>
<td>66.6</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>San Francisco (SFO)</td>
<td>44.9</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td>San Diego (SAN)</td>
<td>17.7</td>
<td>No</td>
</tr>
<tr>
<td>4</td>
<td>Oakland (OAK)</td>
<td>9.7</td>
<td>No</td>
</tr>
<tr>
<td>5</td>
<td>Santa Ana (SNA)</td>
<td>9.2</td>
<td>Yes</td>
</tr>
<tr>
<td>6</td>
<td>San Jose (SJC)</td>
<td>8.8</td>
<td>Yes</td>
</tr>
<tr>
<td>7</td>
<td>Sacramento (SMF)</td>
<td>8.7</td>
<td>Yes</td>
</tr>
<tr>
<td>8</td>
<td>Ontario (OMT)</td>
<td>3.9</td>
<td>No</td>
</tr>
<tr>
<td>9</td>
<td>Burbank (BUR)</td>
<td>3.8</td>
<td>Yes</td>
</tr>
<tr>
<td>10</td>
<td>Long Beach (LGB)</td>
<td>2.8</td>
<td>Yes</td>
</tr>
</tbody>
</table>

As the table above shows, airports with less constricted footprints and even fewer passengers than SAN (like Santa Ana, San Jose, Burbank and Long Beach) have constructed parking structures to meet the demand for terminal area parking. Therefore, the parking plaza is a needed element of this airport’s operation.

3. Parking Management Programs

At the meeting of May 22, the CCC staff posed questions about the type and effectiveness of the airport’s parking management programs in an effort to determine whether the proposed parking structure was even necessary. The following is a description of the SAN parking facilities and parking management programs.

SAN Parking Programs. An airport’s parking customers can be described in the following three categories:

a) Convenience at a premium price – valet; reserved parking;
b) Convenience at a reasonable price – close-in terminal area parking; long-term parking within a short shuttle ride; and
c) Convenience at an inexpensive price — remote airport parking, off-airport parking (none of these facilities is controlled or operated by SDCRAA).

Based on forecasts for increased enplanements, close-in terminal area parking will continue in high demand as customer service programs are implemented (as demonstrated in the analysis in the previous section). In addition, it is important to note that the airport — during lower demand times on weekends (Saturdays and Sundays) serves as a support to visitor-serving activities. The airport allows its parking to be used for events that draw non-airport visitors to the coast for special events of short duration by visitors (1-4 hours for special events at Spanish Landing (Gator on the Bay), Harbor Island (Big Bay Boom), marathons, and special airport events such as greeters for the veterans honor flights or events at the United Services Organization (USO). This is extended on a space available basis at off-peak times for the airport. These uses are all within walking distance of the proposed Terminal Two parking plaza and therefore, the parking plaza can be regarded as a visitor-serving facility as well. This parking for these lower cost events of short duration would have to be accommodated in other areas such as Harbor Island and Spanish Landing that have limited parking for events that draw demand for a short duration during non-peak parking days at the Airport.

In satisfying parking demand, SDCRAA places strong emphasis on customer satisfaction. Customer satisfaction with airport parking services is strongly dependent on two major factors as indicated by airport industry standards:

Facility/Area Layout and Design
- Facility and surrounding areas must be well lit, kept clean and well maintained;
- Patrons need to feel safe and protected, preferably with visible security patrols;
- The facility and its contents (vehicles, equipment) must be secure; and
- Clear directional and wayfinding signage throughout the facility.

Customer Service
- Customers must be able to enter, transit and exit with ease and convenience;
- Parking spaces must be available, appropriately sized and visible;
- Parking should be in close proximity to the terminal, allowing for convenience to avoid delays or missing a flight;
- Facilities should accentuate the San Diego experience with a feel and ambiance that puts people at ease during their use of the airport which is often a very stressful event for many airport users; and
- Parking services are to be competitively priced for the consumer value proposition.
Attachment E provides a description of the SAN parking lots, describing shuttle services, shuttle frequencies, patron assistance, marketing and price structure.

**Parking Operations and Management.** During the Green Build terminal from 2009 to 2013, SDCRAA separated Terminal Two and Two West surface parking areas. During these periods, the airport also temporarily allowed parking on an aircraft apron, to accommodate both the close-in/short-term and remote/long-term customers. To enhance customer service and compensate for the inconvenience, shuttles were employed and parking rates were reduced to alleviate customer frustration. During this four year construction period, these parking facilities were used extensively by airport passengers patiently navigating through the limited parking periods and longer walks through covered construction corridors. Many customers voiced a “sigh of relief” when the parking facilities in front of Terminal Two were returned to operations; however, SDCRAA continues to receive low scores on parking in its quarterly air passenger opinion surveys and complaints about inadequate parking spaces in the close-in terminal parking lots.

Since the Green Build was completed in 2013, SDCRAA has taken significant steps to maximize utilization of existing surface parking facilities and minimize customers’ time and stress to find a suitable parking space location without excessive vehicle circulation. Every week, both Terminals One and Two surface lots are filled to capacity, causing those unable to find a space, the need to move to a parking location including the Terminal Two West lot which is clearly marked with “Additional Parking” signs but requires a longer walk with luggage to Terminals Two East and One, or shuttle ride on the continually circulating Terminal Loop buses. If a passenger cannot find a suitable space, they will park or abandon their vehicle in unauthorized areas and curbs, which the Airport will ticket or tow if creating an unsafe situation or violating parking enforcement regulations. The summer season from May to September in particular has a high level of parking use, and Tuesday/Wednesday/Thursday of each week result in full occupancy. Attachment F includes a table that demonstrates that Terminal One and Terminal Two East parking were at capacity mid-week in Summer 2014 as well as demonstrated in photos taken in June 2014.

The CCC request to examine the feasibility of implementing a pricing strategy to increase the utilization of existing Terminal Two West lot is highly inappropriate, and in an event outside of the scope of the Chapter 3 policies of the Coastal Act. This request ignores the potential negative effects that would result on vehicle miles travelled and reduction of traffic. Further reducing pricing will also induce vehicle trips from customers that currently use remote parking facilities with shuttles and from users that are price-sensitive and presently using remote and off-airport parking facilities.
Moreover, the request suggests that parking pricing at the airport is too high. SAN has competitive daily parking rates, clearly in line with airport industry practices even with future increases. Other than federal grants for airfield maintenance and improvements, the CCC should also recognize that SAN does not receive outside funding and is self-supporting. In any event, the airport knows no Chapter 3 authority for the CCC to regulate parking pricing for airport patrons on an airport.

**Potential Lower Cost Use of Remote Parking Spaces.** At our meeting of May 22, 2015, a question was raised about shuttle service from the more remote areas of the existing Terminal Two West parking lot. When the parking in front of Terminal Two was closed during the construction of the Green Build and the elevated departure roadway, shuttle service was provided, a service that has been continued. However, notwithstanding the convenience of shuttling to the terminal, patrons were reluctant to use these spaces. Because of the arrangement of the parking lot and the existing connection to Terminal Two, it is not possible to provide a cheaper mode for these remote spaces as compared with the closer in spaces.

When the parking plaza is built, however, it will be possible to separate the parking in the parking plaza from that in the remaining surface parking in the short term. A lower parking fee could be offered together with a shuttle. However, it is critical to remember that because of the small physical size of the airport, this parking may be lost as the ADP is developed and a higher and better use is identified. Hopefully, by that time, further transit routes and timetables by others will have induced more patrons to use that opportunity.

### 4. Traffic Reductions with Rental Car Center and Parking Plaza

Perhaps the most important aspect of this CDP consideration is to place the parking plaza in an appropriate context given other approvals of CCC for the airport that have a direct bearing on the effect of the parking plaza.

It should be acknowledged that the CCC approved the rental car center in Application No. 6-13-011 and the CCC considered similar information presented below in its staff report analysis. As requested at our meeting of May 22, the following provides a description of calculations used to determine the number of rental car center vehicle trips removed.

**Rental Car Center (operations commence January 2016).** Currently, five rental car brands operate from property on Harbor Drive, directly south of the airport: Hertz; Dollar; Thrifty; Avis; and National. In 2014, these five brands served 725,050 customer transactions. Customers renting vehicles from these five brands typically travel east on Harbor Drive after renting their vehicle and travel west on Harbor Drive to return their vehicle. Upon the opening of the rental car center, all customer
trips related to the five rental car companies on Harbor Drive (725,050 annual westbound trips and 725,050 annual eastbound trips) will move to the new rental car center and therefore no longer use Harbor Drive.

All rental car brands currently operate courtesy vehicles that use Harbor Drive to travel to and from the Airport terminal area. In 2014, based on automatic vehicle identification data collected by the Airport, rental car companies generated approximately 670,000 annual courtesy vehicle trips to and from the airport. Upon the opening of the rental car center, all rental car courtesy vehicle trips (which utilize over 80 buses) will be eliminated from Harbor Drive (670,000 annual westbound trips and 670,000 annual eastbound trips) and will be replaced by a consolidated rental car shuttle. Beginning in January 2016, the consolidated rental car shuttle (fleet of 16 buses) will operate on on-Airport roadways as much as possible, but will need to use a short portion of Harbor Drive. If the consolidated rental car shuttle operates 20 hours per day, on 5-minute average headways, the shuttle would make approximately 88,000 annual westbound and 88,000 annual consolidated eastbound trips on a small segment of North Harbor Drive.

The opening of the consolidated rental car facility is expected to remove a total of 2.79 million annual trips from North Harbor Drive (removing approximately 1.4 million annual trips in each direction). The reduction of these trips is included in the table below.

Parking Plaza (assumes operations commence mid-2017). The previous May 4, 2015 letter and attached memo provided the calculation for the reduction of 470 average daily trips with the parking plaza.

The projections demonstrate that the additional parking spaces with the proposed parking plaza will result in a decrease in the vehicle trips because the candidates for the parking plaza are airport users that are presently time-sensitive or have mobility issues and would switch from being dropped at the curbfront (generating two round trips) to parking in the close-in terminal area (generating one round trip). But as can be seen above, even if the parking plaza added trips to the system, the overall result would be a significant reduction in trips on North Harbor Drive because of the rental car center.
5. Detailed Traffic Explanation

At our meeting of May 22 and the May 26 letter, a request is made to explain in detail the traffic data. The 2008 FEIR presenting this data, a 2011 Supplemental EIR, and the 2014 Addendum evaluating the parking plaza in light of this data, were all available to the CCC for comment. Only one comment letter was received on the circulation of these documents from Mr. Larry Simon, Federal Consistency Coordinator regarding the 2008 Final EIR; however no comments were received from the San Diego District Office on these documents. Nonetheless, the following explanation is provided as a general “tutorial” on the data that has been presented in the past. These documents were the basis for previous coastal development permits for the Green Build (#6-09-015) and the rental car center (#6-13-011).

A detailed analysis of potential significant impacts to transportation was conducted in three related environmental review documents for the San Diego International Airport Master Plan prepared by the SDCRAA as the lead agency responsible for
compliance with the California Environmental Quality Act. The analysis in the 2008 EIR evaluated three alternatives at a project level specifically analyzing the proposed project: a No Project alternative, an Airport Implementation Plan with 5,000 space parking structure, and an Airport Implementation Plan without a 5,000 space parking structure, in five-year increments from 2010, 2015, 2020, 2025, and 2030. The SDCRAA certified the 2008 Final EIR and prepared Findings of Fact. The FEIR was reviewed and commented on by all of the transportation agencies in San Diego and the traffic analysis has been incorporated into the SANDAG Regional Transportation Plan. The traffic analysis used the regional SANDAG Series 8 model that evaluated all regional traffic through the planning horizon year of 2030. The Final EIR document has been provided to the CCC and was the basis for all coastal development permits related to the San Diego International Airport Master Plan through 2013. As evaluated, the airport improvements will be in service through the 2030 planning horizon and beyond.

The three-level/3,000 space parking structure as proposed will have FEWER impacts than the five-level/5,000 space parking structure alternatives that was evaluated in the Final EIR. This is a basic premise of environmental review and case law guidance and was determined by the SDCRAA as the lead agency in the 2014 Addendum to the EIR.

However, to assist the CCC staff in identifying the analysis that is in the 2008 and 2014 environmental review documents, we are providing:

a) Appendix D: Traffic and Circulation, D.1 General Approach and Methodology, presents the Traffic Impact Study (TIS). Specifically Pages D-7 through D-27 discusses the TIS approach, assumptions, and methodologies. These pages are included in Attachment D which is in the hard copy we provided as well as the FEIR document posted at www.san.org;

b) Appendix D: Traffic and Circulation, D.7 Proposed Airport Land Use Plan describes the TIS assumptions, trip generation and traffic impacts, specifically Pages D-190 through D-224. This section states that the projects assumed in the Airport Land Use Plan are discussed in the Alternative section for the EIR and include all projects in the Proposed Airport Implementation Plan (With Parking Structure) with additional development in the North Area and the former Teledyne Ryan (TDY) site; and

c) A summary table on the following page that lists the specific project elements that were evaluated in the Final EIR through the year 2030. The Proposed Airport Land Use Plan as described and analyzed in Appendix D – D.7, beginning on Page D-190 includes the following project and program assumptions:
It should be clearly understood that the project elements described in the Airport Land Use Plan included facilities that were assumed in 2008 to be larger in size and scope to evaluate a worst-case scenario for all environmental impact categories. For example, the rental car center was assumed in the 2008 FEIR Airport Land Use Plan to be a six-level structure with 9,000 spaces. The analysis was based on the trip generation from 9,000 spaces in the rental car center.

<table>
<thead>
<tr>
<th>No Project Alternative</th>
<th>Airport Implementation Plan</th>
<th>Airport Land Use Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Without Parking Structure</td>
<td>With Parking Structure</td>
</tr>
<tr>
<td>No expansion of terminal areas</td>
<td>Expand Terminal Two with 10 new jet gates</td>
<td>Expand Terminal Two with 10 new jet gates</td>
</tr>
<tr>
<td>No expansion of airfield/aircraft apron</td>
<td>Construct new aircraft parking apron</td>
<td>Construct new aircraft parking apron</td>
</tr>
<tr>
<td>No ground transportation improvements</td>
<td>Construct new apron and aircraft taxi lane</td>
<td>Construct new apron and aircraft taxi lane</td>
</tr>
<tr>
<td>No airport support improvements</td>
<td>Construct new second-level road/curb</td>
<td>Construct new second-level road/curb</td>
</tr>
<tr>
<td></td>
<td>Construct five-level/5,000 space parking structure</td>
<td>Construct five-level/5,000 space parking structure</td>
</tr>
<tr>
<td></td>
<td>Construct access road from Sassafras Street and new general aviation facility</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6-level rental car center with 9,000 spaces</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2,170 public parking spaces</td>
<td></td>
</tr>
<tr>
<td></td>
<td>On-airport circulation road connecting to Northside</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Connection to Sassafras Street</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Future connection to an Intermodal Transit Center with a pedestrian bridge over Pacific Highway</td>
<td></td>
</tr>
</tbody>
</table>
From 2008 to 2010, the SDCRAA worked with the rental car agencies to develop a rental car center that was based upon regional projections for rental car demand, and in 2011, a Supplemental EIR was prepared evaluating a four-level rental car center with 6,500 spaces. However, all of the traffic impacts and the mitigation measures identified were all based upon the worst-case scenario of a 9,000 space rental car center. Similarly, the parking structure was assumed to contain 5,000 spaces on five levels and all of the traffic impacts and mitigation measures were based upon the worst-case scenario of a 5,000 space parking plaza. However, the SDCRAA determined that a 3,000 space parking plaza with three levels was best suited to meet the parking demand for close-in terminal area parking directly in front of Terminal Two. A 3,000 space parking plaza with three levels is the project that has been submitted to the CCC and traffic impacts would be no greater than the impacts analyzed for a 5,000 space parking plaza.

Conclusion

The airport has amply demonstrated:

1. The need for this parking plaza to adequately park airport users in terminal areas;
2. The substantial reduction in traffic and vehicle miles travelled on a major coastal access roadway, North Harbor Drive, as a result of the rental car center, and nominal reduction by the parking plaza;
3. The support of the airport parking for visitor-serving uses, including events with no or low costs to attend; and
4. The fact that this structure will not increase traffic uses or vehicle miles travelled on North Harbor Drive or any other important coastal roadway facilitating public access.

For all of the foregoing reasons, this proposal should be found consistent with the Chapter 3 policies of the Coastal Act.

If you have any questions, please contact me at (619) 400-2478 or tanasis@san.org.
Regards,

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

TNA/jjt

Dist: Sherilyn Sarb, CCC (w/ attachments)
      Deborah Lee, CCC (w/ attachments)
      Keri Robinson, CCC (w/ attachments)
      Thella Bowens, SDCRAA (w/ attachments)
      Angela Shafer-Payne, SDCRAA (w/ attachments)
      Andi Culbertson (w/ attachments)

Attachment A – Public Transportation Options at San Diego International Airport
(from www.san.org)
Attachment B – Construction Schedule for Terminal Two Parking Plaza
Attachment C – Passenger Survey Results
Attachment D – Demand Analysis for Terminal Area Parking
Attachment E – Summary of SAN Parking Services
Attachment F – Table/Photos of Terminal Two Parking, Summer 2014
Attachment G – EIR Appendix D, Pages D-7 through D-27; D-190 through D-224
Attachment A

Public Transportation Options at San Diego International Airport

Amtrak & Coaster: Amtrak Intercity and Coaster commuter trains link communities and travelers from as far away as Los Angeles and Orange Counties to downtown San Diego and coastal North County and, includes stops in Old Town, Sorrento Valley, Solana Beach, Encinitas, Carlsbad and Oceanside.

Travelers headed to and from San Diego International Airport can connect with Amtrak’s Pacific Surfliner and the COASTER at Amtrak’s Santa Fe Depot train station downtown by using Metropolitan Transit System Route 992, which operates between 5:00 a.m. and 11:30 p.m., every 15 minutes on weekdays and every 30 minutes on weekends and holidays.

Amtrak operates seven days a week, 365 days per year, with twelve round trips. Tickets may be purchased at the Amtrak station.

The Coaster operates daily, with the exceptions of New Year’s Day, Memorial Day, July 4th, Labor Day, Thanksgiving and Christmas Day.

For additional information on connecting transit, fares, personalized travel planning and disabled services, call 800.COASTER (800.262.7837) or visit www.gonctd.com/coaster. For additional information on Amtrak service in San Diego, visit the Santa Fe Depot train station, telephone 1-800-USA-RAIL, or visit Amtrak or Amtrak California.

Metro Bus: Public transit is available to and from the Airport and downtown San Diego on the Metropolitan Transit System’s Route 992, which stops at Terminals 1 and 2 as well as the Commuter Terminal, and operates between 5:00 a.m. and 11:30 p.m., every 15 minutes on weekdays and every 30 minutes on weekends and holidays. This frequent bus service connects with Trolley, COASTER and Amtrak stations and is wheelchair accessible.

Planning a trip is easy when you use the MTS Online Trip Planner. For more information on the Metropolitan Transit System, call 619-557-4555 or visit www.sdmts.com.

992 DROP OFF LOCATIONS FOR 992 METRO BUS
**Trolley Service:** MTS' San Diego Trolley is San Diego's light rail transit network. Its three lines serve many popular areas and attractions, such as Downtown, the Convention Center, SDSU, Old Town, and the Mexican border. The Trolley does not stop at the Airport. However, the Trolley’s Blue and Orange Lines make convenient transfers with MTS Bus Route 992 at America Plaza station.

**Limousines & Luxury Sedans:** Many limousine/luxury sedan companies provide service from San Diego International Airport. Please check your local telephone directory for a listing of companies, or visit the San Diego Convention and Visitors Bureau for a list of service providers.

Be sure to verify with your limousine/luxury sedan provider that the company is licensed to pick up passengers at San Diego International Airport.