September 7, 2018

San Diego International Airport Development Plan
DEIR / SCH #2017011053

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

Dear Mr. Anasis:

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

Caltrans supports the consideration of “fair share” fee contributions towards identified strategic transportation improvements or plans that have regional consensus and are directly related to the facilitation of airport access and regional transportation. The San Diego County Regional Airport Authority (SDCRAA) has a responsibility to ensure that traffic circulation impacts surrounding the airport are minimized to the extent that is feasible. It is understood that policies allow for the payment of traffic impact fees within the vicinity that are attributable to airport access. Caltrans would like to continue efforts in this regard and would be a willing partner and stakeholder towards the implementation of potential improvements that benefit San Diego International Airport (SDIA) and the region.

Caltrans would like to submit the following comments for the Draft Environmental Impact Report (DEIR) for the San Diego International Airport Development Plan (ADP) located near Interstate 5 (I-5):

**DEIR TRAFFIC IMPACT STUDY**

California Environmental Quality Act (CEQA) guidelines provide conditions for public agencies to disclose information to reviewing agencies, and specifically to State agencies when a proposed project is of statewide or regional significance. Caltrans requested on several occasions that San
SDCRAA provide specific traffic analysis files associated with the DEIR to facilitate Caltrans’ review. To date, Caltrans has not received the files and did not have the appropriate information to adequately review potential impacts to State facilities.

It was identified within the DEIR that 24 freeway segments are expected to exceed thresholds of significance with Project conditions. The DEIR results show all segments on I-5 southbound in the PM operating at LOS D or better under existing conditions. Without having the specific technical files to validate, Caltrans utilized the freeway Performance Measurement System (PeMS) during the same month the DEIR traffic study intersection counts were done. Many of the freeway segments speeds based on PeMS are more consistent with LOS E and F conditions. Therefore, the existing conditions analysis presented in the DEIR traffic study for freeway segments should be revisited.

**DEIR MITIGATION DETERMINATION FINDINGS**

The DEIR states that the use of Federal Aviation Administration (FAA) funds restricts SDCRAA’s ability to fund and implement off-Airport mitigation measures, and because SDCRAA does not currently have a determination from the FAA that funding for any off-Airport mitigation improvements will be allowed, mitigation measures are considered infeasible. Further, the DEIR concludes that off-Airport mitigation measures are within the jurisdiction of other agencies, and because SDIA cannot require those agencies to implement the mitigation measures, they are considered infeasible.

Caltrans would like SDCRAA to comment on the following:

1. How the SDCRAA is collaborating on off-Airport mitigation projects, as identified in Assembly Bill 93 (2001) and Assembly Bill 1058 (2013).

These Bills established SDCRAA and directed the agency to examine SDIA’s impacts to the surrounding multimodal transportation network, and to cooperate to develop effective surface transportation access to new and existing airports.

2. How SDCRAA is responding to CEQA case law, which indicates that CEQA has no distinction between on-site and off-site mitigation since a public agency must mitigate or avoid significant effects on the “environment of projects” that it proposes, and therefore a public agency is not limited to mitigation strategies only within their jurisdiction or boundaries; and that “each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so”.

It should therefore be considered premature to determine a mitigation to be infeasible before attempting to secure the necessary funds through the appropriate process, and jurisdictional implementation authority is not a feasibility determinant.

3. How SDCRAA interprets federal policies and guidance provided in the DEIR Appendix K regarding the feasibility of using FAA Airport Improvement Program (AIP)
and Passenger Facility Charge (PFC) grant funds along with SDIA revenues to pay for mitigation improvements.

It appears federal legislation and FAA policy documents indicate that these funding types may be used for mitigation improvements under certain conditions.

4. How SDCRAA can use local case studies as examples to use AIP, PFC, and airport revenues to leverage additional local, state, and federal resources for off-Airport ground access projects.

Based on several case studies, including County of San Diego, airport projects have been able to mitigate traffic impacts. There is clear evidence of flexibility with the FAA in allowing airport funds to be used for projects that serve both airport travelers and other travelers, as long as the costs of the improvements are proportional.

MITIGATION RECOMMENDATIONS

The DEIR is identifying that impacts would remain significant and unavoidable at 3 intersections, 10 roadway segments, and 24 freeway segments. With a clear identified mitigation strategy that includes a regional consensus and collaborative funding approach, and given the overall magnitude of impacts associates with the Project Conditions, it is recommended that the SDCRAA consider as mitigation the following strategies to assist in partially reducing impacts to a less-than significant level:

Regional Transportation Plan (RTP) – San Diego Forward

The San Diego International Airport Intermodal Transit Facility and I-5 Direct Connector Ramps project is identified in the RTP. This project is currently unfunded. Based on the overall magnitude of impacts identified in the DEIR to transportation facilities, it is recommended that a “fair share” contribution towards the advancement of this project be considered. Other strategies to assist in developing both these projects can include potentially acquiring right-of-way.

Operational/Access Improvements

Caltrans supports the proposed mitigation measures identified in the DEIR to Hawthorn Street, Kettner Boulevard, Harbor Drive, Laurel Street, and the associated intersections. Improved traffic operations on these facilities may help to prevent queuing on the I-5 southbound exit ramp to Sassafras Street/Kettner Boulevard and I-5 northbound exit ramp to Hawthorn Street.

Consideration should also be made for adaptive signals or signal coordination on Hawthorn Street, Kettner Boulevard, Harbor Drive, and Laurel Street.

Multimodal/Complete Streets

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and new vehicle miles traveled associated with development and recommends appropriate measures to avoid, minimize, or mitigate transportation impacts through smart mobility community design and innovative multimodal demand reduction strategies.

Complete Streets - Caltrans District 11 is in the process of completing a Project Initiation Document (PID) through the State Highway Operations and Protection Program (SHOPP) that identifies Complete Street improvements for I-5 adjacent to the project area. Caltrans supports coordination with the SDCRAA to identify additional enhancements surrounding the project area of the ADP.

Bus Service – In addition to the proposed Old Town Trolley Station shuttle and MTS 992 Rapid route, the EIR can include the feasibility of the Airport Express transit service as identified in the San Diego Airport Multimodal Accessibility Plan (2012).

Bicycle Connections – Planned bicycle improvements on Pacific Highway and nearby arterials, identified in the City of San Diego Bicycle Master Plan, should be addressed in the EIR.

Pedestrian Connections – Direct pedestrian connections between Terminals 1 and 2 and the Harbor Drive path, along with pedestrian connections between the Palm Street Rental Car Center shuttle stop and Middletown Trolley Station, should be addressed in the EIR.

Airport Shuttle Service - Evaluate the feasibility in adding an airport shuttle from the airport to and from Old Town Trolley Station and from the airport to and from Middle Town as identified in the San Diego International Airport Transit Plan (June 2016).

Transportation Demand Management (TDM) - Caltrans supports TDM strategies like those identified in Mitigation Measure MM-TDM-1. Caltrans can coordinate with SDCRAA to facilitate the implementation of wayfinding signage and other appropriate improvements between Caltrans Right of Way (R/W) and the airport.

Multimodal Corridor Plan – Caltrans has also been in discussion with SANDAG to potentially conduct a comprehensive plan for I-5, which would encompass the areas adjacent to SDIA. The plan would study the long-term strategy for I-5, and could potentially incorporate mitigation strategies identified in the ADP EIR.

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

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Mr. Ted Anasis  
September 7, 2018  
Page 5  

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

Sincerely,

[Signature]

Jacob Armstrong, Chief  
Local Development and Intergovernmental Review Branch  

c: State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."