Dear Mr. Anasis:

Thank you for the opportunity to review and comment on the above-referenced Draft Environmental Impact Report (DEIR), prepared by the San Diego County Regional Airport Authority (Airport Authority) and received by our San Diego District Office on July 26, 2018. The Airport Development Plan (ADP or project) consists of improvements that will enable the San Diego International Airport (SDIA or airport) to meet demand through 2035, and includes: (1) demolition of the existing 19-gate, 48 ft. tall, two-story, 336,000 sq. ft. Terminal 1 and replacement with a new 30-gate, 65 ft. tall, three-story, 1,120,000 sq. ft. terminal with an adjacent 400,000 sq. ft. non-airport related commercial development area; (2) construction of a five-story, 85 ft. tall, 2,780,000 sq. ft., 7,500-space parking structure adjacent to the new Terminal 1; (3) a new on-airport entry roadway with a multi-use pedestrian and bicycle pathway that would connect to North Harbor Drive and allow westbound airport traffic to enter the airport at a new intersection west of the existing intersection of North Harbor Drive and Laurel Street; (4) construction of a new 7-gate, 450,000 sq. ft. concourse at Terminal 2 West; (5) replacement of Terminal 2 East with a linear 250,000 sq. ft., three-story concourse connector between Terminal 2 West and the new Terminal 1 resulting in a net decrease of six gates; (6) 12,000 sq. ft. expansion of the Central Utility Plant; (7) demolition of the existing 65 ft. tall, 132,000 sq. ft. administration building and replacement with a new 95 ft. tall, 150,000 sq. ft. administration building in a different location; (8) a new airfield taxiway and new remain overnight (RON) aircraft parking areas; and (9) other associated infrastructure improvements. Ultimately, the number of gates at SDIA would increase from 51 to 61.

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

The DEIR raises many concerns regarding the proposed ADP’s consistency with the Coastal Act and the Public Trust Doctrine. According to the DEIR, the ADP will result in 17 years of construction and significant unmitigated impacts on traffic, air quality, climate change and greenhouse gas emissions, historical resources, land use and planning, and noise. The Coastal Act consistency analysis on pages 3.11-29 to 3.11-30 of the DEIR is inadequate and fails to thoroughly evaluate the project’s consistency with Chapter 3 of the Coastal Act. The DEIR states that only seven Coastal Act policies are applicable to the project; however, the DEIR should address consistency with all relevant Chapter 3 policies. This section should be revised to provide a more detailed analysis of the project’s consistency with the Coastal Act. If the ADP is found to be inconsistent with any of the Chapter 3 policies, mitigation measures or adoption of an alternative would be required to ensure the ADP is brought into conformance with the Coastal Act. Given the deficiency of this section and those deficiencies identified below, we recommend that the DEIR be revised to address these comments and recirculated for additional public review.

Of primary concern to Commission staff is the proposal to significantly expand the capacity of the airport (from 51 gates to 61 gates) without implementing adequate improvements to alternative transportation infrastructure in order to accommodate the increase in passengers arriving and departing from the airport on North Harbor Drive, a major coastal accessway. North Harbor Drive serves as a primary access route not only to the airport but to and along the San Diego Bay, the shoreline promenade, Harbor Island, Shelter Island, Cabrillo Monument, Point Loma, parks, sports fishing interests, marinas, boat launch facilities and many other coastal destinations. Over 70% of the total vehicle traffic on North Harbor Drive is airport-related and the roads surrounding the airport currently experience congestion and levels of service “F” on some street segments and intersections as a result. While we appreciate the incorporation of pedestrian and bicyclist access to the airport as part of the proposed circulation system, these improvements alone will not adequately mitigate for the anticipated traffic impacts on 16 intersections, 18 road segments and 27 freeway segments. The ADP should include more robust public transportation alternatives to increase public access to the airport via modes that minimize traffic and associated greenhouse gas emissions.

These concerns have been previously raised in recent Commission actions, including the Commission’s approval of the rental car center (CDP No. 6-13-011) and the Terminal 2 parking structure (CDP No. 6-14-1886), as well as our March 1, 2017 comment letter regarding the Notice of Preparation for the subject environmental document. In both those actions, the Commission found that additional parking infrastructure could be approved consistent with the Coastal Act because the Airport Authority would continue to plan, implement, and improve alternative transportation options to the airport as part of
future redevelopment. Specifically, the findings of approval for the rental car center stated:

The Commission is strongly supportive of these transit planning efforts, and in particular, efforts to provide airport bus and/or shuttle service for the public from the Old Town Transit Center and/or park and ride type shuttle stops at trolley stations located inland of Pacific Highway, between the Old Town Station and the Santa Fe Station (where the existing public bus stops). Allowing the public to access an airport shuttle or an MTS bus from these locations would be a significant improvement in transit airport access for the public.

The findings of approval for the Terminal 2 parking structure reiterated this statement and also mentioned the Intermodal Transit Center (ITC) which is planned to connect the rail corridor to the airport via a pedestrian bridge.

In August 2013, when the Commission approved the CDP for the rental car center (CDP No. 6-13-011), it imposed Special Condition No. 8 which required a Transportation Demand Management (TDM) program. The TDM program requires an annual status report documenting the current status of efforts made to add or improve mass transit linkage to the airport for employees and users, including the development of the ITC that will connect to the north side of the airport and provide transit users free shuttle service to the terminals, an airport shuttle from the Old Town Transit Center, a direct airport shuttle from the trolley stations between Old Town Transit Center and Santa Fe Depot, and coordination with MTS to expand direct bus service to the airport. Another requirement of the TDM Program included implementation of an on-demand car or shuttle pick-up service provided from the closest transit stations to the rental car center; however, the shuttle service that the airport has implemented in response to this requirement is not what was required or envisioned. The airport shuttle that picks up trolley users is located on airport property and trolley passengers must walk approximately 8 minutes from the trolley station across a busy road (Pacific Highway) to access the shuttle. Thus, this shuttle should be reevaluated and improved as part of the ADP to make the connection from the trolley to the airport more user-friendly, and to be in conformance with the required special condition.

To ensure that the Airport Authority would continue efforts to expand public transit options to the airport, in August 2015 the Commission imposed Special Condition No. 3 as part of the approval for the parking structure (CDP No. 6-14-1886) which requires an update to the comprehensive Airport Transit Plan and an annual progress report documenting the current status of efforts to improve existing and add new mass transit linkages to the airport for employees and passengers. Special Condition No. 2 also required a Public Transit Outreach Program to inform airport users of public transit opportunities to the airport and encourage their use. Finally, Special Condition No. 4 requires that future CDP applications for additional parking at the airport include: an up to date traffic analysis; a comprehensive parking management plan; a detailed parking demand analysis reflecting current conditions; a list of the efforts made by the airport in collaborating with the regional transit agencies in the planning and construction of the
planned ITC; a comprehensive traffic and parking analysis detailing the effects of public transit on parking demand; and an evaluation of parking demand and traffic impacts with and without the ITC in order to determine its impact on airport traffic and parking.

While the airport is located in the center of the City of San Diego, it has not historically been accessible via public transit, except by one bus route (Metropolitan Transit System Bus 992) that stops at the Santa Fe Depot in downtown San Diego. The ADP continues to support reliance on single-occupancy vehicles by proposing a new 7,500-space parking structure at Terminal 1 instead of considering meaningful public transportation alternatives that would make public transit to the airport more easily accessible from the major transit hubs (e.g., Old Town Transit Center, ITC, Santa Fe Depot) and encourage more people to access the airport via public transit, thereby reducing vehicle miles traveled and associated greenhouse gas emissions.

The airport has already spent considerable time and effort identifying potential transit alternatives in the development of an Airport Transit Plan in 2010, updating that plan in 2016, and as a member of the Harbor Drive Mobility Committee. Instead of building another parking structure, some combination of the following alternatives should be considered and analyzed as part of the revised DEIR:

- Contribute to the funding of planning and environmental studies to facilitate development of the ITC to accommodate a future rail connection to the airport.
- Improve the existing airport shuttle to the Middletown trolley station. Currently, transit users must walk from the trolley station, down Palm Street, across Pacific Highway, and then north on airport property to reach the shuttle stop. A more direct connection where shuttles pick up and drop off users at the trolley station would make the connection more convenient and comfortable, and would likely increase use. In the meantime, immediate improvements that should be implemented include signage, sidewalk branding with airport logo, and coordination with the San Diego Unified Port District (Port), City of San Diego, and MTS to repair the Palm Street sidewalk, improve the Pacific Highway crosswalk, and construct a shuttle bus turn-out area at or directly adjacent to the trolley station.
- Construct an automated people mover to take airport passengers/employees from either the Washington Street or Middletown trolley stations directly to the terminals, as well as connect to the Rental Car Center. This improvement could serve as a catalyst for the ITC identified in the San Diego Association of Government (SANDAG) existing Regional Plan as part of the 2035 Revenue Constrained Scenario.
- Contribute to the funding of planning and environmental studies to facilitate development of direct transit connection to the airport (e.g., trolley, rail)
- Convert MTS Route 992 to a Rapid Bus route between the airport and Santa Fe Depot to increase the frequency and limit stops which will result in shorter travel times and increased reliability. If MTS is not in support of conversion of Route 992 to a Rapid Bus route, add direct shuttle between the airport and Santa Fe Depot. The existing MTS Route 992 should also include branding to identify that
it is an airport-bound bus and include improvements (e.g., luggage area) to make the bus more user friendly for airport passengers.

- Dedicate a transit only lane for buses and/or other transit vehicles on North Harbor Drive in order to reduce travel times.

In addition, a shuttle to the Old Town Transit Center should be implemented as part of this project as an interim measure to connect rail passengers (i.e., Coaster and Amtrak) from north San Diego County, trolley passengers from east San Diego County, and bus passengers from around the County to the airport. The Old Town Transit Center shuttle would provide a more direct and efficient connection to the airport via the on-airport roadway, rather than traveling downtown to the Santa Fe Depot and backtracking through traffic on North Harbor Drive, and should be prioritized until such time as the ITC or another direct rail connection to the airport can be built. It is critical that the Airport Authority begin coordination with relevant agencies, including the City of San Diego, California State Parks, MTS, North County Transit District (NTCD), and Amtrak, as soon as possible in order to determine an appropriate parking management plan to ensure that the parking lot at the Old Town Transit Center is only used by transit riders and visitors of the State Park, and does not become a lot for airport employees or passengers to park and ride the shuttle to the airport. Given the importance of the Old Town Transit Center shuttle in linking Coaster passengers from North San Diego County, Amtrak passengers from Los Angeles/Orange County, MTS trolley passengers from East San Diego County, and bus passengers from around the County, this shuttle should be implemented concurrent with the commencement of construction of the ADP to help mitigate the anticipated construction impacts.

The DEIR acknowledges multiple measures that could be implemented to mitigate for project impacts associated with traffic and circulation; however, these mitigation measures are identified as “infeasible” because the Airport Authority has not yet received permission from the Federal Aviation Authority (FAA) to use airport related revenues to mitigate offsite for impacts caused by the proposed development. Specifically, the DEIR states:

*Now that SDCRAA has identified specific mitigation measures for Project impacts, SDCRAA will make specific requests to the FAA, where appropriate, for it to allow funding of off-Airport mitigation measures.*

It is unclear whether the Airport Authority has had any conversation regarding the approval process with the FAA and therefore the subject mitigation measures should not yet be considered “infeasible”.

Even if the Airport Authority does not have jurisdiction to implement necessary traffic improvements because those improvements would be located within another agency’s jurisdiction, the improvements may still be feasible under the California Environmental Quality Act (CEQA), and the Airport Authority may mitigate the ADP’s significant impacts by contributing funds to pay its fair share of the cost to implement the necessary mitigation measures. Based on coordination with other stakeholders, it is our
understanding that many agencies would be willing to enter into an agreement with the Airport Authority to implement mitigation measures if the Airport Authority is willing to provide its fair share of mitigation. The Airport Authority should coordinate with Caltrans, the City of San Diego, MTS, Port, and SANDAG to determine which mitigation measures may be feasible in each of their jurisdictions. The DEIR should then be revised to identify the cost of each of the recommended improvements, the formula for determining the airport’s fair share, and the percentage and dollar amount of the airport’s fair share of the cost of each of the recommended improvements. Unless the FAA determines that such fair share contribution is prohibited by law, the airport should contribute its fair share of the cost of the necessary improvements to the agency with jurisdiction over the affected traffic facility. Following this coordination, the DEIR should also be revised to identify mitigation measures which are within the jurisdiction of another agency as “can and should be adopted by such other agency.”

In addition, it is unclear from the DEIR language which mitigation measures the Airport Authority believes are appropriate and the process necessary to receive FAA approval of mitigation funds. As such, please identify the criteria used to select appropriate mitigation measures, the process to request funding, the expected timeline for request and approval of mitigation funds, and information regarding any preliminary correspondence the Airport Authority has had with the FAA regarding use of these funding mechanisms for mitigation projects. We also recommend additional coordination with the City of San Diego, Port, SANDAG, Caltrans, MTS, and the Commission prior to the final selection of mitigation measures to seek FAA approval for to ensure they are in alignment with current plans for the region.

Finally, please clarify whether the airport has revenue sources that are not subject to FAA approval that could be used to pay the airport’s fair-share of the cost of off-airport improvements necessary to mitigate the ADP’s numerous significant impacts on traffic in the surrounding area.

**Greenhouse Gas (GHG) Emissions and Climate Change**

We appreciate the Airport Authority’s implementation of energy efficiency measures and its goal of achieving carbon neutral operations for those direct and indirect emissions within its control, as described in the DEIR’s Section 3.3.2.2. To help achieve this goal and to allow consistency with prior Commission actions, we recommend the DEIR be modified to address the following two issues.

First, we recommend the DEIR’s Section 3.3.4.3 – State Plans, Policies, and Regulations be revised to identify the Coastal Act as a State-level policy and regulatory mechanism that is applicable to the proposed project. We also recommend that the document describe the Commission’s GHG-related findings and conditions required through CDP Nos. 6-09-015 and 6-09-15-A1, issued to the airport in 2009 and 2018 respectively. The permit authorized development similar to that being currently proposed, required the airport to identify all increased emissions resulting from the project, and required mitigation through several types of measures, including implementing emission reduction methods and obtaining credits and offsets that were consistent with AB 32.
requirements. The end result was to ensure that net emissions from the project did not exceed a 7,000 tonne per year threshold that had been established through a Memorandum of Understanding between the airport and the State Attorney General (described in this DEIR’s Section 3.3.4.5).

We also recommend the DEIR’s Section 3.3.7 – Project Impacts be revised to identify how the Airport could implement similar measures to mitigate or offset all emissions above that same threshold (or another more recent relevant threshold level). For example, as shown in Table 3.3-6, the total incremental increase above existing emissions due to the proposed project would be greater than the 7,000-tonne threshold in 2026, 2030, 2035, and presumably in the years in between that were not included in the table. Later in this section, the DEIR describes several mitigation measures that are expected to reduce this incremental increase, though the reductions are not quantified and they are not tied to any relevant threshold level. We recommend that, as an additional mitigation measure, the Airport Authority consider including in the DEIR a description of annual monitoring or quantification it will implement to identify actual direct and indirect emissions resulting from the project, along with measures such as credits or offsets that it will obtain to ensure net emissions do not exceed the relevant threshold.

The DEIR should also evaluate the project’s long-range GHG impacts for the year 2050 in light of the GHG emissions reduction target for that year in Executive Order S-3-05.

**Sea Level Rise**

Sea Level Rise (SLR) analysis is necessary to fully evaluate impacts related to current and future hazards, including tidal and storm flooding, wave runup, groundwater levels, saltwater intrusion, and erosion, and how the project will minimize risks in areas subject to those hazards. Specifically, to comply with Coastal Act Section 30253, the project will need to be planned, located, designed, and engineered for the changing water levels and associated impacts that might occur over the life of the development. This analysis is also necessary to evaluate the current and future impacts the project will have on public access and recreation, biological resources, and other coastal resources set forth in Chapter 3 of the Coastal Act. To address these potential impacts, as well as compile the appropriate analysis in preparation for CDP review, the DEIR should include a comprehensive SLR analysis and vulnerability assessment for the proposed project.

The analysis should include determining the range of SLR projections specific to the project area over the duration of the project life, identifying potential physical SLR impacts, and how the project may impact coastal resources such as public access and recreation, water quality, coastal habitats, and visual resources over time, given the influence of SLR. The analysis should also identify appropriate mitigation measures, changes to the project design, and adaptation strategies for the project over time as sea levels rise. The analysis should be conducted in accordance with the Commission’s SLR Guidance Update along with the Ocean Protection Council’s 2018 State of California Sea Level Rise Guidance Update, which is the current best available science on climate change and SLR impacts for the State of California. Please refer to Table 34 of Appendix 3 in the OPC Guidance for the probabilistic projections for the height of sea
level rise for the San Diego tide gauge. We recommend considering a range of high emissions (RCP 8.5) scenarios including the 0.5% probability (for medium-high risk aversion), and the H++ scenario (for extreme risk aversion) for the life of the proposed structures. Including the “extreme risk aversion” (H++) scenario is necessary to evaluate the vulnerability of planned or existing assets that have little to no adaptive capacity, that would be irreversibly destroyed or significantly costly to repair, and would have considerable public health, public safety, or environmental impacts should that level of SLR occur, such as large infrastructure projects like the one proposed in the DEIR. The Airport Authority may also consider evaluating the lower projections (those with a higher probability) to gain an understanding on what is likely to be vulnerable regardless of modeling uncertainty and future greenhouse gas emissions.

**Passenger Growth**

The DEIR states that the annual rate of growth in aircraft operations and passenger levels at SDIA is expected to be the same with or without the ADP improvements; however, there is no evidence presented in the DEIR to support this assertion. The reduced number of gates associated with existing conditions would limit the number of flights and result in fewer flights and fewer passengers than could be accommodated with the ten additional gates proposed in the ADP. The use of this assumption likely underestimates the potential environmental impacts of the project. The DEIR should be revised to include a detailed analysis of the current capacity and future capacity with the ADP that explains the relationship between passengers, flights, and number of gates, as well as the efficiencies that may be gained through reconfiguration of the taxiways. This analysis should also clearly identify growth-inducing impacts from the ADP. All analyses that rely on the assumption that passenger growth will be the same with or without the ADP improvements are inaccurate and should be reevaluated once an appropriate passenger growth without the ADP improvements is determined.

The DEIR does not disclose actual existing aircraft operations and passenger levels from 2012 to 2017 or the percentage of growth between these timespans. Instead, the analysis of passenger growth in the DEIR relies on forecasted numbers from 2012 that are significantly lower than the actual number of passengers served today. Specifically, the forecast identifies approximately 9.3 million passengers in 2016 growing to approximately 17.6 million passengers in 2050, even though actual 2017 passenger data indicated the number was well beyond the forecasted numbers at approximately 22 million passengers. Thus, the DEIR’s forecasts are underestimated, and the project’s environmental impacts are likewise underestimated. As such, we request that the Airport Authority include the most recent actual passenger numbers from 2016 and 2017 to forecast passenger growth and revise all analyses in the DEIR that rely on this outdated forecast, including air quality, noise, greenhouse gas emissions, health hazards, traffic and circulation, and utility impacts, so that the significance of environmental impacts are appropriately assessed and mitigated.

**Environmental Justice**
Section 30604(h) of the Coastal Act allows the Commission to consider environmental justice, or the equitable distribution of environmental benefits throughout the state. Coastal Act Section 30107.3 defines environmental justice as:

…the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

As such, please add a discussion that addresses environmental justice. Currently, the project unduly burdens the general public’s ability to access the coast. In order to ensure consistency with the public access/recreation and environmental justice policies of the Coastal Act, we recommend the reevaluation of mitigation measures and alternatives that would avoid or minimize adverse impacts from traffic, air quality, climate change and greenhouse gas emissions.

**Vehicular Circulation**
The description of the proposed new on-airport access road is unclear and fails to discuss how vehicles will turn onto the road and whether any of the proposed improvements will require the use of off-airport land and approvals from other agencies. What improvements to Laurel Street are necessary to access the on-airport road and how will Laurel Street be impacted by the on-airport road? North Harbor Drive is a major coastal accessway to and along the San Diego Bay and Laurel Street is an important east-west link to North Harbor Drive. As such, any modifications to the circulation system should be carefully analyzed for impacts to public access, including vehicular access to and along the bay. Access along North Harbor Drive in both eastbound and westbound directions should be protected for those visitors that want to access and recreate along the San Diego Bay.

**Parking Analysis**
The DEIR should address the need for 7,500 new parking spaces in light of the current underutilization of parking at SDIA. In addition, the parking impact analysis referenced in the DEIR should be included as an appendix. Finally, any modifications to the public and employee parking lot located at the west end of the airport should be included in the project description, including the number of existing and proposed parking spaces.

**Commercial Space**
The DEIR states that a commercial space could be used for a farmers’ market, conference facilities, expanded restaurant, or retail. The intended use of the proposed 400,000 sq. ft. commercial space should be clarified in the project description. Any commercial space should be designed to serve airport passengers only and should not add to the parking demand of the project. Given the number of significant unmitigated impacts associated with the proposed ADP, the Airport Authority should reconsider whether this additional space is necessary. Would the elimination of this area or reduction in size of this area reduce the amount of environmental impacts?
Visual Resources
The proposed Terminal 1 parking structure would result in adverse visual resource impacts due to its height and its proximity to North Harbor Drive. Specifically, the proposed parking structure would be 85 ft. tall which is significantly taller than the 66-ft. Terminal 2 parking structure and the existing 48-ft. Terminal 1 buildings. In addition, the visual analysis provided in the DEIR indicates that a large stretch of the eastern side of North Harbor Drive would be walled off by the proposed parking structure. As stated previously, Commission staff would not support the addition of another parking structure without an appropriate increase of multimodal transit opportunities to the airport.

Should the Airport Authority continue to pursue a parking structure, other alternatives should be considered and analyzed including a smaller parking structure on the existing surface parking lot located on the north side of the airport off of Pacific Highway which has a more direct connection to the region via Interstate-5 and would avoid traffic impacts on North Harbor Drive, the primary coastal access corridor to the bay for the public. In addition, design plans should be included in the visual analysis in order to give the Commission and the public the opportunity to review and comment on the proposed design. Effort should be taken to break up the massing of the structure by reducing the height and stepping it back from adjacent public roads in order to reduce the visual impact.

In addition, the DEIR should include a discussion of the visual impacts of the proposed 95 ft. tall, 150,000 sq. ft. airport administration building, which would be significantly taller than any of the surrounding development. Section 30251 of the Coastal Act requires development to be sited and designed to protect views to and along scenic coastal areas and to be visually compatible with the character of surrounding areas. Given that a 95 ft. tall building would be inconsistent with the surrounding community character, a shorter administration building should be considered and analyzed as an alternative, especially given that the existing building is much smaller at 65 ft. tall and 132,000 sq. ft.

Please include a detailed discussion of the proposed lighting associated with the ADP, including number of lights, types of lights and their Kelvin temperature, as well as conduct a lighting study that analyzes how lighting would impact visual receptors, including sensitive biological species such as the California Least Tern colony.

Please include any proposed signage in the project description. Signs with advertisements or commercialized messaging are not appropriate and should not be included in the project. Digital signs that would be visible from public roads, parks, or any other public areas should also be avoided.

Biological Resources
Given the significant decrease in the population of the California Least Tern (CLT) colony on-site, the DEIR should clarify whether the airport has implemented all of the identified mitigation measures required by the 1993 Biological Opinion and the 2013 Section 7 Consultation. In addition, if these measures are proposed to be included in the
ADP, this should be clarified. The DEIR should also identify how close construction and operational activities will be located to the CLT nesting oval. In light of the dramatic decline in the estimated number of nesting pairs and nests at SDIA, additional and more stringent measures should be required as part of the ADP, including a prohibition on any construction within 1,200 feet of the CLT nesting sites during the nesting season. In addition, the airport should coordinate with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife to determine how far construction storage and staging areas should be located from the CLT colony in order to avoid disturbance.

The essential fish habitat report and 2012 wetlands delineation are outdated and need to be updated. The wetlands delineation should include areas of San Diego Bay that would be impacted by airport stormwater runoff including, but not limited to, the Laurel Hawthorne anchorage, Convair Lagoon, Harbor Island East and West Basins, and the Navy Boat Channel.

**Construction**
Given that construction of the project is proposed to take place for 17 years, the DEIR should identify and analyze the anticipated construction impacts. Construction impacts may be determined by identifying proposed construction approach, equipment, staging areas, truck trips, lighting, number of employees, employee parking locations, restricted work hours, etc.

Mitigation Measure MM-TR-Con-1 requires SDIA only to “promote” TDM strategies and to “consider” establishing a remote parking lot and shuttle service for construction workers, but does not require any action that will result in quantifiable reductions in construction traffic. This measure should be revised to require TDM strategies and establishment of a remote parking lot and shuttle service for construction workers.

The proposed mitigation for 2020 construction traffic impacts at many intersections is misleading and ineffective. CEQA requires mitigation to be implemented before or at the time the significant impact is anticipated to occur. Mitigation measures for these intersections, including at Laurel Street and Kettner Boulevard, are not required to be installed until “prior to the first occupancy of any new or developed facility that is part of Phase 1b.” The significant traffic impacts associated with construction necessarily will occur and presumably will conclude before the first occupancy of any new or developed Phase 1b facility. As a result, the recommended mitigation will not avoid or reduce the significant impact. Please revise the timing of these mitigation measures to ensure they are implemented before the significant impact is anticipated to occur.

**Gates**
The DEIR identifies that there are 19 existing gates in Terminal 1 and the new terminal would have 30 gates, which would result in 11 additional gates. The Terminal 2 West improvements consist of adding a new “stinger” concourse with 7 new gates. The Terminal 2 East improvements include the removal of the easternmost portion of the terminal and replacement with a new concourse that connects Terminal 2 to Terminal 1; this would result in the loss of 13 existing gates and the addition of 7 new gates, which
would result in a net decrease of six gates. The DEIR states that ultimately the number of gates at SIDA would increase from 51 to 61; however, given the numbers in the project description, it appears the ADP would result in 12 new gates (11 Terminal 1 + 7 Terminal 2 West Stinger – 6 Terminal 2 East = net increase of 12 gates). Please clarify the number of existing and proposed gates at each terminal and the net increase in gates airport-wide.

**Rideshare**

Approximately 12% of airport traffic currently accesses the airport with transportation network company (TNC) vehicles. The DEIR does not address this significant, and growing, portion of the ground transportation network. Please revise the DEIR to assess the projected growth of TNCs and associated decrease in parking and rental car demand. The ADP should identify phased operational solutions to be developed to accommodate increasingly larger rideshare volumes; identify and design specific rideshare passenger pick-up and drop-off points, including designs for curb front in front of Terminal 1 to accommodate growing rideshare and future autonomous vehicles; and coordinate with TNCs to designate and design one or more staging areas for TNC drives that reduces air emissions. If TNC and taxis were allowed to drop-off and pick-up passengers without exiting the terminals, this would result in a reduction of vehicle trips to and from the queuing area on North Harbor Drive, therefore reducing traffic and associated greenhouse gas emissions.

Thank you again for the opportunity to review and comment on the proposed ADP. We look forward to continuing to work with the Airport Authority to help advance public transit to and from the airport as part of future redevelopment in collaboration with State, regional and local agencies, including but not limited to, SANDAG, Caltrans, City of San Diego, Port District, MTS, NCTD, and State Parks. If you have any questions or require further clarification, please do not hesitate to contact Melody Lasiter or myself at the above office.

Sincerely,

Kanani Leslie

Senior Coastal Planner

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