September 7, 2018

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

Subject: County of San Diego comments on Draft Environmental Impact Report (EIR)

Dear Mr. Anasis,

The County of San Diego (County) has reviewed the Draft EIR for the San Diego International Airport-Airport Development Plan (SCH No. 2017011053-SDCRAA # EIR-18-01) and has enclosed comments.

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

1. The San Diego International Airport as identified in the Airport Development Plan (ADP) Draft Environmental Impact Analysis (EIR) will cause numerous unmitigated significant traffic impacts to local intersection and roadways. While we agree improvements to local facilities should be constructed to mitigate the Airport’s significant traffic impacts, the proposed mitigation should also include improvements to regional facilities. The DEIR should expand its proposed mitigation beyond just local roadways and intersections. The DEIR should include improvements to regionally significant facilities like the I-5 direct connector ramps because the airport generates traffic and creates impacts on a regional level.
2. The DEIR only includes traffic analysis with I-5 direct connector ramps in the Year 2050 conditions because it is included in SANDAG's Regional Transportation Plan. The ADP and Draft EIR should consider I-5 direct connector ramps as mitigation in all years.

3. The DEIR recommends local roadway improvements and adding lanes along Grape Street and Hawthorn Street to mitigate significant vehicular traffic impacts. The Waterfront along N. Harbor Drive, Little Italy, the County Administration Center (CAC), the Waterfront Park, and all of the adjacent businesses and residences rely on multimodal, pedestrian, and bicyclist facilities to access these San Diego landmarks. The proposed improvements for vehicular traffic must not preclude opportunities for Complete Streets (i.e. sidewalks, pathways, bicycle lanes, etc.) and active transportation.

4. In every yearly scenario (i.e. Year 2022 to Year 2050), the ADP identifies numerous impacts (e.g. 2050 With Project, 8 intersections, 17 roadway segments and 20 freeway segments) expected to exceed thresholds of significance. Aside from the one intersection improvement at North Harbor Drive at Harbor Island Drive/Airport Terminal Road, the Draft EIR states that every single traffic impact will "remain significant and unavoidable" because the FAA may not authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements or mitigation measures. While it's possible the FAA may not provide funding to mitigate local traffic impacts, FAA sponsor assurances do not prohibit the SDIA from using airport revenue to mitigate project impacts. In addition, FAA sponsor assurances do not prohibit the SDIA from obtaining FAA funds to develop transportation facilities dedicated to serving the airport such as an airport-only freeway access. The ADP should include mitigation that will reduce impacts to a less-than-significant level, regardless of funding source. Additionally, LOS Summary tables (e.g. Table 2.14-24) should include a "Yes" or "No" column to clearly identify which facilities have proposed mitigation that is either "considered feasible" or "not considered feasible."

5. We note in Appendix K, Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures, to the DEIR that the SDIA identifies FAA policies that address the use of SDIA revenue for traffic mitigation. FAA policy allows for the payment of traffic impact fees, but does require that the fees be used only for the mitigation of airport project impacts. (See, for example, FAA Order 5190.6B, p. 15-10 & 18-7.) To ensure that impact fees are not diverted to non-airport purposes, the FAA generally instructs airport sponsors to use fees to reimburse for project costs rather than pay for anticipated mitigation. (FAA, Policy and Procedure Concerning the Use of Airport Revenue, February 16, 1999, p. 7708.) The FAA may, however, "permit a prepayment of estimated impact fees at the commencement of a mitigation project, if the funds are necessary to permit the mitigation project to go forward, so long as there is a reconciliation process that assures the airport is reimbursed for any overpayments, based on actual project costs, plus interest." (Id.) In any event, "...where airport development causes a government agency to take an action, such as constructing a new highway interchange in the vicinity of the airport, airport revenues may be used equal to the prorated share of the cost." (Id., emphasis added.) We aren't, accordingly, sure why the Airport Authority believes off-airport traffic mitigation is infeasible for its project. With careful planning, recognizing there are limits to what the FAA will fund, the County has
been able to mitigate traffic impacts for its airport projects. As such, the County requests that the Airport Authority delay certification of the Final Environmental Impact Report until such time that the Airport Authority resolve the funding issue for off-site improvements to mitigate significant traffic impacts.

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

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

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

Sincerely,

[Signature]

MARKO MEDVED, Director
Department of General Services

cc: Aimée Faucett, Chief of Staff, Office of Mayor, City of San Diego
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