September 7, 2018

Mr. Ted Anasis
San Diego County Regional Airport Authority
3225 N. Harbor Drive, 3rd Floor
San Diego, CA 92101

Dear Mr. Anasis:

SUBJECT: San Diego County Regional Airport Authority – Airport Development Plan Draft Environmental Impact Report

Thank you for the opportunity to comment on the San Diego County Regional Airport Authority’s (SDCRAA) Airport Development Plan Draft Environmental Impact Report (EIR). SANDAG recognizes the importance of the San Diego Regional Airport as a regional asset as a critical part of the regional transportation network.

Impacts to the region’s transportation infrastructure as a result of airport development and operations and ongoing interest in advancing transit connections to the airport require a commitment from all parties to contribute toward needed improvements. The SDCRAA also should fully fund its fair share of mitigation for the impacts of its Airport Development Plan.

Transportation Impacts

As concluded in the Draft EIR, the Airport Development Plan will result in significant impacts to the surrounding transportation system. The analysis identifies mitigation measures to reduce the impacts, but states that the mitigation measures are not feasible because the Federal Aviation Administration may not authorize the use of Airport funding to pay for any off-Airport transportation mitigation measures.

SANDAG requests that the EIR identify funding sources that could implement the mitigation measures. Airports throughout the country are increasingly finding creative ways to finance infrastructure projects in support of regional mobility and sustainability needs and objectives. SANDAG request that the SDCRAA commit to funding similar efforts.

Consistent with the California Supreme Court’s ruling in City of San Diego v. Board of Trustees of California State University (61 Cal. 4th 945 (2015)), California Environmental Quality Act requires the responsible agency to determine whether and how a project’s effects can feasibly be mitigated (Pub. Resources Code, § 21081, subd. (a)(1)-(3)), to include mitigation costs in the budget (Pub. Resources Code, § 21106), and if mitigation is infeasible to decide whether the project should nevertheless proceed based on a statement of overriding considerations.
As noted by the Court in that case, it is a fundamental statutory directive 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, even in the face of significant budgetary obstacles or constraints.

Regional Plan Impacts

The Airport Development Plan will have a lasting impact on the regional transportation system and without the necessary improvements, would undermine San Diego Forward: The Regional Plan (Regional Plan) goal of reducing greenhouse gas emissions by investing in a sustainable transportation network.

Projects identified in the Regional Plan that would improve the transportation system around the airport, including the Intermodal Transit Center and new on- and off-ramps on Interstate 5, may require further detailed studies prior to implementation. SANDAG requests that the SDCRAA actively collaborate with the City of San Diego, Caltrans, the Port of San Diego, the San Diego Metropolitan Transit System, and other parties to fund the studies necessary to construct these improvements.

The Regional Plan also identified Skyways, or “aerial gondolas,” as a viable first-mile, last-mile connection for improving linkages to the regional transit system. SANDAG is in the process of completing a feasibility study, funded by the County of San Diego, for a Skyway connection between the Airport, Santa Fe Depot, and Downtown Trolley Stations along Harbor Drive. SANDAG requests that the EIR include design options for integrated Skyway stations at Terminal 1.

Per the mitigation analysis in the draft EIR, Airport funding could be used to plan, design, and construct the Skyway stations because they would be on Airport property. With major reconstruction of Terminal 1 proposed, the Skyway stations could be fully integrated into the design and functionality of the Airport.

Regional Collaboration

California Public Utilities Code Section 170048 states that the SDCRAA, SANDAG, local agencies, and Caltrans shall cooperate to develop effective surface transportation access to the Airport. Work completed over the past year through the Harbor Drive Mobility Working Group and Policy Group demonstrates the ongoing willingness of regional agencies to partner with the SDCRAA to support the implementation of feasible mitigation measures. SANDAG encourages the SDCRAA to utilize these groups to discuss different alternatives that could be explored to ensure the SDCRAA’s fair-share contribution towards these needed improvements.

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101
SANDAG appreciates the opportunity to comment on the SDCRAA’s Airport Development Plan Draft EIR. If you have any questions, please contact SANDAG Senior Regional Planner Seth Litchney at (619) 699-1943 or via email at seth.litchney@sandag.org.

Sincerely,

[Signature]

CHARLES “MUGGS” STOLL
Director of Land Use and Transportation Planning

MST/SLI/mmo

cc: Aimee Faucett, Chief of Staff, Office of Mayor Kevin Faulconer, City of San Diego
    Kris Michell, Chief Operating Officer, City of San Diego
    Randa Coniglio, Chief Executive Officer/President, Port of San Diego
    Cory Binns, District Director, Caltrans District 11
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