Subject:

Certify the Final Environmental Impact Report and Adopt Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program for the San Diego International Airport Development Plan; and 2) Adopt the San Diego International Airport Development Plan – Alternative 4

Recommendation:

Adopt Resolution No. 2020-0001, certifying the Final Environmental Impact Report (EIR) for the San Diego International Airport Development Plan and adopting a Mitigation Monitoring and Reporting Program, a Statement of Overriding Considerations, and California Environmental Quality Act (CEQA) Findings of Fact.

Adopt Resolution No. 2020-0002, adopting Alternative 4 of the San Diego International Airport Development Plan.

Background/Justification:

San Diego International Airport & the San Diego County Regional Airport Authority

San Diego International Airport (SDIA or Airport) was dedicated as the San Diego region’s municipal airport on August 28, 1928. Assembly Bill 93 established the San Diego County Regional Airport Authority Act in 2002, which created the Airport Authority as a local entity of regional government to oversee SDIA’s operations. On January 1, 2003, the operation of SDIA was transferred to the Airport Authority as required by the San Diego County Regional Airport Authority Act. Although the Port District still has ownership of the State Tidelands that underlie SDIA, the transfer from the Port District shifted planning responsibilities, operation, and control of SDIA to the Airport Authority. The Airport Authority Board is responsible for all policy and planning decisions for SDIA and serves as the lead agency in accordance with CEQA.

SDIA is the primary commercial service airport hosting air transportation activity in the San Diego region. The existing Airport site is severely constrained by its location just northwest of the City of San Diego’s downtown. SDIA encompasses 661 acres and has a single, 9,401-foot-long, 200-foot-wide east-west runway (Runway 9/27), making it one of the busiest single-runway commercial airports in North America. The Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy boat channel and Liberty Station to the west, MCRD to the north, and Pacific Highway and Interstate 5 (I-5) to the east. Land in the vicinity of the Airport is densely developed and has high developable value due the Airport’s location less than two miles from downtown San Diego.
SDIA’s air service continues to grow based upon the growing region’s demand for air travel. From 1960 to 2018, the San Diego County population grew from approximately one million residents to approximately 3.3 million residents. The existing passenger terminals were constructed during this almost 60-year period. Annual passenger totals at SDIA grew from 2.5 million annual passengers in 1967 when Terminal 1 first opened, to over 24 million annual passengers in 2018 with approximately 225,000 total aircraft operations (i.e. takeoffs or landings). The Airport’s ultimate capacity, which is approximately 290,000 annual operations, is determined by its single runway system and its mandatory departure curfew from 11:30pm-6:30am.

Airport Development Plan & Final Environmental Impact Report

The Airport Development Plan is the next phase of master planning for San Diego International Airport. A master plan is a concept for the long-term development of an airport. Federal Aviation Administration (FAA) Advisory Circular (AC) 150-5070-6 “Airport Master Plans” provides guidance for preparing airport master plans pursuant to the Airport and Airway Improvement Act of 1982. Preparation of a master plan allows an airport to seek specific federal grants and funds associated with this federal law for improvements associated with the airport master plan. The Airport Authority prepared and adopted the first-ever master plan for SDIA on May 1, 2008.

The Airport Development Plan updates that master plan by addressing the Airport’s current opportunities and constraints, as well as the latest aviation activity forecast information. An updated aviation activity forecast for San Diego International Airport using 2018 as the base year was approved by the FAA in June 2019 and is available on the Authority website. In response to regional demand, operational growth is expected to continue over the next 30 years, but the rate of growth will likely decline as the throughput capacity of SDIA’s single runway is approached. Nonetheless, SDIA’s existing terminal gates and airfield facilities can accommodate the forecasted demand, but aircraft delays and passenger levels of service would be unacceptable.

The Final Environmental Impact Report (Final EIR) evaluates the potential environmental impacts associated with the Airport Development Plan (Project) at SDIA, proposed by the Airport Authority. In addition to being the Project proponent, the Airport Authority is also the lead agency for the Final EIR (i.e., the public agency with primary responsibility for preparing and certifying the California Environmental Quality Act [CEQA] compliance document along with adopting the Project).

Project Goals & Description

The Project is the San Diego International Airport Development Plan and includes improvements to serve forecasted aviation demand through 2035 with more modern, efficient, and comfortable facilities. Improvements to meet aviation demand beyond 2035 will be considered in future planning efforts and related environmental documents. The Project goals are as follows:

- Develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction that reflect the local feel and uniqueness of San Diego;
- Plan for an operationally efficient airfield that meets FAA standards;
- Provide a plan that is fiscally and environmentally sustainable;
- Optimize the productive use of SDIA properties;
- Provide a plan that meets the aviation needs of the San Diego region in a socially responsible manner; and
- Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand.

The primary project components of the Airport Development Plan include the following:

- Demolition of existing Terminal 1 and replacement with a new Terminal 1 facility totaling 1.21 million square feet and 30 gates;
- Airfield improvements including the relocation of existing Taxiway B, construction of a new Taxiway A, reconfigured Remain Overnight (RON) aircraft parking areas, and new apron area around the Terminal 1 replacement;
- A circulation road with an at-grade arrivals curb and an elevated structure with a departures curb;
- A new on-airport inbound/entry road with a multi-use bicycle and pedestrian path that would connect to North Harbor Drive and allow westbound airport traffic to enter SDIA at the existing intersection of North Harbor Drive and Laurel Street; as well as an outbound airport circulation lane, completing the Terminal Link Road that is reserved for high-occupancy vehicles traveling to SDIA’s north side;
- Construction of a close-in parking structure for Terminal 1;
- Expansion of the existing Central Utility Plan by 12,000 square feet;
- New SDCRAA administrative offices totaling up to 150,000 square feet;
- Underground utilities;
- Stormwater capture and reuse system; and
- Demolition of the current SDCRAA administrative offices (former commuter terminal) and other ancillary airport support facilities.

One or more of these elements may require approvals from other governmental agencies, including the FAA and the California Coastal Commission. The project elements of the Airport Development Plan cannot be implemented until the completion of the FAA’s environmental review in compliance with the National Environmental Policy Act (NEPA) and the issuance of a Coastal Development Permit by the California Coastal Commission. All project elements would also be implemented with due regard for the existing contractual right of private parties and public agencies, and applicable law and regulations.
Draft Environmental Impact Report (EIR) – Public & Agency Review

In compliance with CEQA, a Notice of Preparation (NOP) was prepared and circulated for the Draft EIR on January 20, 2017. The NOP was distributed to potential responsible and trustee agencies and other potentially interested parties. The NOP was posted on the Airport Authority’s website and a notice of availability was published in two local newspapers of general circulation – the San Diego Union Tribune and San Diego Daily Transcript. The NOP indicated that the Project had the potential to result in adverse effects to environmental resources and that an EIR would be prepared. The NOP is included in Appendix R-A of the EIR.

The review period for the NOP ended on March 1, 2017. During this public review period, comments and input were solicited from federal, state, and local government agencies that would affect or be affected by the Project, as well as private organizations and individuals that may have an interest in the Project. In addition, two public scoping meetings were held at the Airport Authority’s offices at 3225 North Harbor Drive, San Diego on January 31 and February 1, 2017. Written comments received during the public review period for the NOP and comments received during the public scoping meetings are contained in Appendix R-A of the EIR. The Airport Authority considered the information in the NOP, along with the responses to the NOP and public comments at the scoping meetings in preparing the Draft EIR.

On July 9, 2018, the Airport Authority issued a Draft EIR for public review for a period ending on September 7, 2018. The Draft EIR was posted and available on the Airport Authority website. A Draft EIR Notice of Availability (NOA) was filed with the San Diego County Clerk and published in the San Diego Union Tribune and San Diego Daily Transcript on July 9, 2018. This legal notice announced the release of the Draft EIR, described the Project, identified where it was available for review, and stated the period of submittal of comments on the contents of the Draft EIR. The Airport Authority distributed the Draft EIR to the State Clearinghouse, responsible agencies, trustee agencies, affected public agencies, nearby property owners and residents, and other interested public groups. The Airport Authority also distributed the NOA to potentially interested parties. As part of the above-noted Draft EIR distribution, the Draft EIR was provided to four public libraries to be made available for review by members of the public (City of San Diego Central Library, Mission Hills Branch Library, Ocean Beach Branch Library, and Point Loma Hervey Branch Library) and was also available for review at the Airport Authority’s administrative offices. The Airport Authority received comments from 87 federal, state, regional, and local agencies, organizations, community planning groups and individuals regarding the Draft EIR.

Recirculated Draft EIR & Alternative 4

As a result of the comments received on the July 2018 Draft EIR, the Airport Authority withdrew the July 2018 Draft EIR, developed Alternative 4, and prepared an entirely new recirculated Draft EIR on September 19, 2019 (2019 Recirculated Draft EIR) for public review and a Notice of Availability was published in the two aforementioned newspapers. The 2019 Recirculated Draft EIR was posted on the Authority website and at the four libraries listed above and at the Authority offices, and was made available to responsible agencies, trustee agencies, affected public agencies, property owners and occupants, and other interested public groups and interested parties. The comment period ended on November 4, 2019. A total of 19 federal, state, regional, and local agencies, organizations, and community planning groups as well as 22 individuals submitted comments to the Airport Authority for consideration during the review period.
In addition to the aforementioned project elements, the ADP was modified under Alternative 4 to include:

- Preservation of a “transit-ready” area between the new Terminal 1 and existing Terminal 2 to accommodate a potential future regional transit system connection to SDIA;
- Preservation of right-of-way on airport property to accommodate a future outbound access road;
- Implementation of a dedicated shuttle service between the Old Town Transit Center and SDIA;
- Work with the MTS to promote Bus Route 992 transit service between downtown and SDIA by providing preferential locations at the terminals for bus stops, providing space for a kiosk and fare purchase station in the new Terminal 1, and providing branding of Bus 992 as an Airport route;
- A reduced-scale Terminal 1 parking plaza that would provide up to 5,500 parking spaces (adding only 650 new parking spaces above existing parking spaces in 2018);
- Off-airport improvements to road segments, intersections, and bicycle/pedestrian facilities, contingent upon FAA approval; and
- Various sustainable design features to ensure consistency with the City of San Diego’s Climate Action Plan.

**Final EIR Includes Responses to Comments Received**

In December 2019, the Airport Authority prepared a Final EIR that includes comments received on the 2019 Recirculated Draft EIR and a response to each comment. The Final EIR also includes an Additions/Corrections section to highlight changes to, and clarifications of, the text of the 2019 Recirculated Draft EIR in strikeout/underline format (i.e. to show deleted and new text). The Final EIR was posted on the Authority website on December 30, 2019. A Notice of Availability was sent to all commenters that provided a mailing address or were notified by email reply as to the Final EIR availability on the Authority website.

**Certify Final EIR and Adopt Findings of Fact**

Prior to consideration and adoption of elements of the San Diego International Airport Development Plan, the Board must:

- Consider and certify the Final EIR; and
- Consider and adopt a Mitigation Monitoring and Reporting Program (Exhibit A), a Statement of Overriding Considerations (Exhibit B), and the CEQA Findings of Fact (Exhibit C).
Adopt the San Diego International Airport Development Plan - Alternative 4

Staff recommends that Alternative 4 be adopted as the San Diego International Airport Development Plan.

Fiscal Impact:

The certification of the Final EIR and adoption of the San Diego International Airport Development Plan – Alternative 4 does not have a fiscal impact. As specific projects identified in the Airport Development Plan are approved by the Airport Authority Board, the costs associated with the implementation of the specific project and related mitigation measures will be considered.

Authority Strategies/Focus Areas:

This item supports one or more of the following (select at least one under each area):

**Strategies**

- [x] Community Strategy
- [x] Customer Strategy
- [ ] Employee Strategy
- [x] Financial Strategy
- [x] Operations Strategy

**Focus Areas**

- [x] Advance the Airport Development Plan
- [x] Transform the Customer Journey
- [x] Optimize Ongoing Business

Environmental Review:

A. CEQA: This Board action is a project that would have a significant effect on the environment as defined by the California Environmental Quality Act (“CEQA”), as amended. 14 Cal. Code Regs. §15378. The San Diego International Airport Development Plan – Alternative 4 is a project subject to CEQA and the Final EIR has been prepared in accordance with CEQA.

B. California Coastal Act Review: This Board action is a project that is a "development" as defined by the California Coastal Act. An application for a coastal development permit(s) will be submitted to the California Coastal Commission for review and consideration.

Application of Inclusionary Policies:

Not applicable.

Prepared by:

DENNIS PROBST
VICE PRESIDENT AND CHIEF DEVELOPMENT OFFICER
RESOLUTION NO. 2020-0001

A RESOLUTION OF THE BOARD OF THE SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE SAN DIEGO INTERNATIONAL AIRPORT DEVELOPMENT PLAN AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, A STATEMENT OF OVER RIDING CONSIDERATIONS, AND CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS OF FACT

WHEREAS, the San Diego County Regional Airport Authority Act (Act) created the San Diego County Regional Airport Authority (Authority) and charged the Authority with planning for the future of air transportation for the San Diego region; and

WHEREAS, pursuant to the Act, the Authority was given control over the San Diego International Airport (SDIA), and exclusive jurisdiction to study, plan, and implement any improvements, expansion, or enhancements at any airport within its control; and

WHEREAS, the Authority conducted a detailed, objective, and open public planning process to assess the air transportation needs of the San Diego region and the ability of SDIA to meet those needs; and

WHEREAS, as part of that process the Authority prepared and published an aviation activity forecast in April 2019 that analyzed future aviation activity and demand in the San Diego region; and

WHEREAS, the Federal Aviation Administration (FAA) reviewed and approved the forecast in June 2019; and

WHEREAS, the forecast, based on regional growth and economic trends, indicated that demand for the use of facilities at SDIA would grow continuously over the coming years and that the maximum number of flights that SDIA could accommodate continues to be constrained by the facility’s existing single runway and its mandatory departure curfew from 11:30pm to 6:30am; and

WHEREAS, the analyses indicate that over time the existing SDIA terminal areas, including passenger hold rooms, will become congested with increases in passenger volume, and that such congestion, along with aircraft operational complexity, would cause severe passenger inconveniences and related poor passenger service levels; and
WHEREAS, the analyses indicate that the existing facilities will become inadequate to handle the forecast passenger volume set forth in the FAA-approved forecast at a level of service that is consistent with airport industry standards; and

WHEREAS, the Authority gathered information from the public and experts in the field of airport planning and operations and, based on that information, prepared an Airport Development Plan to address the passenger congestion problems and declining passenger service levels; and

WHEREAS, the Airport Development Plan describes specific structures and facilities that the Authority staff have recommended be constructed and developed to address the likely congestion problems and declining passenger service levels, but does not commit the Authority to the construction or development of any specific structure or facility; and

WHEREAS, the Authority commenced the preparation of an Environmental Impact Report in accordance with the California Environmental Quality Act (CEQA) on the proposed Airport Development Plan; and

WHEREAS, the Authority circulated a Draft Environmental Impact Report in July 2018 (2018 Draft EIR), which examined environmental issues related to the proposed Airport Development Plan to the year 2035; and

WHEREAS, in response to public and governmental agency comments received on the 2018 Draft EIR, the Authority determined that it would withdraw the 2018 Draft EIR and prepare and recirculate an entirely new Draft Environmental Impact Report in September 2019 (2019 Recirculated Draft EIR), which considered potential environmental impacts of the Airport Development Plan, and opened a new public comment period on the 2019 Recirculated Draft EIR; and

WHEREAS, the Authority provided a total of 46 days for the public and governmental agencies to review and comment on the 2019 Recirculated Draft EIR, and then upon expiration of the 46 days, closed the public comment period; and

WHEREAS, the Authority thereafter reviewed and responded to all public and agency comments submitted on the 2019 Recirculated Draft EIR during the public comment period; and

WHEREAS, the Final Environmental Impact Report (Final EIR) was published in December 2019; and
WHEREAS, the Final EIR consists of the 2019 Recirculated Draft EIR and any clarifying changes thereto, Comments and Responses to Comments on the 2019 Recirculated Draft EIR, all appendices, and any documents or materials incorporated in the Final EIR by reference; and

WHEREAS, the Authority reviewed, commented on, and approved all documents and materials prepared by and relied upon by its consultants in preparing the Final EIR; and

WHEREAS, the Final EIR analyzes and addresses the specific structures and facilities recommended in the Airport Development Plan at a project level; and

WHEREAS, the Final EIR evaluated the potential environmental impacts that could result from the adoption of the proposed Airport Development Plan (and in particular focused on potentially significant impacts of the specific structures and facilities listed in the Airport Development Plan); and

WHEREAS, the Final EIR identified and recommended feasible mitigation measures to reduce the significant impacts of the proposed Airport Development Plan to a less-than-significant level; and

WHEREAS, these mitigation measures have been gathered and set forth in a Mitigation Monitoring and Reporting Program (MMRP), attached as Exhibit A hereto; and

WHEREAS, the Final EIR analyzed a reasonable range of alternatives to the proposed Airport Development Plan to determine if any such alternative would feasibly avoid or reduce the potentially significant impacts of the proposed Airport Development Plan to a less-than-significant level; and

WHEREAS, one of the alternatives analyzed in the Final EIR, Alternative 4, would (i) reduce and/or eliminate some of the significant impacts of the proposed Airport Development Plan, (ii) not result in additional or more severe significant impacts than would the proposed Airport Development Plan, and (iii) would include transit improvements not included in the proposed Airport Development Plan; and

WHEREAS, the Final EIR identifies Alternative 4 as the environmentally superior alternative capable of meeting all of the identified project objectives; and

WHEREAS, Authority staff has recommended Alternative 4 for adoption as the preferred Airport Development Plan (the Alternative 4 ADP); and
WHEREAS, the Final EIR was prepared, published, circulated, reviewed, and completed in accordance with the requirements of CEQA and the CEQA Guidelines and constitutes an adequate, accurate, objective, and complete Final EIR in accordance with the requirements of CEQA and the CEQA Guidelines; and

WHEREAS, the Final EIR reflects the independent judgment and analysis of the Authority; and

WHEREAS, the Final EIR reflects the best efforts of the Authority to undertake all reasonably feasible and prudent actions to discover, analyze, disclose, and mitigate all potentially significant environmental impacts of the specific structures and facilities identified in the Alternative 4 ADP; and

WHEREAS, the Final EIR has been presented to the Board, and the Board has reviewed and considered the information contained therein and in the record supporting the Final EIR prior to making these findings or taking action on the specific structure and facilities identified in the Airport Development Plan, and conducted a duly noticed public hearing on the Final EIR; and

WHEREAS, the Authority certifies that the mitigation measures set forth in the MMRP, attached as Exhibit A, are specific and are incorporated into the Alternative 4 ADP, as applicable; and

WHEREAS, the Authority certifies that the MMRP satisfies the requirements of CEQA; and

WHEREAS, some potentially significant impacts may remain after implementation of the Alternative 4 ADP, because either mitigation is infeasible, or the responsibility and jurisdiction over the only feasible mitigation measures lies with another agency and as a result the Authority cannot ensure the implementation of such mitigation measures; and

WHEREAS, the Authority, in light of the significant and unavoidable impacts of the Alternative 4 ADP, has prepared and will adopt a Statement of Overriding Considerations, as set forth in Exhibit B, which identifies the benefits of the Alternative 4 ADP and explains why they override the significant and unavoidable impacts identified in the Final EIR; and

WHEREAS, the Authority has prepared and will adopt CEQA Findings of Fact, attached hereto as Exhibit C, that (i) identify and describe the impacts of the Alternative 4 ADP; (ii) identify, describe, and recommend for adoption feasible mitigation measures capable of reducing the significant impacts of the Alternative 4 ADP; and (iii) describe the overriding considerations that compensate for those impacts of the Alternative 4 ADP that remain significant and unavoidable even after implementation of the recommended mitigations measures.
NOW, THEREFORE, BE IT RESOLVED, that the Board hereby certifies the Final Environmental Impact Report (EIR) for the San Diego International Airport Development Plan and adopts the Mitigation Monitoring and Reporting Program (Exhibit A), a Statement of Overriding Considerations (Exhibit B), and California Environmental Quality Act (CEQA) Findings of Fact (Exhibit C); and

BE IT FURTHER RESOLVED, that the Board has considered staff recommendations and all of the aforesaid materials and all of the evidence in the record of the proceedings and based on that evidence hereby adopts this Resolution certifying the Final EIR as being complete and prepared in compliance with the provisions of CEQA.

PASSED, ADOPTED, AND APPROVED by the Board of the San Diego County Regional Airport Authority at a regular meeting this 9th day of January, 2020, by the following vote:

AYES: Board Members:

NOES: Board Members:

ABSENT: Board Members:

ATTEST:

_________________________________
TONY R. RUSSELL
DIRECTOR, BOARD SERVICES / AUTHORITY CLERK

APPROVED AS TO FORM:

_________________________________
AMY GONZALEZ
GENERAL COUNSEL
Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA) requires that a Lead Agency establish a program to monitor and report on mitigation measures adopted as part of the environmental review process to avoid or reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The State CEQA Guidelines (Section 15097 [a]) require that a mitigation monitoring and reporting program be adopted upon certification of an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) to ensure mitigation measures identified in the EIR or MND are implemented. The program must be adopted by the public agency at the time findings are made regarding the project. The State CEQA Guidelines allow public agencies to choose whether its program will monitor mitigation, report on mitigation, or both (14 CCR Section 15097(c)).

The Mitigation Monitoring and Reporting Program (MMRP) for the San Diego International Airport Development Plan is presented as a table and includes the mitigation measures identified in the Final EIR. The numbers assigned to the mitigation measures are the same as those presented in the Final EIR. The San Diego County Regional Airport Authority (SDCRAA) may modify how it will implement a mitigation measure, as long as the alternative means of implementing the mitigation still achieves the same or greater attenuation of the impact. The MMRP also describes implementation and monitoring procedural guidance, responsibilities, and timing for each mitigation measure identified in the EIR.

Project Description

This document constitutes the MMRP for the San Diego International Airport Development Plan, as described and analyzed in the Final EIR as “Alternative 4 - T1 Replacement and Transportation Improvements.” As described in Chapter 5, Alternatives Analysis, of the Final EIR, the San Diego International Airport Development Plan consists of the following key components:

- replacement of the existing T1;
- a new full-length taxiway;
- a new airport administration building;
- a new on-airport access roadway on airport property along with preservation of right-of-way on airport property to accommodate potential future off-airport access road improvements;
- a new parking structure adjacent to the replacement T1;
- implementation of a dedicated shuttle service between the Old Town Transit Center (located at 4005 Taylor Street) and SDIA;
- work with the MTS to upgrade Bus Route 992 transit service between downtown and SDIA; and
preservation of a portion of SDIA as a “transit-ready” area to accommodate potential future regional transit system improvements that would link to SDIA.

One or more of these elements may require additional review and approvals from other governmental agencies including the Federal Aviation Administration (FAA). All would be implemented with due regard for the existing contractual rights of private parties and public agencies, and applicable law and regulations.

Mitigation Measures
The following are identified for each mitigation measure:

1. Potential Significant Impact: A brief description of the impact that is being mitigated (i.e., the objective of the mitigation),

2. Mitigation Measures: A brief description of the measure and how it will reduce the significant impact in question,

3. Party Responsible: The party who is responsible for the necessary implementing actions,

4. Timing of Mitigation: Identifies the timing for the mitigation implementation, and

5. Monitoring and Reporting Procedure: Describes the monitoring and reporting protocol and identifies the parties responsible for documenting the mitigation implementation efforts.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air Quality, Greenhouse Gases and Climate Change, and Human Health Risk</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Air Quality:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing background concentrations of particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM_{10}) currently exceed state standards and the increase in PM_{10} concentrations associated with project operations would increase that existing exceedance. Construction of the ADP in conjunction with other projects anticipated to be under construction during that same period would result in a significant impact relative to cumulative emissions, at which the ADP’s contribution to that significant impact would be cumulatively considerable. The ADP would result in significant emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), PM_{10}, and sulfur oxides (SO_x).</td>
<td>MM-AQ/GHG-1</td>
<td>Ground Support Equipment Conversion All baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel) by 2024. Additionally, by 2024, 50 percent of gasoline-fueled GSE that are light duty vehicles owned and operated by SDCRAA would be replaced with hybrid electric or alternative fuel vehicles and 100 percent of diesel-fueled GSE that are owned and operated by SDCRAA would be replaced with hybrid electric or alternative fuel vehicles.</td>
<td>SDCRAA</td>
<td>2020-2024</td>
<td>Annual GHG emissions reports that include an end-of-year breakdown of GSE by fuel types for equipment subject to this mitigation measure.</td>
</tr>
<tr>
<td><strong>Greenhouse Gases and Climate Change:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction and operation of the ADP would generate greenhouse gases (GHGs) that may have a significant impact on the environment.</td>
<td>MM-AQ/GHG-2</td>
<td>Renewable Electricity Project-related buildings shall be powered by 100 percent renewable electricity by 2024 and continuing thereafter through on-site generation resources, grid-delivered purchases, and/or renewable energy certificates.</td>
<td>SDCRAA</td>
<td>Ongoing in conjunction with operation of project-related buildings.</td>
<td>Annual GHG emissions reports that include an end-of-year summary breakdown of source types for electricity supplied to project-related buildings, as available from the energy provider (i.e., SDG&amp;E).</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>MM-AQ/GHG-3</td>
<td>Cool Roof The project shall include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under 2016 California Green Building Standards Code.</td>
<td>SDCRAA</td>
<td>Ongoing in conjunction with development of project structures.</td>
<td>Requirement shall be included in bid specifications for construction of project buildings, and will be confirmed as part of plan checks.</td>
</tr>
<tr>
<td></td>
<td>MM-AQ/GHG-4</td>
<td>LEED Silver Certification The project shall demonstrate achievement of at least LEED Silver certification (or equivalent green rating certification) for all new major facilities, such as a new</td>
<td>SDCRAA</td>
<td>In conjunction with development of the new T1</td>
<td>Requirement shall be included in bid specifications for construction of those</td>
</tr>
</tbody>
</table>

San Diego International Airport
Airport Development Plan
January 2020
Mitigation Monitoring & Reporting Program
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction and operation of the ADP would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs</td>
<td>MM-AQ/GHG-5</td>
<td>terminal, a new parking structure, or new SDCRAA administration building.</td>
<td>SDCRAA</td>
<td>2020-2026</td>
<td>Annual GHG emissions reports that include an end-of-year breakdown of GHG rating for vehicles operated at SDIA during the year.</td>
</tr>
<tr>
<td><strong>Human Health Risk:</strong> The combination of construction-related toxic air contaminant emissions and operations-related emissions from the ADP would result in a significant impact relative to cancer risk.¹</td>
<td>MM-AQ/GHG-6</td>
<td>Clean Vehicle Parking The project shall designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles.</td>
<td>SDCRAA</td>
<td>2020-2028</td>
<td>Requirement shall be included in bid specifications for construction of those parking facilities, and will be confirmed as part of plan checks.</td>
</tr>
<tr>
<td></td>
<td>MM-AQ/GHG-7</td>
<td>Ground Transportation Clean Vehicle Program In conjunction with the project, SDIA’s current Commercial Ground Transportation Clean Vehicle Program shall be extended past 2020 with the goal that commercial operator fleets achieve an average GHG rating of 10 (0-204 gCO₂/mile) by 2030 as scored by fueleconomy.gov (or an equivalent program).</td>
<td>SDCRAA</td>
<td>2020-2030</td>
<td>Annual GHG emissions reports that include an end-of-year summary status of the GHG rating score for the commercial operator fleets active at SDIA during the year.</td>
</tr>
<tr>
<td></td>
<td>MM-AQ/GHG-8</td>
<td>Electric On-Airport Shuttles In conjunction with the project, on-airport shuttles serving passenger and employee parking lots, and inter-terminal</td>
<td>SDCRAA</td>
<td>2020-2028</td>
<td>Annual GHG emissions reports that include an end-of-year breakdown of GHG rating for vehicles operated at SDIA during the year.</td>
</tr>
</tbody>
</table>

¹ This significant cancer risk human health impact is primarily due to diesel exhaust associated with ground service equipment (GSE), which would be converted to alternative fuels through Mitigation Measure MM-AQ/GHG-1.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>transfers shall be transitioned to electric vehicles (all-electric or plug-in hybrid) by 2026. The buses serving the Rental Car Center shall be transitioned to electric vehicles by 2028.</td>
<td>SDCRAA</td>
<td>In conjunction with development of the new T1 building and new SDCRAA administration building.</td>
<td>Requirement shall be included in bid specifications for construction of those facilities, and will be confirmed as part of plan checks.</td>
</tr>
<tr>
<td>MM-AQ/GHG-9 Bicycle Facilities</td>
<td></td>
<td>To facilitate active transportation commuting, the project shall install shower stalls and lockers in the new Airport Administration Building and in the new terminal building based on the number of employees and guidance provided in the City of San Diego’s Climate Action Plan Consistency Checklist (estimated at 7 shower stalls and 25 lockers total). In addition, covered bicycle storage shall be installed for SDCRAA and tenant employees based on non-public square footage and guidance provided in the City of San Diego’s Climate Action Plan Consistency Checklist (estimated at 50 bike spaces total).</td>
<td>SDCRAA</td>
<td>Employee parking cash-out program shall be established prior to issuance of certificate of occupancy for new SDCRAA administration office.</td>
<td>Management report to SDCRAA Board confirming establishment of program.</td>
</tr>
<tr>
<td>MM-AQ/GHG-10 Employee Parking Cash-Out Program</td>
<td></td>
<td>SDCRAA shall implement a parking cash-out program for its employees.</td>
<td>SDCRAA</td>
<td>Employee parking cash-out program shall be established prior to issuance of certificate of occupancy for new SDCRAA administration office.</td>
<td>Management report to SDCRAA Board confirming establishment of program.</td>
</tr>
</tbody>
</table>

### Biological Resources

Although SDCRAA would continue to implement measures included in their existing program to protect the California least terns at SDIA which would avoid and/or minimize potential indirect impacts from construction of the ADP,

| MM-BIO-1 California Least Tern: Construction Measures | SDCRAA | Prior to initiation of construction activities (e.g., prior to site preparation, grading). | Annual California Least Tern Report, which is submitted to the state and federal wildlife agencies. |

transfers shall be transitioned to electric vehicles (all-electric or plug-in hybrid) by 2026. The buses serving the Rental Car Center shall be transitioned to electric vehicles by 2028.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>the indirect impact is considered potentially significant.</td>
<td></td>
<td>noise, use of hazardous materials, and activities that may increase perching for predatory species:</td>
<td>demolition, or building construction, whichever occurs first).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>▪ All project construction within 800 feet of the SDIA least tern nesting area will occur from September 16 to March 31 to avoid the tern nesting season.</td>
<td></td>
<td>▪ A tern biologist will monitor the tern during construction occurring between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) and will immediately notify the Resident Engineer (RE; or acting RE) of any construction activity that may lead to, or likely result in, the disruption of the tern, its young, or its eggs. If the tern biologist determines that adverse effects to the tern have occurred, the RE will be notified and all project construction activities will cease immediately, except those activities necessary to make the SDIA safe and operational. The tern biologist, in coordination with the RE, will contact the FAA and USFWS immediately after stopping construction. Construction will not resume until approved by the FAA and USFWS. The tern biologist will submit daily field reports to the FAA and USFWS on the status of the nesting activity, any construction-related incidents that disrupted tern nesting, and any action taken by the RE to avoid further incidents, within 24 hours of each monitoring date. The tern biologist will also submit a final summary report of monitoring to the FAA and USFWS by October 1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>▪ Trash will be properly disposed of and workers will not feed potential tern predators in the area. The Airport Authority will require the contractor to provide trash dumpsters or other covered trash receptacles for use by construction personnel. All food items or containers that previously held food items obtained/handled/controlled by construction personnel will be immediately disposed of in these</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>dumpsters or containers, so as not to attract avian or mammalian predators of the least tern.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction personnel will not be permitted to feed cats, gulls, pigeons, ravens, or any other wildlife, as this may result in an increase in the numbers of these potential predators in the vicinity of tern chicks and eggs.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crane booms or similar equipment that have heights of 25 feet or greater located between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) will be lowered at the close of each construction day, if possible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A pre-construction meeting will be held to make all contractor personnel that will be working between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15), including all construction staff, aware of the tern nesting issue and the specific conditions of construction. Project status meetings will be regularly held to remind all such personnel of the measures required to protect the tern as well as any modifications made to ensure their effectiveness. The USFWS will be notified of the date and time of the pre-construction and status meetings in order to attend, if needed or desired.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nighttime construction occurring between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) will be limited to those activities that are necessary to maintain airfield operations during normal operational times. Should such nighttime construction be required, the tern biologist will be onsite and perform the duties specified above.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>■ Night lighting for project construction occurring between 800 feet to 1,200 feet from the SDIA least tern nesting area will be kept to a minimum during the tern nesting season (April 1- September 15), and will not be used unless active construction or other essential work is occurring. Should such nighttime construction or other essential work be conducted, all lighting associated with the work will be shielded from or directed away from the least tern nesting area.</td>
<td>SDCRAA</td>
<td>Included as condition of design of project elements; fencing maintenance/habitat management -ongoing.</td>
<td>Annual California Least Tern Report, which is submitted to the state and federal wildlife agencies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>■ Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>■ The new airport entry road to the south of the nesting ovals shall not rise above existing surface grade and shall not alter the elevation of roadway structures directly to the south of the nesting ovals.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>MM-BIO-2</td>
<td>California Least Tern: Operations Measures</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>The following measures shall be implemented by SDCRAA as part of the ADP in order to avoid potential indirect impacts during operation as related to perching for predatory species:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>■ New facilities shall be designed to minimize potential perching locations; all structures taller than ten feet and within 200 feet of the nesting ovals, including light poles and sign structures, shall be required to use anti-perch treatments such as stainless steel bird spike barriers that can be applied to potential perch sites (e.g., Nixalite).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>■ Any new landscaping shall be limited to plant species and materials not conducive to perching by birds.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>■ Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Although SDCRAA would continue to implement measures included in their existing program to protect the California least terns at SDIA which would avoid and/or minimize potential indirect impacts from operation of the ADP, the indirect impact is considered potentially significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural Resources</td>
<td>MM-HR-1</td>
<td>Continued habitat management within the ovals including application of herbicide and removal of vegetation.</td>
<td>SDCRAA</td>
<td>Completed in 2018</td>
<td>Completed in 2018 and included in Appendix R-F of ADP Final EIR.</td>
</tr>
</tbody>
</table>

Implementation of the ADP would require the demolition and removal of two buildings (United Airlines Hangar and Terminal Building and the existing Terminal 1) determined to be significant historic resources.

Preparation of Historic American Buildings Survey (HABS) Documentation

An Historic American Buildings Survey (HABS) report has been completed for each of the two significant historic resources that would be impacted by the ADP; those two resources being (1) the United Airlines Hangar and Terminal Building, and (2) the existing Terminal 1. The two HABS reports are contained in Appendix R-F of the EIR. Each HABS report provides a description and supporting documentation related to the following aspects of each resource:

- Historical Information
  - Physical History
  - Historical Context

- Architectural Information
  - Architectural Character
  - Description of Exterior
  - Description of Interior
  - Site Information (i.e., landscaping)

- Sources of Information
  - Architectural Drawings
  - Photographs

Copies of the two HABS reports will be kept available for public review at the SDCRAA Administrative Office at SDIA.
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM-HR-2</td>
<td></td>
<td>Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building)</td>
<td>SDCRAA</td>
<td>Relocation of UAHT will occur in Phase 1a of the project, prior to, or in conjunction with, removal of existing facilities located at the site of the new T1 building and associated improvements.</td>
<td>Management report to SDCRAA Board confirming relocation of UAHT.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Despite having been relocated, the UAHT building is still the oldest surviving building within the Airport and, as such, is associated with the “earliest period of development at Lindbergh Field between 1928 and 1933.” The UAHT building still meets National Register Criteria Consideration B, which allows moved properties that are significant as a surviving property associated with historic events to be considered eligible for the NRHP. As such, relocation of the subject building is recommended as mitigation to preserve its historic significance.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM-HR-4</td>
<td></td>
<td>Interpretative Display Regarding Existing Terminal 1</td>
<td>SDCRAA</td>
<td>Interpretive display of existing Terminal 1 will occur in Phase 1a of the project, prior to, or in conjunction with, removal of existing facilities located at the site of the new T1 building and associated improvements.</td>
<td>Management report to SDCRAA Board confirming completion of interpretive display website.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Building upon the historical resources study and HABS/HAER documentation completed in June 2018 for the SDIA Airport Development Plan (ADP) EIR, which includes, but is not limited to, drawings, plans, photographs, and written data and description of the history of Terminal 1, the SDCRAA shall develop interpretive material for public exhibition concerning the history of the existing Terminal 1. The interpretive material will include the photographs produced in the HABS/HAER documentation, and the historic archival research previously prepared as part of the ADP EIR, and will be supplemented with additional photographs and video documentation developed in coordination with a local historic resources specialist. This interpretive material will be posted to a dedicated public website. The website may also host available plans and construction documents related to Terminal 1.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Hazards and Hazardous Materials**

<table>
<thead>
<tr>
<th>The ADP poses a potential for upset and accident conditions involving the release of hazardous materials into the</th>
<th>MM-HW-1</th>
<th>Preparation of Hazardous Materials Management Plan (HMMP)</th>
<th>SDCRAA</th>
<th>Prior to site excavation activities and/or</th>
<th>Requirements related to the preparation of a Hazardous Materials</th>
</tr>
</thead>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>environment: ground disturbing activities could encounter contaminated soils and/or contaminated groundwater; hazardous building materials (asbestos-containing materials and lead-based paint) are present in some of the structures to be demolished and/or modified.</td>
<td></td>
<td>Prior to site excavation activities and/or construction-related dewatering at the project site, a Hazardous Materials Management Plan (HMMP) shall be prepared and include the following:</td>
<td></td>
<td></td>
<td>Management Plan (HMMP) shall be included in bid specifications for construction contracts for the project, of project buildings, and those requirements shall acknowledge the need for management measures for the specific issues of concern identified in the mitigation measure, as applicable to construction in those areas. Confirmation that the required HMMP(s) has been prepared shall occur in conjunction with SDCRAA review of construction contractor submittals.</td>
</tr>
<tr>
<td>The ADP could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The ADP would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could create a significant hazard to the public or the environment</td>
<td></td>
<td>It is anticipated that there will be a HMMP developed for the course of ADP construction, with site-specific Health and Safety Plans developed that are tailored to the specific characteristics of individual construction contracts, but all with the same purpose of providing a management plan consistent with the ADP HMMP that will adequately address known or potential contaminated soils or groundwater. Based on information presented in the 2018 Amec Phase II ESI and 2018 Kleinfelder Phase II ESA, the site-specific Health and Safety Plans for the following areas (as identified on Figures 3.9-2 through 3.9-5 of the Recirculated Draft EIR) will need to include</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>management measures for the specific issues of concern identified therein:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- <strong>South Side of Building 2320</strong>: Elevated levels of total petroleum hydrocarbons and metals were detected in samples from Soil Boring B30. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater in the vicinity of this boring location and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- <strong>West Side of Building 2417, South Side of Building 2415, and North Side of Washdown Pad</strong>: Elevated levels of volatile organic compounds were detected in groundwater samples from these areas. The Health and Safety Plans for these areas shall account for the presence of contaminated groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- <strong>North of Terminal 1 East Rotunda</strong>: Elevated levels of total petroleum hydrocarbons and semi-volatile organic compounds were detected in groundwater and soil samples from this area. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM-HW-2</td>
<td></td>
<td><strong>Existing Groundwater Monitoring Wells</strong></td>
<td>SDCRAA</td>
<td>In conjunction with the demolition of Terminal 1.</td>
<td>A well survey program addressing the potential presence of a monitoring well(s) in or near the subject area shall be completed, and include provisions for proper well destruction, as warranted. Completion of the program shall be documented in a report to</td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td>Party Responsible</td>
<td>Timing of Mitigation</td>
<td>Monitoring and Reporting Procedure</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------</td>
<td>----------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Environmental Health. Should any monitoring wells associated with an open case be disturbed, the lead agency overseeing the open case shall be notified and any requirements identified by the agency associated with well disturbance shall be adhered to.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>be reviewed by SDCRAA and included in the project construction file.</td>
</tr>
</tbody>
</table>
| MM-HW-3 Hazardous Building Materials Abatement | | Prior to building demolition, the following activities shall be implemented:  
  - SDCRAA shall retain a State of California-licensed asbestos/lead abatement contractor to perform abatement of asbestos containing material (ACM), asbestos containing construction material (ACCM), lead-based paint (LBP), or lead-containing paint (LCP) that could potentially be disturbed.  
  - Prior to the initiation of abatement or demolition work, the abatement or demolition contractor must complete the Notification of Demolition or Asbestos Removal form and submit it to the County of San Diego Air Pollution Control District (SDAPCD) in compliance with Rule 1206 at least 10 business days before the start of abatement or demolition. SDAPCD will return the form, with a “notification number” added, to the abatement or demolition contractor, depending on who submitted the form.  
  - The asbestos/lead abatement contractor shall provide written notification to the local CalOSHA district office regarding its “Intent to Conduct Asbestos Related Work” and/or “Intent to Conduct Lead-Related Work.” These notifications should be submitted at least 24 hours in advance of performing the respective asbestos-related or lead-related work.  
  - Other potentially hazardous building materials, including and mercury-containing equipment, polychlorinated biphenyl (PCB)-containing equipment, lead-containing batteries, chlorofluorocarbon (CFC)-containing equipment, and Universal Wastes (e.g., fluorescent light tubes) | SDCRAA | Prior to building demolition. | Completion of the hazardous building materials surveys and abatement activities identified in the mitigation measure shall include preparation of reports documenting such surveys and activities. Those reports will be reviewed by SDCRAA and included in the project construction file. |
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil vapor gas may be present at the site of the new T1, which could pose a risk of migrating into the building and accumulating in levels that could pose a risk of health effects.</td>
<td>MM-HW-4</td>
<td><strong>Vapor Intrusion Assessment</strong>&lt;br&gt;In conjunction with building design of the new T1, the following measure shall be completed:&lt;br&gt;A soil vapor survey with accompanying human health risk assessment shall be prepared for the area proposed for the new T1 building. If found warranted by the results of that assessment, remediation, such as in-situ soil vapor extraction (SVE) or ex-situ excavation and treatment, shall be implemented to reduce levels to below site-specific risk-based concentrations (RBC), or a vapor intrusion mitigation system shall be incorporated into the design of the new T1 building to ensure that indoor air concentrations do not exceed regulatory thresholds. As part of that effort, the 2014 vapor intrusion investigation for the former Teledyne Ryan Facility site shall be reviewed as it pertains to future buildings within the subject area.</td>
<td>SDCRAA</td>
<td>In conjunction with building design of the new T1.</td>
<td>Requirements related to the completion of a vapor intrusion assessment for the new T1 building shall be included in bid specifications for design of that project, along with acknowledgement that the building design may require inclusion of a vapor intrusion mitigation system depending on the results of the assessment. A report documenting the results and recommendations of the vapor intrusion assessment will be submitted to SDCRAA for review, with requirements for a vapor intrusion mitigation system to be incorporated into design plans that will be reviewed as part of plan check.</td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land Use and Planning</strong></td>
<td></td>
<td><strong>Amendment of the SDIA Airport Land Use Compatibility Plan</strong></td>
<td>SDCRAA</td>
<td>Subsequent to updating the existing Airport Layout Plan (ALP) for SDIA.</td>
<td>Adoption of amended ALUCP by the ALUC (SDCRAA).</td>
</tr>
<tr>
<td>The ADP would pose a conflict with the existing SDIA Airport Land Use Compatibility Plan (ALUCP); contours along the approach path from the southeast are slightly longer under the 2035 conditions than what the ALUCP Contours show under existing conditions.</td>
<td><strong>MM-LUP-1</strong></td>
<td>In conjunction with updating the existing Airport Layout Plan (ALP) for SDIA, which would occur subject to approval of the ADP (and subject to FAA approval of the ALP update), the SDCRAA shall initiate, through the Airport Land Use Commission (ALUC), the process to amend the current SDIA Airport Land Use Compatibility Plan (ALUCP - May 2014) based on the specifics of the project, including the updated noise contours. Implementation of this measure is within the jurisdiction of the SDCRAA, acting in its role as the ALUC for the County, and the ALUC is required by law to amend the ALUCP so that it is consistent with the ALP update.</td>
<td>Subsequent to updating the existing Airport Layout Plan (ALP) for SDIA.</td>
<td>Adoption of amended ALUCP by the ALUC (SDCRAA).</td>
<td></td>
</tr>
<tr>
<td><strong>Noise</strong></td>
<td></td>
<td><strong>Expansion of SDCRAA’s Sound Insulation Program</strong></td>
<td>SDCRAA</td>
<td>2024</td>
<td>Annual reports to the Airport Noise Advisory Committee that provide an end-of-year summary of: the number of residences that are sound attenuated; efforts and events associated with expanding the sound insulation program to include non-residential uses; status of SDCRAA applying to FAA’s Airport Improvement Program for expanding the sound insulation program.</td>
</tr>
<tr>
<td><strong>Airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition.</strong></td>
<td><strong>MM-NOI-1</strong></td>
<td>The existing SDIA Quieter Home Program is the SDCRAA’s Residential Sound Insulation Program. For implementation of the subject Program, the FAA has determined that residences within the FAA-approved 65 dB CNEL contour (and an average interior noise level of 45 dB or greater) around SDIA may be eligible for sound insulation treatments to mitigate aircraft noise and has set a goal of reducing interior noise levels for eligible residents by at least five (5) dB inside the home, providing a noticeable reduction in noise. To mitigate the significant impacts associated with residential units that are newly exposed to 65 dB CNEL or greater from airport operations in future years of the ADP, the SDCRAA will, subject to continued FAA approval and funding, expand the existing sound insulation program to increase the average number of housing units that are sound attenuated annually.</td>
<td>2024</td>
<td>Annual reports to the Airport Noise Advisory Committee that provide an end-of-year summary of: the number of residences that are sound attenuated; efforts and events associated with expanding the sound insulation program to include non-residential uses; status of SDCRAA applying to FAA’s Airport Improvement Program for expanding the sound insulation program.</td>
<td>Annual reports to the Airport Noise Advisory Committee that provide an end-of-year summary of: the number of residences that are sound attenuated; efforts and events associated with expanding the sound insulation program to include non-residential uses; status of SDCRAA applying to FAA’s Airport Improvement Program for expanding the sound insulation program.</td>
</tr>
</tbody>
</table>

There would be a 1.5 dB or more increase in noise-sensitive areas being exposed to 65 CNEL or greater in 2024, 2026, 2030, 2035, and 2050 as a result of airport operations, as compared to the existing (2018 baseline) condition.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation of the ADP would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition.</td>
<td></td>
<td>Likewise, the SDCRAA will expand the existing sound insulation program to include non-residential uses such as churches (places of worship) and schools in order to mitigate the significant impacts to these other noise-sensitive uses, which are newly-exposed to 65 dB CNEL or greater from airport operations in future years of the ADP. The SDCRAA will apply to the FAA’s Airport Improvement Program annually to support the expanded Sound Insulation Program. If the funding is granted by the FAA, then Mitigation Measure MM-NOI-1 is feasible and will be implemented by SDCRAA. If the FAA does not approve the funding, then Mitigation Measure MM-NOI-1 is considered infeasible.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM-NOI-2 Update Noise Exposure Maps Every 5 Years</td>
<td></td>
<td>The aircraft noise exposure maps for SDIA will be updated every five years to determine if the SDIA Noise Compatibility Program, prepared pursuant to 14 Code of Federal Regulations Part 150, needs to be updated. By committing to revise the noise exposure maps every five years, the SDCRAA will ensure that recent data is determining which homes are impacted by noise and, therefore, may be eligible to participate in the Quieter Home Program.</td>
<td>SDCRAA</td>
<td>Every Five Years between 2020 and 2050.</td>
<td>Quinquennial aircraft noise exposure maps that will be coordinated with the Quieter Home Program Boundary Maps available for review at <a href="https://san.org/Airport-Noise/Quieter-Home-Program#646237-maps--stats">https://san.org/Airport-Noise/Quieter-Home-Program#646237-maps--stats</a>.</td>
</tr>
<tr>
<td>MM-NOI-3 Create a Mobile Noise Monitoring Program</td>
<td></td>
<td>A mobile noise monitoring program will be established by SDCRAA to augment SDIA’s existing permanent aircraft noise monitors at locations determined by an acoustical engineer.</td>
<td>SDCRAA</td>
<td>2024</td>
<td>Management report to SDCRAA Board confirming establishment of the program.</td>
</tr>
<tr>
<td>MM-NOI-4 Assess the Findings of the 2018 FAA Reauthorization Act-Related Noise Studies</td>
<td></td>
<td>The 2018 FAA Reauthorization Act includes a requirement for the FAA to complete various studies related to aircraft noise impacts. SDCRAA will review those studies, once completed, to help inform and update SDIA’s noise</td>
<td>SDCRAA</td>
<td>Within 12 months of the studies becoming finalized by the</td>
<td>Annual reports to the Airport Noise Advisory Committee that provide an end-of-year summary of SDCRAA’s reviews of the FAA noise studies, as</td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exceedance of allowable thresholds at area intersections and roadway segments during operation of ADP facilities.</td>
<td>MM-TR-LRP-2</td>
<td><strong>Airport Regional Connections</strong>&lt;br&gt;Prior to 2035, the SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: &lt;br&gt;1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; 2. Preserve space within Airport property to accommodate a transit station located near the terminals and an on-Airport exit roadway; 3. Study and design the outbound roadway and coordinate with SANDAG, the City of San Diego, the Port of San Diego, and other agencies, as applicable, to entitle and</td>
<td>SDCRAA, SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego</td>
<td>SDCRAA’s participation with other agencies in seeking to develop a regional solution to improved Airport access would occur on an ongoing basis with project approval. SDCRAA participation in the construction</td>
<td>Annual GHG emission reports that include an end-of-year summary of the activities and progress that occurred during the year relative to development of a long-range transportation solution for accessing the Airport. If FAA authorizes SDCRAA to construct or fund, and any off-Airport improvements, programs to reduce VMT, or other such mitigation measures.</td>
</tr>
</tbody>
</table>

| Exceedance of allowable thresholds at area intersections and roadway segments during operation of ADP facilities. | MM-NOI-5 | **Utilize Curfew Violation Penalty Fines to Help Fund Aircraft Noise Mitigation Programs**<br>SDCRAA will utilize fines accrued through the aircraft operations curfew violation penalty program to annually fund additional sound insulation or other noise mitigation efforts. | SDCRAA | 2021 | Annual reports to the Airport Noise Advisory Committee that provide an end-of-year summary of curfew violations that occurred during the year, the amounts of fines accrued through the penalty program, and how the resultant funds were utilized for sound insulation and other noise mitigation efforts. |

| Mitigation Programs and Policies. Similarly, the Authority is committing to utilize the latest research findings and policy guidance coming from the FAA Reauthorization Act to update noise programs, if applicable. | | FAA and publicly available. | | Available during the year, and a description of whether/how the findings of those studies assist in updating the SDIA noise programs. |
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Implement improvements and strategies identified in the outbound roadway study and design, if and when needed; and 4. Participate in the implementation of improvements and strategies identified in the Airport Connections Study. To the extent that any of the four measures described above requires funding that must be pre-approved by the FAA, SDCRAA will request and make best efforts to secure such approval.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1. SDCRAA is fully engaged with other stakeholders in SANDAG’s committee and subcommittees, which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. The ADP has allocated a site to accommodate a potential transit station within Airport property in proximity to passenger terminals. The ADP also preserves space for an exit roadway on Airport property that could be built in conjunction with new freeway access ramps and enhanced capacity within the Laurel Street corridor.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. SDCRAA understands that the outbound Airport roadway is an important component to the region’s vision for transit and SDCRAA shall be fully engaged with other stakeholders in studying, designing, entitling and, if and when the outbound roadway is needed, implementing the outbound roadway. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. If any of these measures described above requires FAA funding approval, then SDCRAA will ensure or funding of off-Airport improvements, programs to reduce VMT, or other such mitigation measures would only occur if authorized by FAA (timing unknown).</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

During the year, that would also be described in the annual report.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>request such funding and make best efforts to secure such approval.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. SDCRAA will fund its fair share of agreed-to improvements to implement long-term regional solutions identified by SANDAG’s Airport Connections Study, and the outbound roadway, if and when needed, subject to a FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently not considered feasible, because the Mitigation Measure would be within the control of other agencies or jurisdictions, and would require FAA approval of funding. For example, portions of Mitigation Measure MM-TR-LRP-2 require physical improvements to facilities and/or VMT reduction items that would be located within the jurisdictions of, or must be implemented by, other public agencies or departments. Although these improvements and VMT reduction items may prove to be considered physically feasible, SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs or the street and intersection connections for the outbound roadway. SDCRAA will, however, continue to collaborate with the other public agencies and departments to implement any agreed-upon improvement items and/or VMT reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently not considered feasible, because the FAA may decide not to authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements, programs to reduce VMT, connections for the outbound roadway, or other mitigation measures. As discussed in Section 3.14.6 of</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td>Party Responsible</td>
<td>Timing of Mitigation</td>
<td>Monitoring and Reporting Procedure</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
<td>----------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>Increase in delay greater than two seconds at the intersection of Laurel Street at North Harbor Drive would exceed the allowable threshold.</td>
<td>MM-TR-I-1a</td>
<td>Improve the Intersection of Laurel Street at North Harbor Drive</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to passenger air travel exceeding 32.0 million annual passengers (MAP)</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>revenues for off-airport improvements, including those described in MM-TR-I-1a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td>MM-TR-I-1a</td>
<td>Improve the Intersection of Pacific Highway at West Laurel Street</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove a westbound through lane on the West leg and add a second Eastbound left-turn lane, convert a Southbound through lane into a second Southbound right-turn lane, and re-coordinate signals along Laurel Street. Upgrade from Class II bicycle lanes to Class IV Cycle Tracks on Pacific Highway and provide feasible intersection features, such as corner islands and dedicated traffic signal phasing for bicycles on Pacific Highway. The bicycle improvements will extend from Laurel Street to Washington Street affecting the intersections of Pacific Highway at Sassafras Street / Admiral Boland Way and Pacific Highway at Palm Street. Proposed Mitigation Measure MM-TR-I-1b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1b are within SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td>Party Responsible</td>
<td>Timing of Mitigation</td>
<td>Monitoring and Reporting Procedure</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----</td>
<td>---------------------</td>
<td>-------------------</td>
<td>----------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increase in delay greater than two seconds at the intersection of Kettner Boulevard at West Laurel Street would exceed the allowable threshold.</td>
<td>MM-TR-I-1c</td>
<td>Improve the Intersection of Kettner Boulevard at West Laurel Street</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached,</td>
</tr>
</tbody>
</table>


### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>provide the following improvement, to the satisfaction of the San Diego City Engineer: Re-stripe the Southbound approach to two right-turn lanes, one through lane, and one optional through/left-turn lane. Proposed Mitigation Measure MM-TR-I-1c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1c, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that of Project Phase 1a, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in delay at the intersection of Harbor Island Drive at N Harbor Drive; resulting Level of Service (LOS) would exceed the allowable threshold.</td>
<td><strong>MM-TR-I-1d</strong> Improve the Intersections on North Harbor Drive from Harbor Island Drive to Grape Street</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to passenger air travel exceeding 32.0 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in delay at the intersection of Kettner Boulevard at Palm Street; resulting Level of Service (LOS) would exceed the allowable threshold.</td>
<td>MM-TR-I-1e</td>
<td>Improve the Intersection of Kettner Boulevard at Palm Street</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
</table>
| Increase in delay at the intersection of Columbia Street at West Grape Street; resulting Level of Service (LOS) would exceed the allowable threshold. | MM-TR-I-4a | **Improve the Intersection of Columbia Street at West Grape Street**  
Prior to passenger air travel exceeding 32.0 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Redistribution of traffic and retiming of signals. Provide directional signs on eastbound North Harbor Drive suggesting Laurel Street as an option for reaching I-5 southbound. Proposed Mitigation Measure MM-TR-I-4a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-4a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-4a, described above, would be located outside the SDCRAA and City of San Diego. | SDCRAA and City of San Diego | Prior to passenger air travel exceeding 32.0 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item. | a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications. |
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-4a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td>MM-TR-I-4b</td>
<td>Improve the Intersection of Grape Street at State Street/ I-5 SB Ramps</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to passenger air travel exceeding 32.0 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop</td>
</tr>
<tr>
<td>Increase in delay at the intersection of Grape Street at State Street/ I-5 SB Ramps; resulting Level of Service (LOS) would exceed the allowable threshold.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
</table>
| Increase in delay at the intersection of Pacific Highway at Sassafras Street / Admiral Boland Way; resulting Level of | MM-TR-I-5a | **Improve the Intersection of Pacific Highway at Sassafras Street / Admiral Boland Way**  
Prior to passenger air travel exceeding 39.3 MAP, SDCRAA shall provide the following improvement, to the                     | SDCRAA and City of San Diego | Prior to passenger air travel exceeding 39.3 MAP, subject to and | a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, |

the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-4b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-4b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service (LOS) would exceed the allowable threshold.</td>
<td></td>
<td>satisfaction of the San Diego City Engineer: Restripe the West leg to a left-turn lane, two through lanes and right-turn lane. As part of the Class IV Cycle Track improvement identified in MM-TR-I-1b, the south leg will be restriped to a left-turn lane, two through lanes and a right-turn lane. Proposed Mitigation Measure MM-TR-I-5a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that</td>
<td>with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td>Party Responsible</td>
<td>Timing of Mitigation</td>
<td>Monitoring and Reporting Procedure</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------------</td>
<td>------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Increase in delay at the intersection of Kettner Boulevard at Sassafras Street; resulting Level of Service (LOS) would exceed the allowable threshold.</td>
<td>MM-TR-I-5b</td>
<td><strong>Improve the Intersection of Kettner Boulevard at Sassafras Street</strong></td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to passenger air travel exceeding 39.3 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>

Note: The mitigation measure is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that agency’s required approval of funding for this off-Airport improvement item.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in delay at the intersection of India Street at W Grape Street; resulting Level of Service (LOS) would exceed the allowable threshold.</td>
<td>MM-TR-I-5c</td>
<td>Improve the Intersection of India Street at W Grape Street</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to passenger air travel exceeding 35.8 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>

SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

Prior to passenger air travel exceeding 35.8 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove parking on both sides of Grape Street from North Harbor Drive to State Street, to add a 4th travel lane on the south side of the road and install a Class IV Cycle Track along the north side. Retime signals along Grape Street. Proposed Mitigation Measure MM-TR-I-5c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues.
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
</table>
| Increase in delay at the intersection of Kettner Street at W Grape Street; resulting Level of Service (LOS) would exceed the allowable threshold. | MM-TR-I-5d | Improve the Intersection of Kettner Street at W Grape Street  
Prior to passenger air travel exceeding 35.8 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove parking from the south side and add a 4th travel lane from North Harbor Drive to State Street and retime signals along Grape Street. Proposed Mitigation Measure MM-TR-I-5d is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5d are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5d, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, SDCRAA and City of San Diego Prior to passenger air travel exceeding 35.8 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item. | SDCRAA and City of San Diego | Prior to passenger air travel exceeding 35.8 MAP, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications. |
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in the volume to capacity ratio ((v/c)) along the roadway segment of Sassafras Street from Pacific Highway to Kettner Boulevard; the change in (v/c) ratio would exceed the allowable threshold.</td>
<td>MM-TR-RS-1a</td>
<td><strong>Improve Sassafras Street from Pacific Highway to Kettner Boulevard</strong> Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (w/o two-way left-turn lane) to a 4 Lane Collector (w/o two-way left-turn lane). Proposed Mitigation Measure MM-TR-RS-1a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>

Implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5d, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.
<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td></td>
<td>approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MM-TR-RS-1b</td>
<td>Improve Grape Street from Harbor Drive to Pacific Highway</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing parking on both</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, subject to and with the qualifications that</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over</td>
</tr>
</tbody>
</table>
### Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Proposed Mitigation Measure MM-TR-RS-1b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1b, without FAA approval. Thus, the SDCRAA's ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.</td>
<td>SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.</td>
<td>improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
<td></td>
</tr>
<tr>
<td>Potential Significant Impact</td>
<td>No.</td>
<td>Mitigation Measures</td>
<td>Party Responsible</td>
<td>Timing of Mitigation</td>
<td>Monitoring and Reporting Procedure</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
<td>------------</td>
<td>-----------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Increase in the volume to capacity ratio (v/c) along the roadway segment of Grape Street from Pacific Highway to India Street; the change in v/c ratio would exceed the allowable threshold. | MM-TR-RS-1c | Improve Grape Street from Pacific Highway to India Street  
Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing parking on both sides of the roadway. Proposed Mitigation Measure MM-TR-RS-1c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1c, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval. SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. | SDCRAA and City of San Diego | Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) | a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications. |
<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in the volume to capacity ratio (v/c) along the roadway segment of Grape Street from</td>
<td>MM-TR-</td>
<td>Improve Grape Street from India Street to State Street</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first</td>
<td>a) Assessment of costs for fair</td>
</tr>
<tr>
<td>India Street to State Street; the change in v/c ratio would exceed the allowable threshold.</td>
<td>RS-1d</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of</td>
<td></td>
<td>occupancy of any new</td>
<td>share contribution toward funding,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction</td>
<td></td>
<td>or redeveloped facility that is</td>
<td>b) If mutual concurrence on</td>
</tr>
<tr>
<td></td>
<td></td>
<td>of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-</td>
<td></td>
<td>part of Project Phase 1a,</td>
<td>mitigation is reached, Authority</td>
</tr>
<tr>
<td></td>
<td></td>
<td>way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing parking</td>
<td></td>
<td>subject to and with the</td>
<td>would enter into an agreement with</td>
</tr>
<tr>
<td></td>
<td></td>
<td>on both sides of the roadway. Proposed Mitigation Measure MM-TR-RS-1d is presently</td>
<td></td>
<td>qualifications that</td>
<td>City of San Diego, which has</td>
</tr>
<tr>
<td></td>
<td></td>
<td>not considered fully feasible, because the improvements described in Mitigation</td>
<td></td>
<td>SDCRAA cannot implement</td>
<td>jurisdiction over improvements to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Measure MM-TR-RS-1d are within the City of San Diego jurisdiction and would require</td>
<td></td>
<td>the measure without</td>
<td>street segments surrounding SDIA,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>FAA approval of funding. The mitigation measure is physically feasible, because</td>
<td></td>
<td>(i) collaboration with</td>
<td>c) Develop construction plans and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>there is enough space in the existing roadway widths. The measure, if implemented,</td>
<td></td>
<td>and approval by the City,</td>
<td>specifications.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>would reduce impacts to below a level of significance. The improvements contemplated</td>
<td></td>
<td>(ii) funding approval from</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>by Mitigation Measure MM-TR-RS-1d, described above, would be located outside the</td>
<td></td>
<td>FAA, which SDCRAA has</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego.</td>
<td></td>
<td>already requested but</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Consequently, SDCRAA cannot independently implement the measure; instead,</td>
<td></td>
<td>which has not yet been</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>implementation would require the assistance and approval of the City. The City has</td>
<td></td>
<td>approved.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>informed SDCRAA that it concurs the measure is physically feasible and can be</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>implemented as conceptually described above, provided the proper permits are</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>obtained from the City. Note, however, that SDCRAA may not ensure airport</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>revenues for off-airport improvements, including those described in MM-TR-RS-1d,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>without FAA approval. Thus,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>funding approval from FAA, which SDCRAA has already requested but which has not</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>SDCRAA will continue to work with the FAA to seek that agency’s required approval of</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>funding for this off-Airport improvement item.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in the volume to capacity ratio (v/c) along the roadway segment of Pacific Highway to Kettner Boulevard; the change in v/c ratio would exceed the allowable threshold.</td>
<td>MM-TR-RS-4a</td>
<td>Improve Palm Street from Pacific Highway to Kettner Boulevard</td>
<td>SDCRAA and City of San Diego</td>
<td>Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a</td>
<td>a) Assessment of costs for fair share contribution toward funding, b) If mutual concurrence on mitigation is reached, Authority would enter into an agreement with City of San Diego, which has jurisdiction over improvements to street segments surrounding SDIA, c) Develop construction plans and specifications.</td>
</tr>
</tbody>
</table>

the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

Improve Palm Street from Pacific Highway to Kettner Boulevard
Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement: Convert the roadway on Palm Street from Pacific Highway to Kettner Boulevard from a 2 Lane Collector (w/o two-way left-turn lane) to a 4 Lane Collector (without a two-way left-turn lane). Proposed Mitigation Measure MM-TR-RS-4a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-4a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-4a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and
Table 1: Mitigation Measures for SDIA Airport Development Plan

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>No.</th>
<th>Mitigation Measures</th>
<th>Party Responsible</th>
<th>Timing of Mitigation</th>
<th>Monitoring and Reporting Procedure</th>
</tr>
</thead>
</table>
| Exceedance of allowable thresholds at area intersections and roadway segments during ADP construction activities. | MM-TR-Con-1 | Construction Traffic Measures  
Prior to the start of any construction phases at SDIA, SDCRAA shall promote the following TDM strategies:  
1. Consider establishing a remote lot for construction workers with shuttles to their work site; 2. Stagger start times of various crews, when possible, to reduce the intensity of construction impacts; 3. Consider adding a shuttle stop at the construction site for transit services from Santa Fe Depot and/or Old Town Transit Center. | SDCRAA and MTS | Prior to the start of any construction phases at SDIA. | Requirements related to promoting TDM strategies as a means to reduce construction traffic impacts shall be included in bid specifications for all construction contracts related to the project, and shall be checked by SDCRAA in review of construction contractor submittals. |
Statement of Overriding Considerations

The Final EIR for the San Diego International Airport Development Plan identified significant adverse environmental impacts that cannot be mitigated to a level of insignificance by the implementation of feasible mitigation measures or alternatives. As discussed in the CEQA Findings of Fact, the San Diego County Regional Airport Authority (Airport Authority) has selected Alternative 4, T1 Replacement and Transportation Improvements, as the staff-recommended alternative for approval by the Airport Authority Board of Directors (referred herein below as the “Airport Development Plan” or “Project”). As also discussed in the CEQA Findings of Fact, the unavoidable significant impacts of the Project occur in the areas of air quality, greenhouse gases and climate change, cultural resources, hazards (related to noise), land use and planning (related to noise and traffic), aircraft and road traffic noise, and traffic/circulation.

Section 15093(b) of the State CEQA Guidelines provides that, when a public agency approves a project that may result in significant impacts, which are identified in the Final EIR but are not reduced to an insignificant level, the agency must state in writing the technological, legal, social, or economic reasons to support its decision based on the Final EIR and/or other information in the whole of the Administrative Record. Accordingly, the Airport Authority, as the lead agency for the Airport Development Plan, adopts the following Statement of Overriding Considerations.

Based on substantial evidence in the whole of the Administrative Record for the Project, the Airport Authority hereby determines that the unavoidable potentially significant adverse environmental impacts of the Airport Development Plan are acceptable in light of the following benefits. Each Project benefit described below constitutes a separate overriding consideration warranting adoption of the Airport Development Plan, independent of the other benefits, and outweighs each and every potentially significant unavoidable impact. In the event that any subsequent court decision or regulatory action results in a determination that there are additional remaining significant impacts resulting from the Airport Authority’s adoption of the Project that cannot be avoided even with the incorporation of all feasible mitigation measures into the Project, the following findings and Statement of Overriding Considerations shall be deemed to apply to such additional remaining significant impacts.

After analyzing the impacts of the Proposed Project, the Project, and a reasonable range of alternatives, the Airport Authority has determined that the Project represents the optimal balancing of the Airport Authority’s need to meet Project objectives and to reduce significant unavoidable environmental effects compared to those resulting from the Proposed Project.

A. Improved Airport Safety

Adoption and approval of the Project provides Taxiway A and Taxiway B improvements and relocation that will enhance the Airport’s safety by meeting Federal Aviation Administration (FAA) design standards for the reasons discussed and explained in Final EIR Sections 2.6.3, 5.5.4, and 5.8, which reasons are fully incorporated here.
B. Upgraded Airport Experience

New Terminal 1

Completed in 1967, the existing Terminal 1 is the oldest terminal at SDIA. It is outdated and does not meet: (i) customer service standards employed by comparable commercial airports, or (ii) existing and projected passenger capacity needs. The Project includes a new replacement Terminal 1 with more modern, efficient, and comfortable facilities for the reasons discussed and explained in Final EIR Sections 2.6.1, 5.5.4, and 5.8, which reasons are fully incorporated here. Adoption and approval of the Project provides improvements to safely and adequately prepare for forecasted aviation operations and demand consistent with new code requirements and passenger expectations for airport functionality. The new Terminal 1 includes 30 gates and jet bridges connecting passengers to larger holdrooms with more seating, new concessions, a larger ticket lobby, additional security checkpoints with more lanes, and bigger baggage claim. The new Terminal 1 also includes a new interior passageway, post-security, that would connect the new Terminal 1 to the existing Terminal 2 East, eliminating the need for passengers to pass through security screening a second time when connecting to other destinations through SDIA.

Airfield Improvements

SDIA’s capacity for carrying passengers is limited by its single runway. The Project includes a new Taxiway A and other airfield upgrades that would improve efficiency and help reduce aircraft taxiing times for the reasons discussed and explained in Final EIR Sections 2.6.3, 5.5.4, and 5.8, which reasons are fully incorporated here.

C. Mobility Improvements

New On-Airport Access Road

A new airport access roadway would allow airport-bound drivers to merge from Laurel Street and North Harbor Drive onto a three-lane, free-flow roadway without intersections for the reasons discussed and explained in Final EIR Sections 2.6.4, 5.5.4, and 5.8, which reasons are fully incorporated here. This would reduce the amount of westbound Airport traffic using North Harbor Drive by up to 45%.

Bicycle and Pedestrian Access Upgrades

Safe, recognizable, and continuous connections along North Harbor Drive and to SDIA terminals would be provided for bicycles and pedestrians for the reasons discussed and explained in Final EIR Sections 2.6.4, 5.5.4, and 5.8, which reasons are fully incorporated here. Existing pedestrian and bicycle connections would be retained, while, additionally, new connections would also be established. For westbound passengers accessing SDIA, at the intersection of North Harbor Drive and Laurel Street, a pedestrian/bicycle crossing would be provided along the on-airport entry ramp. A multi-use bicycle and pedestrian path would be built along North Harbor Drive connecting Laurel Street to Terminal 1. At the intersection of North Harbor Drive and Harbor Island Drive, there would be a crossing that connects to the Terminal 1 Parking Structure. From there, pedestrians and bicyclists could access all new Terminal 1 facilities.
Transit-Ready Area
The Project includes preservation of a portion of SDIA as a “transit-ready” area for a future transit station that would connect to a regional transit extension and convey passengers within easy walking distance of existing Terminal 2 and the new Terminal 1 for the reasons discussed and explained in Final EIR Sections 5.5.4 and 5.8, which reasons are fully incorporated here.

D. Sustainability
The Project provides important sustainability benefits through conserving energy and water for the reasons discussed and explained in Final EIR Sections 2.6, 5.5.4, and 5.8, which reasons are fully incorporated here. The new Terminal 1 would incorporate high-performing and sustainable design and construction features consistent with the sustainability policies and goals adopted by SDCRAA, while also achieving certification from the U.S. Green Building Council (USGBC) and/or similar under another green rating system, such as the Envision Rating System for sustainable infrastructure.

Energy conservation measures implemented as part of the Project, such as expanding use of renewable power and increasing use of alternative fuels, would reduce energy use associated with the new construction and contribute to the on-going efforts to increase the overall energy efficiency at SDIA. Buildings constructed as part of the Project would be powered by 100 percent renewable electricity by 2024. Additionally, the Project would include implementation/ expansion of water efficiency and conservation programs which would increase water use efficiency compared to existing conditions.

The Project also includes improvements related to the existing SAN Stormwater Capture and Reuse System, which would serve to reduce the volume of stormwater discharged from the Airport and also provide water quality benefits related to stormwater discharge for the reasons discussed and explained in Final EIR Sections 2.6.7.2, 5.5.4, and 5.6.4.9, which reasons are fully incorporated here. This would also increase the amount of stormwater available for reuse on-site for non-potable purposes. This would result in a corresponding reduction in use of potable water for non-potable purposes.

The Project is supportive of SDCRAA’s Climate Resilience Plan, which presents a strategy for improving climate resilience by adapting to projected climate conditions through flood resilience, extreme heat management, and drought preparedness for the reasons discussed and explained in Final EIR Sections 3.3, 3.11, 5.5.4, 5.6.4, and 5.8, which reasons are fully incorporated here. This strategy will be used to inform the design and implementation of the Project.

These requirements supportive of sustainability and climate resilience implemented under the Project would also help to address risks associated with sea level rise for the reasons discussed and explained in Final EIR Sections 3.11.4.2.6, 3.11.6.2, and 5.6.4.10, which reasons are fully incorporated here.

The Project also provides opportunities for optimized revenue-producing concession uses of the Airport to enhance its economic viability and self-sufficiency for the reasons discussed and explained in Final EIR Sections 2.6.1, 5.5.4, and 5.8, which reasons are fully incorporated here.
E. Job Creation and Regional Economic Benefits

SDIA is a major employer on both local and regional levels. In addition to providing permanent positions at the Airport, SDIA is a major provider of construction jobs. The Project would foster additional employment opportunities and economic activity that would benefit the communities located around SDIA and the San Diego region for the reasons discussed and explained in Final EIR Section 6.4, which reasons are fully incorporated here.

The Project would improve passenger level of service and amenities within a new Terminal 1, and modernize the interior and exterior of the terminal to benefit the overall appearance of SDIA, as well as improve ground access to SDIA, thereby helping maintain the Airport’s economic contribution in the San Diego Region. The Project is estimated to cost approximately $3 billion to construct, and would generate approximately 900+ new employment opportunities at SDIA. Construction activity associated with the Project would also support the economy over the multi-year construction period due to the number of construction workers, anticipated spending by these workers, and the provision of goods and services in support of construction.

Regarding regional economic benefits, an economic impact study was completed for SDIA in June 2018.1 The analysis conducted for this study estimated that on-airport tenants (along with their construction activity) and visitors arriving at SDIA supported nearly 116,600 total jobs earning a total annual payroll approaching $3.9 billion. The total annual economic activity (output) generated by on-airport tenants and visitors is estimated at more than $11.7 billion. These total impacts include the multiplier impacts created by the recirculation of the direct impacts within the economy. When associated off-airport parking and air cargo facilities are added to the total impacts supported by on-airport tenants and visitors, the Airport’s economic impacts increase to nearly 118,000 total jobs, more than $3.9 billion in total annual payroll, and nearly $11.9 billion in total annual economic activity. Total employment and total output supported by the Airport and the associated off-airport parking and air cargo facilities have increased by 31 percent and 29 percent, respectively, since 2012 due primarily to the Airport’s strong growth in passengers. The ongoing successful operation of SDIA serves a vital role in maintaining a healthy regional economy and implementation of the proposed project would help support that role.

Considering the foregoing, and the information contained within the Final EIR and other portions of the Project’s Administrative Record, the Airport Authority concludes that implementation of the Project will result in multiple, independent benefits as outlined above. The Airport Authority also finds that the benefits identified above outweigh and make acceptable the significant, unavoidable environmental impacts associated with the Project and, accordingly, adopts this Statement of Overriding Considerations.

---

1. Introduction

The Final Environmental Impact Report (Final EIR) evaluates the potential environmental impacts associated with the Airport Development Plan (ADP or “project”) at San Diego International Airport (SDIA or “Airport”), proposed by the San Diego County Regional Airport Authority (Authority). In addition to being the project proponent, the Airport Authority is also the lead agency for the Final EIR (i.e., the public agency with primary responsibility for preparing and certifying the California Environmental Quality Act (CEQA) compliance document along with adopting the project).

SDIA encompasses 661 acres. It has a single, 9,401-foot-long and 200-foot-wide east-west runway that accommodated 225,058 flight operations in 2018, making it the busiest single-runway commercial airport in the nation. The runway is supported by one full-length parallel taxiway on the south (Taxiway B). The north taxiway (Taxiway C) is not full length, as there is insufficient space between the runway and the U.S. Marine Corps Recruit Depot property. Additionally, there are ancillary taxiways that provide for runway and terminal access and aprons that provide for aircraft parking. The SDIA terminal complex is comprised of three buildings: Terminal 1 (T1), Terminal 2 East (T2-East), and Terminal 2 West (T2-West). Other landside airport facilities include general aviation facilities, air cargo facilities, related aviation support facilities, and an aircraft rescue and firefighting facility. SDIA’s air service continues to grow based upon the growing region’s demand for air travel. The ADP does not include an additional runway or any changes to the runway configuration.

The ADP is the next phase of master planning for SDIA, enabling SDCRAA to accommodate anticipated future demand for air travel at SDIA with more modern, efficient, and comfortable facilities. The ADP planning effort began in 2012 with defining the effort’s Goals and Objectives. The objectives of the proposed project incorporate and build upon the goals identified in 2012.

The objectives for the ADP include the following:

- **Goal:** Develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction that reflect the local feel and uniqueness of San Diego
  - **Objectives:**
    - Maintain appropriate level of service on the curbfront, security checkpoints, passenger holdrooms, and bag claim areas.
    - Optimize airport concessions to meet demand and generate revenue for SDIA.
    - Minimize walking distances and mode changes from curbside to aircraft gate.
    - Address T1 functional deficiencies, including replacement if necessary.
    - Develop a plan that can be implemented in a phased manner.
- Make the terminal a showplace of functionality and design that reflects the local feel and uniqueness of San Diego.

- **Goal: Plan for an operationally efficient airfield that meets FAA standards**
  - **Objectives:**
    - Improve and optimize airfield configuration for safety, efficiency, and capacity.
    - Develop a plan to eliminate any existing modifications to standards as soon as feasibly practical and do not create conditions warranting additional modifications or waivers from the FAA.
    - Provide flexibility to respond to future aircraft, technology, and industry changes.

- **Goal: Provide a plan that is fiscally and environmentally sustainable**
  - **Objectives:**
    - Wherever prudent, make use of existing facilities through renewal or modernization to meet future demand.
    - Ensure the development plan is fiscally responsible from both the capital and operational cost perspectives.
    - Provide plans that will diversify airport revenues and strengthen the financial position of SDIA.
    - Maximize funding resources through appropriate facility planning.
    - Continue to implement sustainability measures at SDIA, and monitor and report on those measures consistent with Global Reporting Initiative (GRI) Sustainability Reporting Standards.

- **Goal: Optimize the productive use of SDIA properties**
  - **Objectives:**
    - Maximize non-airline revenues.
    - Identify opportunities for increased commercial utilization.

- **Goal: Provide a plan that meets the aviation needs of the San Diego region in a socially responsible manner**
  - **Objectives:**
    - Support increases in air service demand for commercial passenger service to meet the needs of the San Diego regional economy and businesses.
    - Implement airport improvements in a sustainable manner and consider the total cost of ownership including financial, environmental, and social costs.
• Goal: Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand
  
  - Objectives:
    - Provide enhanced vehicular access from Harbor Drive to SDIA.
    - Improve mobility for private vehicles, transit users, and bicyclist/pedestrians along the North Harbor Drive corridor.
    - Improve transit connections to the existing transit system planned by SANDAG and operated by MTS, including bus shuttle service to light rail stations and transit centers (Santa Fe Depot and Old Town Transit Centers).
    - Accommodate demand for short-term and long-term parking spaces on-airport to ensure sufficient passenger satisfaction and appropriate revenue generation.

2. Project Description

The primary components of the proposed project are the replacement of the existing T1, modifications to T2-East and T2-West, and a new airport access roadway. T1 is the oldest terminal at SDIA and does not meet current standards for customer service of commercial air passengers, including undersized passenger waiting areas at gates, limited restrooms, and no post-security connection between concourses. Under the proposed project, the existing T1 would be demolished and replaced with a new terminal facility. As part of the T1 replacement, a new T1 access road and parking structure would be constructed. The T2-West and T2-East modifications consist of adding a new concourse "stinger" (up to seven gates) that extends northward from the western terminus of T2-West, and demolishing the existing easternmost 350,000 square-foot T2-East concourse and replacing it with a new concourse that connects T2 to the new T1. At completion of the proposed project, the number of gates at SDIA would increase from 51 to 61. The improvements would enable SDCRAA to accommodate future demand for air travel that is anticipated to occur at SDIA, with or without the project, with more modern, efficient, and comfortable facilities.

The proposed project also includes a new on-airport entry roadway for airport-bound traffic traveling west on North Harbor Drive. The on-airport entry roadway, which includes an accompanying new pedestrian and bicycle multi-use path, would provide a new airport access point near the intersection of Laurel Street and North Harbor Drive, which would reduce congestion by removing a portion of westbound airport traffic from North Harbor Drive to the new on-airport entry roadway. Other project improvements include an expanded central utility plant and other infrastructure upgrades; the demolition of airport support facilities and administrative building to accommodate the terminal improvements; construction of a new airport administrative office building and potential commercial development area; and the removal and/or reconfiguring of surface elements such as surface parking, access roads, aircraft aprons, and taxiways. The proposed project implementation would occur over two phases (Phase 1 and Phase 2), each with two sub-phases (Phase 1a and Phase 1b, and Phase 2a and Phase 2b).
3. Background

Airport Master Plan and Airport Layout Plan

An airport master plan provides for the long-term development of an airport and allows an airport to seek specific federal grants and funds associated with federal law for improvements associated with an airport master plan. The Port District prepared SDIA’s first comprehensive Master Plan document in 2001; however, it was not adopted prior to the transfer of SDIA ownership and operation to SDCRAA in 2003. In 2008, the SDCRAA Board adopted the Airport Master Plan (AMP), and the AMP continues to govern planning at SDIA. The AMP documents the SDCRAA planning process for SDIA and provides guidance for development of SDIA to meet continued passenger, cargo, and operations growth to meet the two overall objectives of:

1. Providing adequate facilities to accommodate air service demand (forecast growth through 2015), while improving levels of services, airport safety and security, and enhancing airport access.

2. Developing facilities that utilize the current airport property and facilities efficiently and are compatible with surrounding land uses.

A series of goals and detailed objectives were also developed to address specific issues related to the SDIA airport master-planning process and provide a framework for developing improved airport facilities. The AMP identified facility requirements in four categories: Airfield, Terminal, Ground Transportation, and Airport Support Facilities.

Following the adoption of the AMP in May 2008, an Airport Layout Plan (ALP) was completed in June 2009 and approved by the FAA in July 2009, subject to specified conditions, and was updated in 2014. An ALP refers to the official plan drawing approved by the FAA that depicts all existing and planned airport facilities, runway and taxiway safety areas, and the property boundary. It also includes data tables describing various components of SDIA.

The ADP is the next master planning phase for SDIA, building upon the 2008 AMP.

Airport Transit Plan

The SDCRAA has set forth programs to improve provisions for, and use of, transit at SDIA for use by its passengers and airport employees. In 2010, the SDCRAA prepared an Airport Transit Plan to assess potential transit programs and ridership for airport employees and passengers to SDIA. In 2016, the Airport Transit Plan was updated, funded by a California Department of Transportation (Caltrans) transportation planning grant (and available for review at www.san.org). The Airport Transit Plan update focused on near-term transit programs that could increase connectivity to the existing transit systems, particularly the light rail stations and transit centers at Santa Fe Depot and the Old Town Transit Center, which include light rail, heavy rail (such as the North County Transit District’s COASTER and Amtrak), and bus connections. The recommendations in this plan focus on four alternatives developed from eight potential concepts for increasing transit ridership. Two of the programs were implemented by the SDCRAA in 2016 with the opening of an on-airport roadway connecting to the northside of SDIA (see description and implementation dates below). In conjunction with ongoing planning efforts to reduce impacts of airport operations on surrounding areas and the environment, the SDCRAA is working to
implement the other two recommended programs, which require coordination and approvals from other transportation and land use agencies. The four programs identified in the Airport Transit Plan are.

- Maximize marketing and passenger information utilizing airport and non-airport information channels – Implemented January 2016.
- Enhance access to the existing Trolley station at Middletown and launch the Trolley to Terminal shuttle bus utilizing the airport roadway – Implemented January 2016.
- Convert the existing MTS bus route between SDIA and downtown San Diego, Route 992, to a "Rapid" route, with improvements to the operations on SDIA and on the route through downtown.
- Partner with transit operators to implement a transit line from the Old Town Transit Center and Amtrak Station to SDIA.

**Harbor Drive Mobility Committee**

In March 2017, the SDCRAA Board directed and approved the formation of a multi-agency committee – comprised of key land use and transportation agencies, as well as stakeholders in the North Harbor Drive corridor – to improve traffic flow, reduce congestion, and consider road and transit improvements that would improve mobility. As the SDCRAA does not have planning jurisdiction for transportation improvements beyond its 661 acres, the SDCRAA must coordinate ground transportation improvements with the City of San Diego, SANDAG, Port of San Diego, and Caltrans. The Board specifically requested to establish a process by which data is gathered and alternatives evaluated; and solutions and recommendations are presented to decision-makers. The Board further requested the establishment of a cadre of stakeholders to evaluate and recommend transit alternatives to remedy traffic and accessibility concerns around SDIA. This direction specified that stakeholders should include a working group of entities directly impacted by traffic around SDIA and those that have a regional responsibility for transit, and that direction was to be provided by policy-level decision-makers who would evaluate the technical analysis and provide policy-level recommendations for implementation and execution among all of the impacted entities.

The Harbor Drive Mobility Committee included a Policy Group and a Working Group. The Policy Group consisted of representatives from the SDCRAA, the Port of San Diego, the City of San Diego, as well as two representatives from SANDAG (Board Chair and Transportation Committee Chair). The Policy Group, comprised of policy-level decisions-makers, evaluated technical analysis and provided policy-level recommendations for implementation and execution among all of the regional entities. The Harbor Drive Mobility Committee also included a Working Group with membership from the SDCRAA, SANDAG, Port of San Diego, Caltrans, MTS, City of San Diego, and Solar Turbines. The Working Group held regular meetings to develop transportation ideas and alternatives based on thorough technical analyses. The Working Group met periodically with the Policy Group to review and discuss analysis, concepts, and alternatives.
From 2017 through June 2018, the Harbor Drive Mobility Committee held seven Working Group meetings and five Policy Group meetings, to conduct its mission, including an assessment of potential improvements to roads, transit, and pedestrian/bicycle access in the North Harbor Drive corridor from Shelter Island to the San Diego Convention Center.

SANDAG Airport Connectivity Subcommittee
In December 2018, SANDAG established a temporary subcommittee of the Board of Directors, advisory in nature, entitled the Airport Connectivity Subcommittee, to identify future transportation solutions for improved ground and transit connectivity options connecting to SDIA. SANDAG Chair and Poway Mayor Steve Vaus serves as the Chair of the Airport Connectivity Subcommittee. The Airport Connectivity Subcommittee includes Board members from the following organizations: SANDAG, City of San Diego, County of San Diego, MTS, North County Transit District, San Diego Unified Port District, SDCRAA, and Caltrans District 11.

The purpose of the Airport Connectivity Subcommittee is to lead discussions and explore options for how best to build consensus around transportation solutions for improved connectivity to SDIA for generations to come. The work of the Airport Connectivity Subcommittee will conclude upon adoption of a preferred transportation solution by the SANDAG Board of Directors. To help identify potential solutions, the Airport Connectivity Subcommittee is discussing airport connectivity options and SANDAG released two Requests for Information (RFI) to solicit innovative ideas from external entities for improved connectivity, the creation of San Diego Grand Central Station, and supportive land uses. It is anticipated that any recommended solutions by the Airport Connectivity Subcommittee will be considered by the SANDAG Board of Directors for inclusion in the upcoming 2021 Regional Plan.

ADP EIR Procedural History
On January 20, 2017, SDCRAA issued a Notice of Preparation (NOP) for the proposed project to inform responsible and trustee agencies, public agencies, and the public that SDCRAA was preparing a Draft EIR for the proposed ADP project. The NOP was circulated for a 40-day public comment period from January 20, 2017 to March 1, 2017, with two scoping meetings held on January 31, 2017 and February 1, 2017.

SDCRAA released the 2018 Draft EIR on July 9, 2018 for a 46-day review comment period that was extended by an additional 15 days to 61 days. The 61-day review period concluded on September 7, 2018.

A total of 87 federal, state, regional, and local agencies, as well as organizations and individuals submitted comments on the 2018 Draft EIR. Eleven of the comment letters were received after the close of the comment period.

Based on comments received on the 2018 Draft EIR, SDCRAA withdrew the 2018 Draft EIR, developed and prepared an entirely new Recirculated Draft EIR in September 2019 (Recirculated Draft EIR), and also formulated a new alternative to the proposed project. The Recirculated Draft EIR incorporated the updated information and analyses, and included the new alternative. The SDCRAA provided the Recirculated Draft EIR to the public for review and comment pursuant to the requirements of CEQA and the State CEQA Guidelines. State CEQA Guidelines Section 15088.5
requires recirculation of an EIR when significant new information is added after notice of public review has been given, but prior to certification of the EIR. New information can include changes to the project or environmental setting, as well as additional data or other information, including a feasible project alternative different from others previously analyzed that would lessen the environmental impacts of the project.

Provided below is a summary of the main additions and/or updates set forth in the Recirculated Draft EIR.

**Updated Aviation Activity Forecast**

As described in Section 2.5.1 of the 2018 Draft EIR, an aviation activity forecast provides the basis for estimating the number and types of aircraft operations occurring in the future at an airport, along with associated passenger numbers projected for the future. Such information is used not only for planning the types and timing of airport improvements that may be required in the short-, medium-, and long-term, but also for assessing certain project-related impacts that are dependent, in part, on the number of aircraft operations and/or passengers that are anticipated to occur at SDIA in the future. Such impacts include, but are not limited to, air quality and noise impacts associated with increased aircraft operations, and traffic, air quality, and noise impacts from increased vehicle trips associated with future increases in passenger numbers. The 2018 Draft EIR used aviation activity forecasts that were based on data from 2011 and 2012. Although the forecasts were approved by the Federal Aviation Administration (FAA) in 2013, some commenters indicated that the 2013 aviation activity forecast may be underestimating the future activity levels projected for SDIA, noting, in particular, that the actual activity level occurring at SDIA in 2017 was much greater than that projected in the 2013 forecast.

Based on those comments, the SDCRAA updated the aviation activity forecast for SDIA, taking into account a number of factors that have contributed to growth occurring faster than originally projected in the 2013 forecast. Such factors include the strong economic growth that occurred in the San Diego region between 2011 and 2017, decreases in domestic airfares, the use of larger capacity aircraft (in terms of the number of seats), higher load factors (in terms of the percentage of occupied seats on flights), and substantial increases in both origin-destination and connecting passengers at SDIA.

An updated aviation activity forecast for SDIA using 2018 as the base year was completed in April 2019. It includes: (1) updated unconstrained forecasts of enplaned passengers, air cargo, and aircraft operations at SDIA for the future demand years; (2) a comparison to the FAA 2018 Terminal Area Forecast (TAF) for SDIA, which is also an unconstrained forecast; and (3) a constrained demand scenario that accounts for the fact that the future aviation activity demands projected for SDIA (i.e., the unconstrained forecasts) cannot be fully accommodated due to the limits of SDIA’s single runway capacity. The FAA approved the updated aviation activity forecasts on June 19, 2019. More information regarding the updated forecast is provided in Section 2.5.1 of the Recirculated Draft EIR, Appendix R-B of the Recirculated Draft EIR (as corrected in Section 3.3, Corrections and Additions to the Recirculated Draft EIR – Appendices, of the Final EIR), and Attachment 3, Airfield/Airspace Simulation Analysis, of the Final EIR.
Based on the approved aviation activity forecast, the impacts analyses in the 2018 Draft EIR, particularly those related to traffic, air quality, and noise, were revised and were presented in the Recirculated Draft EIR.

**Refinements to the Proposed Project’s Facilities Building Heights**

Based on additional planning and design efforts by SDCRAA subsequent to publication of the Draft EIR in July 2018, refinements to the heights of certain facilities under the proposed project were made, as further discussed in Chapter 2, Project Description, of the Recirculated Draft EIR. Specifically: (1) the height of the proposed new (replacement) Terminal 1 has been increased from 65 feet to a maximum of 90 feet at the terminal façade/ticketing lobby on the south side of the building; (2) the height of the proposed Terminal 1 Parking Structure has been reduced from 80 feet to 60 feet; and (3) the height of the commercial development opportunity adjacent to the new (replacement) Terminal 1 has been reduced from 150 feet to 90 feet.

**New Alternative to the Proposed Project**

In response to comments received on the 2018 Draft EIR, SDCRAA developed a new alternative to the proposed project. The main differences between the new alternative, which is presented in the Recirculated Draft EIR as Alternative 4 - T1 Replacement and Transportation Improvements, and the proposed project, include:

- **Reduction in Size, Scope, and Construction Period of ADP Improvements**
  - Under Alternative 4, the proposed ADP improvements would focus only on the replacement of the existing Terminal 1 and forego the addition to Terminal 2 West (i.e., the proposed “stinger”). It would also forego the replacement of existing Terminal 2 East. Completion of the ADP improvements under this alternative would occur by 2026, as compared to 2035 for the proposed project.
  - Under Alternative 4, the 400,000 square foot commercial development opportunity area proposed adjacent to the new (replacement) Terminal 1 under the proposed project would not be implemented.

- **Transit Service Improvements**
  - Alternative 4 would provide near-term (or first phase) transit service improvements at SDIA, including an airport shuttle service to and from the Old Town Transit Center, which is an intermodal transit station with connections for commuter and inter-city rail service (Amtrak/North County Transit District’s COASTER), light rail service (San Diego Trolley), and San Diego Metropolitan Transit System (MTS) bus lines. SDCRAA would also work with the MTS to upgrade Bus Route 992 transit service between downtown and SDIA, including the connection to the Santa Fe Depot. This would include the following measures to increase ridership by reducing the travel time along the route: 1) allow 992 buses to use the new on-airport access road including preferential locations at the terminals for bus stops; and 2) provide space for a kiosk and fare purchase station at a convenient location within the new, replacement Terminal 1 (implemented in
January 2016 at existing Terminals 1 and 2). While the airport shuttle service to and from the Old Town Transit Center and improvements to Bus Route 992 service to and from SDIA are included as project features of Alternative 4, these transit improvements could also occur as mitigation measures for traffic impacts associated with the proposed project.

- Alternative 4 would designate an area mid-way between the new (replacement) Terminal 1 and the existing Terminal 2 for a potential transit station that would connect SDIA directly to off-airport transit system improvements, should that opportunity occur in the future. Future development of such off-airport transit system improvements would be part of a comprehensive transit system infrastructure planning program involving multiple agencies, including the SDCRAA, the San Diego Association of Governments (SANDAG), the Port of San Diego, the County of San Diego, the City of San Diego, MTS, and Caltrans.

**Roadway System Improvements**

- Alternative 4 would retain the proposed project’s new on-airport three-lane access road, as this is necessary to reduce airport-related traffic traveling west on North Harbor Drive. In addition, Alternative 4 would reserve right-of-way for a future three-lane roadway for outbound traffic, as this would reduce airport-related traffic traveling east on North Harbor Drive. One of the outbound lanes on SDIA would also be enacted in the first phase to allow high occupancy vehicles, such as the Rental Car Center buses and the Old Town Transit Center shuttle to avoid city streets (specifically bypassing North Harbor Drive and Laurel Street) by connecting to the existing on-airport transitway to traverse around the east end of the airfield and connect to the northside of SDIA and Pacific Highway. The connection point for new outbound roadway lanes would occur off of airport property and, therefore, requires further planning and approval from the City of San Diego, Caltrans, and other potential agencies including the California Coastal Commission, the Port of San Diego, and SANDAG. Additionally, the operational characteristics and connection point of the subject roadway would take into consideration other key roadways nearby, such as Laurel Street and Pacific Highway, which likewise would involve coordination with, and environmental review by, other agencies.

**Reduced Size Terminal 1 Parking Structure**

- Alternative 4 would reduce the size of the proposed parking structure south of the new (replacement) Terminal 1. Specifically, it would reduce the number of parking spaces from 7,500 to 5,500, and the total square footage from 2,780,000 to 2,250,000.

**Reduced Height Airport Administrative Offices Building**

- Under Alternative 4, the new (replacement) airport administrative offices building would be only 84 feet in height, compared to the 95-foot height in the proposed project.
State CEQA Guidelines Amendments/Thresholds of Significance

The California Natural Resources Agency adopted amendments to the State CEQA Guidelines in December 2018. While these most recent amendments to the Guidelines result in no substantive changes to the analysis presented in the 2018 Draft EIR, the Recirculated Draft EIR updated its references to the State CEQA Guidelines, where appropriate, to reflect the amendments and be consistent with them.

The Amendments included revisions to the State CEQA Guidelines Appendix G Checklist, which in many cases provides the thresholds of significance used in the analysis of proposed project impacts. The thresholds of significance in the Recirculated Draft EIR have been updated to incorporate the amended Appendix G Checklist questions, as appropriate.

SDCRAA released the Recirculated Draft EIR on September 19, 2019 for a 46-day review comment period which concluded on November 4, 2019.

A total of 41 federal, state, regional, and local agencies, as well as organizations and individuals submitted comments on the Recirculated Draft EIR.

The comments and Authority responses are included in Chapter 2 of the Final EIR.

The Authority published the Final EIR for the ADP on December 30, 2019.

4. Record of Proceedings

For purposes of CEQA and the findings set forth herein, the record of proceedings for the Authority’s decision on the ADP includes the following documents:

- The Initial Study and NOP prepared for the ADP;
- Public notices issued in conjunction with the ADP;
- The July 2018 Draft EIR, including appendices;
- All comments submitted by agencies or members of the public during the public comment period on the July 2018 Draft EIR;
- The Recirculated Draft EIR, including appendices;
- All comments submitted by agencies or members of the public during the public comment period on the Recirculated Draft EIR;
- The Final EIR for the ADP, including responses to comments submitted by agencies or members of the public during the public comment period on the Recirculated Draft EIR, and attachments to the Final EIR;
- The Mitigation Monitoring and Reporting Program (MMRP) for the ADP;
All findings and resolutions adopted by the Authority in connection with the ADP and all documents cited or referred to therein;

All reports, studies, memoranda, maps, and other planning documents relating to the ADP prepared by the Authority, the Authority's consultants, or responsible or trustee agencies with respect to the Authority's compliance with the requirements of CEQA and with respect to the Authority's action on the ADP;

All documents submitted to the Authority by agencies or members of the public in connection with the ADP;

Minutes and verbatim transcripts of all information sessions, public meetings, and public hearings held by the Authority in connection with the ADP;

Any documentary or other evidence submitted to the Authority at such workshops, public meetings, and public hearings; and

Matters of common knowledge to the Authority, including, but not limited to federal, state, and local laws and regulations.

The custodian of the documents comprising the record of proceedings is the San Diego County Regional Airport Authority, Authority Clerk, located at 3225 N. Harbor Drive, San Diego, CA 92101.

5. Findings Required Under CEQA

Under CEQA, for each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three allowable conclusions. The first allowable finding is that “[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.” CEQA Guidelines § 15091(a)(1). The second allowable finding is that “[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.” CEQA Guidelines § 15091(a)(2). The third allowable conclusion is that “[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.” CEQA Guidelines § 15091(a)(3).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to avoid or substantially reduce significant environmental impacts that would otherwise occur. Mitigation measures or alternatives are not required, however, where they are infeasible or where the responsibility for modifying the project or implementing the mitigation measure lies with some other agency. CEQA Guidelines § 15091(a)(3)(c). Public Resources Code section 21061.1 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” CEQA Guidelines Section 15364 adds another factor: “legal” considerations. See also Citizens of

The CEQA Guidelines do not define the difference between “avoiding” a significant environmental effect and merely “substantially lessening” such an effect. The Authority must therefore glean the meaning of these terms from the other contexts in which the terms are used. Public Resources Code section 21081, on which CEQA Guidelines Section 15091 is based, uses the term “mitigate” rather than “substantially lessen.” The CEQA Guidelines, therefore, equate “mitigating” with “substantially lessening.” Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” Cal. Pub. Res. Code, § 21002.

For purposes of these findings, the term “avoid” refers to the effectiveness of one or more mitigation measures to reduce an otherwise potentially significant effect to a less-than-significant level. In contrast, the term “substantially lessen” refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a level that is less than significant. Although the CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is “avoid[ed]” or substantially lessen[ed],” these findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a level that is less than significant, or has simply been substantially lessened but remains significant. Moreover, although CEQA Guidelines Section 15091, read literally, does not require findings to address environmental effects that an EIR identifies as merely “potentially significant,” these findings will nevertheless fully account for all such effects identified in the Final EIR.


In cases in which significant impacts are not at least “substantially mitigated,” the agency, after adopting the findings, may approve the project if it first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project’s “benefits” rendered “acceptable” its “unavoidable adverse environmental effects.” CEQA Guidelines §§ 15093, 15043(b). The California Supreme Court has stated that, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” Goleta II, 52 Cal.3d at 576; Cherry Valley Pass Acres Neighbors v. City of Beaumont, 190 Cal.App.4th 316, 356-58 (2010).

In certain instances, the only mitigation measures identified that would reduce a potentially significant impact to a level of less than significant are within the responsibility and jurisdiction of another agency. Although the Final EIR identifies mitigation for such impacts, because the Authority cannot ensure the implementation of such mitigation and the agency with jurisdiction may choose not to implement the mitigation, the impact may remain significant. Due to this
uncertainty, and to take a conservative approach, where a mitigation measure is within the responsibility and jurisdiction (including as to funding) of another agency, the Authority finds the impact to be significant and unavoidable and adopts a statement of overriding considerations.

This document presents the Authority’s findings as required by CEQA, cites substantial evidence in the record in support of each of these findings, and presents an explanation to supply the logical step between the finding and the facts in the record. CEQA Guidelines § 15091.

6. Legal Effects of Findings

To the extent that these findings conclude that the proposed mitigation measures outlined in the Final EIR are feasible and have not been modified, superseded, or withdrawn, the Authority hereby commits to implementing these measures, to the extent such mitigation measures are within the responsibility and jurisdiction of the Authority. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the Authority adopts a resolution adopting the ADP.

The mitigation measures are referenced in the Mitigation Monitoring and Reporting Program (MMRP), adopted concurrently with these findings, and will be effectuated through the process of constructing and implementing the ADP.

7. Mitigation Monitoring and Reporting Program

A MMRP has been prepared for the ADP. See Cal. Pub. Res. Code § 21081.6. The Authority will use the MMRP to track compliance with ADP mitigation measures. The Authority's Board will consider the MMRP during the certification hearing for the Final EIR. The final MMRP will incorporate all mitigation measures adopted for the ADP.

8. Significant Effects, Mitigation Measures, and Findings

The Final EIR identified nine environmental categories that may be subject to potentially significant environmental impacts from the proposed project: Air Quality, Greenhouse Gases (GHGs) and Climate Change, Human Health Risk, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Land Use and Planning, Noise, and Traffic and Circulation. Although some of the proposed project’s significant impacts can be avoided through the adoption of feasible mitigation measures, certain Air Quality, GHG and Climate Change, Cultural Resources, Hazards and Hazardous Materials (related to noise), Land Use and Planning (related to noise and traffic), Noise, and Traffic and Circulation cannot be avoided. These effects cannot be reduced by the adoption of feasible mitigation measures, and thus must be outweighed by overriding considerations discussed in the Statement of Overriding Considerations adopted in conjunction with the adoption of the ADP.

This section presents in greater detail the Authority’s findings with respect to the environmental effects of the proposed project described in Chapter 2 of the Recirculated Draft EIR. It also summarizes the evidence relied upon by the Authority in making these Findings. This evidence is drawn from the Recirculated Draft EIR, the comments and responses to comments on the Recirculated Draft EIR, the Final EIR, and other evidence presented to the Authority, including all other information in the administrative record.
The following discussion examines each of the environmental impacts evaluated in detail in the EIR. Section 1.4.4 of the Recirculated Draft EIR discusses environmental categories for which no impacts would result and for which detailed analysis was not required, including agriculture and forestry resources, mineral resources, population and housing, and wildfire.

8.1 Aesthetics and Visual Resources

8.1.1 Less-than-Significant Effect

The Final EIR did not identify any significant aesthetics and visual resources impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

Reference: EIR Section 3.1.

8.2 Air Quality

8.2.1 Significant Effect

Relative to emissions of air pollutants, characterized in terms of tons per year or pounds per day, implementation of the proposed project would exceed the screening-level emissions thresholds for certain criteria pollutants, specifically, volatile organic compounds (VOCs), oxides of nitrogen (NOx), carbon monoxide (CO), and sulfur oxides (SOx), which would be a significant impact.

Relative to concentrations of air pollutants, characterized in terms of micrograms per cubic meter and measured against state and federal ambient air quality standards, concentrations of certain criteria pollutants, specifically, VOCs, NOx, CO, SOx, and particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM2.5), would not exceed state or federal standards and, therefore, would result in a less-than-significant impact relative to those pollutants. However, existing background concentrations of particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM10) currently exceed state standards, and the increase in PM10 concentrations associated with project operations would increase that existing exceedance. As such, the project's concentration-based impact associated with PM10 would be a significant impact.

With respect to the proposed project's cumulative impacts on criteria air pollutants, construction of the proposed project in conjunction with other projects anticipated to be under construction during that same period would result in a significant impact relative to cumulative emissions for VOCs, NOx, and PM10, of which the proposed project's contribution to that significant impact would be cumulatively considerable for NOx and PM10.

Operation of the proposed project at buildout in 2035 and in 2050 would contribute to a cumulatively considerable net increase of VOCs and NOx, which are precursors to ozone (O3), for which the San Diego air basin is in nonattainment under federal and state ambient air quality standards. This would be a significant and unavoidable cumulative impact.

There would also be a net increase in CO and SOx emissions, but dispersion modeling demonstrated that these emissions would not result in exceedances of the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) for nitrogen dioxide (NO2), CO, or sulfur dioxide (SO2). Thus, the project's CO and SOx emissions would not constitute a cumulative impact.
Mitigation:

**MM-AQ/GHG-1 Ground Support Equipment (GSE) Conversion:** All baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel) by 2024.

Additionally, by 2024, 50 percent of gasoline-fueled GSE that are light duty vehicles owned and operated by SDCRAA would be replaced with hybrid electric or alternative fuel vehicles and 100 percent of diesel-fueled GSE that are owned and operated by SDCRAA would be replaced with hybrid electric or alternative fuel vehicles. This measure is considered feasible.

**MM-AQ/GHG-2 Renewable Electricity:** Project-related buildings shall be powered by 100 percent renewable electricity by 2024 and continuing thereafter through on-site generation resources, grid-delivered purchases, and/or renewable energy certificates. This measure is considered feasible.

**MM-AQ/GHG-3 Cool Roof:** The project shall include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under 2016 California Green Building Standards Code. This measure is considered feasible.

**MM-AQ/GHG-4 LEED Silver Certification:** The project shall demonstrate achievement of at least LEED Silver certification (or equivalent green rating certification) for all new major facilities, such as a new terminal, a new parking structure, or new SDCRAA administration building. This measure is considered feasible.

**MM-AQ/GHG-5 Clean Vehicle Parking:** The project shall designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles. This measure is considered feasible.

**MM-AQ/GHG-6 Electric Vehicle Chargers:** The project shall install electric vehicle charging ports at three percent of new parking stalls and another three percent would be “EVSE-ready”. This measure is considered feasible.

**MM-AQ/GHG-7 Ground Transportation Clean Vehicle Program:** In conjunction with the project, SDIA’s current Commercial Ground Transportation Clean Vehicle Program shall be extended past 2020 with the goal that commercial operator fleets achieve an average GHG rating of 10 (0-204 gCO₂/mile) by 2030 as scored by fueleconomy.gov (or an equivalent program). This measure is considered feasible.

**MM-AQ/GHG-8 Electric On-Airport Shuttles:** In conjunction with the project, on-airport shuttles serving passenger and employee parking lots, and inter-terminal transfers shall be transitioned to electric vehicles (all-electric or plug-in hybrid) by 2026. The buses serving the Rental Car Center shall be transitioned to electric vehicles by 2028. This measure is considered feasible.
MM-AQ/GHG-9 Bicycle Facilities: To facilitate active transportation commuting, the project shall install shower stalls and lockers in the new Airport Administration Building and in the new terminal building based on the number of employees and guidance provided in the City of San Diego’s Climate Action Plan Consistency Checklist (estimated at 7 shower stalls and 25 lockers total). In addition, covered bicycle storage shall be installed for SDCRAA and tenant employees based on non-public square footage and guidance provided in the City of San Diego’s Climate Action Plan Consistency Checklist (estimated at 50 bike spaces total). This measure is considered feasible.

MM-AQ/GHG-10 Employee Parking Cash-Out Program: SDCRAA shall implement a parking cash-out program for its employees. This measure is considered feasible.

With mitigation, the effects will be:

(X) Significant and Unavoidable  ( ) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:

SDCRAA has a long-standing commitment to sustainability at SDIA including, but not limited to, the reduction of air pollutant emissions such as criteria pollutants and GHG. As described in Section 3.2 of the EIR, there are numerous existing plans, programs, policies, and practices at SDIA that currently serve to reduce such emissions and are already responsive to the types of mitigation measures often recommended to be included in environmental documents for the reduction of air pollutant and GHG emissions. As demonstrated in Table 3.2-17 of the EIR, the vast majority of potential measures for reducing air pollutant and GHG emissions are already being implemented at SDIA and would extend to implementation of the proposed project, and additional measures, such as project design/operational features (such as hydrant fueling pits at aircraft gates) or mitigation measures specific to the proposed project (MM-AQ/GHG-1 through MM-AQ/GHG-10 as outlined above), would serve to further reduce the air pollutant and GHG emissions of the proposed project.

As shown in Table 3.2-11 of the EIR, the majority (i.e., ranging from approximately 51 to more than 95 percent depending on the pollutant/pollutant precursor) of the emissions of VOC, NOx, CO, and SOx (the pollutants/pollutant precursors for which emission estimates exceed the thresholds of significance) are from aircraft operations. Notably, while the SDCRAA does not have the legal
authority to regulate aircraft operations or emissions from aircraft engines, as evidenced by the aircraft taxi times presented in Table R-C-7, implementation of the proposed project would reduce future aircraft taxi-related emissions through a concourse/gate design that would be more efficient than the existing configuration. As indicated in Table 3.2-17 of the Recirculated Draft EIR regarding potential mitigation measures for the reduction of project-related air pollutant emissions, including criteria pollutants and GHG emissions, the ability to reduce aircraft emissions at SDIA is limited by the fact that under the Airport Noise and Capacity Act of 1990, public-use airport operators in the United States are not permitted to create facility use regulations that are discriminatory against one type or size of aircraft. That fact is also reflected in the statement on page 3.3-37 of the Recirculated Draft EIR that the SDCRAA does not have authority to regulate aircraft operations or emissions from aircraft engines.

As also noted in Table 3.2-17 of the Recirculated Draft EIR, other potential mitigation measures for reducing air pollutant emissions were considered, but found to be infeasible or impractical based on SDIA’s setting and use. Such measures include solar thermal heating, wind turbines, and expanded urban forestry and green infrastructure.

As shown in Table 3.2-14 of the EIR, implementation of the mitigation measures with quantifiable emission reductions would result in the following significant emissions associated with project operations being reduced to less than significant:

- 2024 – CO
- 2026 and 2030 – VOC and CO
- 2035 and 2050 – CO

Emissions that would still exceed the applicable thresholds of significance even with mitigation include the following:

- 2024, 2026, and 2030 – NOX
- 2035 and 2050 – VOC, NOX, and SOX

The results of the dispersion analysis that was performed for the proposed project with mitigation are provided in Table 3.2-15 and Table 3.2-16 for the CAAQS and NAAQS, respectively. With the exception of CO, when compared to the proposed project without mitigation, concentrations of evaluated pollutants would be the same with the mitigation. The lower concentration of CO with mitigation is primarily a result of Mitigation Measure MM-AQ/GHG-1, the measure that converts off-road GSE owned and operated by the airlines and their ground handling contractors to alternative fuels by 2024.

With respect to the CAAQS, the results of the dispersion analysis indicate that concentrations of NO2, CO, SO2, and PM2.5 would be below the CAAQS, for both the with and without mitigation modeling scenarios. Levels of PM10 would also be below the CAAQS for the 24-hour standard for this pollutant; however, because the average annual background level of PM10 is above the standard levels, the proposed project, both with and without mitigation, would also be above the standard. Because levels of PM10 are predicted to exceed the CAAQS in 2035 with the proposed project and
emissions are estimated to increase when compared to existing levels, the exceedance with the proposed project, even with mitigation, would remain a significant impact.

With respect to the NAAQS, the results of the dispersion analysis indicate that concentrations of NO\textsubscript{2}, CO, SO\textsubscript{2}, PM\textsubscript{2.5}, and PM\textsubscript{10} would all be below the standards for both the with and without mitigation modeling scenarios.

Regarding significant cumulative impacts from construction-related emissions, there are no feasible mitigation measures within the control of the SDCRAA to reduce to less than significant the cumulative emissions from all projects under construction at the same time as the Alternative 4 ADP, and, as indicated in Table 3.2-17 of the Recirculated Draft EIR, the SDCRAA already includes in construction contract requirements for SDIA projects provisions related to the use of clean-fuel construction vehicles with pollution-control technology or low-emission construction vehicles.

As described in Section 3.2.7.2.3 of the EIR, the proposed project includes numerous features and improvements, as well as several mitigation measures (specifically, MM-AQ/GHG-1 through MM-AQ/GHG-10, as well as MM-TDM-1 [see Section 8.14 [Traffic and Circulation]], that serve to reduce future emissions; however, there are no other feasible mitigation measures available to reduce aircraft emissions, which are the primary source of VOC and NO\textsubscript{X} emissions.

Reference: EIR Section 3.2.

8.3 Greenhouse Gases and Climate Change

8.3.1 Significant Effect

Construction and operation of the proposed project would generate more GHGs than currently occur under baseline conditions, and that may have a significant impact on the environment. Construction and operation of the proposed project also would conflict with some applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. This would also be a significant impact.

Mitigation:

MM-AQ/GHG-1 through MM-AQ/GHG-10 (See Section 8.2 [Air Quality] above)

MM-TDM-1: TDM and Transit Measures (See Section 8.14 [Traffic and Circulation] below)

With mitigation, the effects will be:

(X) Significant and Unavoidable ( ) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).
Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:

SDCRAA has a long-standing commitment to sustainability at SDIA including, but not limited to, the reduction of air pollutant emissions such as criteria pollutants and GHG. As described in Section 3.2 of the EIR, there are numerous existing plans, programs, policies, and practices at SDIA that currently serve to reduce such emissions and are already responsive to the types of mitigation measures often recommended to be included in environmental documents for the reduction of air pollutant and GHG emissions. As demonstrated in Table 3.2-17 of the EIR, the vast majority of potential measures for reducing air pollutant and GHG emissions are already being implemented at SDIA and would extend to implementation of the proposed project, and additional measures, such as project design/operational features (such as hydrant fueling) or mitigation measures specific to the proposed project (MM-AQ/GHG-1 through MM-AQ/GHG-10 as outlined above), would serve to further reduce the air pollutant and GHG emissions of the proposed project. As described in Section 3.2.7.3.3 of the EIR, the proposed project includes numerous features and improvements, as well as several mitigation measures (specifically, MM-AQ/GHG-1 through MM-AQ/GHG-10, as well as MM-TDM-1 [see Section 8.14 [Traffic and Circulation]], that would serve to reduce the GHG emissions associated with construction and operation of the proposed project; however, the vast majority of GHG emissions associated with operation of the proposed project are from sources that the SDCRAA has no control over (i.e., Scope 3 GHG emissions), such as aircraft, auxiliary power units (APU) and motor vehicles, as described above.

As indicated in Table 3.2-17 of the Recirculated Draft EIR regarding potential mitigation measures for the reduction of project-related air pollutant emissions, including criteria pollutants and GHG emissions, the ability to reduce aircraft emissions at SDIA is limited by the fact that under the Airport Noise and Capacity Act of 1990, public-use airport operators in the United States are not permitted to create facility use regulations that are discriminatory against one type or size of aircraft. That fact is also reflected in the statement on page 3.3-37 of the Recirculated Draft EIR that the SDCRAA does not have authority to regulate aircraft operations or emissions from aircraft engines.

As also noted in Table 3.2-17 of the Recirculated Draft EIR, other potential mitigation measures for reducing air pollutant emissions were considered, but found to be infeasible or impractical based on SDIA’s setting and use. Such measures include solar thermal heating, wind turbines, and expanded urban forestry and green infrastructure.

As such, it is considered infeasible to reduce the increment of GHG emissions associated with construction and operation of the proposed project to a less-than-significant level; therefore, the proposed project would result in a significant and unavoidable impact relative to GHG emissions.

Reference: EIR Section 3.3 and Section 3.2.
8.4 Human Health Risk

8.4.1 Significant Effect

The combined construction and operations of the proposed project would expose receptors to significant levels of toxic air contaminants (TAC). Specifically, incremental cancer risk for combined construction and operational exposure would be above the threshold of 10 in 1 million for maximally exposed 30-year residents, adult residents, and off-airport adult workers. Incremental cancer risk impacts would be significant. Population-based cancer burden risk would result in greater than 0.5 new cases of cancer. Therefore, population-based cancer burden risk would be significant.

Mitigation:

MM-AQ/GHG-1: Ground Support Equipment Conversion (See Section 8.2 [Air Quality] above)

With mitigation, the effects will be:

( ) Significant and Unavoidable  (X) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:

Significant impacts to cancer risk for 30-year residents, adult residents, and off-airport adult workers, and significant cancer burden impacts, would be driven by an incremental increase in diesel particulate matter (DPM) associated with GSE operation at the Airport. Mitigation Measure MM-AQ/GHG-1, Ground Support Equipment Conversion, would replace conventionally-fueled GSE with alternative-fueled equipment by 2024. This conversion to biodiesel, electric, renewable diesel, and natural gas would directly result in a reduction of DPM associated with GSE operation. In addition to Mitigation Measure MM-AQ/GHG-1, implementation of Mitigation Measures MM-AQ/GHG-2 through MM-AQ/GHG-10 (see Section 8.2 [Air Quality]), and MM-TDM-1 (see Section 8.14 [Traffic and Circulation]) would also serve to reduce TAC emissions. After application of Mitigation Measure MM-AQ/GHG-1, cancer risk for 30-year residents, adult residents, and off-airport adult workers would each be reduced to levels below the significance threshold of 10 in 1 million. Additionally, the total cancer burden would be reduced to a level below the significance threshold of 0.5.

Reference: EIR Section 3.4.
8.5 Biological Resources

8.5.1 Significant Effect

Construction and operation of the proposed project would not have a significant direct impact on a 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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). However, although SDCRAA would continue to implement measures included in their existing program to protect the California least terns at SDIA, and although these measures would avoid and/or minimize potential indirect impacts from construction and operation of the proposed project, the proposed project may still have indirect impacts on California least tern and/or its habitat. This is considered a potentially significant impact for both construction and operations.

Mitigation:

MM-BIO-1: California Least Tern: Construction Measures: The following measures shall be included in all construction contracts for the proposed project facilities and implemented as part of the proposed project to avoid potential indirect impacts during construction from increased lighting, noise, use of hazardous materials, and activities that may increase perching for predatory species:

- All project construction within 800 feet of the SDIA least tern nesting area will occur from September 16 to March 31 to avoid the tern nesting season.

- A tern biologist will monitor the tern during construction occurring between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) and will immediately notify the Resident Engineer (RE; or acting RE) of any construction activity that may lead to, or likely result in, the disruption of the tern, its young, or its eggs. If the tern biologist determines that adverse effects to the tern have occurred, the RE will be notified and all project construction activities will cease immediately, except those activities necessary to make the SDIA safe and operational. The tern biologist, in coordination with the RE, will contact the FAA and USFWS immediately after stopping construction. Construction will not resume until approved by the FAA and USFWS. The tern biologist will submit daily field reports to the FAA and USFWS on the status of the nesting activity, any construction-related incidents that disrupted tern nesting, and any action taken by the RE to avoid further incidents, within 24 hours of each monitoring date. The tern biologist will also submit a final summary report of monitoring to the FAA and USFWS by October 1.

- Trash will be properly disposed of and workers will not feed potential tern predators in the area. The Airport Authority will require the contractor to provide trash dumpsters or other covered trash receptacles for use by construction personnel. All food items or containers that previously held food items obtained/handled/controlled by construction personnel will be immediately disposed of in these dumpsters or containers, so as not to attract avian or mammalian predators of the least tern.
• Construction personnel will not be permitted to feed cats, gulls, pigeons, ravens, or any other wildlife, as this may result in an increase in the numbers of these potential predators in the vicinity of tern chicks and eggs.

• Crane booms or similar equipment that have heights of 25 feet or greater located between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) will be lowered at the close of each construction day, if possible.

• A pre-construction meeting will be held to make all contractor personnel that will be working between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15), including all construction staff, aware of the tern nesting issue and the specific conditions of construction. Project status meetings will be regularly held to remind all such personnel of the measures required to protect the tern as well as any modifications made to ensure their effectiveness. The USFWS will be notified of the date and time of the pre-construction and status meetings in order to attend, if needed or desired.

• Nighttime construction occurring between 800 feet to 1,200 feet of any nesting least tern area during the tern nesting season (April 1- September 15) will be limited to those activities that are necessary to maintain airfield operations during normal operational times. Should such nighttime construction be required, the tern biologist will be onsite and perform the duties specified above.

• Night lighting for project construction occurring between 800 feet to 1,200 feet from the SDIA least tern nesting area will be kept to a minimum during the tern nesting season (April 1- September 15), and will not be used unless active construction or other essential work is occurring. Should such nighttime construction or other essential work be conducted, all lighting associated with the work will be shielded from or directed away from the least tern nesting area.

• Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.

• The new airport entry road to the south of the nesting ovals shall not rise above existing surface grade and shall not alter the elevation of roadway structures directly to the south of the nesting ovals.

This measure is considered feasible.

**MM-BIO-2: California Least Tern: Operations Measures:** The following measures shall be implemented by SDCRAA as part of the proposed project in order to avoid potential indirect impacts during operation as related to perching for predatory species:

• New facilities shall be designed to minimize potential perching locations; all structures taller than ten feet and within 200 feet of the nesting ovals, including light poles and sign structures, shall be required to use anti-perch treatments.
such as stainless steel bird spike barriers that can be applied to potential perch sites (e.g., Nixalite®).

- Any new landscaping shall be limited to plant species and materials not conducive to perching by birds.
- Continued diligent maintenance of fencing around the perimeter of the ovals to shield the terns from lighting, predators, and unauthorized human access.
- Continued habitat management within the ovals including application of herbicide and removal of vegetation.

This measure is considered feasible.

**With mitigation, the effects will be:**

( ) Significant and Unavoidable  (X) Not Significant

**Finding(s) per CEQA Guidelines section 15091:**

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

**Reference:** EIR Section 3.5 and responses to Comment Letter R-AF001 in Chapter 2, Responses to Comments, of the Final EIR.

**Rationale:**

Mitigation Measures MM-BIO-1 and MM-BIO-2 would be implemented in conjunction with continued implementation of (i) the applicable measures specified in the 1993 Biological Opinion; (ii) the applicable measures set forth in the 2013 Informal Section 7 Consultation between the FAA and USFWS regarding potential effects of the SDIA Northside Improvements Project; (iii) the applicable measures set forth in the 2018 Informal Section 7 Consultation between the FAA and USFWS regarding potential effects of the SDIA Taxiway B Object-Free Area Improvement Project; (iv) BMPs; and (v) compliance with federal, state, and local regulations regarding hazardous materials management. These measures would reduce potentially significant impacts to California least tern to a less-than-significant level.
8.6 Cultural Resources

8.6.1 Significant Effect 1

Implementation of the proposed project would require the demolition and removal of two significant historical buildings (the existing Terminal 1 and the existing Terminal 2-East).

Mitigation:

MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation. An Historic American Buildings Survey (HABS) report has been completed for each of the three significant historic resources that would be impacted by the proposed project; those three resources being (1) the United Airlines Hangar and Terminal Building, (2) the existing Terminal 1, and (3) the existing Terminal 2-East. The three HABS reports are contained in Appendix R-F of the EIR. Each HABS report provides a description and supporting documentation related to the following aspects of each resource:

- Historical Information
  - Physical History
  - Historical Context

- Architectural Information
  - Architectural Character
  - Description of Exterior
  - Description of Interior
  - Site Information (i.e., landscaping)

- Sources of Information
  - Architectural Drawings
  - Photographs

Copies of the three HABS reports will be kept available for public review at the SDCRAA Administrative Office at SDIA. This measure is considered feasible.

MM-HR-3: Retention of the Terminal 1 Façade. The primary façade of Terminal 1’s original primary (south) façade of the main terminal area has remained intact and possesses three out of four Primary and both Secondary character-defining features of Brutalism. Further, the construction of Terminal 1 is reflective of the modernization of San Diego and its ability to accommodate the ever-increasing needs of the commercial air traffic boom of the 1960s and 1970s. Retention of the façade and incorporation into the design of the replacement Terminal 1 would reduce impacts on historical resources, but it would not reduce impacts associated with demolition of Terminal 1 to less than significant, because only the façade would remain and the structure would no longer be reflective of the past modernization of SDIA. Moreover, retention of the façade is
not physically feasible to meet the design and access needs of the Airport. Retention of the existing one story façade would frustrate Project Objectives to optimize the productive use of Airport properties, and to improve ground access to the Airport, because it would not allow for the construction of the new two-level roadway system that separates arrival and departure traffic, helping to ease congestion at the curbfront and improving overall airport circulation and mobility. Consequently, retention of the façade and incorporation into the design of the replacement Terminal 1 would, therefore, compromise the Project to such a degree that it would be unreasonable to proceed with the Project in view of its purposes and need. In addition, retention of the façade and incorporation into the design of the replacement Terminal 1 is not prudent because it would result in unacceptable safety and operational problems at SDIA. Based on the above, this mitigation measure is considered to be infeasible and, therefore, is not recommended for implementation.

**MM-HR-4: Interpretative Display Regarding Existing Terminal 1.** Building upon the historical resources study and HABS/HAER documentation completed in June 2018 for the SDIA Airport Development Plan (ADP) EIR, which includes, but is not limited to, drawings, plans, photographs, and written data and description of the history of Terminal 1, the SDCRAA shall develop interpretive material for public exhibition concerning the history of the existing Terminal 1. The interpretive material will include the photographs produced in the HABS/HAER documentation, and the historic archival research previously prepared as part of the ADP EIR, and will be supplemented with additional photographs and video documentation developed in coordination with a local historic resources specialist. This interpretive material will be posted to a dedicated public website. The website may also host available plans and construction documents related to Terminal 1. This measure is considered feasible.

**With mitigation, the effects will be:**

(X) Significant and Unavoidable  
( ) Not Significant

**Finding(s) per CEQA Guidelines section 15091:**

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

**Rationale:**

Under State CEQA Guidelines Section 15126.4(b)(1), treatment of historical resources consistent with the U.S. Secretary of the Interior’s Standards is generally considered sufficient to mitigate impacts to less than significant levels. However, State CEQA Guidelines Section 15126.4(b)(2) states
that, in some cases, documentation of an historical resource by way of historical narrative, photography, etc., may not be enough to mitigate the effects to less-than-significant levels caused by the demolition of an historical resource. Such is the case with the proposed project.

As indicated above in the description of MM-HR-3, retention of the façade and incorporation into the design of the replacement Terminal 1 would reduce impacts on historical resources, but it would not reduce impacts associated with demolition of Terminal 1 to less than significant, because only the façade would remain and the structure would no longer be reflective of the past modernization of SDIA. Moreover, retention of the façade is not physically feasible to meet the design and access needs of the Airport. Retention of the existing one story façade would frustrate Project Objectives to optimize the productive use of Airport properties, and to improve ground access to the Airport, because it would not allow for the construction of the new two-level roadway system that separates arrival and departure traffic, helping to ease congestion at the curbfront and improving overall airport circulation and mobility. Consequently, retention of the façade and incorporation into the design of the replacement Terminal 1 would, therefore, compromise the Project to such a degree that it would be unreasonable to proceed with the Project in view of its purposes and need.

As indicated in Response to Comment R-PC016-1 in Chapter 2, Responses to Comments, of the Final EIR, the Save Our Heritage Organisation (SOHO) requested that SDCRAA consider how the existing Terminal 1 façade, or a portion thereof, might be used to create an art or similar installation for SDIA as a permanent fixture or, at a minimum, perform HABS level 2 documentation and feature this façade within an art exhibit. As indicated in Mitigation Measure MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation, a HABS report was completed for the proposed project and includes the existing Terminal 1. The subject HABS documentation, presented in Appendix R-F1 of the EIR, includes drawings and plans, as available, numerous photographs, including several of the Terminal 1 façade, and written data and description of the history of Terminal 1. Such documentation is consistent with the Level II requirements of the Guidelines for Architectural and Engineering Documentation set forth by the U.S. Department of Interior-National Park Service. Additionally, the SDCRAA proposed to work with a local photographer(s) to develop additional documentation of the Terminal 1 façade, and compile archival photographic and video documentation of Terminal 1 to be posted to a dedicated public website. The website may also host available plans and construction documents related to Terminal 1. SDCRAA’s commitment to that follow-up is set forth through the addition of Mitigation Measure MM-HR-4: Interpretative Display Regarding Existing Terminal 1, listed above.

Based on the above, demolition and removal of the existing Terminal 1 building would remain a significant and unavoidable impact after mitigation.

Similarly, while implementation of Mitigation Measure MM-HR-1 would provide for comprehensive documentation to memorialize the history and characteristics of the Terminal 2-East significant historic building that would be demolished and removed for the proposed project, the permanent loss of the Terminal 2-East building would remain a significant and unavoidable impact after mitigation. As noted in Section 10.4 below, under Alternative 4, there would be no removal of the existing Terminal 2-East; as such, Alternative 4 would avoid the unavoidable
significant impact to this historic resource that would occur with implementation of the proposed project.

Reference: EIR Section 3.6 and Response to Comment R-PC016-1 in Chapter 2, Responses to Comments, of the Final EIR.

8.6.2 Significant Effect 2
Implementation of the proposed project would also impact the former United Airlines Hangar and Terminal Building, which is a significant historical building.

Mitigation:

MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building (now known as the ASIG Building): Despite having been relocated, the UAHT building is still the oldest surviving building within the Airport and, as such, is associated with the “earliest period of development at Lindbergh Field between 1928 and 1933.” The UAHT building still meets National Register Criteria Consideration B, which allows moved properties that are significant as a surviving property associated with historic events to be considered eligible for the NRHP. As such, relocation of the subject building is recommended as mitigation to preserve its historic significance. This measure is considered feasible.

MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation (see Section 8.6.1 above)

With mitigation, the effects will be:

( ) Significant and Unavoidable   (X) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:
A study was performed to assess the condition of the United Airlines Hangar and Terminal Building and its compliance with current codes, and to evaluate options for preserving the building. It was determined that it is possible to deconstruct and then re-construct the building at a new location, accounting for the fact that reconstruction of the building would require substantial improvements in order to bring it up to current building code and safety requirements. Two potential on-Airport relocation sites were identified in the northern portion of SDIA, one location near the northern end
of the cargo handling area and the other location at the southeastern edge of the general aviation area, offering the potential for the building to be reused for airport operational purposes or commercial/public use. In addition, the possibility of the subject building being acquired and relocated by a privately-funded entity to a site off-airport was also identified as a potential option.

Relocation of the building to the northern portion of SDIA, with retention of the structure’s remaining historic features, will provide compatibility with the orientation, setting, general environment, original character, and use of the historic resource. The relocation under these circumstances will allow the building to retain its eligibility for listing in the National Register of Historic Places and the California Register of Historical Resources. Further, retention of the building in its current location is not prudent because it would frustrate Project Objectives to develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction, to optimize the productive use of Airport properties, and to improve ground access to the Airport, and would, therefore, compromise the proposed project to such a degree that it would be unreasonable to proceed with the proposed project in view of its purposes and need.

Implementation of Mitigation Measures MM-HR-1 and MM-HR-2 would reduce the impact on the United Airlines Hangar and Terminal Building to a level less-than-significant.

Reference: EIR Section 3.6.

8.7 Tribal Cultural Resources
8.7.1 Less-than-Significant Effect
The Final EIR did not identify any significant tribal cultural resources impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

Reference: EIR Section 3.7.

8.8 Geology and Soils
8.8.1 Less-than-Significant Effect
The Final EIR did not identify any significant geology and soils impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

Reference: EIR Section 3.8.

8.9 Hazards and Hazardous Materials
8.9.1 Significant Effect 1
The proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could create a significant hazard to the public or the environment as the project’s ground disturbing activities could encounter contaminated soils and/or contaminated groundwater. Also, the proposed project could 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 from the demolition of structures during construction which could release lead-based paint particles and/or asbestos fibers to the air, creating a significant hazard to the public and workers. There is also the possibility that soil vapor gas is present at the site of the proposed new Terminal 1, which could pose a risk of migrating into the building and accumulating in levels that could pose a risk of health effects. As such, operation of the proposed project could result in a significant impact relative to potential vapor intrusion. Lastly, the proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction.

**Mitigation:**

**MM-HW-1: Preparation of Hazardous Materials Management Plan (HMMP):** Prior to site excavation activities and/or construction-related dewatering at the project site, a Hazardous Materials Management Plan (HMMP) shall be prepared and include the following:

- Delineation of roles and responsibilities, including those of the Contractor and those of SDCRAA;
- Procedures for identification, initial screening, and notification, of contaminated soil and/or groundwater encountered during site excavation;
- Procedures to secure/cordon-off area known to be or suspected of being contaminated;
- Procedures for decontamination of personnel and equipment leaving the secured area known to be or suspected of being contaminated;
- Procedure for assessing the nature and extent of contamination, and the approach to managing the contaminated soil/groundwater, including excavation/pumping, handling, storage, transport, and disposition (i.e., treatment/disposal); and
- Site-specific Health and Safety Plan for the safety and protection of construction workers, airport employees, and the general public from exposure to impacted soil, dust, and groundwater during construction activities.

It is anticipated that there will be a HMMP developed for the course of ADP construction, with site-specific Health and Safety Plans developed that are tailored to the specific characteristics of individual construction contracts, but all with the same purpose of providing a management plan consistent with the ADP HMMP that will adequately address known or potential contaminated soils or groundwater. Based on information presented in the 2018 Amec Phase II ESI and 2018 Kleinfelder Phase II ESA, the site-specific Health and Safety Plans for the following areas (as identified on Figures 3.9-2 through 3.9-5 of the Recirculated Draft EIR) will need to include management measures for the specific issues of concern identified therein:
- **South Side of Building 2320**: Elevated levels of total petroleum hydrocarbons and metals were detected in samples from Soil Boring B30. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater in the vicinity of this boring location and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

- **West Side of Building 2417, South Side of Building 2415, and North Side of Washdown Pad**: Elevated levels of volatile organic compounds were detected in groundwater samples from these areas. The Health and Safety Plans for these areas shall account for the presence of contaminated groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

- **North of Terminal 1 East Rotunda**: Elevated levels of total petroleum hydrocarbons and semi-volatile organic compounds were detected in groundwater and soil samples from this area. The Health and Safety Plan for this area shall account for the presence of impacted soil and groundwater and provide measures for segregation, containment, and disposal of impacted materials, as appropriate.

This measure is considered feasible.

**MM-HW-2: Existing Groundwater Monitoring Wells**: In conjunction with the demolition of Terminal 1, the following measure shall be completed:

- The suspected location of monitoring well MW-3 should be investigated to confirm the presence or absence of the well. All monitoring wells located within proposed project development areas or that could otherwise be disturbed by project construction should be properly destroyed in accordance with the requirements of, and be subject to permit approval by, the County Department of Environmental Health. Should any monitoring wells associated with an open case be disturbed, the lead agency overseeing the open case shall be notified and any requirements identified by the agency associated with well disturbance shall be adhered to. This measure is considered feasible.

**MM-HW-3: Hazardous Building Materials Abatement**: Prior to building demolition, the following activities shall be implemented:

- SDCRAA shall retain a State of California-licensed asbestos/lead abatement contractor to perform abatement of asbestos containing material (ACM), asbestos containing construction material (ACCM), lead-based paint (LBP), or lead-containing paint (LCP) that could potentially be disturbed.

- Prior to the initiation of abatement or demolition work, the abatement or demolition contractor must complete the Notification of Demolition or Asbestos Removal form and submit it to the County of San Diego Air Pollution Control District (SDAPCD) in compliance with Rule 1206 at least 10 business days before the start of abatement or demolition. SDAPCD will return the form, with a “notification number” added, to the abatement or demolition contractor, depending on who submitted the form.
- The asbestos/lead abatement contractor shall provide written notification to the local CalOSHA district office regarding its “Intent to Conduct Asbestos Related Work” and/or “Intent to Conduct Lead-Related Work.” These notifications should be submitted at least 24 hours in advance of performing the respective asbestos-related or lead-related work.

- Other potentially hazardous building materials, including and mercury-containing equipment, polychlorinated biphenyl (PCB)-containing equipment, lead-containing batteries, chlorofluorocarbon (CFC)-containing equipment, and Universal Wastes (e.g., fluorescent light tubes) will require segregation and may require further testing and analysis to determine whether they meet the definition of a hazardous waste in California and can be managed under the Universal Waste Rules. Hazardous wastes should only be handled by properly trained workers.

- Notification should be provided to contractor and subcontractor personnel as to the presence of ACMs, ACCMs, LBPs, LCPs, and other hazardous building materials at the site.

This measure is considered feasible.

**MM-HW-4: Vapor Intrusion Assessment:** In conjunction with building design of the new T1, the following measure shall be completed:

A soil vapor survey with accompanying human health risk assessment shall be prepared for the area proposed for the new T1 building. If found warranted by the results of that assessment, remediation, such as in-situ soil vapor extraction (SVE) or ex-situ excavation and treatment, shall be implemented to reduce levels to below site-specific risk-based concentrations (RBC), or a vapor intrusion mitigation system shall be incorporated into the design of the new T1 building to ensure that indoor air concentrations do not exceed regulatory thresholds. As part of that effort, the 2014 vapor intrusion investigation for the former Teledyne Ryan Facility site shall be reviewed as it pertains to future buildings within the subject area. This measure is considered feasible.

**With mitigation, the effects will be:**

( ) Significant and Unavoidable  (X) Not Significant

**Finding(s) per CEQA Guidelines section 15091:**

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).
Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

**Rationale:**

With implementation of Mitigation Measures MM-HW-1, MM-HW-2, and MM-HW-3 related to construction and MM-HW-4 related to operations, the significant hazardous materials-related impacts of the proposed project would be reduced to a level that is less than significant impact.

**Reference:** EIR Section 3.9.

**8.9.2 Significant Effect 2**

The current Airport Land Use Compatibility Plan (ALUCP), adopted in May of 2014, promotes compatibility between the Airport and future land use of the surrounding area for the orderly development of the Airport and environs and to protect public health, safety, and welfare in the surrounding area. The ALUCP provides airport land use compatibility policies and standards related to noise, safety, airspace protection, and overflight, to guide future development and redevelopment in the area surrounding the Airport, but not at the Airport itself. The Airport Land Use Commission (ALUC) is required by State law to review proposed airport plans for consistency with the ALUCP. The ALUCP must be amended as necessary to reflect any updates and revisions to the airport plans. This requirement ensures that the ALUC is kept informed of changes in airport plans, so that appropriate amendments to this ALUCP can be made. While implementation of the proposed project would require that the current ALUCP be amended to account for projected changes in the aircraft noise compatibility (65 CNEL) contour for SDIA, the proposed project does not pose a safety hazard that would require amending the SDIA ALUCP relative to safety.

Future aircraft noise levels would generate aircraft noise that would increase noise levels in noise-sensitive areas to a level considered significant. Therefore, operation of the proposed project would result in an excessive aircraft noise hazard for people residing or working in the project area. Although, for informational purposes, the future aircraft noise levels would occur even if the proposed project was not implemented (i.e., future aircraft noise levels are the same for both the proposed project and the No Project Alternative).

**Mitigation:**

Mitigation Measures MM-NOI-1 through MM-NOI-5 (see Section 8.12 [Noise] below)

**With mitigation, the effects will be:**

(X) Significant and Unavoidable  ( ) Not Significant

**Finding(s) per CEQA Guidelines section 15091:**

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).
Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:
As described in Section 8.12.1 (Noise), there are no feasible mitigation measures for aircraft noise impacts. As described in that section, the infeasibility of potential mitigation measures for the noise impacts are based on the fact that 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. Nonetheless, SDCRAA shall continue to make best efforts to pursue FAA authorization and grant funds for noise mitigation efforts.

Reference: EIR Section 3.9.

8.10 Hydrology and Water Quality
8.10.1 Less-than-Significant Effect
The Final EIR did not identify any significant hydrology and water quality impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

Reference: EIR Section 3.10.

8.11 Land Use and Planning
8.11.1 Significant Effect 1
The proposed project would cause a significant environmental impact due to conflict with certain aspects of land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the proposed project would generate future noise and traffic impacts that are in conflict with certain community plans and policies. This is considered a significant impact.

Mitigation:

With mitigation, the effects will be:

(X) Significant and Unavoidable  ( ) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).
Rationale:

As described in Section 8.12.1 (Noise), and in Section 8.14.1 (Traffic and Circulation), some mitigation measures for aircraft noise impacts and traffic impacts are infeasible. As described in those sections, the infeasibility of potential mitigation measures for the noise and traffic impacts are based on the facts that: (1) physical improvements occurring within the City of San Diego, outside the boundaries of SDIA, are not within the jurisdiction of the SDCRAA, and the Authority cannot require the City to implement those improvements; and/or, (2) 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. (See also Final EIR Sections 3.12 (Noise) and 3.14 (Traffic and Circulation), and Appendix R-K for further discussion of the infeasibility of off-Airport improvements or mitigation measures.)

Reference: EIR Section 3.11.

8.11.2 Significant Effect 2

The SDIA Airport Land Use Compatibility Plan (ALUCP) contains land use policies for proposed new development to protect public health and minimize the public’s exposure to safety hazards and excessive noise related to the operation of SDIA. Implementation of the proposed project would not substantially change noise exposure within the Airport Influence Area (AIA), the jurisdictional boundary of the ALUCP. The primary difference between the 2050 noise contours presented in Section 3.12, Noise, of the ADP EIR and the Noise Contour Map in the adopted SDIA ALUCP (the “ALUCP Contours”) is that the ADP EIR Contours along the approach path from the southeast are slightly longer under the 2035 conditions than what the ALUCP Contours show under existing conditions. This is considered a significant impact.

Mitigation:

MM-LUP-1: Amendment of the SDIA Airport Land Use Compatibility Plan. In conjunction with updating the existing Airport Layout Plan (ALP) for SDIA, which would occur subject to approval of the proposed project (and subject to FAA approval of the ALP update), the SDCRAA shall initiate, through the Airport Land Use Commission (ALUC), the process to amend the current SDIA Airport Land Use Compatibility Plan (ALUCP - May 2014) based on the specifics of the project, including the updated noise contours. Implementation of this measure is within the jurisdiction of the SDCRAA, acting in its role as the ALUC for the County, and the ALUC is required by law to amend the ALUCP so that it is consistent with the ALP update. This measure is considered feasible.

With mitigation, the effects will be:

( ) Significant and Unavoidable                  (X) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).
( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:
Relative to the significant impact associated with the future aircraft noise contours of the proposed project being inconsistent with the noise compatibility contour (i.e., the 65 CNEL) delineated in the currently adopted ALUCP, Mitigation Measure MM-LUP-1 would reduce the inconsistency with ALUCP impact to a level less-than-significant.

Reference: EIR Section 3.11.

8.12 Noise
8.12.1 Significant Effect 1
The proposed project would result in the following significant noise impacts related to aircraft operations. It should be noted for informational purposes, however, that the future increases in aircraft noise levels that result in these impact would be the same even if the proposed project was not implemented (i.e., there is no difference between the proposed project and the No Project Alternative relative to future increases in aircraft noise levels).

- Airport operations at SDIA in future years (2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that would increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above, as compared to the existing (2018) baseline condition.

- Implementation of the proposed project would cause a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater increase in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition.

- Implementation of the proposed project would cause a 3 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition.

- Implementation of the proposed project would cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population in 2024, 2026, 2030, 2035, and 2050, as compared to the existing (2018) baseline condition.

Mitigation:

MM-NOI-1: Expansion of SDCRAA's Sound Insulation Program. The existing SDIA Quieter Home Program is the SDCRAA’s Residential Sound Insulation Program. For implementation of the subject Program, the FAA has determined that residences within the FAA-approved 65 dB CNEL contour (and an average interior noise level of
45 dB or greater) around SDIA may be eligible for sound insulation treatments to mitigate aircraft noise and has set a goal of reducing interior noise levels for eligible residents by at least five (5) dB inside the home, providing a noticeable reduction in noise. To mitigate the significant impacts associated with residential units that are newly exposed to 65 dB CNEL or greater from airport operations in future years of the proposed project, the SDCRAA will, subject to continued FAA approval and funding, expand the existing sound insulation program to increase the average number of housing units that are sound attenuated annually.

Likewise, the SDCRAA will expand the existing sound insulation program to include non-residential uses such as churches (places of worship) and schools in order to mitigate the significant impacts to these other noise-sensitive uses, which are newly-exposed to 65 dB CNEL or greater from airport operations in future years of the proposed project. The SDCRAA will apply to the FAA’s Airport Improvement Program annually to support the expanded Sound Insulation Program. If the funding is granted by the FAA, then Mitigation Measure MM-NOI-1 is feasible and will be implemented by SDCRAA. If the FAA does not approve the funding, then Mitigation Measure MM-NOI-1 is considered infeasible.

**MM-NOI-2:** Update Noise Exposure Maps Every 5 Years. The aircraft noise exposure maps for SDIA will be updated every five years to determine if the SDIA Noise Compatibility Program, prepared pursuant to 14 Code of Federal Regulations Part 150, needs to be updated. By committing to revise the noise exposure maps every five years, the SDCRAA will ensure that recent data is determining which homes are impacted by noise and, therefore, may be eligible to participate in the Quieter Home Program. Mitigation Measure MM-NOI-2 is considered feasible.

**MM-NOI-3:** Create a Mobile Noise Monitoring Program. A mobile noise monitoring program will be established by SDCRAA to augment SDIA’s existing permanent aircraft noise monitors at locations determined by an acoustical engineer. Mitigation Measure MM-NOI-3 is considered feasible.

**MM-NOI-4:** Assess the Findings of the 2018 FAA Reauthorization Act-Related Noise Studies. The 2018 FAA Reauthorization Act includes a requirement for the FAA to complete various studies related to aircraft noise impacts. SDCRAA will review those studies, once completed, to help inform and update SDIA’s noise mitigation programs and policies. Similarly, the Authority is committing to utilize the latest research findings and policy guidance coming from the FAA Reauthorization Act to update noise programs, if applicable. Mitigation Measure MM-NOI-4 is considered feasible.

**MM-NOI-5:** Utilize Curfew Violation Penalty Fines to Help Fund Aircraft Noise Mitigation Programs. SDCRAA will utilize fines accrued through the aircraft operations curfew violation penalty program to annually fund additional sound insulation or other noise mitigation efforts. Mitigation Measure MM-NOI-5 is considered feasible.

With mitigation, the effects will be:
Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:

MM-NOI-1 is subject to funding availability and FAA approval. If the funding is granted by the FAA, then Mitigation Measure MM-NOI-1 is feasible and will be implemented by SDCRAA. If the FAA does not approve the funding, then Mitigation Measure MM-NOI-1 is considered infeasible. MM-NOI-2 through MM-NOI-5 are considered feasible and will be implemented by SDCRAA. Based on uncertainties regarding whether all of the impacted noise-sensitive uses could be mitigated through Mitigation Measures MM-NOI-1 through MM-NOI-5, the impact is considered to be significant and unavoidable.

Reference: EIR Section 3.12.

8.12.2 Significant Effect 2

The proposed project would result in the following significant noise impacts related to roadway traffic noise.

- Implementation of the proposed project would cause traffic noise levels for existing development along two segments of one roadway [Grape Street from Pacific Highway to India Street and from India Street to State Street] to exceed the noise levels considered compatible for noise-sensitive areas associated with the applicable land use categories.

- Implementation of the proposed project would cause traffic noise levels along one roadway segment [India Street from Sassafras Street to Laurel Street] that already exceeds the levels considered compatible for noise-sensitive land use associated with the applicable land use categories to increase by more than 3 dB CNEL, as compared to existing baseline conditions.

Mitigation:

As described in Section 3.12 of the EIR, four potential mitigation measures were identified and evaluated to address the significant roadway traffic noise impacts of the proposed project, but were determined to be infeasible, as described below.

MM-NOI-6: Grape Street Sound Barrier. Installation of a sound wall/barrier is one method of reducing exterior noise level exposure at noise-sensitive receptors adjacent to
roadways. In general terms, a sound wall/barrier that breaks the line-of-sight between the noise source and the noise receptor provides approximately 5 dB of noise reduction. In the case of the significant impacts described above, this would be sufficient to reduce the future traffic noise exposure levels along Grape Street to less than 70 CNEL, thereby reducing the impacts to less than significant. The multifamily residential uses along Grape Street are between four and five stories tall, with heights up to approximately 75 feet. Additionally, the subject developments have little, if any, setbacks from the street, with only an 11-foot-wide sidewalk separating the building from the street. There is neither the lateral or vertical room available to construct a 50- to 55-foot-tall sound wall/barrier to shield existing development from traffic noise emanating from Grape Street.

Accordingly, Mitigation Measure MM-NOI-6 is not physically feasible. Additionally, Mitigation Measure MM-NOI-6 is also not considered feasible because the mitigation measure is within the City of San Diego jurisdiction, would itself result in significant environmental impacts, including as to aesthetics and land use/planning, and would require FAA approval of funding. SDCRAA could not require the City to implement this improvement in the right-of-way or approve the improvement on private property. Construction of the very high sound barrier would be inconsistent with the Community Plan and would exceed the height limit for walls stated in the City Code. SDCRAA reasonably presumes that the City of San Diego would not support or implement this improvement, and the City has jurisdiction over the potential improvement. Further, due to FAA regulations, potential improvements currently could not be implemented and are presently not considered feasible 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 as discussed in Section 3.14.6 of the Recirculated Draft EIR. SDCRAA has not requested funding of this improvement because it is reasonably presumed the City would not support or implement the improvement, and the City has jurisdiction over the potential improvement. Based on the above, this mitigation measure is considered to be infeasible, and is therefore not recommended for implementation. As such, this impact is considered unmitigable.

**MM-NOI-7: Grape Street Vehicle Speed Reduction.** Along Grape Street, the modeled traffic speed was 35 miles per hour (mph). If traffic calming measures were to be introduced as a noise mitigation method, a 5 mph decrease in vehicle speed (i.e., new speed of 30 mph) would provide a net benefit of approximately 1.6 dBA, while a 10 mph decrease in vehicle speed (i.e., new speed of 25 mph) would provide a net benefit of approximately 3.0 dBA, and a 15 mph decrease in vehicle speed (i.e., new speed of 20 mph) would provide a net benefit of approximately 4.0 dBA. In order to reduce the significant impact of the 3.6 dBA increase in CNEL that would occur in 2050, as compared to existing baseline conditions, the posted speed limit on Grape Street would need to be 20 mph.

---

Traffic calming measures can include, but not be limited to, vertical deflectors (i.e., speed humps, speed tables, raised intersections), horizontal shifts (i.e., chicanes), and road narrowing. Implementation of this measure would require approval from the City of San Diego, which is anticipated to be subject to completion of a traffic study to assess potential impacts to traffic flows from installation of such measures. It should be noted that posting a speed limit of 20 mph would not change driver behavior and is likely not enforceable unless supported by a Speed Survey that shows that the free flow 85th percentile speed is 20 mph. Given that segment of Grape Street is a main one-way collector for eastbound traffic in the local area, it is unlikely that a nearly 40 percent reduction of the speed limit to 20 miles per hour would be approved. Similar to above for Mitigation Measure MM-NOI-6, Mitigation Measure MM-NOI-7 is not considered feasible because the mitigation measure is within the City of San Diego jurisdiction, and would require FAA approval of funding. SDCRAA could not require the City to implement this improvement. Further, due to FAA regulations, potential improvements currently could not be implemented and are presently not considered feasible 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 as discussed in Section 3.14.6 of the Recirculated Draft EIR. SDCRAA has not requested funding of this improvement because it is reasonably presumed that the City would not approve or implement the mitigation measure. Based on the above, this mitigation measure is considered to be infeasible, and is therefore not recommended for implementation. As such, this impact is considered unmitigable.

**MM-NOI-8: India Street Sound Barrier.** Installation of a sound wall/barrier is one method of reducing exterior noise level exposure at noise-sensitive receptors adjacent to roadways. In general terms, a sound wall/barrier that breaks the line-of-sight between the noise source and the noise receptor provides approximately 5 dB of noise reduction. In the case of the significant impacts described above, this would be sufficient to reduce the future increase in traffic noise by more than 3 dB. The single-family dwelling, where the 3+ dB CNEL increase would occur, is located at the northeast corner of India Street and Quince Street. The subject residential lot slopes up (eastward) from India Street, with the house being constructed on a stepped pad that begins approximately 40 feet from the nearest travel lane, at an elevation that is approximately eight feet above India Street, and extends approximately 10 feet east to the west wall of the house. The lower seven feet (approximate) of the west wall provides support for the base of the main floor, which extends up approximately 10 feet to the roof of the building (i.e., the ceiling level of the house is approximately 25 feet above the elevation of India Street). In order to break the line-of-sight between vehicles on India Street and the top of the house, an 18-foot tall barrier would need to be constructed along the western edge of the property. Construction of such a barrier is considered to be physically feasible, although its appearance would be inconsistent with the visual setting of

---

the surrounding area and it would reduce, if not eliminate, the existing unobstructed view of San Diego Bay currently available at the subject site. Mitigation Measure MM-NOI-8 is not considered feasible, however, because the mitigation measure is within the City of San Diego jurisdiction, would itself result in significant environmental impacts, including as to aesthetics and land use/planning, and would require FAA approval of funding. SDCRAA could not require the City to implement this improvement in the right-of-way or approve the improvement on private property. Construction of the very high sound barrier would be inconsistent with the Community Plan and would exceed the height limit for walls stated in the City Code. SDCRAA reasonably presumes that the City of San Diego would not support or implement this improvement, and the City has jurisdiction over the potential improvement. Further, due to FAA regulations, potential improvements currently could not be implemented and are presently not considered feasible 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 as discussed in Section 3.14.6 of the Recirculated Draft EIR. SDCRAA has not requested funding of this improvement because it is reasonably presumed the City would not support or implement the improvement, and the City has jurisdiction over the potential improvement. Based on the above, this mitigation measure is considered to be infeasible, and is therefore not recommended for implementation. As such, this impact is considered unmitigable.

**MM-NOI-9: India Street Vehicle Speed Reduction.** Along India Street, the modeled traffic speed was 35 miles per hour (mph). If traffic calming measures were to be introduced as a noise mitigation method, a 10 mph decrease in the speed limit (i.e., new speed limit of 25 mph) would be needed in order to achieve a CNEL decrease of approximately 3.0 dBA. Traffic calming measures can include, but not be limited to, vertical deflectors (i.e., speed humps, speed tables, raised intersections), horizontal shifts (i.e., chicanes), and road narrowing. Implementation of this measure would require approval from the City of San Diego, which is anticipated to be subject to completion of a traffic study to assess potential impacts to traffic flows from installation of such measures. It should be noted that posting a speed limit of 25 mph would not change driver behavior and is likely not enforceable unless supported by a Speed Survey that shows that the free flow 85th percentile speed is 25 mph. Given that segment of India Street (Sassafras Street to Laurel Street) is a main one-way collector for northbound traffic in the local area, it is unlikely that a 30 percent reduction of the speed limit to 25 mph would be approved. Similar to above for Mitigation Measures MM-NOI-6 through MM-NOI-8, Mitigation Measure MM-NOI-9 is not considered feasible because the mitigation measure is within the City of San Diego jurisdiction, and would require FAA approval of funding. SDCRAA could not require the City to implement this improvement. Further, due to FAA regulations, potential improvements currently could not be implemented and are presently not considered feasible 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 as
discussed in Section 3.14.6 of the Recirculated Draft EIR. SDCRAA has not requested funding of this improvement because it is reasonably presumed that the City would not approve or implement the mitigation measure. Based on the above, this mitigation measure is considered to be infeasible, and is therefore not recommended for implementation. As such, this impact is considered unmitigable.

**With mitigation, the effects will be:**

(X) Significant and Unavoidable  ( ) Not Significant

**Finding(s) per CEQA Guidelines section 15091:**

( ) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

**Rationale:**

As indicated above, potential Mitigation Measure MM-NOI-6: Grape Street Sound Barrier, and potential Mitigation Measure MM-NOI-8: India Street Sound Barrier are not physically feasible and are also not considered to be feasible 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. Potential Mitigation Measure MM-NOI-7: Grape Street Vehicle Speed Reduction and potential Mitigation Measure MM-NOI-9: India Street Vehicle Speed Reduction are not considered feasible due to unlikely nature of achieving the necessary speed reduction and 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. Based on the above, the roadway noise impacts would be significant and unavoidable.

**Reference:** EIR Section 3.12.

**8.13 Public Services**

**8.13.1 Less-than-Significant Effect**

The Final EIR did not identify any significant public services impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

**Reference:** EIR Section 3.13.
8.14 Traffic and Circulation

8.14.1 Less-than-Significant Effects

- Implementation of the proposed project would result in an increase in vehicle hours of delay (VHD) at six at-grade railroad crossing locations in Downtown San Diego; however, the increase in VHD would not exceed the threshold of significance. As such, the at-grade railroad crossing impact would be less than significant.

- Implementation of the proposed project would result in a temporary deficit in on-Airport parking supply during development of Phase 1a in 2021; however, this temporary shortfall in parking would not substantially affect parking in adjacent residential areas or in off-Airport public parking, including at parks and beaches. As such, the parking impact would be less than significant.

No finding per CEQA Guidelines Section 15091 is required, as the above effects would not be significant.

Reference: EIR Section 3.12.

8.14.2 Significant Effect 1

Implementation of the proposed project would exceed thresholds of significance relating to the operation of 2 intersections in late 2020 or early 2021 With Project Construction Conditions scenario (Construction Phase 1a); such impacts would be significant.

Mitigation:

MM-TR-Con-1: Construction Traffic Measures. Prior to the start of any construction phases at SDIA, SDCRAA shall promote the following TDM strategies:
1. Consider establishing a remote lot for construction workers with shuttles to their work site; 2. Stagger start times of various crews, when possible, to reduce the intensity of construction impacts; 3. Consider adding a shuttle stop at the construction site for transit services from Santa Fe Depot and/or Old Town Transit Center.

With mitigation, the effects will be:

( ) Significant and Unavoidable    (X) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).
( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

**Rationale:** Mitigation Measure MM-TR-Con-1 is feasible and would fully mitigate these impacts.

**Reference:** EIR Section 3.12.

### 8.14.3 Significant Effects 2 through 10

- Implementation of the proposed project would result in unacceptable operations of study facilities. Of those facilities, 5 intersections, 11 roadway segments, and 14 freeway segments are expected to exceed thresholds of significance under the Existing With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain significant and unavoidable at 7 roadway segments and 14 freeway segments.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2024. Of those facilities, 4 intersections, 13 roadway segments, and 17 freeway segments are expected to exceed thresholds of significance under the 2024 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain significant and unavoidable at 1 intersection, 10 roadway segments, and 17 freeway segments.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2026. Of those facilities, 4 intersections, 14 roadway segments, and 19 freeway segments are expected to exceed thresholds of significance under the 2026 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain significant and unavoidable at 1 intersection, 11 roadway segments, and 19 freeway segments.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2030. Of those facilities, 8 intersections, 20 roadway segments, and 21 freeway segments are expected to exceed thresholds of significance under the 2030 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible and other measures only partially mitigate impacts, therefore, impacts would remain significant and unavoidable at 2 intersections, 18 roadway segments, and 21 freeway segments.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2035. Of those facilities, 13 intersections, 20 roadway segments, and 21 freeway segments are expected to exceed thresholds of significance under the 2035 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain significant and unavoidable at 2 intersections, 18 roadway segments, and 21 freeway segments.
significant level; however, some proposed mitigation is infeasible and other measures only partially mitigate impacts, therefore, impacts would remain significant and unavoidable at 4 intersections, 18 roadway segments, and 21 freeway segments.

- Implementation of the proposed project would result in unacceptable operations of study facilities in 2050. Of those facilities, 26 intersections, 25 roadway segments, and 22 freeway segments are expected to exceed thresholds of significance under the 2050 With Project Conditions scenario. Mitigation is proposed to reduce these impacts to a less-than-significant level; however, some proposed mitigation is infeasible, therefore, impacts would remain significant and unavoidable at 26 intersections, 23 roadway segments, and 22 freeway segments.

- Implementation of the proposed project would exceed thresholds of significance relating to the operation of 5 intersections in 2024 With Project Construction Conditions scenario (Construction Phase 1b). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would be significant and unavoidable at 1 intersection.

- Implementation of the proposed project would exceed thresholds of significance relating to the operation of 4 intersection in 2026 With Project Construction Conditions scenario (Construction Phase 2a). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would be significant and unavoidable at 1 intersection.

- Implementation of the proposed project would exceed thresholds of significance relating to the operation of 10 intersections in 2030 With Project Construction Conditions scenario (Construction Phase 2b). Although mitigation is proposed to reduce these impacts, impacts would not be fully mitigated and would remain significant and unavoidable at 4 intersections.

**Mitigation:**

**MM-TDM-1:** **TDM and Transit Measures.** Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, and continued through all Project phases, SDCRAA shall implement the following TDM and Transit measures:

1. **Implement a shuttle service connecting the Old Town Transit Center and Amtrak Station to SDIA.** Adding a new shuttle service from the Old Town Transit Center would enhance Airport access for COASTER, Trolley, Amtrak, and MTS bus line riders who could connect at the station. Implementation of this service will include further outreach with Old Town stakeholders to implement measures that discourage Airport passengers from using the parking available for the Transit Center, Old Town San Diego Historic Park,
2. **Promote the use of transit using the Palm Street LRT station to access the Airport for Airport workers and travelers.** Implement the following techniques: a) continue to allow free use of Airport buses for transit riders accessing transit at the Terminal Link Road near Palm Street; and, b) promote the use of LRT on Airport connection web sites (Airport websites, Metropolitan Transit System (MTS) websites, Airport terminal kiosks, and employee/vendor notification boards.

3. **Promote the use of Bus Route 992 service between downtown and SDIA.** This would include the following measures to help increase ridership on this route: a) allow 992 buses to use the new on-Airport access road including preferential locations at the terminals for bus stops; b) provide space for a kiosk and fare purchase station at a convenient location within the new, replacement Terminal 1 (implemented in January 2016 at existing Terminals 1 and 2); and, c) provide branding of the route as an Airport route.

Proposed Mitigation Measure MM-TDM-1 is within SDCRAA’s control and is **physically and operationally feasible.** If implemented, these TDM measures could reduce Airport generated traffic by two to four percent. It is not anticipated to reduce the traffic impact to be less than significant, but would help lessen the traffic impact on the impacted facilities.

**MM-TR-I-1a:** **Improve the Intersection of Laurel Street at North Harbor Drive.** Prior to passenger air travel exceeding 32.0 million annual passengers (MAP), SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Add a third Eastbound left-turn lane and remove an Eastbound through lane. Proposed Mitigation Measure MM-TR-I-1a is **presently not considered fully feasible,** because the improvements described in Mitigation Measure MM-TR-I-1a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is **physically feasible,** because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1a, without FAA
Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-1b: Improve the Intersection of Pacific Highway at West Laurel Street.** Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove a westbound through lane on the West leg and add a second Eastbound left-turn lane, convert a Southbound through lane into a second Southbound right-turn lane, and re-coordinate signals along Laurel Street. Upgrade from Class II bicycle lanes to Class IV Cycle Tracks on Pacific Highway and provide feasible intersection features, such as corner islands and dedicated traffic signal phasing for bicycles on Pacific Highway. The bicycle improvements will extend from Laurel Street to Washington Street affecting the intersections of Pacific Highway at Sassafras Street / Admiral Boland Way and Pacific Highway at Palm Street. Proposed Mitigation Measure MM-TR-I-1b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.
approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-1c**: Improve the Intersection of Kettner Boulevard at West Laurel Street. Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Re-stripe the Southbound approach to two right-turn lanes, one through lane, and one optional through/left-turn lane. Proposed Mitigation Measure MM-TR-I-1c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1c, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-1d**: Improve the Intersection on North Harbor Drive from Harbor Island Drive to Grape Street. Prior to passenger air travel exceeding 32.0 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Re-coordinate signals along North Harbor Drive from Harbor Island Drive to Grape Street. Proposed Mitigation Measure MM-TR-I-1d is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1d are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance.
a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1d, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1d, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-1e:** Improve the Intersection of Kettner Boulevard at Palm Street. Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Install a traffic signal, restripe Palm Street to two lanes in each direction between Kettner Boulevard and Pacific Highway, and install pre-signals at the rail crossing. Provide directional signs on Kettner Boulevard, Pacific Highway, Laurel Street and North Harbor Drive suggesting Palm Street as an option for reaching the Airport terminals. Proposed Mitigation Measure MM-TR-I-1e is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-1e are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-1e, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-1e, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.
SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-RS-1a:** Improve Sassafras Street from Pacific Highway to Kettner Boulevard.  
Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (w/o two-way left-turn lane) to a 4 Lane Collector (w/o two-way left-turn lane). Proposed Mitigation Measure MM-TR-RS-1a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-RS-1b:** Improve Grape Street from Harbor Drive to Pacific Highway. Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing
parking on both sides of the roadway. Proposed Mitigation Measure MM-TR-RS-1b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

MM-TR-RS-1c: Improve Grape Street from Pacific Highway to India Street. Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing parking on both sides of the roadway. Proposed Mitigation Measure MM-TR-RS-1c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not
ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1c, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-RS-1d: Improve Grape Street from India Street to State Street.** Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Convert the roadway from a 3 Lane Collector (one-way) to a 4 Lane Collector (one-way) with Class IV cycle tracks by removing parking on both sides of the roadway. Proposed Mitigation Measure MM-TR-RS-1d is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-1d are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-1d, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-1d, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.
**MM-TR-I-4a:** Improve the Intersection of Columbia Street at West Grape Street. Prior to passenger air travel exceeding 32.0 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Redistribution of traffic and retiming of signals. Provide directional signs on eastbound North Harbor Drive suggesting Laurel Street as an option for reaching I-5 southbound. Proposed Mitigation Measure MM-TR-I-4a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-4a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-4a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-4a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-4b:** Improve the Intersection of Grape Street at State Street / I-5 SB Ramps. Prior to passenger air travel exceeding 32.0 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Redistribution of traffic and retiming of signals. Provide directional signs on eastbound North Harbor Drive suggesting Laurel Street as an option for reaching I-5 southbound. Proposed Mitigation Measure MM-TR-I-4b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-4b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-4b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently,
SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-4b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-RS-4a:** Improve Palm Street from Pacific Highway to Kettner Boulevard. Prior to the first occupancy of any new or redeveloped facility that is part of Project Phase 1a, SDCRAA shall provide the following improvement: Convert the roadway on Palm Street from Pacific Highway to Kettner Boulevard from a 2 Lane Collector (w/o two-way left-turn lane) to a 4 Lane Collector (without a two-way left-turn lane). Proposed Mitigation Measure MM-TR-RS-4a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-RS-4a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-RS-4a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-RS-4a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved.
approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for this off-Airport improvement item.

**MM-TR-I-5a:** Improve the Intersection of Pacific Highway at Sassafras Street / Admiral Boland Way. Prior to passenger air travel exceeding 39.3 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Restripe the West leg to a left-turn lane, two through lanes and right-turn lane. As part of the Class IV Cycle Track improvement identified in MM-TR-I-1b, the south leg will be restriped to a left-turn lane, two through lanes and a right-turn lane. Proposed Mitigation Measure MM-TR-I-5a is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5a are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5a, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5a, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency's required approval of funding for this off-Airport improvement item.

**MM-TR-I-5b:** Improve the Intersection of Kettner Boulevard at Sassafras Street. Prior to passenger air travel exceeding 39.3 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Restripe the north leg of the intersection to a left lane, 2 through lanes, a through/right-turn lane and right-turn lane. Proposed Mitigation Measure MM-TR-I-5b is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5b are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the
existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5b, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5b, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-5c:** Improve the Intersection of India Street at W. Grape Street. Prior to passenger air travel exceeding 35.8 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove parking on both sides of Grape Street from North Harbor Drive to State Street, to add a 4th travel lane on the south side of the road and install a Class IV Cycle Track along the north side. Retime signals along Grape Street. Proposed Mitigation Measure MM-TR-I-5c is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5c are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5c, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5c, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.
SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-I-5d:** **Improve the Intersection of Kettner Street at W Grape Street.** Prior to passenger air travel exceeding 35.8 MAP, SDCRAA shall provide the following improvement, to the satisfaction of the San Diego City Engineer: Remove parking from the south side and add a 4th travel lane from North Harbor Drive to State Street and retune signals along Grape Street. Proposed Mitigation Measure MM-TR-I-5d is presently not considered fully feasible, because the improvements described in Mitigation Measure MM-TR-I-5d are within the City of San Diego jurisdiction and would require FAA approval of funding. The mitigation measure is physically feasible, because there is enough space in the existing roadway widths. The measure, if implemented, would reduce impacts to below a level of significance. The improvements contemplated by Mitigation Measure MM-TR-I-5d, described above, would be located outside the jurisdiction of the SDCRAA but within the jurisdiction of the City of San Diego. Consequently, SDCRAA cannot independently implement the measure; instead, implementation would require the assistance and approval of the City. The City has informed SDCRAA that it concurs the measure is physically feasible and can be implemented as conceptually described above, provided the proper permits are obtained from the City. Note, however, that SDCRAA may not ensure airport revenues for off-airport improvements, including those described in MM-TR-I-5d, without FAA approval. Thus, the SDCRAA’s ability to implement this measure is contingent upon that approval.

SDCRAA will include this mitigation measure in the Mitigation Monitoring and Reporting Program (MMRP) for the project, subject to and with the qualifications that SDCRAA cannot implement the measure without (i) collaboration with and approval by the City, and (ii) funding approval from FAA, which SDCRAA has already requested but which has not yet been approved. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for this off-Airport improvement item.

**MM-TR-LRP-1:** **Airport Regional Connections.** Prior to 2035, the SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: 1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; and 2.
Participate in the implementation of improvements and strategies identified in the Airport Connections Study. To the extent that either of the two measures described above requires funding that must be pre-approved by the FAA, SDCRAA will request and make best efforts to secure such approval.

1. SDCRAA is fully engaged with other stakeholders in SANDAG’s committee and subcommittees, which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.

2. SDCRAA will fund its fair share of agreed-to improvements to implement long-term regional solutions identified by SANDAG’s Airport Connections Study, subject to a FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented and is presently not considered feasible, because the Mitigation Measure would be within the control of other agencies or jurisdictions, and would require FAA approval of funding. For example, portions of Mitigation Measure MM-TR-LRP-1 require physical improvements to facilities and/or VMT reduction items that would be located within the jurisdictions of, or must be implemented by, other public agencies or departments. Although these improvements and VMT reduction items may prove to be considered physically feasible, SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs. SDCRAA will, however, continue to collaborate with the other public agencies and departments to implement any agreed-upon improvement items and/or VMT reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-1 currently could not be implemented and is presently not considered feasible, because the FAA may decide not to authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements, programs to reduce VMT, or other mitigation measures. As discussed in Section 3.14.6, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for the as yet unidentified off-Airport improvement or VMT reduction items. If the funding is granted (and the other agencies agree to implement or give approval to the SDCRAA to implement), then the Mitigation Measure would be feasible. If the FAA does not approve the funding, then the Measure would be infeasible.
MM-TR-Con-1: Construction Traffic Measures. Prior to the start of any construction phases at SDIA, SDCRAA shall promote the following TDM strategies:
1. Consider establishing a remote lot for construction workers with shuttles to their work site; 2. Stagger start times of various crews, when possible, to reduce the intensity of construction impacts; 3. Consider adding a shuttle stop at the construction site for transit services from Santa Fe Depot and/or Old Town Transit Center. Implementation of MM-TR-Con-1 is feasible.

With mitigation, the effects will be:
(X) Significant and Unavoidable  ( ) Not Significant

Finding(s) per CEQA Guidelines section 15091:
(X) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect. Subd. (a)(1).
(X) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. Subd. (a)(2).
(X) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:
As indicated above, the proposed project would result in significant and unavoidable impacts on transportation facilities. As explained throughout Section 3.14.6 of the Recirculated Draft EIR, physically feasible mitigation measures have been identified to reduce significant traffic and circulation impacts of the proposed project. As explained throughout Section 3.14.6 of the Recirculated Draft EIR, some of the proposed mitigation measures are not fully feasible in reducing traffic and circulation impacts to below a level of significance due to funding, legal, and/or jurisdictional limitations and factors that prevent implementation of the mitigation measures.

In addition, as described in Section 3.14.6 of the Recirculated Draft EIR, per City of San Diego and Caltrans direction to Kimley-Horn on September 7, 2018 regarding potential mitigation for traffic impacts associated with the proposed project, any improvements to roadway segments that would require widening beyond the community plan buildout roadway classification or freeway improvements not included in the San Diego Regional Transportation Plan or one of Caltrans’ Transportation Concept Report are to be considered infeasible.

Further, as noted in the August 27, 2019 letter to the FAA, and a November 27, 2019 follow-up letter to the FAA, and as discussed in Appendix R-K, FAA fair share funding approval for off-Airport roadway and intersection improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. Other specific potential off-Airport roadway and intersection improvement items listed as possible mitigation measures in Section 3.14 of the Recirculated Draft EIR either would not meet this FAA
fair share funding requirement, or have not been approved or supported by the City of San Diego, which has jurisdiction over the improvement items.

As discussed in Section 3.14 of the EIR, the identification of mitigation measures included discussion with the owner of the transportation facility to determine what SDCRAA would be allowed to construct. Because the City of San Diego owns and operates most roadways and intersections surrounding SDIA, SDCRAA regularly met with City staff throughout preparation of the traffic analysis for the Recirculated Draft EIR. The result of this vetting process was confirmation of the mitigation measures that the City would permit SDCRAA to implement, and those improvements that would not be permitted due to inconsistencies with Community Plan recommendations for street configuration and bicycle facility improvements. Where stated in the Recirculated Draft EIR that an improvement is inconsistent with a community plan, this was based on concurrence from the City of San Diego. This collaborative effort resulted in the proposed mitigation measures provided in both Section 3.14, Traffic and Circulation, and Appendix R-H1, Alternative 4: Traffic and Circulation Evaluation, of the Recirculated Draft EIR.

The SDCRAA will continue to coordinate with the FAA regarding the potential fair share funding of the transportation system improvements reflected in the mitigation measures of the Recirculated Draft EIR. A formal request has been submitted to the FAA to allow for the use of airport revenues to implement roadway and intersection mitigation. A copy of the request letter, dated August 27, 2019, and a November 27, 2019 follow-up letter to the FAA, are provided in Appendix R-K, Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures, of the Recirculated Draft EIR. As noted in the August 27, 2019 letter to the FAA, and a November 27, 2019 follow-up letter to the FAA, and as discussed in Appendix R-K, FAA fair share funding approval for off-Airport roadway and intersection improvements is limited under federal law to items that provide improvements to direct access routes to the Airport. The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA are understood by the SDCRAA to satisfy this legal standard. Other specific potential off-Airport roadway and intersection improvement items listed as possible mitigation measures in Section 3.14 of the Recirculated Draft EIR either would not meet this FAA funding requirement, or have not been approved or supported by the City of San Diego, which has jurisdiction over the improvement items.

Further, as discussed in Appendix R-K to the Recirculated Draft EIR, Airport revenues may legally be used for the capital or operating costs of: (1) the airport; (2) the local airport system; or (3) other local facilities owned and operated by the airport owner or operator and directly and substantially related to the air transportation of passengers or property. (49 U.S.C. § 46301(a)(3); see also FAA Order 5190.6B, p. 15-4; FAA Policy and Procedure Concerning the Use of Airport Revenue, Feb. 16, 1999, p. 7705.) To satisfy the “directly and substantially related to the air transportation” prong, the access way should be the primary means of ground access to the airport, and in this case, funding is limited to the portion of the road from the airport to the nearest line of mass capacity. (FAA Order 5190.6B, p. 15-6.) This general rule prohibits the use of airport revenues for off-site projects that are not owned or operated by the airport and are not directly or substantially related to air transportation. (See FAA Order 5100.38D, p. C-5.) The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA (included in Appendix R-K) are understood by the SDCRAA to satisfy the legal standards for fair share FAA funding approval.
Also as discussed in Appendix R-K to the Recirculated Draft EIR, all airline fees, passenger fees, concession payments, lease payments, parking fees, rental car fees, and any other form of revenue received or generated within the boundaries of the Airport is determined under federal law to be Airport revenue. Again, as discussed in Appendix R-K to the Recirculated Draft EIR, Airport revenues may legally be used for the capital or operating costs of: (1) the airport; (2) the local airport system; or (3) other local facilities owned and operated by the airport owner or operator and directly and substantially related to the air transportation of passengers or property. (49 U.S.C. § 46301(a)(3); see also FAA Order 5190.6B, p. 15-4; FAA Policy and Procedure Concerning the Use of Airport Revenue, Feb. 16, 1999, p. 7705.) To satisfy the “directly and substantially related to the air transportation” prong, the access way should be the primary means of ground access to the airport, and in this case, fair share funding is limited to the portion of the road from the airport to the nearest line of mass capacity. (FAA Order 5190.6B, p. 15-6.) This general rule prohibits the use of airport revenues for off-site projects that are not owned or operated by the airport and are not directly or substantially related to air transportation. (See FAA Order 5100.38D, p. C-5.) (Note that FAA grant funds also are similarly restricted to prevent use on off-Airport improvement projects.) The improvement items listed in Exhibit C to the August 27, 2019 letter to the FAA (included in Appendix R-K) are understood by the SDCRAA to satisfy the legal standards for FAA fair share funding approval. Other than Airport revenue (which is subject to FAA approval for use), no other source of funding for off-site mitigation measures or improvements exists. Any possible Airport bond revenues, for example, would have to be paid back with Airport revenues, which are subject to the use restrictions stated above. Moreover, individual U.S. airports, including SDIA, do not generally receive annual appropriations from Congress for airport operations. Rather, only Airport revenues and FAA grant funds provide funding sources for SDIA operations and possible off-Airport improvement projects. Based on the above, the traffic and transportation system impacts would be significant and unavoidable.

Specifically, the intersections, roadway segments, and freeway segments for which the impacts would remain significant and unavoidable because the improvements that could mitigate the impact would require widening beyond the community plan buildout roadway classification or freeway improvements not included in the San Diego Regional Transportation Plan or one of Caltrans’ Transportation Concept Reports are indicated below in **bold**.

**Operation**

**Existing**

**Intersection**
- W Laurel St at N Harbor Drive
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Harbor Island Drive at N. Harbor Drive
- Kettner Boulevard at Palm Street

**Roadway**
- **Kettner Boulevard from Vine Street to Sassafras Street**
- **Kettner Boulevard from Sassafras Street to Palm Street**
- Sassafras Street from Pacific Highway to Kettner Boulevard
- **Laurel Street from Harbor Drive to Pacific Highway**
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- **Hawthorn Street from India Street to State Street**
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- **North Harbor Drive from Laurel Street to Hawthorn Street**

**Freeway**
- Northbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of Route 94 Junction
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

**2024**

**Intersection**
- Pacific Highway at Enterprise Street
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Kettner Boulevard at Palm Street
Roadway

- Kettner Boulevard from Vine Street to Sassafras Street
- Kettner Boulevard from Sassafras Street to Palm Street
- Sassafras Street from Pacific Highway to Kettner Boulevard
- Palm Street from Pacific Highway to Kettner Boulevard
- Laurel Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- Hawthorn Street from India Street to State Street
- Hawthorn Street from State Street to Albatross Street
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- North Harbor Drive from Laurel Street to Hawthorn Street

Freeway

- Northbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of SR-94 Junction
- Northbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of India / Sassafras Street
- Northbound direction on I-5, from north of Pacific Highway Viaduct
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

2026

Intersection
- Pacific Highway at Enterprise Street
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Kettner Boulevard at Palm Street

Roadway
- Kettner Boulevard from Vine Street to Sassafras Street
- Kettner Boulevard from Sassafras Street to Palm Street
- Kettner Boulevard from Palm Street to Laurel Street
- Sassafras Street from Pacific Highway to Kettner Boulevard
- Palm Street from Pacific Highway to Kettner Boulevard
- Laurel Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- Hawthorn Street from India Street to State Street
- Hawthorn Street from State Street to Albatross Street
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- North Harbor Drive from Laurel Street to Hawthorn Street

Freeway
- Northbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of SR-94 Junction
- Northbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of India / Sassafras Street
- Northbound direction on I-5, from north of Pacific Highway Viaduct
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Robinson Street
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

**2030**

**Intersection**
- Pacific Highway at Enterprise Street
- W Laurel St at N Harbor Drive
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Columbia Street at W Grape Street
- State Street / I-5 SB On-Ramp at W Grape Street
- Harbor Island Drive at N Harbor Drive
- Kettner Boulevard at Palm Street

**Roadway**
- Kettner Boulevard from Vine Street to Sassafras Street
- Kettner Boulevard from Sassafras Street to Palm Street
- Kettner Boulevard from Palm Street to Laurel Street
- India Street from Sassafras Street to Laurel Street
- Sassafras Street from Pacific Highway to Kettner Boulevard
- Palm Street from Pacific Highway to Kettner Boulevard
- Laurel Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- Hawthorn Street from India Street to State Street
- Hawthorn Street from State Street to Albatross Street
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- North Harbor Drive from Winship Lane to Liberator Way
- North Harbor Drive from Liberator Way to Cell Phone Lot
- North Harbor Drive from Cell Phone Lot to Laurel Street / Solar Turbines
- North Harbor Drive from Laurel Street / Solar Turbines to West Laurel Street
- North Harbor Drive from Laurel Street to Hawthorn Street
- North Harbor Drive from Hawthorn Street to Grape Street

**Freeway**
- Northbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of SR-94 Junction
- Northbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of India / Sassafras Street
- Northbound direction on I-5, from north of Pacific Highway Viaduct
- Northbound direction on I-5, from north of Sassafras Street
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Robinson Avenue
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Eastbound direction on I-8, from east of Morena Boulevard
- Eastbound direction on I-8, from east of Hotel Circle/Taylor Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

**2035**

**Intersection**
- Pacific Highway at Enterprise Street
- Pacific Highway at Sassafras Street / Admiral Boland Way
- Kettner Boulevard at Sassafras Street
- W Laurel St at N Harbor Drive
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Columbia Street at W Hawthorn Street
- **State Street at W Hawthorn Street**
- India Street at W Grape Street
- Columbia Street at W Grape Street
- State Street / 1-5 SB On-Ramp at W Grape Street
- Harbor Island Drive at N Harbor Drive
- Kettner Boulevard at Palm Street

**Roadway**

- Kettner Boulevard from Vine Street to Sassafras Street
- Kettner Boulevard from Sassafras Street to Palm Street
- Kettner Boulevard from Palm Street to Laurel Street
- India Street from Sassafras Street to Laurel Street
- Sassafras Street from Pacific Highway to Kettner Boulevard
- Laurel Street from Harbor Drive to Pacific Highway
- Palm Street from Pacific Highway to Kettner Boulevard
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- Hawthorn Street from India Street to State Street
- Hawthorn Street from State Street to Albatross Street
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- North Harbor Drive from Winship Lane to Liberator Way
- North Harbor Drive from Liberator Way to Cell Phone Lot
- North Harbor Drive from Cell Phone Lot to Laurel Street / Solar Turbines
- North Harbor Drive from Laurel Street / Solar Turbines to West Laurel Street
- North Harbor Drive from Laurel Street to Hawthorn Street
- North Harbor Drive from Hawthorn Street to Grape Street

**Freeway**

- Northbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of SR-94 Junction
- Southbound direction on I-5, from North of Pershing Drive
- Northbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of India/Sassafras Street
- Northbound direction on I-5, from north of Pacific Highway Viaduct
- Northbound direction on I-5, from north of Sassafras Street
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Southbound direction on SR-163, from north of Robinson Avenue
- Northbound direction on SR-163, from north of Robinson Avenue
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Eastbound direction on I-8, from east of Morena Boulevard
- Eastbound direction on I-8, from east of Hotel Circle/Taylor Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

2050

Intersections

- Pacific Highway at Taylor Street/Rosecrans Street
- Pacific Highway at Enterprise Street
- NB Pacific Highway On-Ramp/ Frontage Road at Washington Street
- San Diego Avenue at Washington Street
- Pacific Highway at Sassafras Street/Admiral Boland Way
- Kettner Boulevard at Sassafras Street
- W Laurel Street at N Harbor Drive
- Pacific Highway at W Laurel Street
- Kettner Boulevard at W Laurel Street
- Pacific Highway at W Hawthorn Street
- Kettner Boulevard at W Hawthorn Street
- India Street at W Hawthorn Street
- Columbia Street at W Hawthorn Street
- State Street at W Hawthorn Street
- I-5 NB Off-Ramp/Brant Street at W Hawthorn Street
- Kettner Boulevard at W Grape Street
- India Street at W Grape Street
- Columbia Street at W Grape Street
- State Street / I-5 SB On-Ramp at W Grape Street
- Harbor Island Drive at N Harbor Drive
- Liberator Way at N Harbor Drive
- Cell Phone Lot at N Harbor Drive
- Terminal Link Road / Coastal Guard at N Harbor Drive
- Kettner Boulevard at Palm Street
- N Harbor Drive at Laning Road
- Rosecrans Street at Nimitz Boulevard

Roadway
- Pacific Highway from Barnett Avenue to Washington Street
- Kettner Boulevard from Vine Street to Sassafras Street
- Kettner Boulevard from Sassafras Street to Palm Street
- Kettner Boulevard from Palm Street to Laurel Street
- India Street from Sassafras Street to Laurel Street
- Washington Street from East of India Street
- Sassafras Street from Pacific Highway to Kettner Boulevard
- Palm Street from Pacific Highway to Kettner Boulevard
- Laurel Street from Harbor Drive to Pacific Highway
- Laurel Street from Pacific Highway to India Street
- Hawthorn Street from Harbor Drive to Pacific Highway
- Hawthorn Street from Pacific Highway to India Street
- Hawthorn Street from India Street to State Street
- Hawthorn Street from State Street to Albatross Street
- Grape Street from Harbor Drive to Pacific Highway
- Grape Street from Pacific Highway to India Street
- Grape Street from India Street to State Street
- North Harbor Drive from Winship Lane to Liberator Way
- North Harbor Drive from Liberator Way to Cell Phone Lot
- North Harbor Drive from Cell Phone Lot to Laurel Street / Solar Turbines
- North Harbor Drive from Laurel Street / Solar Turbines to West Laurel Street
- North Harbor Drive from Laurel Street to Hawthorn Street
- North Harbor Drive from Hawthorn Street to Grape Street
- Harbor Island Drive from Harbor Island Drive to Parking Lot
- North Island Drive, east of Parking Lot
Freeway

- Southbound direction on I-5, from north of J Street
- Northbound direction on I-5, from north of J Street
- Southbound direction on I-5, from north of SR-94 Junction
- Northbound direction on I-5, from north of SR-94 Junction
- Southbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Pershing Drive
- Northbound direction on I-5, from north of Route 163 Junction
- Northbound direction on I-5, from north of Sixth Avenue
- Northbound direction on I-5, from north of First Avenue
- Southbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of Hawthorn Street
- Northbound direction on I-5, from north of India/Sassafras Street
- Northbound direction on I-5, from north of Pacific Highway Viaduct
- Northbound direction on I-5, from north of Sassafras Street
- Southbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Washington Street
- Northbound direction on I-5, from north of Old Town Avenue
- Southbound direction on SR-163, from north of I-5 Junction
- Northbound direction on SR-163, from north of I-5 Junction
- Southbound direction on SR-163, from north of Quince Street
- Northbound direction on SR-163, from north of Quince Street
- Southbound direction on SR-163, from north of Richmond Street
- Northbound direction on SR-163, from north of Richmond Street
- Southbound direction on SR-163, from north of Robinson Avenue
- Northbound direction on SR-163, from north of Robinson Avenue
- Southbound direction on SR-163, from north of Washington Street
- Northbound direction on SR-163, from north of Washington Street
- Westbound direction on I-8, from east of I-5 Junction
- Eastbound direction on I-8, from east of I-5 Junction
- Eastbound direction on I-8, from east of Morena Boulevard
- Eastbound direction on I-8, from east of Hotel Circle/ Taylor Street
- Eastbound direction on I-8, from east of Hotel Circle
- Westbound direction on I-8, from east of SR-163 Junction
- Eastbound direction on I-8, from east of SR-163 Junction

Construction
### 8.15 Utilities

#### 8.15.1 Less-than-Significant Effect

The Final EIR did not identify any significant utilities impacts relating to the proposed project.

No finding per CEQA Guidelines Section 15091 is required, as no significant effect would occur.

Reference: **EIR Section 3.15.**

### 9. Cumulative Impacts

Chapter 4 of the EIR includes a discussion of cumulative impacts for each of the environmental impact categories evaluated in detail.
For seven of the fifteen examined categories, the proposed project, in combination with cumulative projects, would result in a less than significant impact: Aesthetics and Visual Resources, Biological Resources, Tribal Cultural Resources, Geology and Soils, Hydrology and Water Quality, Public Services, and Utilities.

For three of the categories, the EIR already accounts for and identifies proposed mitigation measures to address the significant cumulative impacts in the analysis of the proposed project’s specific significant environmental effects:

- **Greenhouse Gases and Climate Change:** The GHG impacts addressed in Section 3.3, Greenhouse Gases and Climate Change, of the EIR are treated exclusively as cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.

- **Human Health Risk:** No standards have been set forth by an agency with subject matter expertise that establish a threshold of significance for cumulative human health risk impacts. Additionally, the methodologies, models and thresholds of significance used to determine cancer risk, and chronic and acute non-cancer health hazards in Section 3.4 of the EIR are incremental in nature, intended to determine the risks associated with an individual project; the analytical framework is not intended for applications relating to cumulative risk. Moreover, due to uncertainties in evolving technologies, future regulations, and other societal and technological factors, meaningful quantification of future cumulative health risk exposure in the vicinity of the project is not feasible.

- **Traffic and Circulation:** Cumulative traffic and circulation impacts are incorporated into the analysis provided in Section 3.14, Traffic and Circulation, of the EIR. More specifically, the contributions of the proposed project to cumulative impacts were determined based on a comparison between Future (2024, 2026, 2030, 2035, and 2050) Without Project traffic conditions and Future (2024, 2026, 2030, 2035, and 2050) With Project traffic conditions. The Future Without Project scenarios include traffic associated with future regional growth, which accounts for traffic from cumulative projects.

The following discusses the proposed project’s contribution to significant cumulative impacts associated with the remaining five categories:

- **Air Quality:** As discussed in Section 8.2 (Air Quality) above, construction of the proposed project in conjunction with other projects anticipated to be under construction during that same time would result in a significant impact relative to cumulative air pollutant emissions, specifically, VOCs, NOx, and PM10, at which the proposed project’s contribution to that significant impact would be cumulatively considerable for NOx and PM10. Operation of the proposed project at buildout in 2035 and in the 2050 horizon year would result in a cumulatively considerable net increase of VOCs and NOx, which are precursors to O3, for which the San Diego air basin is in nonattainment under federal and state ambient air quality standards. That cumulatively considerable impact is a significant and unavoidable impact of the proposed project even with implementation of mitigation measures discussed in Section 8.2 above. Additionally, existing background concentrations of PM10 currently exceed state standards and there would be an increase
in PM$_{10}$ emissions associated with project operations. The increase is considered to be cumulatively considerable; this is a significant and unavoidable impact even with implementation of mitigation measures discussed in Section 8.2 above. It should be noted, for informational purposes only, that the air pollutant emissions associated with operations at SDIA in the future without implementation of the proposed project would be generally the same as, or greater than (i.e., worse than), emissions with implementation of the proposed project due to anticipated growth in future activity that will occur at SDIA regardless of whether the project is implemented. As such, SDIA’s contribution to cumulative (regional) air quality impacts would be greater without implementation of the proposed project than with implementation of the project.

- **Cultural Resources:** Development projects at SDIA that could adversely affect historical resources, in combination with the proposed project improvements that would result in the demolition of historical resources, could pose the potential for impacts to historical resources, more specifically historical resources associated with the historical use of the Airport property for aeronautical/aviation purposes. Eleven historical resources have been identified on the Airport property, two of which (Consolidated Aircraft Plant No. 1 [historic district] and Ryan Aeronautical Company Historic District) have been demolished as part of past improvement projects on the north side and south side of the Airport. Implementation of the proposed project would require the demolition and removal of two significant historical buildings (the existing Terminal 1 and the existing Terminal 2-East). Mitigation Measure MM-HR-1: Preparation of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Documentation, is proposed to document the characteristics of each of these two buildings and MM-HR-4: Interpretative Display Regarding Existing Terminal 1 is proposed to further document the characteristics of the existing Terminal 1; however, the permanent loss of those historic structures would be a significant and unavoidable impact of the project. Implementation of the proposed project would also impact the former United Airlines Hangar and Terminal Building, which is also a significant historical building. Mitigation Measures MM-HR-1 and MM-HR-2: Relocation of the United Airlines Hangar and Terminal Building, are proposed and would reduce the impact to a level less than significant. Based on the above, implementation of the proposed project, in combination with past development at the Airport, would cause a substantial adverse change in the significance of historical resources as defined by State CEQA Guidelines Section 15064.5(a). This would be a significant cumulative impact to historical resources and the proposed project’s contribution to this impact would be cumulatively considerable.

- **Hazards and Hazardous Materials:** With implementation of project-specific mitigation measures identified in Section 3.9 of the Recirculated Draft EIR (MM-HW-1 through MM-HW-4), the proposed project, in combination with cumulative projects, would result in a less than significant impact related to the release of hazardous materials into the environment, or impacts from listed hazardous materials sites, or impacts to adopted emergency response or evacuation plans. However, regarding impacts associated with whether the proposed project could result in excessive noise for people residing or working in the project area, future airport operations associated with the project would result in significant and unavoidable aircraft noise impacts on areas around the Airport even with
implementation of project-specific mitigation measures discussed in Section 8.12 above. This impact would be attributable primarily to future growth in passenger demand at the Airport, which is projected to occur with or without the proposed project. Notwithstanding, this significant impact could be considered to be a cumulatively considerable contribution to significant noise impacts within the region. As such, the impact is considered to be significant and unavoidable.

- **Land Use and Planning:** Development projects at/adjacent to SDIA in combination with ADP improvements could pose the potential for impacts to land use and planning. As discussed in Section 3.11, Land Use and Planning, the proposed project would not conflict with most aspects of land use plans, policies, or regulations related to land use planning (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. Future airport operations associated with the project would, however, result in significant and unavoidable aircraft noise impacts on areas around the Airport, significant and unavoidable roadway noise impacts southeast of the Airport, and significant and unavoidable traffic impacts in areas close to the Airport even with implementation of project-specific mitigation measures discussed in Sections 8.12 and 8.14 above. Such impacts would be attributable primarily to future growth in passenger demand at the Airport and in the region, which is projected to occur with or without the proposed project. Notwithstanding, the aforementioned significant impacts could be considered to be a cumulatively considerable contribution to significant noise and traffic impacts within the local planning areas. As such, the impact is considered to be significant and unavoidable.

- **Noise:** Section 3.12, Noise, of the EIR addresses impacts of the proposed project related to aircraft noise, roadway traffic noise, and construction noise. The analysis of aircraft noise presented in that section accounts for existing and future aircraft operations at SDIA through 2050. Aircraft noise impacts to the nearby area are dominated by operations at SDIA. Although aircraft operations also occur at Naval Air Station (NAS) North Island, located south of SDIA, such operations do not overlap with those of SDIA, but rather are separated from, and extend south of, SDIA. The NAS North Island aircraft noise contours presented in the *Air Installations Compatible Use Zones (AICUZ) Update, 2011 Final AICUZ Study Update* show the aircraft noise contours for existing/baseline conditions and for the future prospective AICUZ footprint, projected for Calendar Year 2020, as extending primarily to the south, away from SDIA. There is a small amount of overlap between the northern edge of the prospective (2020) NAS North Island 60 Community Noise Equivalent Level (CNEL) contour and the southern edge of the SDIA 60 CNEL contour, occurring near Harbor Island. The combined (cumulative) noise level of the two 60 CNELs in that overlap area would be approximately 63 CNEL, and there are no noise-sensitive uses within that overlap area.

---

The analysis of traffic noise impacts accounts for future increases in background traffic that would occur in conjunction with future regional growth. As such, the analysis already accounts for cumulative traffic noise impacts.

Relative to the potential for cumulative construction noise impacts, the vast majority of cumulative projects shown in Figure 4-1 of the EIR are located well away from the project site. Given the separation distances of the projects situated outside of SDIA and their relationship to the noise-sensitive receptors near SDIA, as described in Section 3.12 of the EIR, no significant cumulative construction noise impacts (i.e., noise levels greater than 75 decibels [dB] Equivalent Continuous Noise Level [Leq]) are anticipated to occur relative to those projects. Relative to the potential for cumulative construction noise impacts from the combination of the proposed project and other improvements proposed within SDIA, the greatest potential for a significant impact would be relative to the combination of the proposed project’s improvements to Taxiway A/Taxiway B and the Air Cargo Warehouse Facilities and Associated Improvements located approximately 800 feet to the north at its nearest point, as well as the Additional Fuel Tanks Project located approximately 1,100 feet to the north, as shown on Figure 4-1 of the EIR. As indicated in Section 3.12.5.5.2 of the EIR, construction of the Taxiway A/Taxiway B improvements would be within 650 feet of the U.S. Coast Guard Station (considered to be a noise-sensitive use because of its sleeping quarters) at the closest point of construction, which could result in a “worst-case” construction noise level of up to 73.6 dB Leq, based on the very conservative assumption that all construction equipment is operating at the same time. Using that same conservative assumption, the noise level at the U.S. Coast Guard Station that would be associated with the Air Cargo Warehouse Facilities and Associated Improvements would be approximately 65.2 dB Leq and the Additional Fuel Tanks Project would be approximately 63.7 dB Leq, which when combined with 73.6 dB Leq, would equal a cumulative noise level of approximately 74.6 dB Leq, which would be less than significant.

Relative to cumulative impacts associated with the combination of the three types of noise sources – aircraft noise, traffic noise, and construction noise – the most notable potential for such impacts is primarily associated with only the combination of aircraft noise and traffic noise. As noted above, the vast majority of the cumulative projects are located well away from the project site, which avoids the potential for any notable combined construction noise impacts, and the only notable potential for cumulative construction noise impacts relates to the combination of the Taxiway A/Taxiway B improvements and Air Cargo Warehouse Facilities and Associated Improvements and the Additional Fuel Tanks Project, which would impact the U.S. Coast Guard Station, but at a less than significant level. That cumulative construction noise impact is accounted for in the discussion below regarding the addition of project-related aircraft noise and traffic noise.

The evaluation of combined noise levels was considered in terms of the thresholds of significance related to increases in exterior noise levels in noise-sensitive areas; specifically, whether there would be: (1) a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater, as compared to the existing (2018)
baseline condition; or (2) a 3.0 dB or more increase resulting in noise-sensitive areas being exposed to 60 CNEL to less than 65 CNEL, as compared to the existing (2018) baseline condition.

In evaluating the potential for such increases in noise levels, it is useful to understand how noise levels from two sources are added, which is done logarithmically based on the sound energy level of each source, to determine the combined (cumulative) noise level. Relative to whether the combined noise levels from two sources would result in a 1.5 dB increase or a 3 dB increase, the noise levels generated by the sources need to generate generally similar noise levels in order to result in those levels of increase. For example, two noise sources that generate equal sound energy levels, in terms of dB, will result in a combined, cumulative noise level that is 3 dB higher than the level that would occur from either source individually (i.e., 65 dB + 65 dB = 68 dB). If, on the other hand, the noise levels from two sources are substantially different, say they differ by 10 dB or more, the cumulative noise level is approximately the same as the louder noise source (i.e., 65 dB + 55 dB = 65.4 dB, which rounds to 65 dB). Relative to whether a 1.5 dB increase would occur when combining two noise sources, there would generally need to be a 4 dB increase to result in a 1.5 dB increase in the louder of the two sources (i.e., 65 dB + 61 dB = 66.5 dB).

Section 3.12.4.5.2 of the EIR summarizes the results of the roadway (traffic) noise modeling completed for the proposed project and includes a description of roadways where there are noise-sensitive uses nearby. Table 4-4 of the EIR identifies the roadway segments with noise-sensitive uses nearby, the nature of those uses, the existing noise levels in terms of the modeled roadway CNEL levels for existing baseline conditions, the future (2050) roadway noise levels, the approximate CNEL for aircraft noise in 2050 estimated for that area, and the combined future roadway noise and future aircraft noise CNEL.4

As indicated in Table 4-4 of the EIR, the combined 2050 roadway noise level and 2050 future aircraft noise level would result in more than a 3 dB increase over the existing baseline roadway CNEL, which would be a significant cumulative noise impact along all of the subject roadway segments except Pacific Highway from Barnett Avenue to Washington Street and Harbor Drive from Cell Phone Lot to Laurel Street/Solar Turbines. As described in Section 3.12 of the EIR, Mitigation Measures MM-NOI-1 through MM-NOI-5 are proposed to mitigate aircraft noise impacts; however, it has been concluded that the noise impacts would be significant and unavoidable.

It should be noted that the increases over the existing baseline noise level from 2050 cumulative noise levels shown in Table 4-4 of the EIR would generally be the same without the proposed project than with the proposed project (i.e., impacts would be similar under the No Project Alternative compared to the proposed project); this is because the future aircraft noise levels are projected to be the same with or without the

---

4 This approach is considered to represent a conservative (worst-case) analysis of cumulative increases of future noise levels over existing baseline noise levels because the existing CNEL is based on the modeled roadway noise level for existing traffic and does not account for the fact that the actual existing noise level at several locations is dominated by aircraft noise, which is higher than the modeled roadway noise level.
proposed project and roadway noise levels would generally be similar with or without
the proposed project (see Section 3.12 of the EIR). Notwithstanding the above, the
cumulative noise impacts would be significant and unavoidable, and the proposed
project’s contribution to such impacts would be considerable.

Mitigation:

With mitigation, the effects will be:

(X) Significant and Unavoidable  ( ) Not Significant

Finding(s) per CEQA Guidelines section 15091:

(X) Changes or alterations have been required in, or incorporated into, the project that avoid or
substantially lessen the significant environmental effect. Subd. (a)(1).

(X) Such changes or alterations are within the responsibility and jurisdiction of another public
agency and not the agency making the finding. Such changes have been adopted by such other
agency or can and should be adopted by such other agency. Subd. (a)(2).

(X) Specific economic, legal, social, technological, or other considerations, including provision of
employment opportunities for highly trained workers, make infeasible the mitigation
measures or project alternatives identified in the Final EIR. Subd. (a)(3).

Rationale:

The Rationale discussions above in Sections 8.2 (Air Quality), 8.3 (Greenhouse Gases and Climate
Change), 8.6 (Cultural Resources), 8.9 (Hazards and Hazardous Materials), 8.11 (Land Use and
Planning), 8.12 (Noise), and 8.14 (Traffic and Circulation) address the Rationale related to the
finding for Cumulative Impacts associated with these topics.

Reference: EIR Chapter 4.

10. Feasibility of Project Alternatives

Because the proposed project could potentially cause unavoidable, significant environmental
effects, as stated above in Sections 8.2 (Air Quality), 8.3 (Greenhouse Gases and Climate Change),
8.6 (Cultural Resources), 8.9 (Hazards and Hazardous Materials), 8.11 (Land Use and Planning),
8.12 (Noise), 8.14 (Traffic and Circulation), and Section 9 (Cumulative Impacts), the Authority must
consider the feasibility of any environmentally superior alternatives to the Project. The Authority
must evaluate whether one or more of these alternatives could avoid or substantially lessen the
Project’s potential unavoidable significant environmental effects. Citizens for Quality Growth v.

CEQA does not require lead agencies to address the feasibility of both mitigation measures and
environmentally superior alternatives when the lead agencies contemplate approval of a proposed
project with significant impacts. Where a significant impact can be mitigated to an acceptable level
solely by the adoption of mitigation measures, the agency, in drafting its findings, has no obligation
to consider the feasibility of environmentally superior alternatives even if the alternatives’ impacts
would be less severe than those of the proposed project as mitigated. Mira Mar Mobile Community
v. City of Oceanside, 119 Cal.App.4th 477, 490 (2004); see also Kings County Farm Bureau v. City of Hanford, 221 Cal. App. 3d 692, 730-31 (1990) and Laurel Heights Improvement Ass’n v. Regents of the Univ. of Cal., 47 Cal.3d 376, 400-03 (1988). Accordingly, in adopting findings concerning project alternatives, the Authority considers only those environmental impacts of the proposed project that are significant and cannot be avoided through mitigation.

As discussed above, implementation of the proposed project would have significant, unavoidable adverse environmental impacts in regard to Air Quality, Greenhouse Gases and Climate Change, Cultural Resources, Hazards and Hazardous Materials (related to noise), Land Use and Planning (related to noise and traffic), Noise, Traffic and Circulation, and Cumulative Impacts. In compliance with CEQA and the State CEQA Guidelines, the ADP EIR includes examination of the following alternatives to the proposed project:

- Alternative 1 - No Project Alternative
- Alternative 2 - Reduced Scale of Development
- Alternative 3 – Revised Implementation Phasing
- Alternative 4 – T1 Replacement and Transportation Improvements

These findings examine the four project alternatives to the extent the alternatives lessen or avoid the Project’s significant unavoidable environmental effects and if so, whether the alternative is feasible. The Authority need not consider the alternatives with respect to the Project’s environmental impacts that are insignificant or avoided through mitigation.

10.1 Alternative 1: No Project Alternative

Under Alternative 1, none of the improvements under the proposed project would occur. The project site would retain the existing structures and roadway system and there would be no demolition of, or additions or modifications to, the existing facilities. It should be noted, however, that even without implementation of the proposed project improvements, there would be continued growth in aircraft operations and passenger activity levels in the future at SDIA, including through 2035 (the buildout year for the ADP), to meet the region's demand for air service. The capacity limitation of SDIA’s single-runway is the same with or without the project improvements.

The No Project Alternative would avoid all the construction-related impacts of the proposed project; however, most of the proposed project’s construction impacts are less than significant, with the exception of GHG emissions (when combined with operations-related impacts), construction-related traffic impacts, and a significant and unavoidable cumulatively considerable contribution to significant air quality cumulative impact. Moreover, several operational impacts of the No Project Alternative, including those related to human health risk and air quality and GHG emissions, would be greater than the unavoidable significant impacts of the proposed project. Alternative 1 is infeasible, however, because it would not result in any terminal, roadway, airfield, or other improvements that would occur under the proposed project to improve operational efficiency and environmental sustainability, and better accommodate future activity levels and
coordinating of transit services and facilities, and therefore, would not meet any of the Project Objectives.

10.2 Alternative 2: Reduced Scale of Development

Under Alternative 2, additional gates and terminal area at SDIA would be developed as a new stand-alone facility constructed east of the existing T1. The new facility would have 12 gates and approximately 500,000 square feet of terminal area. The existing T1 and T2 would remain in their current location and configuration. Under the Reduced-Scale Alternative, the total amount of terminal area would be approximately 25 percent less than that of the proposed project.

In addition to having less demolition of existing terminal area and construction of new terminal area compared to the proposed project, Alternative 2 would not include development of the 400,000 square foot commercial development opportunity that is included in the proposed project, and would also not require demolition and replacement of the existing SDCRAA Administrative Offices that are located in the former Commuter Terminal. Also, under Alternative 2, the 1.5 million square foot T1 Parking Structure that is included in the proposed project would not be developed but, instead, 700,000 square feet of surface parking would be provided, which would be accessed via an on-airport roadway system similar to that of the proposed project. Under Alternative 2, only the eastern portions of the Taxiway A and Taxiway B improvements would be constructed, immediately north of the 12-gate terminal, resulting in only 650,000 square feet of taxiway improvements rather than 1,415,000 square feet of taxiway improvements that would occur under the proposed project. Similarly, the amount of aircraft apron area around the terminals would be reduced to approximately 550,000 square feet under Alternative 2, instead of the 2,360,000 square feet of apron area under the proposed project.

Under Alternative 2, it would not be necessary to demolish and remove the former United Airlines Hangar and Terminal Building (a.k.a. the ASIG building or Menzies Aviation), the existing Terminal 1, or the existing Terminal 2-East, which are identified in Section 3.6, Cultural Resources, of the EIR as being significant historic resources.

Implementation of Alternative 2: Reduced Scale of Development would result in construction-related impacts that would, for most environmental issue areas, be generally comparable to those of the proposed project; however, relative to historic resources, Alternative 2 would avoid the significant impacts of the project, and, relative to construction-related traffic and GHG emissions, would reduce significant impacts. The operations-related impacts of Alternative 2 would be generally comparable to those of the proposed project; however, air pollutant emissions and GHG emissions would be slightly reduced compared to the proposed project. Implementation of Alternative 2 would not, however, meet most of the Project Objectives. The following summarizes the relationship between Alternative 2 and the Project Objectives.

- Goal: Develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction that reflect the local feel and uniqueness of San Diego. Alternative 2—Development of a new stand-alone terminal east of existing T1 would provide a limited improvement to passenger service and efficiency, but SDIA would still rely on the existing T1 which is relatively old and inefficient, and would not provide the quality of passenger satisfaction that SDCRAA is seeking for both existing and future activity levels.
Objectives:

- Maintain appropriate level of service on the curbfront, security checkpoints, passenger holdrooms, and bag claim areas. Alternative 2 – Existing T1, as retained under Alternative 2, would provide less than desired levels of service based on limitations associated with the existing size and design of the T1 facilities, although development of the new stand-alone terminal would help compensate for those limitations.

- Optimize airport concessions to meet demand and generate revenue for SDIA. Alternative 2 – This objective could be met under Alternative 2.

- Minimize walking distances and mode changes from curbside to aircraft gate. Alternative 2 – The design of the stand-alone terminal under Alternative 2 has an elongated concourse that extends well east of the passenger processing area and curbside, which would not meet the objective to minimize walking distances. Additionally, its physical separation from T1 and T2 would require passengers on connecting flights to or from those other terminals to walk quite a distance or would require bussing of connecting passengers between terminals.

- Address T1 functional deficiencies, including replacement if necessary. Alternative 2 – This objective would not be met under Alternative 2.

- Develop a plan that can be implemented in a phased manner. Alternative 2 – This objective could be met under Alternative 2.

- Make the terminal a showplace of functionality and design that reflects the local feel and uniqueness of San Diego. Alternative 2 – The new stand-alone terminal could meet this objective; however, retaining the existing T1 under Alternative 2 would not respond to the objective relative to a showplace of functionality and design.

Goal: Plan for an operationally efficient airfield that meets FAA standards

Objectives:

- Improve and optimize airfield configuration for safety, efficiency, and capacity. Alternative 2 – Retaining the existing T1 under Alternative 2 would substantially limit the proposed improvement of Taxiway A (i.e., the end gates on T1 are located where the new Taxiway A extension is proposed); hence, the ability to achieve this objective would be compromised.

- Develop a plan to eliminate any existing modifications to standards as soon as feasibly practical and do not create conditions warranting additional modifications or waivers from the FAA. Alternative 2 – Alternative 2 does not affect this objective.

- Provide flexibility to respond to future aircraft, technology, and industry changes. Alternative 2 – Alternative 2 does not affect this objective.
Goal: Provide a plan that is fiscally and environmentally sustainable. *Alternative 2 – Retaining existing T1, which relatively old and inefficient, requiring substantial maintenance and upkeep, is not considered to be fiscally or environmentally sustainable.*

- Objectives:
  
  o Wherever prudent, make use of existing facilities through renewal or modernization to meet future demand. *Alternative 2 – Based on the age, condition, size, and nature of existing T1, renewal and modernization of that facility, in lieu of replacement, is not considered prudent. Further, the footprint of existing T1 cannot be modified to accommodate an increase in the number of security screening lanes without a major structural modification that would affect the number of gates.*

  o Ensure the development plan is fiscally responsible from both the capital and operational cost perspectives. *Alternative 2 – Based on the age, condition, size, and nature of existing T1, renewal and modernization of that facility, in lieu of replacement, is not considered fiscally responsible from an operational cost perspective.*

  o Provide plans that will diversify airport revenues and strengthen the financial position of SDIA. *Alternative 2 – Similar to above, the long-term costs of ongoing maintenance and operation associated with retaining existing T1, instead of replacing it, would not strengthen the financial position of the Airport.*

  o Maximize funding resources through appropriate facility planning. *Alternative 2 – Same as above.*

  o Continue to implement sustainability measures at SDIA, and monitor and report on those measures consistent with Global Reporting Initiative (GRI) Sustainability Reporting Standards. *Alternative 2 – Alternative 2 does not affect this objective.*

Goal: Optimize the productive use of SDIA properties.

- Objectives:

  o Maximize non-airline revenues. *Alternative 2 – Alternative 2 does not affect this objective.*

  o Identify opportunities for increased commercial utilization. *Alternative 2 – Alternative 2 does not affect this objective.*

Goal: Provide a plan that meets the aviation need of the San Diego region in a socially responsible manner.

- Objectives:

  o Support increases in air service demand for commercial passenger service to meet the needs of the San Diego regional economy and businesses. *Alternative 2 – Alternative 2 could meet this objective.*
Implement airport improvements in a sustainable manner and consider the total cost of ownership including financial, environmental, and social costs. Alternative 2 – Based on the age, condition, size, and nature of existing T1, renewal and modernization of that facility, in lieu of replacement, implementation of Alternative 2 is not considered to provide for airport improvements in a sustainable manner and considers the total cost of ownership.

Goal: Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand. Alternative 2 – Alternative 2 would provide for improved ground access with the new on-airport roadway and includes a new surface lot for parking nearby, but does not provide improvements to enhance transit service.

- Objectives:
  - Provide enhanced vehicular access from Harbor Drive to SDIA. Alternative 2 – Alternative 2 meets this objective.
  - Improve mobility for private vehicles, transit users, and bicyclist/pedestrians along the North Harbor Drive corridor. Alternative 2 – Alternative 2 does not meet this objective.
  - Improve transit connections to the existing transit system planned by the San Diego Association of Governments (SANDAG) and operated by the San Diego Metropolitan Transit System (MTS) including bus shuttle service to light rail stations and transit centers (Santa Fe Depot and Old Town Transit Centers). Alternative 2 – Alternative 2 does not meet this objective.
  - Accommodate demand for short-term and long-term parking spaces on-airport to ensure sufficient passenger satisfaction and appropriate revenue generation. Alternative 2 – Alternative 2 includes a new surface lot for parking nearby.

In summary, Alternative 2 could avoid or reduce certain significant impacts associated with the proposed project, but is infeasible, because it would not meet most of the Project Objectives.

10.3 Alternative 3: Revised Implementation Phasing

Under Alternative 3, the currently proposed project would still be developed, but the implementation phasing would be modified such that the T2-West modification/addition (the “Stinger”) would be included in the first phase of development (i.e., under the proposed project, the Stinger would be constructed in Phase 2a, but under Alternative 3, the Stinger would be constructed in Phase 1a) and would then be followed by the development phasing sequence of the proposed project (i.e., development of the new T1 eastern portion, then development of the new T1 western portion, and then removal of T2-East and the associated development of a linear concourse between the new T1 western portion and the existing T2-West). The implementation phasing associated with Alternative 3 would shift the most intensive development activities, in terms of the amount of demolition and construction, of the overall ADP program to occur between 2024 and 2030. By comparison, the proposed project would have the most intensive development
activities assumed to occur between approximately 2021 and 2026. Alternative 3 would include all the elements of the proposed project and the total amount of development at buildout would be the same as the proposed project; only the phasing of development would differ.

Implementation of Alternative 3 does not avoid or reduce the significant impacts of the project. Alternative 3 includes all the elements of the proposed project but with modified phasing. Therefore, as with the proposed project, it would meet all the Project Objectives. However, the timing on meeting several of the objectives would change. For example, under Alternative 3, the completion of the new T1 would occur in Phase 2a, instead of Phase 1b as would occur under the proposed project. Therefore, while Alternative 3 would still meet the objective of addressing T1 functional deficiencies, the completion of the new T1 improvements would occur in 2030 under Alternative 3, instead of 2026 as would occur under the proposed project.

Alternative 3 will not reduce or avoid significant and unavoidable impacts of the proposed project.

10.4 Alternative 4: T1 Replacement and Transportation Improvements

Under Alternative 4, the ADP would focus primarily on replacing T1 and providing transportation/transit-related improvements, including on-airport access road enhancements to reduce airport-related traffic on nearby streets and upgrades to public transit systems at and near SDIA. As further described below, Alternative 4 would eliminate certain aspects of the proposed project. It also would substantially reduce the construction period otherwise required for the proposed project. The SDCRAA developed Alternative 4 in response to comments received on the 2018 Draft EIR, many of which requested that SDCRAA reduce the size, scope, and the construction period of the proposed project, and provide more transit-related improvements to reduce the project’s traffic and air quality impacts. The following describes the elements of Alternative 4 as compared to those of the proposed project.

Overview

Under Alternative 4, the primary elements of the ADP would be limited to the following:

- replacement of the existing T1;
- a new reduced-height (compared to the proposed project) airport administration building;
- a new on-airport access roadway on airport property along with preservation of right-of-way on airport property to accommodate potential future off-airport access road improvements;
- a new reduced-size (compared to the proposed project) parking structure;
- elimination of the commercial development opportunity area included in the proposed project;
- implementation of a dedicated shuttle service between the Old Town Transit Center (located at 4005 Taylor Street) and SDIA;
- work with the MTS to upgrade Bus Route 992 transit service between downtown and SDIA;
preservation of a portion of SDIA as a “transit-ready” area to accommodate potential future regional transit system improvements that would link to SDIA.

- there would be no additions or modifications to T2.

SDIA would implement Alternative 4 over one phase, within two sub-phases (Phase 1a and Phase 1b), as shown in Figures 5-2 and 5-3 of the Recirculated EIR. Below is a description of each element of Alternative 4 and how it compares to the elements of the proposed project. Build-out of Alternative 4 is shown in Figure 5-3 of the Recirculated EIR. The details of the construction phasing, including a description of what elements would occur in each sub-phase, are also described below.

**Terminal Improvements**

**Terminal 1**

Under Alternative 4, the features of the T1 replacement would generally be the same as those of the proposed project, with the following notable exceptions:

- Under Alternative 4, there would be no development of the 400,000 square-foot potential commercial development opportunity area.

- Under Alternative 4, the parking structure proposed adjacent to the replacement T1 would be smaller than that of the proposed project (i.e., 5,500 parking spaces versus 7,500 parking spaces). By reducing the number of parking spaces, Alternative 4 would provide space to reserve a “transit-ready” area for connecting SDIA with potential future regional transit system improvements nearby.

- Also, Alternative 4 includes near-term transit system connection programs, such as a dedicated shuttle service between the Old Town Transit Center and SDIA, and upgrade of the Bus Route 992 transit service between downtown and SDIA. Additional discussion of these elements is provided below in the description of Ground Transportation improvements.

**Terminal 2**

Under Alternative 4, SDIA would not construct the proposed project’s T2-West addition (i.e., the “Stinger”). Nor would SDIA demolish the existing T2-East, or replace it with a linear concourse between the new T1 and the existing T2-West. In short, there would be no ADP Phase 2 improvements under Alternative 4, although interior renovations and upgrades to the existing T2-East would likely occur in the future.

**Ground Transportation**

Proposed ground transportation system modifications under Alternative 4 include the following.

**On-Airport Vehicle Transportation**

Under Alternative 4, the on-airport vehicle circulation improvements would generally be the same as those of the proposed project. These include a new on-airport entry roadway that would connect to North Harbor Drive. This new roadway would allow westbound airport traffic to enter SDIA at a new intersection west of the existing intersection of North Harbor Drive and Laurel Street. This will reduce the amount of westbound airport traffic using North Harbor Drive. Other
improvements include a new loop road that would provide access to the new T1 and a new reduced-size (compared to the proposed project) T1 Parking Structure.

Alternative 4 includes several other transportation- and transit-related improvements that are not in the proposed project described. Those additional improvements that are included in Alternative 4 are as follows:

- Under Alternative 4, space is reserved within the on-airport roadway to accommodate a 42-foot wide eastbound egress route on the north side of North Harbor Drive between Winship Lane and Terminal Link Road/Coast Guard. This egress route would tie into future off-airport roadway system improvements that would serve to improve access to and from SDIA. The location of that future right-of-way is shown on Figures 5-2 and 5-3 of the Recirculated Draft EIR. The nature, extent, and timing of such off-airport roadway system improvements would be determined through the involvement of, and subject to approvals by, several agencies beyond the SDCRAA, including the California Coastal Commission, SANDAG, MTS, the County of San Diego, the City of San Diego, the Port of San Diego, and the California Department of Transportation (Caltrans). In addition, any contribution of Airport funds to the off-airport roadway system would be subject to FAA approval.

- Under Alternative 4, a dedicated airport shuttle service between the Old Town Transit Center and SDIA would be established to provide improved access to local and regional transit for airport passengers and employees. The operational characteristics of the proposed shuttle system are anticipated to include:
  - Shuttle bus would operate daily between the Old Town Transit Center and Terminals 1 and 2 during the same hours as the San Diego Trolley. The trolley currently operates from approximately 5 AM to 1 AM daily. On Weekdays, the service would operate at 15-minute frequency from 5 AM to 9 PM, and at 30-minute frequency from 9 PM to 1 AM. On Weekends, the service would operate at 15-minute frequency from 5 AM to 7 PM, and at 30-minute frequency from 7 PM to 1 AM.
  - Shuttles would be all-electric zero-emission-vehicles (ZEVs) that can accommodate 20 passengers.
  - Shuttle Route between the SDIA Terminals and Old Town Transit Center: The shuttle bus would depart the terminals, access the Terminal Link Road at the U.S. Coast Guard crossing, and exit onto Pacific Highway at the intersection with Palm Street. The shuttle bus would continue north on Pacific Highway to the Old Town Transit Center where it would use the curbfront located on either the west or east curb at the Old Town Transit Center located at 4005 Taylor Street.
  - Shuttle Route from Old Town Transit Center to SDIA Terminals: The shuttle bus would depart the Old Town Transit Center at 4005 Taylor Street by proceeding south on Pacific Highway. At the intersection with Palm Street, the shuttle bus would access the gated Terminal Link Road, on which it would proceed to Terminals 1 and 2.
  - Distance: The shuttle bus would be 3.8 miles for each one-way trip (according to Google Maps).
Under Alternative 4, SDCRAA would also work with the MTS to upgrade Bus Route 992 transit service between downtown and SDIA. This would include the following measures to increase ridership by reducing the travel time along the route: 1) allow 992 buses to use the new on-airport access road including preferential locations at the terminals for bus stops; and 2) provide space for a kiosk and fare purchase station at a convenient location within the new, replacement Terminal 1 (implemented in January 2016 at existing Terminals 1 and 2). Under Alternative 4, a designated “transit-ready” area would be located between the proposed new T1 Parking Structure and the recently opened T2 Parking Plaza. This “transit-ready” area would place a potential future transit station in close proximity to both T1 and T2. The nature, design, and timing of such a transit station would be determined through a joint effort between agencies, such as SDCRAA, the Port District, SANDAG, and MTS to select the preferred regional transit system connection to SDIA. This transit connection type could include an automated people mover, light-rail/trolley line, subway, gondola, or autonomous electric vehicles, and will be further evaluated as part of SANDAG’s 2021 Regional Transportation Plan.

Pedestrian and Bicycle Circulation

Similar to the proposed project, Alternative 4 would include safe, recognizable, and continuous connections along North Harbor Drive to SDIA terminals for bicycles and pedestrians. Existing pedestrian and bicycle connections would be retained, while, additionally, new connections would also be established. For westbound passengers accessing SDIA, at the intersection of North Harbor Drive and Laurel Street, a pedestrian/bicycle crossing would be provided along the on-airport entry ramp. From the entry ramp, pedestrians and bicycles could travel on a multi-use path along the north side of the on-airport entry roadway. At the intersection of North Harbor Drive and Terminal Link Road, the multi-use path would cross under the on-airport entry road where it would continue along the north side of North Harbor Drive. At the intersection of North Harbor Drive and Harbor Island Drive, there would be a crossing that connects to the T1 Parking Structure. From there, pedestrians and bicyclists could access all new T1 facilities. At some future time when additional eastbound exit lanes within right-of-way along the north side of North Harbor Drive are implemented (see discussion above under the Heading “On-Airport Vehicle Transportation”), the multi-use path may be realigned to connect with circulation improvements and continue to provide bicycle and pedestrian access from land uses to the east of SDIA.

Parking

Like the proposed project, Alternative 4 would construct a new parking structure south of the new T1, but it would be smaller in size, with only 5,500 spaces instead of 7,500 spaces under the proposed project. The smaller footprint would, in turn, provide space for the “transit-ready” area described above. The 5,500-space parking structure would be a maximum of approximately 2,250,000 square feet, with up to five levels and a maximum height of 60 feet for the main roof deck and 84 feet for the elevator penthouses and light poles. It is important to note that, although the new parking structure would provide 5,500 spaces, the majority of these spaces would offset the loss of existing parking at SDIA. The following table provides a breakdown of parking spaces at SDIA under existing (2018) conditions and at buildout of Alternative 4. As shown in the table, with
implementation of Alternative 4, including the 5,500-space parking structure, there would be a net increase of 650 parking spaces compared to existing conditions.

### Airport Parking Spaces: Existing Conditions, Proposed Project, and Alternative 4

<table>
<thead>
<tr>
<th>Type</th>
<th>Lot</th>
<th>Existing (2018) Baseline</th>
<th>Proposed Project</th>
<th>Buildout of Alternative 4 (2026)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Passenger Parking</strong></td>
<td>T1 Parking</td>
<td>1,200</td>
<td>7,500</td>
<td>5,500</td>
</tr>
<tr>
<td></td>
<td>T2W Surface Lot (NTC)</td>
<td>1,100</td>
<td>900</td>
<td>900</td>
</tr>
<tr>
<td></td>
<td>T2 Parking Plaza</td>
<td>2,900</td>
<td>2,900</td>
<td>2,900</td>
</tr>
<tr>
<td></td>
<td>Long-Term Lot #1 (Harbor Dr.)</td>
<td>1,400</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Economy Lot (Pacific Hwy)</td>
<td>1,950</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Subtotal</td>
<td></td>
<td>11,300</td>
<td>9,300</td>
</tr>
<tr>
<td><strong>Valet Parking</strong></td>
<td>Various</td>
<td>450</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Employee Parking</strong></td>
<td>Admin Building Lot #7</td>
<td>200</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Employee Lot #6 (Harbor Dr.)</td>
<td>1,550</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>ADC Lot (McCain Rd.)</td>
<td>50</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Employee Lot (Pacific Hwy)</td>
<td>0</td>
<td>1,950</td>
<td>1,950</td>
</tr>
<tr>
<td></td>
<td>T2W Employee Lot (NTC)</td>
<td>0</td>
<td>200</td>
<td>200</td>
</tr>
<tr>
<td></td>
<td>Subtotal</td>
<td>1,800</td>
<td>2,150</td>
<td>2,150</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>TOTAL</strong></td>
<td>10,800</td>
<td>13,450</td>
<td>11,450</td>
</tr>
<tr>
<td><strong>APPROXIMATE NET INCREASE</strong></td>
<td></td>
<td></td>
<td>2,650</td>
<td>650</td>
</tr>
</tbody>
</table>


### Central Utility Plant

Alternative 4’s improvements to the Central Utility Plant would be the same as those under the proposed project. Those improvements would include replacement of the existing boilers and chillers, which would increase the heating and cooling capacity at SDIA, improve efficiencies, and reduce energy consumption compared to the existing system.

### Airport Administrative Offices

Similar to the proposed project, Alternative 4 would include demolition of the former 132,000 square-foot Commuter Terminal, where SDCRAA administrative offices are currently located, and construction of a new 150,000 square-foot airport administration office building near the intersection of McCain Road and Airport Terminal Road. Parking for the new airport administration building would be at the existing surface lot located at the current T2 Parking Lot at McCain Road and Airport Terminal Road. The lot would be resurfaced and reconfigured. The new airport administration building developed under Alternative 4 would, however, differ from that of the proposed project in that it would be only 84 feet tall, instead of the 95-foot building height associated with the proposed project.

### Other Improvements

Other improvements associated with the proposed project would be similar to those under Alternative 4, including those related to utilities, including the SAN Stormwater Capture and Reuse System, with the most notable difference being that there would be no utility systems modifications...
in the T2 area, since the new T2-West improvement (i.e., the "Stinger") and replacement of existing T2-East with a linear concourse between T1 and T2-West would not occur under Alternative 4.

**Project Phasing**

Under Alternative 4, the proposed improvements would be implemented in one major phase (Phase 1), with two sub-phases (Phases 1a and 1b), that would ensure that regular airport operations would be maintained at a sufficient level during construction. As indicated earlier, Alternative 4 would not provide for the development of the new T2-West addition (i.e., the “Stinger”) or demolition of existing T2-East and its replacement with a new linear concourse between the new T1 and the existing T2-West. As such, there would be no Phase 2 improvements under Alternative 4. The primary components of Phase 1 under Alternative 4 are the replacement of T1 (including realignment of Taxiway B and construction of a new Taxiway A), a new T1 Parking Structure, a T1 loop road, and the on-airport entry roadway. The following tables provide a detail of the demolition and construction, respectively, that would occur under each sub-phase, and compares the amounts to those that would otherwise occur under the proposed project. As shown in the tables, there is some variation in construction and demolition amounts in Phase 1a and Phase 1b between the proposed project and Alternative 4 although overall, the total amounts of construction and demolition are similar. This difference is accounted for by refinements and minor design variations under Alternative 4 (e.g., preservation of right-of-way on airport property to accommodate potential future off-airport access road and the "transit-ready" area to accommodate potential future regional transit system improvements under Alternative 4).

<table>
<thead>
<tr>
<th>Comparison of Demolition Amounts - Proposed Project and Alternative 4</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Phase</th>
<th>Facility</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>Airport Administration Building</td>
<td>132,000</td>
<td>132,000</td>
</tr>
<tr>
<td>1a</td>
<td>Facilities Maintenance Division (FMD) Administration Building</td>
<td>10,000</td>
<td>10,000</td>
</tr>
<tr>
<td>1a</td>
<td>Triturator &amp; Wash Rack</td>
<td>3,500</td>
<td>3,500</td>
</tr>
<tr>
<td>1a</td>
<td>United Cargo</td>
<td>17,000</td>
<td>17,000</td>
</tr>
<tr>
<td>1a</td>
<td>Southwest Cargo</td>
<td>32,000</td>
<td>32,000</td>
</tr>
<tr>
<td>1a</td>
<td>Air Freight (Southwest, Alaska, Hawaiian, Delta, jetBlue)</td>
<td>30,000</td>
<td>30,000</td>
</tr>
<tr>
<td>1a</td>
<td>Menzies Aviation Maintenance</td>
<td>9,000</td>
<td>9,000</td>
</tr>
<tr>
<td>1a</td>
<td>American Airlines Maintenance</td>
<td>12,000</td>
<td>12,000</td>
</tr>
<tr>
<td>1a</td>
<td>FMD Workshop; Paint Shop &amp; Procurement</td>
<td>29,000</td>
<td>29,000</td>
</tr>
<tr>
<td>1a</td>
<td>FMD Maintenance Shops</td>
<td>25,000</td>
<td>25,000</td>
</tr>
<tr>
<td>1a</td>
<td>Terminal 1 (Gates 1, 1A &amp; 2)</td>
<td>36,000</td>
<td>36,000</td>
</tr>
<tr>
<td>1a</td>
<td>On-Airport Roadways</td>
<td>590,000</td>
<td>590,000</td>
</tr>
<tr>
<td>1a</td>
<td>Administration Building Parking Lot &amp; Access Roads</td>
<td>390,000</td>
<td>390,000</td>
</tr>
<tr>
<td>1a</td>
<td>Taxiway B</td>
<td>300,000</td>
<td>585,000</td>
</tr>
<tr>
<td>1a</td>
<td>Employee/Public Parking Lots</td>
<td>1,003,000</td>
<td>1,493,000</td>
</tr>
<tr>
<td>1a</td>
<td>Terminal 1 Parking Lot</td>
<td>270,000</td>
<td>470,000</td>
</tr>
<tr>
<td>1a</td>
<td>Aircraft Apron</td>
<td>1,415,000</td>
<td>1,265,000</td>
</tr>
<tr>
<td>Phase 1a - Buildings Total</td>
<td>335,500</td>
<td>335,500</td>
<td></td>
</tr>
<tr>
<td>Phase 1a - Surface Elements Total</td>
<td>3,968,000</td>
<td>4,793,000</td>
<td></td>
</tr>
<tr>
<td>Phase 1a – Total</td>
<td>4,303,500</td>
<td>5,128,500</td>
<td></td>
</tr>
</tbody>
</table>
## Comparison of Demolition Amounts - Proposed Project and Alternative 4

<table>
<thead>
<tr>
<th>Phase</th>
<th>Facility</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1b</td>
<td>Terminal 1</td>
<td>300,000</td>
<td>300,000</td>
</tr>
<tr>
<td>1b</td>
<td>Terminal 1 Parking Lot</td>
<td>300,000</td>
<td>100,000</td>
</tr>
<tr>
<td>1b</td>
<td>Aircraft Apron</td>
<td>410,000</td>
<td>580,000</td>
</tr>
<tr>
<td>1b</td>
<td>Employee Parking Lot</td>
<td>490,000</td>
<td>0</td>
</tr>
<tr>
<td>1b</td>
<td>Taxiway B</td>
<td>300,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 1b - Buildings Total</td>
<td></td>
<td>300,000</td>
<td>300,000</td>
</tr>
<tr>
<td>Phase 1b - Surface Elements Total</td>
<td></td>
<td>1,500,000</td>
<td>680,000</td>
</tr>
<tr>
<td>Phase 1b – Total</td>
<td></td>
<td>1,800,000</td>
<td>980,000</td>
</tr>
<tr>
<td>Phase 1 - Buildings Total</td>
<td></td>
<td>635,500</td>
<td>635,500</td>
</tr>
<tr>
<td>Phase 1 - Surface Elements Total</td>
<td></td>
<td>5,468,000</td>
<td>5,473,000</td>
</tr>
<tr>
<td>Phase 1 – Total</td>
<td></td>
<td>6,103,500</td>
<td>6,108,500</td>
</tr>
<tr>
<td>Phase 2a - Buildings Total</td>
<td></td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2a - Surface Elements Total</td>
<td></td>
<td>725,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2a – Total</td>
<td></td>
<td>725,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2b - Buildings Total</td>
<td></td>
<td>350,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2b - Surface Elements Total</td>
<td></td>
<td>540,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2b – Total</td>
<td></td>
<td>890,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2 - Buildings Total</td>
<td></td>
<td>350,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2 - Surface Elements Total</td>
<td></td>
<td>1,265,000</td>
<td>0</td>
</tr>
<tr>
<td>Phase 2 – Total</td>
<td></td>
<td>1,615,000</td>
<td>0</td>
</tr>
<tr>
<td>Demolition Total – Buildings</td>
<td></td>
<td>985,500</td>
<td>635,500</td>
</tr>
<tr>
<td>Demolition Total - Surface Elements</td>
<td></td>
<td>6,773,000</td>
<td>5,473,000</td>
</tr>
<tr>
<td>Demolition Grand Total</td>
<td></td>
<td>7,718,500</td>
<td>6,108,500</td>
</tr>
</tbody>
</table>


## Comparison of Construction Amounts - Proposed Project and Alternative 4

<table>
<thead>
<tr>
<th>Phase</th>
<th>Facility</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>Terminal 1</td>
<td>810,000</td>
<td>835,000</td>
</tr>
<tr>
<td>1a</td>
<td>Terminal 1 Parking</td>
<td>1,500,000</td>
<td>2,250,000</td>
</tr>
<tr>
<td>1a</td>
<td>Airport Administration Building</td>
<td>150,000</td>
<td>150,000</td>
</tr>
<tr>
<td>1a</td>
<td>Existing CUP Capacity Expansion</td>
<td>12,000</td>
<td>12,000</td>
</tr>
<tr>
<td>1a</td>
<td>Aircraft Apron</td>
<td>1,230,000</td>
<td>1,120,000</td>
</tr>
<tr>
<td>1a</td>
<td>Taxiway A</td>
<td>385,000</td>
<td>506,000</td>
</tr>
<tr>
<td>1a</td>
<td>Taxiway B</td>
<td>360,000</td>
<td>640,000</td>
</tr>
<tr>
<td>1a</td>
<td>Terminal/Airport Access Roads</td>
<td>654,300</td>
<td>654,300</td>
</tr>
<tr>
<td>1a</td>
<td>Aircraft Overnight Parking</td>
<td>230,000</td>
<td>230,000</td>
</tr>
<tr>
<td>Phase 1a - Buildings Total</td>
<td></td>
<td>2,472,000</td>
<td>3,247,000</td>
</tr>
<tr>
<td>Phase 1a - Surface Elements Total</td>
<td></td>
<td>2,859,300</td>
<td>3,150,300</td>
</tr>
<tr>
<td>Phase 1a – Total</td>
<td></td>
<td>5,331,300</td>
<td>6,397,300</td>
</tr>
</tbody>
</table>
Comparison of Construction Amounts - Proposed Project and Alternative 4

<table>
<thead>
<tr>
<th>Phase</th>
<th>Facility</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1b</td>
<td>Terminal 1</td>
<td>400,000</td>
<td>375,000</td>
</tr>
<tr>
<td>1b</td>
<td>Terminal 1 Parking</td>
<td>1,280,000</td>
<td>0</td>
</tr>
<tr>
<td>1b</td>
<td>Aircraft Apron</td>
<td>260,000</td>
<td>285,000</td>
</tr>
<tr>
<td>1b</td>
<td>Taxiway A</td>
<td>380,000</td>
<td>269,000</td>
</tr>
<tr>
<td>1b</td>
<td>Taxiway B</td>
<td>290,000</td>
<td>0</td>
</tr>
<tr>
<td>1b</td>
<td>Terminal Area Road-On Grade</td>
<td>20,000</td>
<td>20,000</td>
</tr>
<tr>
<td>1b</td>
<td>Transit-Ready Area</td>
<td>0</td>
<td>100,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phase</th>
<th>Total Number of Gates at SDIA</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1b - Buildings Total</td>
<td>1,680,000</td>
<td>375,000</td>
<td></td>
</tr>
<tr>
<td>Phase 1b - Surface Elements Total</td>
<td>950,000</td>
<td>674,000</td>
<td></td>
</tr>
<tr>
<td>Phase 1 - Total</td>
<td>2,630,000</td>
<td>1,049,000</td>
<td></td>
</tr>
<tr>
<td>Phase 1 - Buildings Total</td>
<td>4,152,000</td>
<td>3,622,000</td>
<td></td>
</tr>
<tr>
<td>Phase 1 - Surface Elements Total</td>
<td>3,809,300</td>
<td>3,824,300</td>
<td></td>
</tr>
<tr>
<td>Phase 1 – Total</td>
<td>7,961,300</td>
<td>7,446,300</td>
<td></td>
</tr>
<tr>
<td>Phase 2a - Buildings Total</td>
<td>850,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2a - Surface Elements Total</td>
<td>520,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2a – Total</td>
<td>1,370,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2b - Buildings Total</td>
<td>250,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2b - Surface Elements Total</td>
<td>560,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2b – Total</td>
<td>810,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2 - Buildings Total</td>
<td>1,100,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2 - Surface Elements Total</td>
<td>560,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Phase 2 – Total</td>
<td>2,180,000</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Project Total – Buildings</td>
<td>5,252,000</td>
<td>3,622,000</td>
<td></td>
</tr>
<tr>
<td>Project Total - Surface Elements</td>
<td>4,889,300</td>
<td>3,824,300</td>
<td></td>
</tr>
<tr>
<td>Grand Total</td>
<td>10,141,300</td>
<td>7,446,300</td>
<td></td>
</tr>
</tbody>
</table>


Aircraft Gates

The following table provides a comparison of the number of aircraft gates at each subphase of development under the proposed project and Alternative 4.

Number of Airport Gates at SDIA by Project Construction Phases - Proposed Project Compared to Alternative 4

<table>
<thead>
<tr>
<th>Terminal</th>
<th>Existing</th>
<th>Phase 1a</th>
<th>Phase 1b</th>
<th>Phase 2a</th>
<th>Phase 2b</th>
<th>Proposed Project</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></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>
</tr>
</tbody>
</table>
Implementation of Alternative 4: T1 Replacement and Transportation Improvements, would result in construction-related impacts that would, for most environmental issue areas, be generally comparable to those of the proposed project; however, relative to construction-related air pollutant emissions, would reduce significant impacts. The operations-related impacts of Alternative 4 would be less than those of the proposed project relative to traffic, air quality, greenhouse gas, cultural resources, and roadway noise. Implementation of Alternative 4 would meet all of the Project Objectives, as summarized below.

- **Goal:** Develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction that reflect the local feel and uniqueness of San Diego. *Alternative 4 – As with the proposed project, the new T1 would provide improvement to passenger service and efficiency. No new stinger would be constructed and no improvements to T2 would occur under Alternative 4, although interior renovations and upgrades would likely occur in the future as normal business practice.*

  - **Objectives:**
    - Maintain appropriate level of service on the curbside, security checkpoints, passenger holdrooms, and bag claim areas. *Alternative 4 – the new T1 would provide the desired levels of service.*
    - Optimize airport concessions to meet demand and generate revenue for SDIA. *Alternative 4 – This objective could be met under Alternative 4.*
    - Minimize walking distances and mode changes from curbside to aircraft gate. *Alternative 4 – the design of the new T1 would meet this objective, although no linear concourse between the new T1 and the existing T2-West would be implemented.*
    - Address T1 functional deficiencies, including replacement if necessary. *Alternative 4 – this objective would be met under Alternative 4 through the replacement of the existing T1 with a new T1.*
o Develop a plan that can be implemented in a phased manner. *Alternative 4 – This objective would be met under Alternative 4.*

o Make the terminal a showplace of functionality and design that reflects the local feel and uniqueness of San Diego. *Alternative 4 – the new T1 would meet this objective.*

- **Goal:** Plan for an operationally efficient airfield that meets FAA standards
  - **Objectives:**
    - Improve and optimize airfield configuration for safety, efficiency, and capacity. *Alternative 4 – Alternative 4 would meet this objective.*
    - Develop a plan to eliminate any existing modifications to standards as soon as feasibly practical and do not create conditions warranting additional modifications or waivers from the FAA. *Alternative 4 – Alternative 4 does not affect this objective.*
    - Provide flexibility to respond to future aircraft, technology, and industry changes. *Alternative 4 – Alternative 4 does not affect this objective.*

- **Goal:** Provide a plan that is fiscally and environmentally sustainable. *Alternative 4 – Replacing the existing T1, which relatively old and inefficient, with new environmentally efficient construction would meet this objective. Although there would be no improvements to T2-East under Alternative 4, interior renovations and upgrades would likely occur in the future as a normal business practice.*
  - **Objectives:**
    - Wherever prudent, make use of existing facilities through renewal or modernization to meet future demand. *Alternative 4 – Based on the age, condition, size, and nature of existing T1, renewal and modernization of that facility, in lieu of replacement, is not considered prudent. Further, the footprint of existing T1 cannot be modified to accommodate an increase in the number of security screening lanes without a major structural modification that would affect the number of gates. As such, replacement of T1 with a new facility is more appropriate. There would be no improvements to T2-East under Alternative 4, however, interior renovations and upgrades would likely occur in the future as a normal business practice.*
    - Ensure the development plan is fiscally responsible from both the capital and operational cost perspectives. *Alternative 4 – the replacement of T1 with a new facility and the resultant reduction of long-term costs of ongoing maintenance and operation, as compared with retaining the existing T1, would strengthen the financial position of the Airport.*
    - Provide plans that will diversify airport revenues and strengthen the financial position of SDIA. *Alternative 4 – Same as above, Alternative 4 would meet this objective.*
- Maximize funding resources through appropriate facility planning. *Alternative 4 – Same as above, Alternative 4 would meet this objective.*

- Continue to implement sustainability measures at SDIA, and monitor and report on those measures consistent with Global Reporting Initiative (GRI) Sustainability Reporting Standards. *Alternative 4 – the replacement of the existing T1 with new construction that exceeds the State of California’s current energy efficiency requirements would meet this goal.*

**Goal: Optimize the productive use of SDIA properties.**

- **Objectives:**
  - Maximize non-airline revenues. *Alternative 4 – Alternative 4 does not affect this objective.*
  - Identify opportunities for increased commercial utilization. *Alternative 4 – Alternative 4 does not affect this objective.*

**Goal: Provide a plan that meets the aviation need of the San Diego region in a socially responsible manner.**

- **Objectives:**
  - Support increases in air service demand for commercial passenger service to meet the needs of the San Diego regional economy and businesses. *Alternative 4 – Alternative 4 meets this objective.*
  - Implement airport improvements in a sustainable manner and consider the total cost of ownership including financial, environmental, and social costs. *Alternative 4 – Alternative 4 would provide for airport improvements in a sustainable manner and considers the total cost of ownership.*

**Goal: Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand.** *Alternative 4 – Alternative 4 would provide for improved ground access with the new on-airport roadway and parking structure. Additionally, Alternative 4 provides improvements to enhance transit service. In addition to transit improvements that would occur under the proposed project, Alternative 4 includes preservation of a portion of SDIA as a “transit-ready” area to accommodate potential future regional transit system improvements that would link to SDIA.*

- **Objectives:**
  - Provide enhanced vehicular access from Harbor Drive to SDIA. *Alternative 4 – Alternative 4 meets this objective.*
  - Improve mobility for private vehicles, transit users, and bicyclist/pedestrians along the North Harbor Drive corridor. *Alternative 4 – Alternative 4 meets this objective.*
Improve transit connections to the existing transit system planned by the San Diego Association of Governments (SANDAG) and operated by the San Diego Metropolitan Transit System (MTS) including bus shuttle service to light rail stations and transit centers (Santa Fe Depot and Old Town Transit Centers). *Alternative 4 – Alternative 4 meets this objective.*

Accommodate demand for short-term and long-term parking spaces on-airport to ensure sufficient passenger satisfaction and appropriate revenue generation. *Alternative 4 – Alternative 4 includes a parking structure and would meet this objective.*

Based on the above comparison of environmental impacts associated with each alternative, Alternative 2 is considered to be the environmentally superior alternative as it would reduce the significant impacts related to air quality, GHG emissions, traffic, and historical resources that would otherwise occur under the proposed project, both in terms of construction-related impact and operations-related impacts. Implementation of Alternative 2 would not, however, meet most of the project objectives.

Implementation of Alternative 4 would also result in reduced impacts related to air quality, GHG emissions, traffic, historical resources, and roadway noise, but, unlike Alternative 2, implementation of Alternative 4 would meet all of the project objectives. Alternative 4 is environmentally superior to the proposed project, is considered feasible, and would meet all of the project objectives.

Although the No Project Alternative would avoid all the construction-related impacts of the proposed project, most of those construction impacts are less than significant, with the exception of construction-related traffic impacts. Moreover, the operational impacts of the No Project Alternative, including those related to air quality and GHG emissions, would be greater than the unavoidable significant impacts of the proposed project.

It should be noted that all of the mitigation measures identified in Section 8 above for the proposed project would be equally applicable to Alternative 4, with the following three exceptions:

1) The text of Mitigation Measure MM-HR-1 for Alternative 4 is modified to delete reference of existing Terminal 2-East (a significant historical building), as unlike the proposed project, Terminal 2-East would not be removed/affected by Alternative 4.

**MM-HR-1: Preparation of Historic American Buildings Survey (HABS) Documentation (Alternative 4).** An Historic American Buildings Survey (HABS) report has been completed for each of the two significant historic resources that would be impacted by the ADP; those two resources being (1) the United Airlines Hangar and Terminal Building, and (2) the existing Terminal 1. The two HABS reports are contained in Appendix R-F of the EIR. Each HABS report provides a description and supporting documentation related to the following aspects of each resource:

- Historical Information
- Physical History
- Historical Context
- Architectural Information
  - Architectural Character
  - Description of Exterior
  - Description of Interior
  - Site Information (i.e., landscaping)
- Sources of Information
  - Architectural Drawings
  - Photographs

Copies of the two HABS reports will be kept available for public review at the SDCRAA Administrative Office at SDIA. This measure is considered feasible.

2) In Section 8.14.3 regarding Significant Effects 2 through 10 associated with traffic and circulation impacts, 19 mitigation measures are delineated for those impacts, including MM-TR-LRP-1, Airport Regional Connections. For Alternative 4, a comparable equivalent mitigation measure is proposed in place of MM-TR-LRP-1. That replacement mitigation measure, which is presented in Chapter 3 of the Final EIR, is specific to Alternative 4 and is as follows:

**MM-TR-LRP-2: **Airport Regional Connections. Prior to 2035, the SDCRAA shall participate in regional efforts to develop a long-range transportation solution for accessing the Airport, including the following measures: 1. Participate in regional planning efforts led by SANDAG (Airport Connections Study) to determine transit connections between regional transit and the Airport terminals, freeway connections along the Laurel Street corridor, intelligent transportation systems, and mobility hub improvements/strategies; 2. Preserve space within Airport property to accommodate a transit station located near the terminals and an on-Airport exit roadway; 3. Study and design the outbound roadway and coordinate with SANDAG, the City of San Diego, the Port of San Diego, and other agencies, as applicable, to entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed; and 4. Participate in the implementation of improvements and strategies identified in the Airport Connections Study. To the extent that any of the four measures described above requires funding that must be pre-approved by the FAA, SDCRAA will request and make best efforts to secure such approval.
1. SDCRAA is fully engaged with other stakeholders in SANDAG’s committee and subcommittees, which are tasked with developing regional solutions for improving access to the Airport. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. SDCRAA has shared data, plans, concepts, and studies. In addition, SDCRAA shall provide feedback on suggested options.

2. The ADP has allocated a site to accommodate a potential transit station within Airport property in proximity to passenger terminals. The ADP also preserves space for an exit roadway on Airport property that could be built in conjunction with new freeway access ramps and enhanced capacity within the Laurel Street corridor.

3. SDCRAA understands that the outbound Airport roadway is an important component to the region’s vision for transit and SDCRAA shall be fully engaged with other stakeholders in studying, designing, entitling and, if and when the outbound roadway is needed, implementing the outbound roadway. Other stakeholders include SANDAG, City of San Diego, MTS, Caltrans, US Navy and Marine Corps, and the Port of San Diego. If any of these measures described above requires FAA funding approval, then SDCRAA will request such funding and make best efforts to secure such approval.

4. SDCRAA will fund its fair share of agreed-to improvements to implement long-term regional solutions identified by SANDAG’s Airport Connections Study, and the outbound roadway, if and when needed, subject to a FAA concurrence to use Airport funding for these purposes. Proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently not considered feasible, because the Mitigation Measure would be within the control of other agencies or jurisdictions, and would require FAA approval of funding. For example, portions of Mitigation Measure MM-TR-LRP-2 require physical improvements to facilities and/or VMT reduction items that would be located within the jurisdictions of, or must be implemented by, other public agencies or departments. Although these improvements and VMT reduction items may prove to be considered physically feasible, SDCRAA could not require those agencies or departments to implement any as yet unidentified improvements or VMT reduction programs or the street and intersection connections for the outbound roadway. SDCRAA will, however, continue to collaborate with the other public agencies and departments to implement any agreed-upon improvement items and/or VMT
reduction programs (consistent with CEQA Guidelines section 15064.3) relating to the Airport. Also, due to FAA regulations, proposed Mitigation Measure MM-TR-LRP-2 currently could not be implemented and is presently not considered feasible, because the FAA may decide not to authorize the use of any FAA grant funds or SDIA revenue to be used to construct or fund any off-Airport improvements, programs to reduce VMT, connections for the outbound roadway, or other mitigation measures. As discussed in Section 3.14.6 of the Recirculated Draft EIR, SDCRAA will continue to work with the FAA to seek that agency’s required approval of funding for the as yet unidentified off-Airport improvement or VMT reduction items and as of yet unidentified street and intersection connections for the outbound roadway once designed. If the funding is granted (and the other agencies agree to implement or give approval to the SDCRAA to implement), then the Mitigation Measure would be feasible. If the FAA does not approve the funding, then the Measure would be infeasible.

3) In Section 8.14.3 regarding Significant Effects 2 through 10 associated with traffic and circulation impacts, 19 mitigation measures are delineated for those impacts. Mitigation Measure MM-TDM-1: TDM and Transit Measures is only applicable to the proposed project, and is not applicable to Alternative 4. As explained in Section 3, Background, above, Alternative 4 would provide near-term (or first phase) transit service improvements at SDIA, including an airport shuttle service to and from the Old Town Transit Center, which is an intermodal transit station with connections for commuter and inter-city rail service (Amtrak/North County Transit District’s COASTER), light rail service (San Diego Trolley), and San Diego Metropolitan Transit System (MTS) bus lines. SDCRAA would also work with the MTS to upgrade Bus Route 992 transit service between downtown and SDIA, including the connection to the Santa Fe Depot. This would include the following measures to increase ridership by reducing the travel time along the route: 1) allow 992 buses to use the new on-airport access road including preferential locations at the terminals for bus stops; and 2) provide space for a kiosk and fare purchase station at a convenient location within the new, replacement Terminal 1 (implemented in January 2016 at existing Terminals 1 and 2). While the airport shuttle service to and from the Old Town Transit Center and improvements to Bus Route 992 service to and from SDIA are included as project features of Alternative 4, these transit improvements could also occur as mitigation measures for traffic impacts associated with the proposed project [i.e., MM-TDM-1].

Based on the above, Alternative 4 is the SDCRAA Staff Recommended Alternative over the proposed project. As such, and as allowed by Section 15092 of the CEQA Guidelines, the Authority may decide to carry out the ADP through approval of Alternative 4 instead of the proposed project identified in the EIR.

11. Independent Review and Analysis
Under CEQA, the lead agency must (1) independently review and analyze the EIR, (2) circulate draft documents that reflect its independent judgment, and as part of the certification of an EIR, (3) find that the report or declaration reflects the independent judgment of the lead agency. Cal. Pub. Res. Code, § 21082.1(c).

The Authority independently reviewed and analyzed the Final EIR and determined that the Final EIR reflects its independent judgment. Moreover, upon completing this review and making this determination, the Authority circulated the Recirculated Draft EIR, as described above. With the adoption of these findings, the Authority finds that the Final EIR reflects its independent judgment.
RESOLUTION NO. 2020-0002

A RESOLUTION OF THE BOARD OF THE SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY, ADOPTING SAN DIEGO INTERNATIONAL AIRPORT DEVELOPMENT PLAN – ALTERNATIVE 4

WHEREAS, the San Diego County Regional Airport Authority Act (Act) created the San Diego County Regional Airport Authority (Authority) and charged the Authority with planning for the future of air transportation for the San Diego region; and

WHEREAS, pursuant to the Act, the Authority was given control over the San Diego International Airport (SDIA) and exclusive jurisdiction to study, plan and implement any improvements, expansion, or enhancements at any airport within its control; and

WHEREAS, the Authority conducted a detailed, objective, and open public planning process to assess the air transportation needs of the San Diego region and the ability of SDIA to meet those needs; and

WHEREAS, as part of that process the Authority prepared and published an aviation activity forecast in April 2019 that analyzed future aviation activity and demand in the San Diego region; and

WHEREAS, the Federal Aviation Administration (FAA) reviewed and approved the forecast in June 2019; and

WHEREAS, the forecast, based on regional growth and economic trends, indicated that demand for the use of facilities at SDIA would grow continuously over the coming years and that the maximum number of flights that SDIA could accommodate continues to be constrained by the facility’s existing single runway; and

WHEREAS, the analyses indicate that over time the existing SDIA terminal areas, including passenger hold rooms, will become congested with increases in passenger volume, and that such congestion, along with aircraft operational complexity, would cause severe passenger inconveniences and related poor passenger service levels; and

WHEREAS, the analyses indicate that the existing facilities will become inadequate to handle the forecast passenger volume set forth in the FAA-approved forecast at a level of service that is consistent with airport industry standards; and
WHEREAS, the Authority gathered information from the public and experts in the field of airport planning and operations and, based on that information, prepared an Airport Development Plan to address the passenger congestion problems and declining passenger service levels; and

WHEREAS, the Authority commenced the preparation of an Environmental Impact Report in accordance with the California Environmental Quality Act (CEQA) on the proposed Airport Development Plan; and

WHEREAS, the Authority circulated a Draft Environmental Impact Report in July 2018 (2018 Draft EIR), which examined environmental issues related to the proposed Airport Development Plan to the year 2035; and

WHEREAS, in response to public and governmental agency comments received on the 2018 Draft EIR, the Authority determined that it would withdraw the 2018 Draft EIR and prepare and recirculate an entirely new Draft Environmental Impact Report in September 2019 (2019 Recirculated Draft EIR), which considered potential environmental impacts of the Airport Development Plan, and opened a new public comment period on the 2019 Recirculated Draft EIR; and

WHEREAS, the Authority provided a total of 46 days for the public and governmental agencies to review and comment on the 2019 Recirculated Draft EIR, and then upon expiration of the 46 days, closed the public comment period; and

WHEREAS, the Authority, as the lead agency under CEQA, the proponent of the Airport Development Plan and airport proprietor, set forth certain goals and objectives to guide it during the preparation of the 2019 Recirculated Draft EIR, including, but not limited to the following:

(i) Goal: Develop passenger terminal facilities to efficiently accommodate future activity levels and maintain high levels of passenger satisfaction that reflect the local feel and uniqueness of San Diego

- Objectives:
  - Maintain appropriate level of service on the curbfront, security checkpoints, passenger holdrooms, and bag claim areas.
  - Optimize airport concessions to meet demand and generate revenue for SDIA.
  - Minimize walking distances and mode changes from curbside to aircraft gate.
Address T1 functional deficiencies, including replacement if necessary.

Develop a plan that can be implemented in a phased manner.

Make the terminal a showplace of functionality and design that reflects the local feel and uniqueness of San Diego.

(ii) Goal: Plan for an operationally efficient airfield that meets FAA standards

- Objectives:
  
  - Improve and optimize airfield configuration for safety, efficiency, and capacity.
  
  - Develop a plan to eliminate any existing modifications to standards as soon as feasibly practical and do not create conditions warranting additional modifications or waivers from the FAA.
  
  - Provide flexibility to respond to future aircraft, technology, and industry changes.

(iii) Goal: Provide a plan that is fiscally and environmentally sustainable

- Objectives:
  
  - Wherever prudent, make use of existing facilities through renewal or modernization to meet future demand.
  
  - Ensure the development plan is fiscally responsible from both the capital and operational cost perspectives.
  
  - Provide plans that will diversify airport revenues and strengthen the financial position of SDIA.
  
  - Maximize funding resources through appropriate facility planning.
  
  - Continue to implement sustainability measures at SDIA, and monitor and report on those measures consistent with Global Reporting Initiative (GRI) Sustainability Reporting Standards.¹

(iv) Goal: Optimize the productive use of SDIA properties

---

Objectives:

- Maximize non-airline revenues.
- Identify opportunities for increased commercial utilization.

Goal: Provide a plan that meets the aviation needs of the San Diego region in a socially responsible manner

Objectives:

- Support increases in air service demand for commercial passenger service to meet the needs of the San Diego regional economy and businesses.
- Implement airport improvements in a sustainable manner and consider the total cost of ownership including financial, environmental, and social costs.

Goal: Improve ground access to SDIA, including coordination of transit service and facilities that interface with regional systems, and accommodate parking demand

Objectives:

- Provide enhanced vehicular access from Harbor Drive to SDIA.
- Improve mobility for private vehicles, transit users, and bicyclist/pedestrians along the North Harbor Drive corridor.
- Improve transit connections to the existing transit system planned by SANDAG and operated by MTS, including bus shuttle service to light rail stations and transit centers (Santa Fe Depot and Old Town Transit Centers).
- Accommodate demand for short-term and long-term parking spaces on-airport to ensure sufficient passenger satisfaction and appropriate revenue generation; and

WHEREAS, the Authority thereafter reviewed and responded to all public and agency comments submitted on the 2019 Recirculated Draft EIR during the public comment period; and

WHEREAS, the Final Environmental Impact Report (Final EIR) was published in December 2019; and
WHEREAS, after conducting a duly noticed public hearing on January 9, 2020, the Authority adopted Resolution No. 2020-0001, which certified the Final EIR for the proposed San Diego International Airport Development Plan and adopted CEQA Findings of Fact, a Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program for the Airport Development Plan; and

WHEREAS, the Final EIR analyzed and addresses the specific structures and facilities recommended in the Airport Development Plan at a project level; and

WHEREAS, the Airport Development Plan identifies specific structures and facilities that the Authority staff have recommended be constructed and developed to address the forecasted congestion problems and declining passenger service levels, but does not commit the Authority to the construction or development of any specific structure of facility; and

WHEREAS, before the Authority legally can or will commit to develop or construct a specific structure or facility to carry into effect the Airport Development Plan, the Authority must take additional discretionary actions, such as competitive procurement processes and subsequent approval of construction contracts, and the determination of the manner and availability of funding for any such improvements, and, in addition, the Authority must apply for and obtain from the FAA, federal environmental review under the National Environmental Policy Act (conducted by the FAA), FAA approval of an Airport Layout Plan, FAA approval of the location and design of the structure or facility, and in all probability, FAA grants under the federal Airport Improvement Program and FAA approval of the collection and use of Passenger Facility Charges (PFC); and

WHEREAS, the Authority reviewed, commented on, and approved all documents and materials prepared by and relied upon by its consultants in preparing the Final EIR; and

WHEREAS, the Final EIR evaluated the potential environmental impacts that could result from the adoption of the proposed Airport Development Plan (and, in particular, focused on potentially significant impacts of the specific structures and facilities listed in the Airport Development Plan); and

WHEREAS, the Final EIR identified and recommended feasible mitigation measures to reduce the significant impacts of the proposed Airport Development Plan to a less-than-significant level; and

WHEREAS, these mitigation measures were gathered and set forth in the Mitigation Monitoring and Reporting Program (MMRP) adopted in conjunction with certification of the Final EIR; and
WHEREAS, the Final EIR analyzed a reasonable range of alternatives to the proposed Airport Development Plan to determine if any such alternative would feasibly avoid or reduce those potentially significant impacts of the proposed Airport Development Plan to a less-than-significant level; and

WHEREAS, one of the alternatives analyzed in the Final EIR, Alternative 4, would (i) reduce and/or eliminate some of the significant impacts of the proposed Airport Development Plan, (ii) not result in additional or more severe significant impacts than would the proposed Airport Development Plan, and (iii) would include transit improvements not included in the proposed Airport Development Plan; and

WHEREAS, the Final EIR identifies Alternative 4 as the environmentally superior alternative capable of meeting all of the identified project objectives; and

WHEREAS, Authority staff has recommended Alternative 4 for adoption as the preferred Airport Development Plan (the Alternative 4 ADP); and

WHEREAS, some potentially significant impacts may remain after implementation of the Alternative 4 ADP, because the mitigation measures needed to reduce those impacts to a less-than-significant level are infeasible or lie within the responsibility and jurisdiction of another agency, thus precluding the Authority from guaranteeing implementation of such mitigation measures, the Authority adopted a Statement of Overriding Considerations as set forth in Exhibit B to Resolution No. 2020-0001; and

WHEREAS, the Authority certifies that the mitigation measures set forth in the MMRP, attached to Resolution No. 2020-0001 as Exhibit A, are specific and are incorporated into the Alternative 4 ADP, as applicable; and

WHEREAS, the Authority certifies that the MMRP satisfies the requirements of CEQA; and

WHEREAS, the Final EIR consists of the 2019 Recirculated Draft EIR and any clarifying changes thereto, Comments and Responses to Comments on the 2019 Recirculated Draft EIR, all appendices, and any documents or materials incorporated in the EIR by reference; and

WHEREAS, the Final EIR was prepared, published, circulated, reviewed, and completed in accordance with the requirements of CEQA and the CEQA Guidelines, and thus constitutes an adequate, accurate, objective, and complete Final EIR in accordance with the requirements of CEQA and the CEQA Guidelines; and
WHEREAS, the Final EIR reflects the best efforts of the Authority to undertake all reasonably feasible and prudent actions to discover, analyze, disclose, and mitigate all potentially significant environmental impacts of the Project; and

WHEREAS, the specific physical improvements in the Alternative 4 ADP, individually and collectively, would allow SDIA to effectively continue its mission of serving San Diego’s commercial air transportation needs as forecasted through 2035; and

WHEREAS, the structures and facilities identified in the Alternative 4 ADP, individually and collectively, would improve airport traffic flow, maintain a better level of service for the growing number of passengers and enable SDIA to effectively continue its mission of serving San Diego’s commercial air transportation needs as forecasted through 2035, but would not increase the aircraft operational capacity of SDIA beyond that which exists at this time with existing facilities; and

WHEREAS, all construction or development of individual facilities would be implemented with due regard for existing contractual rights of private parties and public agencies, and applicable law and regulations; and

WHEREAS, the Authority may in the future modify or amend the Alternative 4 ADP to respond to, among other things, changes in the demand for Airport facilities as identified in future passenger, operations, and cargo forecasts or experience, in response to FAA policies, or in response to social, environmental, technical, or economic circumstances.

NOW, THEREFORE, BE IT RESOLVED, that the San Diego County Regional Airport Authority Board, on behalf of the Authority and in the exercise of its independent judgment, and based upon all the evidence in the record finds and determines as follows:

1. The recitals above are true and correct and are incorporated herein by reference.

2. The physical improvements, and the structures and facilities identified in the Alternative 4 ADP, individually and collectively, would improve airport traffic flow, maintain a better level of service for the growing number of passengers, and enable SDIA to effectively continue its mission of serving the San Diego region’s commercial air transportation needs as forecasted through 2035, but would not increase the aircraft operational capacity of SDIA beyond that which exists at this time with existing facilities.
3. Adoption of the Alternative 4 ADP does not commit the Authority to the
construction or development of any specific structure or facility.

4. The CEQA Findings of Fact, attached as Exhibit C to Resolution 2020-0001, as they relate to the Alternative 4 ADP are true and correct and
are incorporated herein by reference. The references below to the
CEQA Findings of Fact include those pertaining to the originally
proposed project, as presented in Section 8 of the CEQA Findings of
Fact, and those pertaining to the Alternative 4 ADP, as presented in
Section 10.4 of the CEQA Findings of Fact. In particular, the Board
finds and affirms that:

- As set forth more fully in Section 8 of the CEQA Findings of
  Fact, adoption of Alternative 4 ADP would have no impacts
  related to: agriculture and forestry resources; mineral resources;
  population and housing; and wildfire.

- As set forth more fully in Sections 8.1, 8.7, 8.8, 8.10, 8.12, 8.13,
  8.14, 8.15, and 10.4 of the CEQA Findings of Fact, adoption of
  the Alternative 4 ADP will have less-than-significant adverse
  environmental impacts on: aesthetics and visual resources;
  tribal cultural resources; geology and soils; hydrology and water
  quality; construction noise; public services; railroad street
  crossings; and utilities.

- As set forth more fully in Sections 8.4, 8.5, 8.9, and 10.4 of the
  CEQA Findings of Fact, adoption of the Alternative 4 ADP will
  have less-than-significant adverse environmental impacts after
  incorporation of mitigation measures on: human health risk;
  biological resources; and hazardous materials.

- As set forth more fully in Sections 8.2 and 10.4 of the CEQA
  Findings of Fact, the Alternative 4 ADP will have the following
  significant and unavoidable impacts on air quality: emissions of
  volatile organic compounds (VOCs), oxides of nitrogen (NOx),
  carbon monoxide (CO), and sulfur oxides (SOx). Additionally,
  existing background concentrations of particulate matter with an
  aerodynamic diameter less than or equal to 10 micrometers
  (PM10) currently exceed state standards within San Diego
  county, and the increase in PM10 concentrations associated with
  project operations would increase that existing exceedance,
  which would be a significant impact. Also, operation of the
  Alternative 4 ADP at buildout in 2035 and in 2050 would
  contribute to a cumulatively considerable net increase of VOCs
  and NOx, which are precursors to ozone (O3), for which the San
  Diego air basin is in nonattainment under federal and state
ambient air quality standards. This would be a significant and unavoidable cumulative impact. The primary sources of these air pollutants are related to aircraft operations and motor vehicle operations. Notwithstanding that mitigation measures related to aircraft operations (i.e., MM-AQ/GHG-1) and motor vehicle operations (i.e., MM-AQ/GHG-5, MM-AQ/GHG-6, MM-AQ/GHG-7, MM-AQ/GHG-8, MM-AQ/GHG-9, and MM-TR-LRP-2) are included in Alternative 4 ADP along with transit system improvement features of Alternative 4 ADP, the only way to reduce aircraft- and motor vehicle-related air quality impacts to a less-than-significant level would be to substantially reduce such operations. The ability to do so, however, is beyond the control of the Authority and is not considered a feasible mitigation measure, and thus these air quality impacts are considered significant and unavoidable. As such, the Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse air quality impacts and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

- Construction-related emissions associated with the Alternative 4 ADP would be less than significant; however, construction of the Alternative 4 ADP in conjunction with other projects anticipated to be under construction during that same period would result in a significant impact relative to cumulative emissions for VOCs, NOx, and PM10, of which the Alternative 4 ADP’s contribution to that significant impact would be cumulatively considerable for NOx and PM10. There are no feasible mitigation measures within the control of the Authority to reduce to less than significant the cumulative emissions from all projects under construction at the same time as the Alternative 4 ADP, and the Authority already includes in construction contract requirements for SDIA project provisions related to the use of clean-fuel construction vehicles with pollution-control technology or low-emission construction vehicles. As such, the Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse air quality impacts and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

- As set forth more fully in Sections 8.3 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP will have a significant and unavoidable impact on Greenhouse Gases and Climate Change. More specifically, construction and operation of the
Alternative 4 ADP would generate more greenhouse gases (GHGs) than currently occur under baseline conditions (i.e., more than a 40 percent increase over baseline conditions), which may result in a significant impact on the environment. Construction and operation of the Alternative 4 ADP would also conflict with some applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs, which would also be a significant impact. Similar to above for air quality, the vast majority (i.e., over 90 percent) of GHG emissions are from aircraft and motor vehicle operations. Although mitigation measures MM-AQ/GHG-1 through MM-AQ/GHG-9, along with MM-TR-LRP-2, would serve to reduce GHG emissions, the only way to reduce GHG emission to a less-than-significant impact would be to substantially reduce aircraft and motor vehicle operations. The ability to do so, however, is beyond the control of the Authority, and is therefore not considered a feasible mitigation measure. As such, the GHG impacts are considered significant and unavoidable. The Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse GHG impacts and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

- As set forth more fully in Sections 8.6 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP will have a significant and unavoidable impact on cultural resources, specifically as related to the demolition and removal of Terminal 1, which is considered to be a significant historical building. Mitigation Measure MM-HR-1 calls for the preparation of Historic American Buildings Survey (HABS) documentation, which will document and memorialize the history and architectural characteristics of Terminal 1, and Mitigation Measure MM-HR-4 will provide for an interpretative display that will make the HABS information, as well as other information regarding the history of Terminal 1, available to the general public. Nevertheless, the permanent loss of Terminal 1, through its demolition and removal, would be a significant and unavoidable impact. As such, the cultural resources impacts are considered significant and unavoidable. The Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse cultural resources impact and found that the impact is acceptable after considering the other benefits of the Alternative 4 ADP.
As set forth more fully in Sections 8.9 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP will have a significant and unavoidable impact related to hazards, specifically as related to noise impacts. As further discussed below, relative to noise impacts addressed in Section 8.12 of the CEQA Findings of Fact, operation of the Alternative 4 ADP will result in significant aircraft and motor vehicle noise impacts. For the reasons stated in the discussion below, noise impacts are considered significant and unavoidable. The Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse noise impacts, as also considered to be a hazards impact, and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

As set forth more fully in Sections 8.11 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP will have a significant and unavoidable impact related to land use and planning, specifically as related to future project-related noise and traffic impacts conflicting with certain aspects of land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As further discussed below, relative to noise impacts addressed in Section 8.12 of the CEQA Findings of Fact, and relative to traffic impacts in Section 8.14 of the CEQA Findings of Fact, operation of the Alternative 4 ADP will result in significant noise impacts and traffic impacts. For the reasons stated in those discussions below, noise impacts and traffic impacts are considered significant and unavoidable. The Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse land use and planning impacts, specifically as related to noise and traffic impacts, and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

As set forth more fully in Sections 8.12 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP will have significant and unavoidable impacts related to aircraft noise and roadway noise. Airport operations at SDIA in future years (i.e., 2024, 2026, 2030, 2035, and 2050) would generate aircraft noise that, as compared to the existing (2018) baseline condition, would: increase noise levels at exterior use areas of residences and other noise-sensitive uses to noise levels of 65 CNEL or above; cause a 1.5 dB or more increase resulting in noise-sensitive areas being exposed to 65 CNEL or greater; cause a 3 dB or more increase resulting in noise-sensitive areas being exposed
to 60 CNEL to less than 65 CNEL; and cause a substantial increase in the number of nighttime flight operations that produce exterior SELs sufficient to awaken an increasing proportion of the population. Mitigation Measures MM-NOI-1 through MM-NOI-5 are included with Alternative 4 ADP to reduce aircraft noise impacts; however, based on uncertainties regarding whether all of the impacted noise-sensitive uses could be mitigated through these five mitigation measures, especially given that MM-NOI-1 is subject to funding availability and FAA approval, the aircraft noise impacts are considered to be significant and unavoidable. Regarding roadway noise impacts, implementation of the Alternative 4 ADP would cause: traffic noise levels for existing development along Grape Street from Pacific Highway to State Street to exceed the noise levels considered compatible for noise-sensitive areas associated with the applicable land use categories; and traffic noise levels along India Street from Sassafras Street to Laurel Street that already exceeds the levels considered compatible for noise-sensitive land use associated with the applicable land use categories to increase by more than 3 dB CNEL, as compared to existing baseline conditions. These roadway noise impacts would be significant. Mitigation Measures MM-NOI-6 through MM-NOI-9 were formulated and evaluated, but were found to be infeasible; hence, the roadway noise impacts would be significant and unavoidable. Based on the above, the Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse noise impacts, and found that the impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

As set forth more fully in Sections 8.14 and 10.4 of the CEQA Findings of Fact, the Alternative 4 ADP may have several significant and unavoidable impacts related to traffic, including significant impacts on certain street and freeway segment operations and intersections. Although the Final EIR identifies specific mitigation measure to reduce some impacts to a less-than-significant level, either the City of San Diego or Caltrans has the responsibility and jurisdiction over each of the identified mitigation measures. The identified mitigation measures can and should be made by these other governmental authorities. (CEQA Guidelines, § 15091(a)(2).) Because adoption of these mitigation measures rests with other agencies, the Authority lacks the ability to ensure that they will be implemented. For this reason, the identified significant traffic related impacts may remain as a result of the Alternative 4 ADP. As such, the
Statement of Overriding Considerations, as adopted by Resolution No. 2020-0001, weighed the benefits of the Alternative 4 ADP against the adverse traffic impacts and found that impacts are acceptable after considering the other benefits of the Alternative 4 ADP.

5. The Statement of Overriding Considerations, attached as Exhibit B to Resolution 2020-0004, as it relates to the Alternative 4 ADP, is true and correct and is incorporated herein by reference. In particular, the Board finds and reaffirms that:

- The FAA-approved aviation activity forecast for SDIA indicates that SDIA could reach 39 million annual passengers and 3 million international passengers by 2035. In 2018, passenger facilities were already congested during peak periods with queues for passenger check-in and security exceeding current terminal facilities. Terminal 1 served 2.5 million passengers in 1967; it served more than 12 million passengers in 2018. Increased passengers and operations forecast for the SDIA will result in excessive congestion in terminals, which already experience crowding and low levels of service in some locations of the terminals, curbside, aircraft and vehicle parking, and airfield movement areas.

- As described fully in the Statement of Overriding Considerations adopted by Resolution No. 2020-0004, the specific physical improvements under the Alternative 4 ADP will resolve the congestion issues through 2035 and enable SDIA to effectively continue its mission of serving the San Diego region’s commercial air transportation needs as forecasted through 2035.

- Based on substantial evidence in the whole of the Administrative Record, the Authority hereby determines that the unavoidable potentially significant adverse environmental impacts of the Alternative 4 ADP are acceptable in light of the benefits identified above and in the Statement of Overriding Considerations adopted by Resolution No. 2020-0004. Each benefit described above constitutes an overriding consideration warranting adoption of the Alternative 4 ADP, independent of the other benefits, despite each and every potentially significant unavoidable impact.

6. The mitigation measures applicable to the Alternative 4 ADP set forth in the Mitigation Monitoring and Reporting Program, attached to Resolution No. 2020-0004 as Exhibit A, are specific and are incorporated into the Alternative 4 ADP and fully comply with CEQA.
BE IT FURTHER RESOLVED, that the Board hereby adopts the San Diego International Airport Development Plan – Alternative 4.

PASSED, ADOPTED, AND APPROVED by the Board of the San Diego County Regional Airport Authority at a regular meeting this 9th day of January, 2020, by the following vote:

AYES: Board Members:

NOES: Board Members:

ABSENT: Board Members:

ATTEST:

_________________________________
TONY R. RUSSELL
DIRECTOR, BOARD SERVICES / AUTHORITY CLERK

APPROVED AS TO FORM:

_________________________________
AMY GONZALEZ
GENERAL COUNSEL
ITEM 1

INFORMATION RECEIVED FROM THE PUBLIC
January 8, 2020

Via E-Mail and U.S. Mail

San Diego County Regional Airport Authority
Third Floor, SDCRAA Administration Building
3225 North Harbor Drive
San Diego, California  92101

Re:  San Diego International Airport – Airport Development Plan

Dear Board Members:

We submit the following letter on behalf of the Cleveland National Forest Foundation (“CNFF”), a nonprofit organization committed to sustainable regional land use planning to stem the tide of urban encroachment into the San Diego backcountry and its wildlands. These comments address the San Diego International Airport Development Plan (“Project”) and its Environmental Impact Report (“EIR”). CNFF submitted comments on the Draft Environmental Impact Report (“DEIR”) and the Recirculated Draft EIR (“RDEIR”). See letters from Shute, Mihaly & Weinberger, LLP to T. Anasis, September 5, 2018 and November 4, 2019, submitted under separate cover.

Although CNFF has serious concerns with the Project’s failure to achieve more immediate intermodal access to the Airport, the organization is heartened that staff is recommending that the Authority Board approve Alternative 4 as we believe this alternative is critical to the success of long-term regional transit. Moreover, as discussed below, because Alternative 4 is feasible and would reduce the environmental impacts of the Project, the Authority is bound to adopt it.

CNFF is also encouraged by recent efforts on the part of the Authority to participate in and support regional collaboration toward effective transit access to the airport. As the San Diego Association of Governments (“SANDAG”) continues its work toward building a “Grand Central Station” mobility hub near the existing Old Town Transit Center, it is essential that a reliable and time-competitive transit link to the airport be a core component in regional planning.
While CNFF firmly believes that the Authority can and must do more to support an increase in transit mode share to support the Project, it also recognizes that the Federal Aviation Administration (“FAA”) has imposed certain constraints on use of airport revenues for off-site mitigation. CNFF also understands that the Authority believes it cannot request approval for funding of specific transit projects until such time as those projects’ specific scope is more firmly determined. Nonetheless, the Authority’s recent announcement of an agreement with airline partners to provide significant funding for transportation infrastructure is welcome. Because ground access to the airport is currently almost entirely auto-based, CNFF continues to urge the Authority to seek authority to spend these transportation dollars on developing multi-modal transit, rather than auto-based, infrastructure.

That said, as discussed below, the EIR continues to fall short of the requirements of the California Environmental Quality Act (CEQA), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. This letter does not seek to repeat the deficiencies identified in our prior letters; instead, we focus primarily on the need for additional mitigation for the Project’s significant and purportedly unavoidable greenhouse gas, air quality, noise and ground traffic-related land use, and traffic and circulation impacts, as well as the need for clearer commitments to the mitigation measures already proposed.

I. The Authority Must Adopt Alternative 4.

Because Alternative 4 is feasible and would reduce or avoid at least some of the Project’s significant environmental impacts, the Authority cannot approve the Project as originally proposed, and instead must approve Alternative 4. CEQA prohibits a public agency from approving a project that has significant environmental impacts if there are feasible alternatives or mitigation measures that would reduce or avoid those impacts. Pub. Resources Code §§ 21002, 21002.1(b). Moreover, before approving a project despite significant environmental impacts, the agency must expressly find that mitigation measures or alternatives identified in the EIR are infeasible. Pub. Resources Code §§ 21081(a)(3).

The FEIR states that Alternative 4 “is feasible, meets all the project objectives, and would have reduced environmental impacts compared to the proposed project.” FEIR at 1-1. Accordingly, the Authority cannot lawfully make the findings required to approve the Project as originally proposed, and instead must adopt Alternative 4.
II. **The Authority Should Clarify and Strengthen Its Commitment to Regional Transit Improvements in MM-TR-LRP-2.**

Mitigation measure MM-TR-LRP-2 is the primary measure addressing transit connections that could reduce the Project’s significant traffic, air quality, and climate impacts. While CNFF appreciates the Authority’s stated commitment to continue participating in (and, if possible, to provide significant funding for) regional transit improvements, CNFF remains concerned that the Authority has not yet identified all feasible options for supporting these efforts. Moreover, even to the extent that FAA approval is required before the Authority can spend at least some of its resources on off-site improvements, other commitments in MM-TR-LRP-2 can be clarified and strengthened.

First, the FEIR does not respond to CNFF’s comments related to the possibility of using non-airport revenues or obtaining additional funding that might not be subject to FAA restrictions. CNFF first raised this issue in its September 5, 2018 comments on the DEIR (at pages 17-20) and reiterated its concerns in its November 4, 2019 comments on the RDEIR (at pages 6-8 and Exhibit 1). CNFF pointed to specific statutory provisions that appear to allow the Authority to access other sources of revenue, including provisions authorizing special benefit assessments, borrowing of funds, and state grants. CNFF also pointed out that the Authority’s FY 2018 and 2019 budgets identified more than $100 million in “Non-Airline Revenue.” CNFF requested an analysis of whether any or all of these potential sources of funding might allow the Authority to commit to supporting its fair share of on-site and off-site transit improvements. The FEIR does not appear to contain any thorough, substantive response to CNFF’s detailed comments on this point, which CEQA requires. See CEQA Guidelines § 15088(c).

Second, and relatedly, the Authority has a responsibility to seek out adequate funding for mitigation of the impacts of the Project, whether those impacts occur on-site or off-site. See *City of San Diego v. Board of Trustees of the California State University* (2015) 61 Cal.4th 945, 959-61; *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 359-60. That funding may include, but is not necessarily limited to, funds in the agency’s own budget over which it exercises discretionary control. See *City of San Diego*, 61 Cal.4th at 960-61. Both *City of San Diego* and *City of Marina* clearly indicate that an agency cannot dismiss mitigation measures as infeasible based on unsupported or legally erroneous assumptions regarding its authority to pay its fair share of off-site improvements necessary to address significant impacts of its projects. Absent some clear legal analysis or cogent evidence showing that all funds the Authority might hold or reasonably obtain, from any source whatsoever,
cannot be spent on any transit mitigation without FAA approval, the Authority cannot support a finding that MM-TR-LRP-2 is infeasible.

Third, even if the Authority were able to demonstrate that fair-share mitigation commitments are not presently feasible without FAA approval, other agency commitments in MM-TR-LRP-2 should be clarified. The measure is drafted in a somewhat ambiguous manner, with two separate lists of points numbered 1 through 4. Each point in the second list appears to modify or expand on the corresponding numbered point in the first list, but this is not entirely clear. Moreover, only point 4 appears to involve any discussion of the feasibility of constructing or paying for off-site transit or roadway improvements. Yet the text of the second point numbered 4 suggests that MM-TR-LRP-2 in its entirety “is presently not considered feasible.” Mitigation Monitoring and Reporting Plan at 17-19. This language is overbroad and could potentially undermine other important commitments in MM-TR-LRP-2, including the Authority’s basic commitment to work with SANDAG and other agencies to develop—and, to the fullest extent possible, to seek and provide significant funding for—regional transit projects that will reduce the Project’s significant environmental impacts. The FEIR presents no evidence that these aspects of MM-TR-LRP-2 are infeasible. Accordingly, MM-TR-LRP-2 should be clarified so that both the Authority and the public understand that the agency is making an enforceable commitment to do everything in its power to pursue regional transit solutions before approving the Project. This could be accomplished by clarifying the “presently infeasible” finding so that it applies only to the actual construction of off-site improvements and the use of FAA-restricted funds to pay for the Authority’s fair share of such improvements before specific projects are identified.

Finally, MM LRP-2 should be strengthened to ensure that the Project does not foreclose the possible implementation of any of the airport-related transit projects currently being considered as part of SANDAG’s October 2019 Airport Connections Study. Thus, we request LRP-2 be revised to include the following language: “SDCRAA understands that a transit connection to the Airport, as contemplated by SANDAG’s Airport Connectivity Analysis, is a critical component of the regional transit network and SDCRAA shall be fully engaged with other stakeholders in studying, designing, entitling, and, subject to any necessary FAA approval, funding its fair share of agreed to improvements. SDCRAA also commits to not take any action under the Airport Development Plan that would foreclose any option for airport transit connections identified in the Airport Connectivity Analysis. Specifically, SDCRAA commits to preserve land and necessary right-of-way for the on-airport components of all of the conceptual transit connection options identified in the Airport Connectivity Analysis pending identification and approval of a specific option.”
III. The Authority Should Adopt Additional Mitigation Measures Recommended by CNFF and Others.

Lead agencies must evaluate and respond to additional mitigation measures suggested by commenters on an EIR, and must adopt those measures if they are feasible. See, e.g., Covington v. Great Basin Unified Air Pollution Control District (Cal. App. 3d Dist. No. C080342; Nov. 26, 2019) 2019 WL 7169140 at p. *6. CNFF suggested a number of potentially feasible mitigation measures in its comments on both the DEIR and the RDEIR. Notably, these proposed measures do not involve off-site improvements, but rather address matters within the Authority’s control; as a result, FAA restrictions on expenditures of airport revenue may not be relevant. The Authority should carefully consider whether those measures are feasible, and if they are, must adopt them.

First, by improving multi-modal access to the Airport, the Authority could reduce traffic congestion in and around the airport while also reducing each of the aforementioned significant environmental impacts. To this end, we respectfully request that the Authority adopt the following mitigation measure:

- Enact a Long-term Program to Modify Project Components That Encourage Vehicular Travel. Given the lack of existing transit infrastructure supporting the airport, the Project would develop new roadway infrastructure and additional parking intended to facilitate automobile travel. Upon completion of a direct transit connection to the airport, however, excessive roadway and parking capacity will deter transit use. Consequently, once the direct transit connection to the Airport is established, the Authority should take steps to remove excess roadway and parking capacity.

Second, in our prior comments on the DEIR, we requested that the Authority evaluate the feasibility of a series of mitigation measures to reduce the Project’s significant impacts relating to transportation, greenhouse gas emissions and air quality. The FEIR failed to include an evaluation of the following measures:

- Reduce Parking to Discourage Auto-based Travel. The FEIR explains that while the proposed Project could build up to 7,500 parking spaces at the proposed Terminal 1 parking structure, only 5,000 spaces would be built initially (Phase 1), resulting in a net increase of 250 parking spaces for airline passengers in 2024. FEIR at 2-117. Assuming Alternative 4 is approved, the Authority would construct 5,500 parking spaces in the Terminal 1 parking plaza. The FEIR goes on to explain “that should parking demand continue to decline, SDCRAA would not need to expand
the parking supply at the Terminal 1 parking plaza.” FEIR at 2-117 (emphasis added). The Authority misunderstands our comment relating to the relationship between parking supply and transit use. Ample parking provides an incentive to drive, and a disincentive for airport patrons to ride transit. The Authority’s response to our comment implies that parking supply would only be reduced if the demand for parking declines. In fact, the Authority should reduce the supply of parking to encourage airport patrons to travel to the airport by transit rather than by automobile.

- **Shared Parking.** Pursuant to the suggestions of the Port of San Diego and the City of San Diego, the Airport should use shared parking sites to accommodate the parking needs of Airport patrons. *See* Letter from the San Diego Unified Port District to the Airport Authority, March 1, 2017.

- **Enhanced TDM Program.** The following components would increase the effectiveness of MM-TDM-1:
  - Provision of adequate curb space to facilitate transit and shared mobility services such as rideshare and shuttle buses.
  - Provision of secure and convenient parking and amenities such as showers, lockers, and bicycle repair stands for airport employees.
  - Provision of free or reduced cost transit passes for employees of the Airport Authority and airport tenants.
  - Promotion of transit pass sales on-site to expand transit ridership and other connecting services within the airport and potential commercial development areas.
  - Provision of interactive transportation kiosks that display real-time information about regional transit services, bikeshare, carshare, rideshare, and other transportation options.
  - Eliminate subsidized parking for employees and offer an equivalent subsidy to employees that use commute alternatives to driving alone (transit, vanpool, etc.)

- **Additional greenhouse gas reduction measures.** The following measures would help reduce the Project’s significant greenhouse gas impacts:
• The Authority could commit to implementing all applicable measures in: (1) City of San Diego’s Climate Action Plan and consistency checklist; (2) memorandum of understanding with the California Attorney General’s office; (3) Port of San Diego’s Climate Action Plan. See September 5, 2018 letter from Shute, Mihaly & Weinberger, LLP to T. Anasis, p. 39.

• Commit to: (1) “zero net energy” buildings; (2) expanding solar generation; and (3) achieve LEED Platinum certification.

In sum, the EIR impermissibly leaves a long list of potentially feasible mitigation measures on the table, and thus cannot support the findings CEQA requires. Simply declaring the Project’s transportation, greenhouse gas, and air quality impacts are significant and unavoidable is insufficient. The Authority must do everything it feasibly can to reduce or avoid these impacts.

IV. Conclusion

Alternative 4 represents a step in the right direction for the Airport and the Authority because it would accommodate future regional transit planning efforts. Moreover, if any alternative is adopted, it must be Alternative 4. However, prior to adopting Alternative 4, the Authority must include the aforementioned mitigation measures to reduce the Project’s significant and “unavoidable” environmental impacts as these measures are certainly feasible. In addition, the Authority must seek all available funding to support both on-airport and off-airport transit infrastructure before finding a contribution to any such improvements infeasible.

Thank you for your consideration of these comments.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

cc: Duncan McFetridge, CNFF