



VIA EMAIL TO: planning@san.org

November 4, 2019

San Diego County Regional Airport Authority
Attn: Ted Anasis, Airport Planning Manager
P.O. Box 82766
San Diego, CA 92138-2776

Subject: Comments regarding the Recirculated Draft Environmental Impact Report for the San Diego International Airport's Airport Development Plan (SCH No. 2017011053; SDCRAA #EIR-18-01)

Dear Mr. Anasis:

The San Diego Unified Port District (Port) appreciates the opportunity to review the Recirculated Draft Environmental Impact Report (RDEIR) (SDCRAA# EIR-18-01; State Clearinghouse No. 2017011053) for the Airport Development Plan (ADP) at the San Diego International Airport (SDIA). As the trustee and lessor of the Tidelands where the SDIA is located, an abutting jurisdiction to the SDIA and a California Environmental Quality Act (CEQA) responsible agency for the RDEIR,¹ the Port has a unique interest in development that occurs at the SDIA, including the ADP, and environmental issues associated with such development and how it may impact the surrounding areas – especially Tidelands.

The Port has partnered with the San Diego County Regional Airport Authority (Airport) and other agency stakeholders, including the San Diego Association of Governments (SANDAG), the City of San Diego (City), the Metropolitan Transit System (MTS), the North County Transit District (NCTD), the County of San Diego (County), the California Department of Transportation (Caltrans), and others to collaboratively identify solutions that would significantly broaden opportunities to fulfill the region's transit vision. SANDAG is taking a leadership role in collaborating with regional partners to study concepts for improved regional airport connectivity. One of the goals of this effort is to improve SDIA passenger access to transit through a variety of options to reduce congestion and provide additional environmental benefit. The Port is very supportive of SANDAG's effort and continues to be a part of the solution.

Alternative 4 – T1 Replacement and Transportation Improvements

The Port is grateful for the inclusion of the RDEIR's new Alternative 4 – T1 Replacement and Transportation Improvements (Alternative 4) and its contribution to the region's transit vision. Key components of Alternative 4 include:

- The set aside of land for a transit stop at SDIA (in-lieu of 400,000 square feet of commercial development);

¹ The Airport will need a long-term lease(s) or easement(s) for the construction and operation of parts of proposed inbound roadway and the multi-use path from the Port.

- A multi-use path to and from the airport for pedestrians and bicyclists;
- The inbound roadway that will take traffic off North Harbor Drive;
- A dedicated shuttle service between the Old Town Transit Center and SDIA;
- The potential creation of a rapid bus line to/from SDIA;
- A future connection to a potential future intermodal transit center;
- A reduced parking garage;
- The set aside of 42-foot wide right-of-way for a three-lane outbound roadway that if constructed would further reduce vehicular traffic on North Harbor Drive; and
- Construction of one of the lanes of the outbound roadway for use by high occupancy vehicles such as Rental Car Center buses and the Old Town Transit Center shuttle.

Providing transit to and from SDIA is a key component to meeting the region's collective greenhouse gas emissions (GHG) reduction and transportation goals. Alternative 4 takes an initial step towards these goals. The Port requests that the Airport continue to work with SANDAG, the City, the Port and other stakeholders on this issue.

Specific Comments

As the Airport is aware (through several conversations between Port, Airport, City and SANDAG staff), the Port's vision for North Harbor Drive includes dedicated transit lanes, as well as bicycle and pedestrian facilities and connections. The vision would enable the visitors and residents to walk, bike and take transit around and through the Embarcadero, with an emphasis on expanding transit opportunities from Harbor Island to the San Diego Convention Center.² Additional increased development intensity on East Harbor Island and in the Embarcadero may also occur in the future. The outbound roadway may be needed to reduce future congestion along North Harbor Drive and RDEIR recognizes that the operation of the outbound roadway would reduce airport-related traffic traveling eastbound on North Harbor Drive (see page ES-4 of the RDEIR). Accordingly, the Port is proposing the Airport continue to work with the Port and other agencies on the design, routing and if/when needed, the development of the outbound roadway.

Below is a revised MM-TR-LRP-1³, which will facilitate transit to and from the SDIA. The Port's changes to that mitigation measure are shown in bold, underline and strikeout text. Additionally, the Port believes both SANDAG's long-range transportation solution and the outbound roadway will be physically feasible and request this change be made to MM-TR-LRP-1.

“MM-TR-LRP-1: Airport Regional Connections: Prior to 2035, ~~the~~ 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.; ~~and~~ **3. Study and design the outbound roadway and coordinate with SANDAG, the City of San Diego, the Port of San Diego and other**

² The vision would likely be implemented through the proposed Port Master Plan Update (PMPU), and while the PMPU has not been approved, it is a cumulative project in the RDEIR.

³ Mitigation measure MM-TR-LRP-1, found on pages 3.14-177 to 3.14-178 of the DEIR, addresses a long-range transportation planning study to address Year 2035 cumulative impacts.

agencies, as applicable, to entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed.

- A. SDCRAA staff are fully engaged as 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.
- B. **SDCRAA understands that the outbound Airport roadway is an important component to the region's vision for transit and SDCRAA staff shall be fully engaged in studying, designing, entitling and if 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.**
- C. SDCRAA will fund its fair share of agreed to improvement to implement long-term regional solutions identified by SANDAG's Airport Connections Study, **and the outbound roadway, if and when needed**, subject to 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 parts of the Mitigation Measure are within the control of other agencies or jurisdictions, and would require FAA approval of funding. Portions of Mitigation Measure MM-TR-LRP-1 require physical improvements to facilities and/or VMT reduction items and are within the jurisdiction of other public agencies or departments and are ***not 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 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 not 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 above, 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 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."

The Port requests that the revised MM-TR-LRP-1 be adopted and applied to Alternative 4 and/or the following project features be added to Alternative 4:

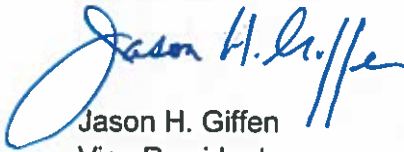
- SDRCAA will study the outbound roadway and design it, including the portions on and off Airport property.
- SDRCAA will coordinate with SANDAG, the City of San Diego, the Port and other agencies (collectively, Stakeholder Agencies), as applicable, on the outbound roadway design and study.

- SDRCAA will coordinate with the stakeholder Agencies to the entitle and implement improvements and strategies identified in the outbound roadway study and design, if and when needed.

Subject to the foregoing, the Port supports Alternative 4⁴ and looks forward to continued collaboration with the Airport.⁵

If you would like to discuss any of these comments further, please contact me at (619) 686-6473 or Lesley Nishihira, Planning Director, at (619) 686-6469.

Sincerely,



Jason H. Giffen
Vice President
Planning, Environment & Government Relations

cc: Brendan Reed
Dennis Probst
Randa Coniglio
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Job Nelson
Thomas Russell
Rebecca Harrington

⁴ A robust environmental analysis was conducted for Alternative 4 in the RDEIR. Additionally, Alternative 4 avoids and substantially lessens the significant environmental impacts of the proposed ADP project, meets the basic project objectives and is actually feasible (to the Port's knowledge there is no information or evidence that Alternative 4 is potentially or actually infeasible). Consequently, the Port believes the Airport Board should adopt Alternative 4 with appropriate mitigation measures.

⁵ The Port reserves all its rights, including without limitation, commenting on the Final Environmental Impact Report, and this comment letter does not constitute a waiver of any of those rights.