

**Attachment B to Agenda File No. 2020-0007**

January 8, 2020

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Paul Robinson, Vice Chair

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Kimberly J. Becker, President/CEO

Ted Anasis, Airport Planning Manager

Re: District Comment Letter to the Final APD EIR

Dear Board Chair Boling, et al,

The San Diego Unified Port District (District) appreciates the opportunity to review the Final Environmental Impact Report (FEIR) (SDCRAA # EIR-18-01; State Clearinghouse No. 2017011053) for the Airport Development Plan (ADP), San Diego International Airport (SDIA), dated January 2020, and the on-going coordination and collaboration with the San Diego County Regional Airport Authority (Airport). The District is pleased with the inclusion of Alternative 4: T-1 Replacement and Transportation Improvements in the Final EIR, as it sets aside land for transit to the SDIA and the outbound roadway, reduced significant environmental impacts of the proposed ADP project (Project) and meets the basic objectives of the Project. The District fully supports Airport staff's recommendation of Alternative 4's adoption by the Airport Board, with the inclusion of revised Mitigation Measure MM-TR-LRP-2 and concurrence on the intent of this mitigation measure, as further detailed below.

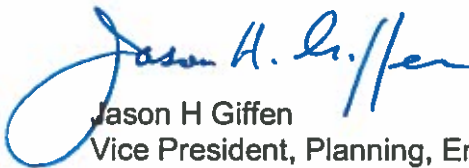
As the Airport is aware, the outbound roadway is a key component for transit to, from and on nearby Tidelands, including along N. Harbor Drive, and may also be a key component of the regional effort to connect transit to the SDIA and the surrounding area, which is being led by San Diego Association of Governments (SANDAG). The District made suggested revisions to MM-TR-LRP-1 (now MM-TR-LRP-2 as it applies to Alternative 4) in its comment letter to the Recirculated Draft Environmental Impact Report (RDEIR) dated November 4, 2019. The District greatly appreciates the Airport's consideration of those revisions. While the Airport Authority included most of the District's revisions, it did not exactly revise the mitigation measure as requested. Of concern to the District are the Airport's changes to the District's suggested revisions to subsection 2 of mitigation measure MM-TR-LRP-2. In addition, the District wanted some clarity on subsection 3; however, through conversations with Airport staff, the District believes that the Airport's intent and the implementation of mitigation measure MM-TR-LRP-2 reflects the District's revisions. Accordingly, subsection 2 of measure MM-TR-LRP-2 requires the Airport to be fully engaged in studying, designing, entitling and, if and when the outbound roadway is needed, implementing the outbound

Board Chair Boling, et al  
January 8, 2020  
Page Two

roadway. The outbound roadway may be triggered by a collective study conducted by the Airport, SANDAG, Port and City of San Diego or a future environmental analysis showing the need for the outbound roadway. Coupled with subsection 3 of mitigation measure MM-TR-LRP-2, the Airport shall pay its fair share of the outbound roadway and associate improvements off Airport land, if and when the outbound roadway is needed. Separately from the design, study, entitlement and implementation of the outbound roadway (if and when needed), the Airport shall coordinate with stakeholders listed in subsection 2. It is the District's understanding that subsection 3 requires the Airport to fund its fair share of the outbound roadway, if and when it is needed, and this is a discrete obligation from the agreed to long-term regional solutions identified in the Airport Connections Study. The District also understands that funding of improvements may be subject to Federal Aviation Administration (FAA) approval and the Airport will use best efforts to obtain such necessary FAA approval. Additionally, the infeasibility finding for mitigation measure MM-TR-LRP-2 related to obtaining FAA funding and any approvals necessary to implement improvements outside of the of Airport's jurisdiction does not alleviate the Airport from requesting the funding and seeking such approvals from other agencies. Provided this is the intent of the revised mitigation measure MM-TR-LRP-2, the District fully supports Alternative 4 and the inclusion of the revised MM-TR-LRP-2.

Thank you for your continued lines of communication and collaboration. Should you have any questions, please feel free to contact me at 619-686-6473, or via email at [jgiffen@portofsandiego.org](mailto:jgiffen@portofsandiego.org).

Sincerely,

A handwritten signature in blue ink that reads "Jason H. Giffen".

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

cc: Brendan Reed  
Dennis Probst  
Matt Harris  
Randa Coniglio  
SDUPD Board of Port Commissioners  
Jason Giffen  
Job Nelson  
Thomas Russell  
Rebecca Harrington