

## Draft EA Comments and Responses to Comments

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## Appendix N Draft EA Comments and Responses to Comments

### N.1 Introduction

This appendix contains the comments received on the Draft Environmental Assessment (EA) during the 47-day comment period (June 16, 2021 through August 2, 2021) and the responses to those comments. The San Diego County Regional Airport Authority (SDCRAA) solicited comments through public notices and collected comments in writing via U.S. mail comment submissions and electronically via [planning@san.org](mailto:planning@san.org). Each written comment is presented as it was received by the SDCRAA including any misspellings and grammatical errors. Each written comment is numbered in the margin of the comment letter or email submission, and the responses to all of the comments follow that comment letter or email submission. Following each comment submission, responses to each of the comments are provided.

Section N.2, below, provides a list of commenters grouped by agencies, tribal governments, organizations, and the general public.

Section N.3 contains copies of comments received during the comment period, in written or electronic format, and responses to those comments.

### N.2 List of Commenters

Table N.2-1 below provides an indexed list of all commenters. The table is separated by agencies, tribal governments, organizations, and members of the public. Codes were developed that consist of a letter and a number to identify each commenter to facilitate the cataloging of all comments that were received. The letter identifies the type of commenter as follows:

A = Agency (State or Local)

T = Tribal Government

O = Organization

P = Public

The number that follows the letter identifies the specific comment letter or email comment. For example, the code "A2" describes the commenter as being the 2<sup>nd</sup> agency that provided comments.

**Table N.2-1: Commenters on Draft EA**

Commenter Number	Name	Affiliation	Date Received	Submission Type
<b>Agency</b>				
A1	Ann M. Fox	California Department of Transportation (Caltrans)	August 2, 2021	Electronic
A2	Seth Litchney	City of San Diego Planning Department	July 30, 2021	Electronic
A3	Frederick Kosmo	Peninsula Community Planning Board	July 28, 2021	U.S. Mail
<b>Tribal Government</b>				
T1	Ray Teran	Viejas Tribal Government	June 16, 2021	Electronic
T2	Ray Teran	Viejas Tribal Government	June 21, 2021	Electronic
<b>Organization</b>				
O1	Bruce Coons	Save Our Heritage Organisation	July 27, 2021	Electronic
<b>Public</b>				
P1	Gary Wonacott		June 25, 2021	Electronic
P2	Richard S. Phillips		August 4, 2021	U.S. Mail

## **N.3 Comments and Responses to Comments on the Draft EA**

**Commenter A1**  
**Ann M. Fox**  
**California Department of Transportation (Caltrans)**

CALIFORNIA STATE TRANSPORTATION AGENCY

COMMENTER A1

GAVIN NEWSOM, GOVERNOR

**California Department of Transportation**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 688-6681 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



August 2, 2021

BY: .....

11-SD- I-5  
PM 17.3

Airfield Improvements and Terminal 1 Replacement Project  
July 2021 Draft Environmental Assessment

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

Dear Mr. Anasis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the San Diego County Regional Airport Authority's (SDCRAA) San Diego International Airport Airfield Improvements and Terminal 1 Replacement project located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans has the following comments:

**Traffic Analysis**

We are supportive of Travel Demand Management Strategies (TDM) that expand non-auto options to reduce the number of vehicles on the road, greenhouse gas emissions and wear and tear on our roadways, and Transportation Systems Management (TSM) measures that utilize technology to optimize operations of our collective transportation system.



"Provide a safe and reliable transportation network that serves all people and respects the environment"

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Caltrans is asking that SDCRAA consider TDM and TSM measures along the Hawthorn Street roadway segment from Harbor Drive to Albatross Street, and the Kettner Boulevard roadway segment from Vine Street to Laurel Street. And additional considerations at the following intersections:

1

- 6 Hancock Street at Washington Street
- 10 Kettner Boulevard at Sassafras Street
- 15 Pacific Highway at W Laurel Street
- 16 Kettner Boulevard at W Laurel Street
- 17 India Street at W Laurel Street
- 18 N Harbor Drive at W Hawthorn Street
- 19 Pacific Highway at W Hawthorn Street
- 20 Kettner Boulevard at W Hawthorn Street
- 21 India Street at W Hawthorn Street
- 22 Columbia Street at W Hawthorn Street
- 23 State Street at W Hawthorn Street
- 24 I-5 NB Off-Ramp / Brant Street at W Hawthorn Street
- 41 Kettner Boulevard at Palm Street

Caltrans supports the SDCRAA in the Aug. 27, 2019 letter to the Federal Aviation Administration requesting funds to be used for off-airport mitigation measures such as roadway and intersection improvements, and transit projects that would improve access to the Airport.

#### **Complete Streets and Mobility Network**

*Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System* directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and vehicle miles traveled associated with distinct traffic generators. Caltrans supports appropriate measures to avoid, minimize, or mitigate transportation impacts on and off the State Highway System to reduce vehicle miles traveled to and from the San Diego International Airport.

2

Early coordination with Caltrans, in locations that may affect both state and local agencies is strongly encouraged.

#### **Regional Transportation Planning**

Currently, Caltrans and SANDAG are working on developing a Project Study Report-Project Development Support (PSR-PDS) document to identify and analyze opportunities to enhance near-term and future connectivity between I-5, the proposed San Diego Airport improvements, the proposed Central Mobility Hub (CMH)

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COMMENTER A1

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and adjacent developments. We encourage the Airport Authority to participate on the development of this document and the future phases of the projects.

3

Please consider coordinating with the City of San Diego, SANDAG, the Port of San Diego and other local stakeholders as new development plans emerge for the Midway, Sports Arena, and Port communities and adjacent areas.

SANDAG and local stakeholders are working on the Central Mobility Hub and Connections Comprehensive Multimodal Corridor Plan (CMH and Connections CMCP) which include the San Diego International Airport project area. SANDAG is also updating the 2021 Regional Plan. Please see the links below to reference both documents.

- <https://www.sandag.org/index.asp?classid=12&subclassid=83&projectid=608&function=projects.detail>
- <https://www.sdfoward.com/mobility-planning/2021-regional-plan>

The Airport Connectivity-Complete Corridor Elements project as part of the Central Mobility Hub and the Central Mobility Hub Land Acquisition project has been identified in the SANDAG 2021 Regional Plan. This project is currently unfunded. Based on the overall magnitude of impacts identified in the Environmental Assessment to transportation facilities, it is recommended that a "fair share" contribution towards the advancement of this project be considered. Other strategies to assist in developing these projects can include potentially acquiring right-of-way to facilitate the construction of such projects.

#### Right-of-Way

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

4

Caltrans appreciates the opportunity to continue coordination efforts with the SDCRAA. If you have any questions, please contact Roger Sanchez at (619) 987-1043 or by email at [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

Sincerely,

*Ann M. Fox*

ANN M. FOX  
 Deputy District Director  
 Planning and Local Assistance

"Provide a safe and reliable transportation network that serves all people and respects the environment"

## Responses to Commenter A1

- A1-1. As discussed in Section 4.13.1 of the EA, a traffic study evaluated the effects of the Proposed Project on 43 intersections as well as 44 roadway segments within the General Study Area for future years 2026 and 2031. This evaluation included two roadway segments described in the comment and the 13 intersections listed in the comment (see Section 1.1 of Appendix G of the EA). As indicated in Section 4.13.1.3 of the EA, which is based upon the traffic analysis data contained in Appendix G of the EA, the Proposed Project would not result in a significant surface transportation impact; therefore, no mitigation measures, such as Travel Demand Management Strategies (TDM) or Transportation Systems Management (TSM) measures, are required.
- A1-2. Comment noted. The Central Mobility Hub and other future planning is outside the scope of the Proposed Project and its EA. The SDCRAA will make the decision if it will participate in these future efforts.
- As noted above, the EA does not identify any significant impact from the Proposed Project related to transportation (see Section 4.13.1 of the EA).
- A1-3. Comment noted. The Central Mobility Hub and other future planning is outside the scope of the Proposed Project and its EA. The SDCRAA will make the decision if it will participate in these future efforts. See Response to Comment A1-1 above.
- A1-4. Comment noted.

**Commenter A2**  
**Seth Litchney**  
**City of San Diego Planning Department**

COMMENTER A2



July 30, 2021

Ted Anasis  
 Manager, Airport Planning  
 San Diego County Regional Airport Authority  
 3225 North Harbor Drive, 3<sup>rd</sup> Floor  
 San Diego, CA 92101

**Subject: CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL ASSESSMENT FOR THE AIRFIELD IMPROVEMENTS AND TERMINAL 1 REPLACEMENT PROJECT AT SAN DIEGO INTERNATIONAL AIRPORT**

Dear Mr. Anasis:

The City of San Diego (City) Planning Department has received the Notice of Availability of a Draft Environmental Assessment prepared by the San Diego County Regional Airport Authority (SDCRAA) and distributed it to applicable City departments for review. The City, as a Participating Agency under the National Environmental Policy Act (NEPA), has reviewed the Notice of Availability and appreciates this opportunity to provide comments to the SDCRAA. Continued coordination between the City, SDCRAA, and other local, regional, state, and federal agencies will be essential, especially if future ministerial or discretionary actions on behalf of the City are required. In response to this request for public comments, the City has the following comments on the Notice of Availability for your consideration.

• • •

**Stormwater Department - Mark Stephens, Associate Planner – [MGStephens@sandiego.gov](mailto:MGStephens@sandiego.gov), (858) 541-4361**

- |   |        |
|---|--------|
| 1. Page 1-7, under 1.3.1.3 Landside/Ground Transportation Components. Storm drain assets are located in proposed roadway improvement areas. Any improvements associated with City storm drain assets will need City of San Diego Stormwater Department review and approval.   | 1      |
| 2. Page 3-3, under 3.3 Environmental Resources Affected and Not Affected, Floodplains. Here, and in Appendix M FEMA Flood Insurance Rate Maps Applicable to SAN, please assure the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panels discussed and provided reflect the most current version of Panels 1877H and 1881H, which can be accessed through the following link. <a href="https://msc.fema.gov/portal/search?AddressQuery=San%20Diego%20International%20Airport#searchresultsanchor">https://msc.fema.gov/portal/search?AddressQuery=San%20Diego%20International%20Airport#searchresultsanchor</a> | 2      |
| 3. Pages 4-47 to 4-49, under 4.15 Water Resources. While recognizing the Draft Environmental Assessment indicates increased stormwater flows will be captured and reused onsite, if any new connections into the City of San Diego's stormwater system  | 3<br>↓ |

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 San Diego, CA 92123  
[sandiego.gov/planning/](http://sandiego.gov/planning/)

T (619) 235-5200  
[sandiego.gov](http://sandiego.gov)

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need to be made, please coordinate this with the City of San Diego Stormwater Department.	3
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4. Pages 4-49 to 4-54, under 4.16 Cumulative Impacts. Modifications to the list of cumulative projects are recommended to include the Navy’s Old Town Campus Revitalization Project, the San Diego Association of Governments (SANDAG) San Diego Forward: 2021 Regional Plan, SANDAG Central Mobility Hub Project, the Courthouse Commons Project (located between Broadway and C Street and Union Street and Front Street), and the City’s recently released Blueprint San Diego. Noting the Manchester Pacific Gateway Project listed has largely morphed into the IQHQ Research and Development District Project is also recommended.	4
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5. General Comment. While this Draft Environmental Assessment was prepared to comply with National Environmental Policy Act (NEPA) requirements, please assure project implementation also conforms with prior comments provided during review of the San Diego International Airport Development Plan Environmental Impact Report (EIR) prepared to comply with California Environmental Quality Act (CEQA) requirements. (Specifically, this includes relevant comments in the City of San Diego’s November 4, 2019 letter and Attachment A thereto addressing the San Diego County Regional Airport Authority’s Recirculated Draft EIR on the San Diego International Airport Development Plan, which incorporated the proposed project.)	5
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**Public Utilities Department – Lindsey Frick, Associate Planner – [LFrick@saniego.gov](mailto:LFrick@saniego.gov), (858) 292-6459**

1. A detailed sewer and drinking water study, as well as a sewer capacity analysis should be prepared as part of the project submittal to the City’s Development Services Department.	6
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**San Diego Police Department – Brian Schimpf, Police Officer II – [BSchimpf@saniego.gov](mailto:BSchimpf@saniego.gov), (619) 531-2122**

<p><u>Area Station</u></p> <p>Police service for the Terminal 1 Replacement Project will be provided by officers from Western Division, on beat 623, located at 5215 Gaines Street.</p> <p><u>Current Staffing / Officer Availability</u></p> <p>The Western Division is currently staffed with 110 sworn personnel and one civilian employee. The current patrol strength at Northwestern Division is 82 uniformed patrol officers. Officers work ten-hour shifts. Staffing is comprised of three shifts which operate from 6:00 a.m. – 4:00 p.m. (First Watch), 2:00 p.m.- Midnight (Second Watch) and from 9:00 p.m.- 7:00 a.m. (Third Watch). Using the department’s minimum staffing guidelines, the Western Division currently deploys a minimum of 15 patrol officers on First Watch, 18 patrol officers on Second Watch and 11 patrol officers on Third Watch.</p> <p>The San Diego Police Department does not staff individual stations based on ratios of sworn officers per 1,000 population ratio. The goal citywide is to maintain 1.48 officers per 1,000 population ratio.</p> <p><u>Current Response Times</u></p> <p>The police department currently utilizes a five level priority calls dispatch system, which includes priority E (Emergency), one, two, three and four. The calls are prioritized by the</p>	7
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COMMENTER A2

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phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority "E" and priority one calls involve serious crimes in progress or those with a potential for injury. Priority Two calls include vandalism, disturbances and property crimes. Priority Three includes calls after a crime has been committed, such as cold burglaries and loud music. Priority Four include calls include parking complaints or lost and found reports.

7

The Project is currently located in the City of San Diego; within the boundaries of police beat 623. The 2016 average response times for Beat 611 are 6.1 minutes for emergency calls, 11.8 minutes for priority one calls, 30.0 minutes for priority two calls, 83.1 minutes for priority three calls and 156 minutes for priority four calls.

The department's response time goals are 7 minutes for emergency calls, 14 minutes for priority one calls, 27 minutes for priority two calls, 80 minutes for priority three calls and 90 minutes for priority four calls. The citywide average response times, for the same period, were 6.5 minutes for emergency calls, 34.6 minutes for priority one calls, 133.1 minutes for priority two calls, 256.1 minutes for priority three calls and 262.4 minutes for priority four calls during that same time period. The department strives to maintain the response time goals as one of various other measures used to assess the level of service to the community.

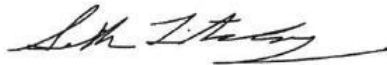
#### Potential Mitigation Measures to Response Time

The department's current staffing ratio of 1.34 officers per 1,000 residents is based on a 2014 estimated residential population of 1,311,882. The ratio is calculated to take into account all support and investigative positions within the department. This ratio does not include the significant population increase resulting from employees who commute to work from outside of the city of San Diego or those visiting.



Thank you for the opportunity to provide comments on the Notice of Availability. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at [RMalone@sandiego.gov](mailto:RMalone@sandiego.gov) or by phone at (619) 446-5371 if there are any questions regarding the contents of this letter or if the SDCRAA would like to meet with City staff to discuss these comments.

Sincerely,



Seth Litchney, Program Manager  
Planning Department

RM/ep

cc: Reviewing Departments (via email)  
Review and Comment online file

## Responses to Commenter A2

- A2-1. Comment noted. SDCRAA will coordinate with City of San Diego staff in the planning, design, and approval of Project-related improvements that are within the jurisdiction of the City, as required.
- A2-2. The most current version of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panels 1877H and 1881H, dated December 20, 2019, were used to determine that the airport is not within a 500-year floodplain. The FIRM Panels are included in Appendix M of the EA. Section 3.3 of the EA has been modified to identify the number and date of the panels. Additionally, the EA's Chapter 7, References, has been modified to include the map information including the website and the date that the website was last checked for updates.
- A2-3. Comment noted. SDCRAA will coordinate with City of San Diego staff in the planning, design, and approval of Project-related improvements that are within the jurisdiction of the City, as required.
- A2-4. As discussed in Section 4.16 of the EA, “[i]n accordance with NEPA, the cumulative impacts analysis evaluates the past, present, and reasonably foreseeable future actions and their cumulative impact on environmental resources. For this analysis, past actions are those known to have occurred within the five years prior to the Proposed Project’s environmental review. Present actions are those that are ongoing and will continue during the Proposed Project construction. Future actions are as described in the Desk Reference for FAA Order 1050.1F (Paragraph 15.1), reasonably foreseeable actions are those that are not remote or speculative. For this analysis, future actions are those expected to occur within five years after the Proposed Project’s environmental review.” For purposes of analysis, the General Study Area (GSA) represents the spatial boundary used to identify cumulative projects that are included in the cumulative impacts analysis. The five-year periods described above for past actions and reasonably foreseeable actions are generally considered, for the purposes of the EA, to define a temporal boundary for consideration of cumulative projects. The following discusses whether and how the six projects identified in the comment meet the temporal and/or spatial boundaries that would necessitate inclusion in the list of cumulative projects considered in the cumulative impacts analysis in Section 4.16 of the EA.
1. The Navy’s Old Town Campus Revitalization Project (Navy OTC Revitalization Project) includes a proposal to modernize Naval Information Warfare Systems Command (NAVWAR) facilities on approximately 70.5 acres of Navy-owned underutilized property at the Old Town Campus to support NAVWAR needs. This project is within the GSA for the Proposed Project EA. A Draft Environmental Impact Statement (EIS) for the Navy OTC Revitalization Project was published on May 14, 2021 and the public comment period ended on August 12, 2021 (the Draft EIS is available at <https://navwar-revitalization.com/draft-eis/>). The Draft EIS presents and addresses five action alternatives, in addition to the required “no action” alternative. Of the five build alternatives, Alternative 1 is a Navy-only project that would construct new or renovate existing NAVWAR facilities at the project site (i.e., referred to as the Old Town Campus or “OTC”). Alternative 2 through 5 propose a collaboration between the Navy, the private sector, and possibly other government agencies to finance and construct new NAVWAR facilities at OTC and a range of private mixed-use development (e.g., residential, office, retail, hotel) of varying size and intensity. Two of those alternatives, Alternatives 4 and 5, include consolidation of a transit center to OTC. Alternative 4 is identified in the Draft EIS as the Preferred Alternative. The development timeframes identified in the Draft EIS for the five action alternatives assume five years for implementation/completion of Alternative 1 (i.e., public/Navy improvements only) and an additional 25 years for implementation/completion of Alternatives 2 through 5 (i.e., 30-year implementation period for the alternatives with the public-private uses). The start of construction is assumed in the Draft EIS to occur in 2021; however, no approvals for any of

the action alternatives have yet occurred, which means the start date for construction will likely be pushed back to some indeterminate date in the future.

As indicated above, for purposes of the EA, reasonably foreseeable future actions are generally considered to be those occurring within five years after the Proposed Project's environmental review. As such, only implementation of Alternative 1 in the Draft EIS would fall into that timeframe. Moreover, Alternatives 2 through 5 include extensive amounts of mixed-use development that will require local environmental review and permitting that will be extensive and time-consuming. Specifically, Alternative 4 proposes up to 19,589,268 square-feet of office, residential, hotel, and retail uses comprised of up to 109 low-, mid-, and high-rise buildings and parking structures, none of which has gone through the state and local environmental review and entitlements processes. Also, there is still considerable uncertainty regarding the nature, amount, and timing of the mixed-uses development associated with Alternatives 2 through 5. For example, the California Coastal Commission is scheduled to consider whether the Navy OTC Revitalization Project is consistent with the California Coastal Management Program. Coastal Commission staff, in a report prepared for the October 15, 2021 Commission hearing on the matter (since postponed), recommended against concurrence with the Navy's finding of program consistency because there is insufficient information to support such a determination.<sup>1</sup> The staff report notes that the Navy has not selected a private developer as a project partner, nor prepared specific construction, site, or design plans. Even the Navy indicates that there is currently no certainty about the final development footprints, layouts, densities, number of buildings, heights, proposed uses and inclusion of a transit facility with the proposed project. In addition to the implementation period for Alternatives 2 through 5 being beyond the 5-year period considered to be reasonably foreseeable for the EA analysis, the uses associated with those alternatives are considered too speculative at this time.

As such, only the potential implementation of Alternative 1 in the Draft EIS for the Navy OTC Revitalization Project is considered reasonably foreseeable. It should be noted that the Draft EIS identifies numerous cumulative projects/actions and determined which projects/actions fall within the geographic effect region for each action alternative. The SAN Airport Development Plan (ADP)<sup>2</sup> lies outside of the geographic effect region identified for Alternative 1.<sup>3</sup> Nevertheless, Alternative 1 for the Navy OTC Revitalization Project has been taken into consideration in the cumulative impacts analysis of the SAN Airfield Improvements and Terminal 1 Replacement Project EA and has been added to the list of cumulative projects identified in Section 4.16 of the EA. The addition of this project does not affect the cumulative impacts analysis/conclusions stated in Section 4.16 of the EA, particularly given that Alternative 1 for the Navy OTC Revitalization Project proposes the replacement and improvement of existing development at the project site with the proposed uses and building types that are generally comparable to those that currently exist. While Alternative 1 proposes increases in the amount (i.e., square footage) of some existing uses and decreases in the amount of other existing uses, the net square footage increase would result in only a negligible contribution to cumulative operational impacts. For example, relative to cumulative traffic impacts, operation of Alternative 1 would result in the

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<sup>1</sup> California Coastal Commission Staff Report F12b regarding Consistency Determination No. CD-0007-21. Available: <https://documents.coastal.ca.gov/reports/2021/10/F12b/F12b-10-2021-report.pdf>.

<sup>2</sup> As indicated in Section 1.1, Project Introduction, of the EA, the SAN ADP is the latest master plan for the airport and identifies the facilities needed to meet the forecasted travel demand in the region through 2035. It describes various projects that are proposed to be constructed in the near term, as well as projects that are long-range development actions that will be required in the future. The Proposed Project, as addressed in the federal EA, is a subset of the SAN ADP that requires FAA authorization/approval prior to construction.

<sup>3</sup> U.S. Department of the Navy, *Draft Environmental Impact Statement, Navy Old Town Campus Revitalization*, Figure 4.3-1 and Table 4.3-2, May 2021. Available: <https://navwar-revitalization.com/draft-eis/>.

generation of 800 daily vehicle trips, compared to that associated with existing conditions (i.e., the No Action Alternative for the Navy OTC Revitalization Project). With approximately 35 percent of trips associated with the Navy's project occurring on Pacific Highway south of the project site (i.e. towards the airport),<sup>4</sup> there would only be 25 additional vehicle trips in the A.M. Peak Hour and 28 additional trips in the P.M. Peak Hour.<sup>5</sup> For reference, forecasted 2026 traffic volumes on Pacific Highway, which include those associated with full operation of the SAN Airfield Improvements and Terminal Replacement Project as well as other background traffic (i.e., future growth including cumulative projects), range from approximately 14,700 daily trips to 64,200 daily trips (see Table 5-5 in Appendix G of the EA). As such, Alternative 1 of the Navy OTC Revitalization Project, in combination with the Proposed Project, is not anticipated to result in a significant cumulative traffic impact.

2. The San Diego Association of Governments (SANDAG) Draft San Diego Forward: 2021 Regional Plan represents the currently proposed update to the Regional Plan for San Diego County, which is updated every four years and combines three planning documents that SANDAG must complete per state and federal laws: The Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The Regional Plan also supports other regional transportation planning and programming efforts, including overseeing which projects are funded under the Regional Transportation Improvement Program and the TransNet. The 2021 Regional Plan includes proposed implementation of major transportation strategies that consider potential policies and programs and changes in land use and infrastructure, take advantage of existing transportation highway and transit networks, and leverage trends in technology to optimize use of the transportation system. For the most part, these major strategies apply County-wide, are not specific to the GSA identified in the EA, and are long-term in nature (i.e., planning horizon year for the 2021 Regional Plan is 2050). Based on the above, the Draft San Diego Forward: 2021 Regional Plan has not been added to the list of cumulative projects identified in Section 4.16 of the EA.

There is a potential improvement though identified within the Transportation Network Improvements and Programs aspect of the 2021 Regional Plan that is proposed in the vicinity of SAN. That improvement is the Central Mobility Hub with a potential fixed-rail connection ("Automated People Mover") to the SAN terminal area, which is described below.

3. The San Diego Central Mobility Hub and associated Connections Comprehensive Multimodal Corridor Plan (CMH and Connections CMCP) currently being considered by SANDAG and Caltrans is intended to provide transportation solutions in the area of SAN and the surrounding communities, focusing primarily on the proposed development of the CMH. Mobility hubs are human-centered, transit-oriented spaces meant to enhance the community and travel experience by providing an array of amenities, recreation areas, and mobility services. As a multimodal transportation center, the CMH currently being considered by SANDAG and Caltrans would connect SAN with transportation options like the Trolley, COASTER, Amtrak Pacific Surfliner, Rapid Transit, local bus, shared mobility services, and future transit modes. SANDAG and Caltrans are exploring two locations for a CMH, both of which are within the GSA: one site is at the Navy OTC Revitalization Project site, included as part of Alternatives 4 and 5 described above relative to the Draft EIS for that project; and the other site is near the northeastern edge of SAN between Interstate 5 and Pacific Highway, south of Washington Street. Because some site preparation for it could occur within five years after the Proposed Project's environmental review, the potential development of the CMH has been added to the list of cumulative projects identified in Section 4.16 of the EA.

<sup>4</sup> U.S. Department of the Navy, *Draft Environmental Impact Statement, Navy Old Town Campus Revitalization*, Appendix E, Figure 7-1, May 2021. Available: <https://navwar-revitalization.com/draft-eis/>.

<sup>5</sup> U.S. Department of the Navy, *Draft Environmental Impact Statement, Navy Old Town Campus Revitalization*, Appendix E, Table 7-4, May 2021. Available: <https://navwar-revitalization.com/draft-eis/>.



The addition of this project does not affect the cumulative impacts analysis/conclusions stated in Section 4.16 of the EA regardless of which site is selected for its development. The CMH's basic nature, function, and location all relate to an intermodal transportation facility within an urbanized, previously developed site, serving to reduce traffic, air quality, and greenhouse gas impacts on both a local and regional level, which indicates that its implementation along with the Proposed Project and other cumulative projects would not cause a significant cumulative impact.

4. The Courthouse Commons Project consists of 431 residential units, approximately 19,000 square feet of retail space, approximately 269,000 square feet of office space, and a 10,260-square foot, 360 feet long concrete tunnel between the existing County Central Jail Building and the new San Diego Central Courthouse. The project is located in downtown San Diego between Broadway and C Street and Union Street and Front Street, which is within the GSA. Construction of the Courthouse Commons Project was initiated in 2020 and completion is estimated in 2023. As such, the Courthouse Commons Project qualifies to be included in the cumulative analysis and has been added to the list of cumulative projects in Table 4.16-2 and to Figure 4.16-1 of the EA. The Courthouse Commons Project site is located southeast of SAN in a highly urbanized area, outside of the Coastal Zone and does not contain historic resources (refer to Figures 3.8-1 and 4.16-1 of the EA) or biological resources. The addition of this project does not affect the cumulative impacts analysis/conclusions stated in Section 4.16 of the EA, including traffic and associated air quality impacts, as the trip generation estimates for the Courthouse Commons Project are within the overall conservative trip generation estimates used in the cumulative traffic analysis for the Proposed Project.
5. Blueprint San Diego represents a new approach to comprehensive Citywide planning that will proactively identify the City's housing, climate, and mobility goals and implement them throughout the City at the community plan level in a way that reflects the unique characteristics of each community. The community plan updates included in Blueprint San Diego include those for the Mira Mesa, University, and Hillcrest communities, all of which are outside the GSA for the SAN Airfield Improvements and Terminal 1 Replacement Project EA. Blueprint San Diego will include revisions to the General Plan to incorporate the City's climate action goals and SANDAG's new vision for the region's transportation system and provide a Citywide framework to guide future land use changes in each community. The Draft EIR for Blueprint San Diego is currently being prepared, with release anticipated to occur in winter 2022 and completion of the Final EIR is projected to occur in summer/fall 2022. Given that Blueprint San Diego primarily involves the planning approach and policies for future development in the City and there are no specific improvements identified within the GSA nor is there a schedule for implementation of Blueprint San Diego, it would be speculative to evaluate how implementation of Blueprint San Diego along with implementation of the SAN Airfield Improvements and Terminal 1 Replacement Project would result in cumulative impacts. As such, it has not been added to the list of cumulative projects identified in Section 4.16 of the EA.
6. The Manchester Pacific Gateway Project (855,000 square feet of office, 372,000 square feet of Navy office, 1,360 hotel rooms, and 391,000 square feet of retail) originally listed in Table 4.16-2 and shown on Figure 4.16-2 in the EA has been changed to reflect the new project name and development characteristics of the IQHQ Research and Development District Project (1,101,000 square feet of office, 1,035 hotel rooms, and 319,000 square feet of retail). This project change does not affect the cumulative impacts analysis/conclusions in Section

4.16 of the EA, including traffic, as the IQHQ is a decrease in size and is projected to generate less traffic than the Manchester Pacific Gateway Project.<sup>6</sup>

In summary, of the six projects identified in the comment, the Navy OTC Revitalization Project (Alternative 1), the CMH (Concept 3), and the Courthouse Commons Project have been added to Section 4.16 of the EA and their impacts have been considered in the cumulative impacts section.

A2-5. The proposed SAN ADP is not the Proposed Project evaluated in this federal EA. As indicated in Section 1.1, Project Introduction, of the EA, the SAN ADP is the latest master plan for the airport and identifies the facilities needed to meet the forecasted travel demand in the region through 2035. It describes various projects that are proposed to be constructed in the near term, as well as projects that are long-range development actions that will be required in the future. The Proposed Project, as addressed in the federal EA, is a subset of the SAN ADP that requires FAA authorization/approval prior to construction. The remaining portions of the SAN ADP are independent and separate from the Proposed Project and either do not need FAA action prior to construction or are not ripe for FAA NEPA review.

The federal EA for the Proposed Project was prepared pursuant to the requirements of Section 102(2)(c) of the *National Environmental Policy Act of 1969* (NEPA), as amended; and Title 40, Code of Federal Regulations (CFR) §§ 1500-1508.<sup>7</sup> The EA also follows the policies, procedures, and guidelines as outlined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, as well as the 1050.1F Desk Reference. These documents outline FAA-accepted methodologies, models, techniques, and thresholds of significance for the impact assessment and preparation of environmental documents. An EIR is a state-level document prepared under the California Environmental Quality Act using State of California guidelines, methodologies, and significance thresholds. The state EIR is independent of the federal EA and any comments submitted under the CEQA process were addressed in the EIR. FAA is not required to resolve differences between environmental documents prepared under state environmental disclosure laws (in this case CEQA) and NEPA. SAN provided responses to comments submitted by the City of San Diego on the Recirculated Draft EIR as part of the Final EIR for the SAN Airport Development Plan (available at <https://www.san.org/Airport-Projects/Environmental-Affairs#1245314-adp-final-eir>).

A2-6. Comment noted. SDCRAA will coordinate with City of San Diego staff in the planning, design, and approval of Proposed Project-related improvements that are within the jurisdiction of the City, as required.

A2-7. Comment noted.

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<sup>6</sup> Kimley-Horn and Associates, *SAN Airfield Improvements and Terminal 1 Replacement Project EA – Updated/Additional Cumulative Projects Trip Generation Summary*, August 2021.

<sup>7</sup> Note that this document was initiated prior to the September 2020 revisions of the Council on Environmental Quality (CEQ) regulations and, thus, complies with the earlier regulation, and remains in compliance with FAA Orders 1050.1F and 5050.4B.

**Commenter A3**  
**Frederick Kosmo**  
**Peninsula Community Planning Board**



COMMENTER A3

July 23, 2021



BY: .....

Mr. Ted Anasis, Manager, Airport Planning  
 San Diego County Regional Airport Authority  
 3225 North Harbor Drive, 3<sup>rd</sup> Floor  
 San Diego, CA 92101

Re: Draft Environmental Assessment (EA) for the San Diego International Airport (SAN)  
 Airfield Improvements and Terminal 1 Replacement Project (June, 2021)

Dear Mr. Anasis:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the San Diego International Airport (SAN) Airfield Improvements and Terminal 1 Replacement Project (June, 2021). At its July 22, 2021 meeting the Peninsula Community Planning Board approved the transmittal of the following comments.

The Airfield Improvements and Terminal Replacement Project proposes improvements throughout the airport, including airfield improvements, improvements to the airport roadway system and the replacement of the existing Terminal 1. However, only those project components that are subject to Federal Aviation Administration (FAA) approval are the subject of the Draft EA. Our comments are confined to those aspects of the project that require FAA approval. Those project components include the following:

- Replacement of the existing Terminal 1 and associated improvement and construction of a new approximately 1,210,000 square foot terminal containing 30 gates, an addition of 11 new gates
- Partial relocation of Taxiway B and the construction of a new parallel Taxiway A southerly of Taxiway B
- Reconfiguration of the existing Remain Overnight (RON) aircraft parking areas
- Construction of a new on-airport roadway for inbound vehicle, pedestrian and bicycle traffic and new on-airport circulation roadways to serve the proposed new terminal, with grade separated arrival and departure curbs

While we recognized that the existing Terminal 1 is an aging facility that does not meet either current codes or the expectations of travelers, we have concerns regarding the scale of the proposed development, the number of new gates proposed and the failure to provide a discussion of meaningful and practical alternatives to the proposed project.

1

**Alternatives Analysis**

The alternatives analysis considers on-site three alternatives to the proposed terminal replacement project, the renovation of the existing terminal in place, the relocation to the north

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 1220 Rosecrans Street. PMB 549, San Diego, CA 92106

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COMMENTER A3

Mr. Ted Anasis, Manager, Airport Planning  
 July 23, 2021  
 Page 2

side (which has been suggested and rejected in the past) and the removal of portions of Terminal 1 to accommodate the proposed new Taxiway A.

The need for additional terminal space and gates described in the Purpose and Need section of the EA could also be achieved through the renovation of the existing terminal and construction of a new, smaller terminal located in the vicinity of the former Commuter Terminal. While this alternative might not achieve the additional 11 gates proposed in the Preferred Alternative, it could achieve the goal of providing improved passenger service without resulting in the enormous increase in building scale and bulk compared to the Preferred Alternative. As proposed, the total floor area of Terminal 1 would increase from 284,300 square feet to 1,210,000 square feet. The goal of increasing the level of customer service could be achieved with a building with a significantly smaller footprint and a reduced number of additional gates. We believe that the EA should examine this reasonable alternative.

2

We also find the off-site alternatives analysis lacking in its evaluation in the use of other airports to alleviate congestion at SDIA. The Cross Border Express serving Tijuana International Airport (TIJ) has proven to be successful and, given its planned expansion, could further serve flights currently served by SDIA or forecast to serve the San Diego region in the future. The alternatives analysis should have given greater consideration to the use of Cross Border Express and TIJ to serve the San Diego region’s air travel needs.

3

**Air Quality**

While we recognize that that total project related emissions resulting from the proposed project do not exceed the de minimis threshold as stated in the EA, the Peninsula community remains concerned about the impacts of airport operations on the air quality of the community and of the region. We strongly encourage SDIA to continue to emphasize the use of low- or no-emission ground service equipment, pre-cooled air at boarding bridges, ground power to minimize the use of auxiliary power units and the use of electric on-airport shuttles.

4

**Airport Noise**

While we cannot argue that the proposed project will result in significant noise impacts, given the EA’s assertion that the number and type of operations will be the same under the proposed project or the no-project alternative, the Peninsula community remains concerned over the noise Impacts on our community. We note that the number of housing units within the 65 CNEL contour totals 7,805 units, the SDIA’s residential sound insulation program has treated only 3,819 dwelling units as of June, 2019. We strongly encourage SDIA to accelerate the pace of providing sound insulation throughout our community and those to the east of the airport.

5

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COMMENTER A3

Mr. Ted Anasis, Manager, Airport Planning  
July 23, 2021  
Page 3

Again, we appreciate the opportunity to provide comments on the Draft EA for the SAN Airfield Improvements and Terminal 1 Replacement Project.

If you have any questions, you can contact me at [fkosmo@wilsonturerkosmo.com](mailto:fkosmo@wilsonturerkosmo.com). Thanks.

Sincerely,

A handwritten signature in blue ink, appearing to read "Fred Kosmo", with a horizontal line extending to the right.

Frederick Kosmo, Chair  
Peninsula Community Planning Board

**Peninsula Community Planning Board**  
1220 Rosecrans Street, PMB 549, San Diego, CA 92106

[www.pcpb.net](http://www.pcpb.net)  
[pcpbsd@gmail.com](mailto:pcpbsd@gmail.com)

## Responses to Commenter A3

- A3-1. Comment noted. Section 1.4 of the EA describes the purpose and need for the Proposed Project being evaluated in this federal EA. Chapter 2 of the EA presents the alternatives analysis that identifies reasonable alternatives for use in the federal EA consistent with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.
- A3-2. The commenter suggests that a smaller terminal would meet the purpose and need. Appendix A1, Section A2.0 of the EA provides the planning data that underly the need for the Proposed Project. As is shown in Table A1-3 of Appendix A1, as well as Table 1-3 of the EA, in order to meet the service level objectives at 18 million annual enplanements and provide all necessary elements of a modern airport terminal, SAN will need over 1 million square feet of space composed of numerous functional areas (i.e., Security Screening Checkpoint, Concessions, Outbound Bag Screening and Make-up area). Thus, the space requirements are not driven by the 11 additional gates that would be supplied, but by the service demands of modern air travel, security processing, and the amenities expected by the public. Section 1.4 of the EA main document and Appendix A1, Section A2.0 of the EA discuss the purpose and need for the Proposed Project, while Chapter 2 of the EA discusses the alternatives. A reduced size terminal was initially considered in the EA, but did not pass the alternatives screening, because it would not meet the purpose and need as described in Section 2.3.2.3 (Alternative titled Add Taxiway A and Remove Portions of Terminal 1).
- A3-3. A supplemental airport or a replacement for SAN is evaluated in the EA. It was considered as an alternative in the EA (see Section 2.3.1) and found to not meet purpose and need. While the Cross Border Xpress (CBX) (pedestrian bridge allowing direct access from the U.S. to the Tijuana International Airport and vice versa) might serve some passengers, it would not serve all or even most passengers who currently use Terminal 1 at SAN. The CBX is in place to serve international passengers. Specifically, U.S. travelers use CBX to connect with four foreign flag airlines at Tijuana International Airport (Aeromexico, Calafia, Viva Aerobus, and Volaris), which serve destinations in Mexico. Travelers to U.S. destinations are unable to use this service (see <https://www.crossborderxpress.com/en/about>). Section 2.3.1 of EA notes “Even if a new airport was constructed, another existing airport in the region was improved, or other transportation modes (such as rail, bus, or auto) were improved to accommodate forecast aviation demand, or a combination of the two (CBX), SAN would continue to operate and, due to its well-established air service and close proximity to downtown San Diego, would continue to attract high numbers of passengers and aircraft operations.” Section 2.3.1 of the EA also notes that neither the FAA nor the SDCRAA have the authority to require passengers or airlines to use another airport, which also applies to the use of the CBX. Thus, improvements at SAN would still be required to meet the purpose and need, specifically meeting the building code as well as addressing the customer service needs with existing and forecast passenger levels.
- A3-4. Comment noted. As described in Appendix A4, Project Design Features/Commitments, of the EA, the SDCRAA has included a number of project design features and measures as part of the Proposed Project to minimize environmental effects, including the following to minimize air quality and climate impacts:

### Ground Support Equipment (GSE) Conversion

- All baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SAN 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.

#### **Electric On-Airport Shuttles**

- In conjunction with the Proposed 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.

Section A4.1 of Appendix A4 of the EA has been modified to also reflect that ground power (400 hertz) and preconditioned air is a design feature for all new aircraft gates. Section A4.1 now states, "All new aircraft gates shall be equipped with ground power (400 hertz) and preconditioned air."

A3-5. Comment noted.

**Commenter T1**  
**Ray Teran**  
**Viejas Tribal Government**

COMMENTER T1

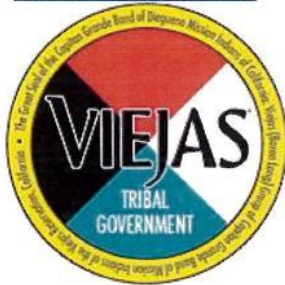
**From:** Ray Teran <rteran@viejas-nsn.gov>  
**Sent:** Wednesday, June 16, 2021 10:19 AM  
**To:** Airport Planning  
**Cc:** Ernest Pingleton  
**Subject:** Airfield Improvements and Terminal 1 Replacement Project

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project. 1

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors, please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

*Ray Teran*  
Viejas Tribal Government  
Resource Management Director  
619-659-2312  
[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)



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JUN 16 2021  
BY: .....



## Response to Commenter T1

T1-1. Comment noted. As described in Section 4.9.4 of the EA, the SDCRAA has agreed to the request by the Viejas Tribal Government that a Kumeyaay Cultural Monitor be present during excavation activities associated with implementation of the Proposed Project. The SDCRAA is currently developing a Memorandum of Agreement (MOA) with the Viejas Tribal Government, and that MOA will become effective prior to excavation activities for the Proposed Project. The FAA has added the following avoidance and minimization measures to Section 4.9.4 of the EA:

- In consultation with the Jamul Indian Village Tribe, the San Diego County Regional Airport Authority will provide the tribe with any cultural and geological reports that are either available or come available.
- In consultation with the Viejas Tribal Government, the San Diego County Regional Airport Authority has agreed to respect the cultural perspective of the Native American Community that the SDIA property was part of the traditional use area for Native Americans during the prehistoric habitation of the bay area. Because of the Native American history in the area, the San Diego County Regional Airport Authority will accommodate the request by the Viejas Tribal Government that a Kumeyaay Cultural Monitor be present during excavation activities associated with implementation of the San Diego International Airport - Airport Development Plan. This Excavation Monitoring will be limited to those areas of the construction project that are located beneath the modern dredge and fill soils that were imported to this location to create the airport. Monitoring the excavation of any soil associated with imported fill material will not be required.
- The Excavation Monitoring will be conducted in the area designated for the Airport Development Plan, which includes the replacement of Terminal 1, a new parking facility, and associated roadway and aircraft apron improvements that are within the planning jurisdiction of the San Diego County Regional Airport Authority. Native American monitoring will always be conducted in conjunction with archaeological monitoring, and a qualified archaeologist will be responsible for the determination of when appropriate soil horizons are encountered that would necessitate Native American and archaeological monitoring.
- The Excavation Monitoring will be conducted within the areas identified in Figure 1-2: Proposed Project.
- The specifics of the Excavation Monitoring program will be described in a Memorandum of Agreement, which will be prepared and agreed to by the San Diego County Regional Airport Authority and the Viejas Tribal Government.

**Commenter T2**  
**Ray Teran**  
**Viejas Tribal Government**

COMMENTER T2

**From:** Ray Teran <rteran@viejas-nsn.gov>  
**Sent:** Monday, June 21, 2021 2:08 PM  
**To:** Airport Planning  
**Cc:** Ernest Pingleton  
**Subject:** Airfield Improvements and Terminal 1 Replacement

I'm sure we have commented before, but here is another official comment:

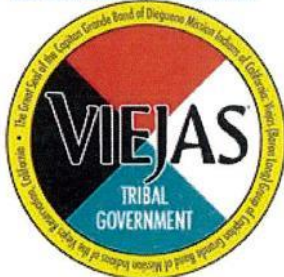
The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

1

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is \$54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

*Ray Teran*  
**Viejas Tribal Government**  
**Resource Management Director**  
**619-659-2312**  
[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)



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JUN 21 2021  
BY: .....

## **Response to Commenter T2**

T2-1. Comment noted. Please see Response to Comment T1-1 above.

**Committer O1**  
**Bruce Coons**  
**Save Our Heritage Organisation**

COMMITTER O1



Save Our Heritage Organisation  
*Protecting San Diego's architectural and cultural heritage since 1969*

Tuesday, July 27, 2021

Ted Anasis, Manager, Airport Planning  
San Diego County Regional Airport Authority  
3225 North Harbor Drive, 3rd Floor,  
San Diego, CA 92101

Re: Airfield Improvements and Terminal 1 Replacement Project – draft EA comments

Mr. Anasis,

Save Our Heritage Organisation (SOHO) has reviewed the Draft Environmental Assessment for the Federal Aviation Administration's (FAA) required environmental review under NEPA regarding the San Diego County Regional Airport Authority's proposed Airfield Improvements and Terminal 1 Replacement Project at the San Diego International Airport. SOHO concurs with the FAA in their finding that the United Airlines Hangar/Terminal Building and Convair Wind Tunnel Building are within the Area of Potential Effect (APE) and qualify as historic properties eligible for listing in the National Register of Historical Places (NRHP). SOHO also acknowledges that construction of this Project would not adversely affect these two historic properties, and strongly recommends both resources be listed in the NRHP.

1

Significant under multiple designation criteria, the c. 1931 United Airlines Hangar and Terminal (UAHT) is the oldest surviving structure associated with the earliest period of Lindbergh Field's development between 1928 and 1933. While SOHO acknowledges relocation of the UAHT building is part of a "separate and independent project," it will be located inside the APE. As an early aircraft hangar example, SOHO strongly recommends for FAA and/or San Diego Airport Authority to pursue listing the UAHT on the NRHP. The Convair Wind Tunnel Building is also significant under multiple NRHP Criteria as the first low-speed wind tunnel facility in the city and can further the study of aerospace and aviation technology through continued testing. While not proposed to be affected by the Project, SOHO also recommends listing on the NRHP.

2

Last, SOHO encourages a portion of the Brutalist style Terminal One primary (south) façade be used to create an art or similar installation for the Airport as a permanent fixture. The construction of Terminal One is significant as it enabled Lindbergh Field to dock and maintain large jet engine aircraft. Terminal One reflects the modernization of San Diego through an increase in air traffic. Due to this strong significance, SOHO asserts it is important the FAA and Airport Authority continue to share the important aerospace and aviation history that has taken place in San Diego. One suggestion is to create an observation area, for the public to observe aircraft takeoff and land, a tradition in many families. Sufficient ceiling height within Terminal One would also enable relevant San Diego aircraft to be displayed (beyond the Spirit of St. Louis) and further bringing aviation history to the public. Artwork should also be retained and displayed illustrating San Diego's history in this field.

3

Thank you for the opportunity to comment,

Bruce Coons  
Executive Director  
Save Our Heritage Organisation (SOHO)

3525 Seventh Avenue • San Diego CA 92103 • www.SOHOsandiego.org • 619/297-9327

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**Responses to Commenter O1**

O1-1. Comment noted.

O1-2. FAA's role is to evaluate the proposed undertaking pursuant to Section 106 of the National Historic Preservation Act. The comment recommending nomination of the structure is noted. However, FAA and SDCRAA are not obligated to nominate a historic property that has been determined eligible for inclusion into the National Register of Historic Places.

O1-3. Comment noted. Section 3.10 of the EA, specifically Table 3.10-1, clearly states the FAA has determined the 1967 Terminal 1 is not eligible for listing in the National Register of Historic Places (i.e., it does not meet the criteria for listing) and is, therefore, not considered to be a significant historic resource. This conclusion is supported by a letter from the California State Historic Preservation Officer (SHPO) dated August 17, 2021 completing the Section 106 consultation process (see Appendix E1 of the EA). In the letter, the California SHPO specifically states "SHPO concurs that Terminal 1 and the Pacific Southwest Airlines Administrative and Maintenance Building are ineligible for listing on the National Register of Historic Places."

**Commenter P1**  
**Gary Wonacott**



**From:** Gary Wonacott <gwonacott@hotmail.com> **BY:** ..... COMMENTER P1  
**Sent:** Friday, June 25, 2021 1:21 PM  
**To:** Airport Planning  
**Cc:** Greg Knight; cathy ives; Jean Froning; Jeannie Mershon; bob semonsen; Debbie Watkins; Will Schussel; Klaus Mendenhall; Nancie Geller  
**Subject:** Draft Environmental Assessment: San Diego International Airport Airfield Improvements and Terminal 1 Replacement Project Comments

I have three primary objections to the information in the proposal by the San Diego County Regional Airport Authority (Airport Authority) to expand Terminal 1 and make modifications to the taxi-ways.

1. It is stated in the document that the current taxi-way is a cause for arrival/departure delays; in previous documents published by the Airport, it was clear that the primary and only cause for delays is the one runway.	1
---	---

2. The Airport Authority continues to ignore the illegal post 10 pm departure, referred to as the nighttime noise abatement departure. The change was illegal when it was implemented decades ago and it is still illegal for the same reason. There was never an environmental assessment to quantify the noise shift on Mission Beach. This assessment must be made to confirm "no shift".	2
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3. Virtually every aspect of the input data for the AEDT models is flawed from the aircraft mix to the distribution of day, evening, and nighttime departures for 2026 and 2035, to the assumed departure tracks for the illegal nighttime noise abatement procedure as well as for the PADRZ SID.	3
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The implementation of the FAA satellite navigation procedures resulted in a substantial increase in noise concentration in Mission Beach. After four years of review and analysis by members of the TAC, CAC and interested citizens, many of the points alluded to above were clearly demonstrated. The continued use of the flawed input data illustrates an arrogance by the Airport Authority and to some extent the FAA. The phrase, the end justifies the means, applies over and over in the approach taken by the Airport Authority in this environmental assessment.	4
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"The statement that the ends justifies the means can be traced back to Niccolo Machiavelli. The closest he came to it was when he expressed his view in Chapter XVIII of *The Prince*:

## COMMENTER P1

“There is nothing more necessary to appear to have than this last quality (appearing to be religious), inasmuch as men judge generally more by the eye than by the hand, because it belongs to everybody to see you, to few to come in touch with you.”

In this quote from Chapter 18 of *The Prince* about keeping faith, or being true to your word, Machiavelli is instructing a Prince on how to behave and how to keep up appearances. He says it’s very important to appear merciful, faithful, humane, upright, and religious. He also says that one must be prepared to act in a manner contrary to the appearance to keep up the appearance. This is because everyone can see what you appear to be, and only a few will get close enough to touch you and actually find out what happened.

Lindbergh Field, now San Diego International Airport (SDIA) was and continues to be considered essential to the economy of San Diego. In 2018, the Airport Authority performed a financial study and showed that the airport brings in approximately \$12B of revenue to San Diego County. Apparently, in the eyes of the Airport Authority and others, this is far and away sufficient ***ends to justify the means.***

5

Unfortunately, it is far too easy for the Airport Authority to look at the population of San Diego impacted by airport noise as data and statistics. It is far too easy to rationalize increasing noise illegally over the residents of Mission Beach, rather than to come to Mission Beach and experience first hand the disruption throughout the day, but particularly at night. It is far too easy to manipulate noise monitoring data collection and analysis to support the desired answer. It is far too easy to pressure consultants to rationalize answers that support the end objective.

Shortly after Lindbergh Field became operational, there were noise complaints from residents living off of the west end of runway 27. This culminated in litigation during the 80’s that led to formation of the ANAC and commitment to formation of an airport noise abatement office and soundproofing of housing as FAA funds were made available. In addition, eventually the San Diego County Regional Airport Authority (SDCRAA) was formed, which provided an organizational structure that focused the public away from the final decision makers on the SDCRAA Board. Again, the end justifies the means.

And perhaps not surprisingly, in all of the years of operation of the SDCRAA, the ANAC and the Noise Abatement Office, there has never been an operational change that would mitigate aircraft noise on the ground. The projected increases in operations at SDIA in the future should demand noise consideration, but none is included in the

6

document. In fact, the document completely ignores the disruption from aircraft noise anywhere around the airport, both inside and outside the 65 dB CNEL. As always at SDIA, the end justifies the means dominates planning at SDIA.

6

Not only has the Airport Authority reversed its position and now claims that the taxiway traffic impacts overall flow at SDIA, but there is no analysis offered to even attempt to support this position. But, this is not the first time that the Airport Authority has elected not to provide supporting analysis when the analysis results do not support the Airport Authority objectives. ***The end justifies the means.***

7

#### **Analysis of flawed input data to AEDT**

The data below was taken from the Appendix F, Noise Technical Report. One key flawed aspect of the input data is the inaccuracy of the 2018 departure totals and the disparity between the 2018 departures versus the 2026 and 2031 projections.

8



**Table 3. Modeled Average Daily Aircraft Operations for 2018**

Aircraft Type	Arrivals			Departures			Total
	Day	Evening	Night	Day	Evening	Night	
717200	0.9992	0.4565	0.7320	1.4557	0.7265	0.0000	4.3699
737300	0.0167	0.0028	0.0028	0.0195	0.0056	0.0000	0.0473
737400	0.0501	0.0306	0.0000	0.0223	0.0612	0.0028	0.1670
737500	0.0028	0.0000	0.0000	0.0028	0.0000	0.0000	0.0056
737700	58.9495	14.0116	8.6925	65.9080	14.3234	1.2108	163.0958
737800	49.4665	17.7859	14.2148	61.5771	14.0812	5.5278	162.6533
747400	0.3841	0.0167	0.0000	0.0000	0.3841	0.0195	0.8044
757300	0.7766	0.1169	0.0362	0.5817	0.1447	0.1921	1.8482
767300	1.7396	0.2310	1.8231	1.2024	2.1989	0.3925	7.5875
777200	0.0334	0.0000	0.0000	0.0000	0.0306	0.0028	0.0668
777300	0.0000	0.0000	0.0000	0.0028	0.0000	0.0000	0.0028
1900D	0.0056	0.0028	0.0000	0.0056	0.0028	0.0000	0.0167
7378MAX	0.7654	0.2171	0.1169	0.9324	0.1475	0.0139	2.1933
757PW	3.0339	0.7766	1.3499	3.9079	1.0271	0.2199	10.3153
767CF6	0.6096	0.0000	0.1113	0.6652	0.0529	0.0000	1.4390
7773ER	0.4509	0.1225	0.0000	0.0056	0.5483	0.0195	1.1468
7878R	1.0104	0.0000	0.0028	1.0159	0.0000	0.0000	2.0291
A109	0.0251	0.0000	0.0028	0.0167	0.0111	0.0000	0.0557
A310-304	0.0000	0.0000	0.0000	0.0056	0.0000	0.0000	0.0056
A319-131	4.9878	0.5817	1.0577	5.5640	1.0521	0.0056	13.2490
A320-211	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
A320-232	13.0486	5.1604	1.8259	14.9357	4.1389	0.8740	39.9835
A321-232	19.7788	6.0511	4.0610	22.0055	5.5501	2.3102	59.7567
A330-301	0.0084	0.1503	0.8656	1.0159	0.0028	0.0000	2.0430
A330-343	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
A340-211	0.6569	0.0167	0.0000	0.5539	0.1030	0.0167	1.3472
B206L	0.0084	0.0000	0.0000	0.0139	0.0000	0.0000	0.0223
BD-700-1A10	0.3201	0.0724	0.0557	0.3758	0.0696	0.0084	0.9018
BD-700-1A11	0.1392	0.0167	0.0084	0.1531	0.0084	0.0000	0.3257
BEC58P	0.2589	0.0028	0.0028	0.2366	0.0167	0.0000	0.5177
CIT3	0.1336	0.0084	0.0000	0.1280	0.0139	0.0000	0.2839

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May 19, 2021  
Page 6

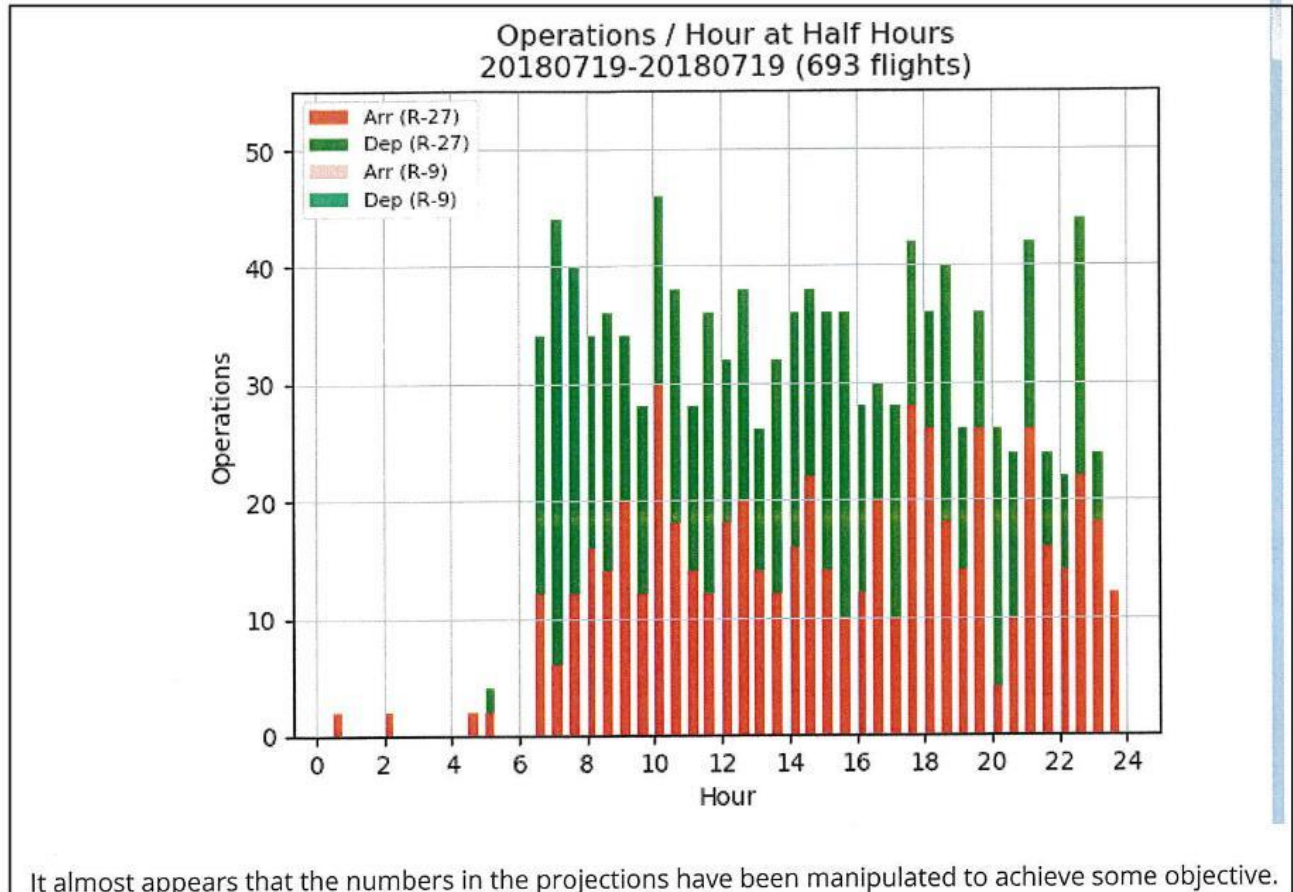
Aircraft Type	Arrivals			Departures			Total
	Day	Evening	Night	Day	Evening	Night	
PA28	0.0612	0.0000	0.0000	0.0390	0.0056	0.0000	0.1058
R44	0.0278	0.0056	0.0000	0.0418	0.0000	0.0000	0.0752
S76	0.0000	0.0000	0.0000	0.0028	0.0000	0.0000	0.0028
SA341G	0.0028	0.0028	0.0000	0.0000	0.0028	0.0000	0.0084
SA350D	0.0111	0.0028	0.0056	0.0306	0.0056	0.0000	0.0557
SA355F	0.0000	0.0000	0.0000	0.0056	0.0000	0.0000	0.0056
T41	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>213.5727</b>	<b>54.9136</b>	<b>40.5596</b>	<b>243.9089</b>	<b>53.8921</b>	<b>11.1531</b>	<b>618.0000</b>

9

From the table below, the day, evening and night departures are compared with the other data:

	Daytime	Evening	Night
2018	244	54	11
2026	252	48	54
2031	264	50	59

We collected the same type of data for 2018 to quantify the number of nighttime departures between 6:30 and 7 am and 10 pm to 11:30 pm (total operations is 694). We did this for multiple dates in both 2018 and 2019. If we compare the nighttime only, from the chart below we get a total of 57 departures compared to the 11 above. There is no way to rationalize this difference. But, if this data was used in the 2018 AEDT analyses to project the 65 dB CNEL, it must have resulted in a gross error. Keep in mind that there is a factor of 10 dB penalty on nighttime operations; you can also multiple the number of operations by 10, so 110 according to the Airport Authority data compared to 570 from our data. AEM could be used to roughly quantify the difference in areas for the two cases, but these results would simply be ignored because they are not consistent with the Airport Authority objectives.



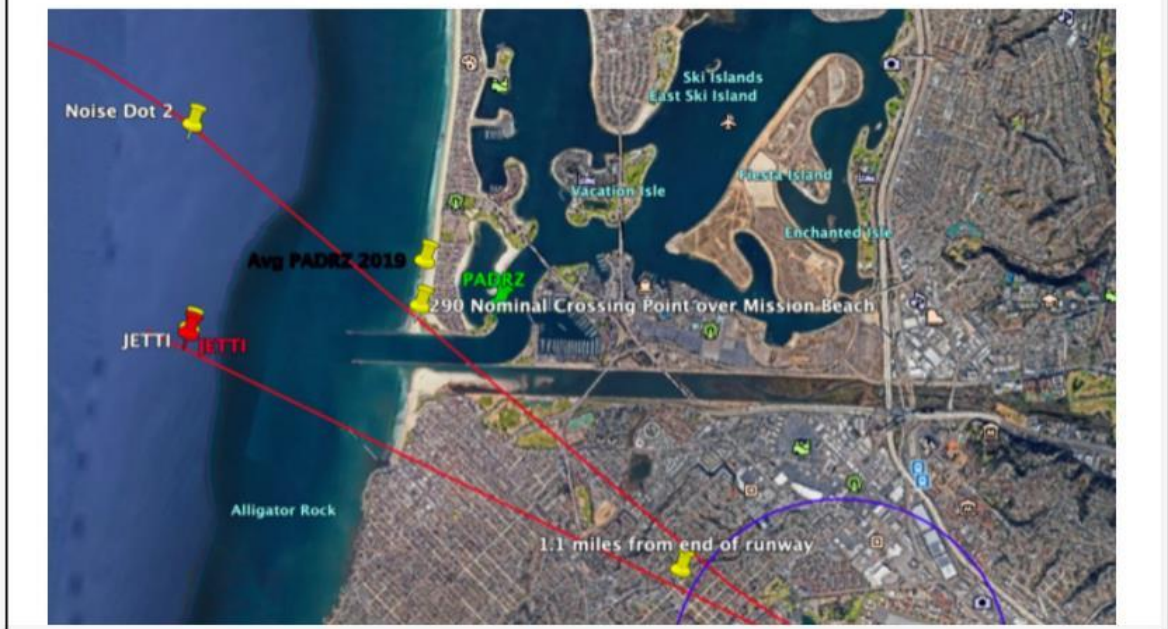
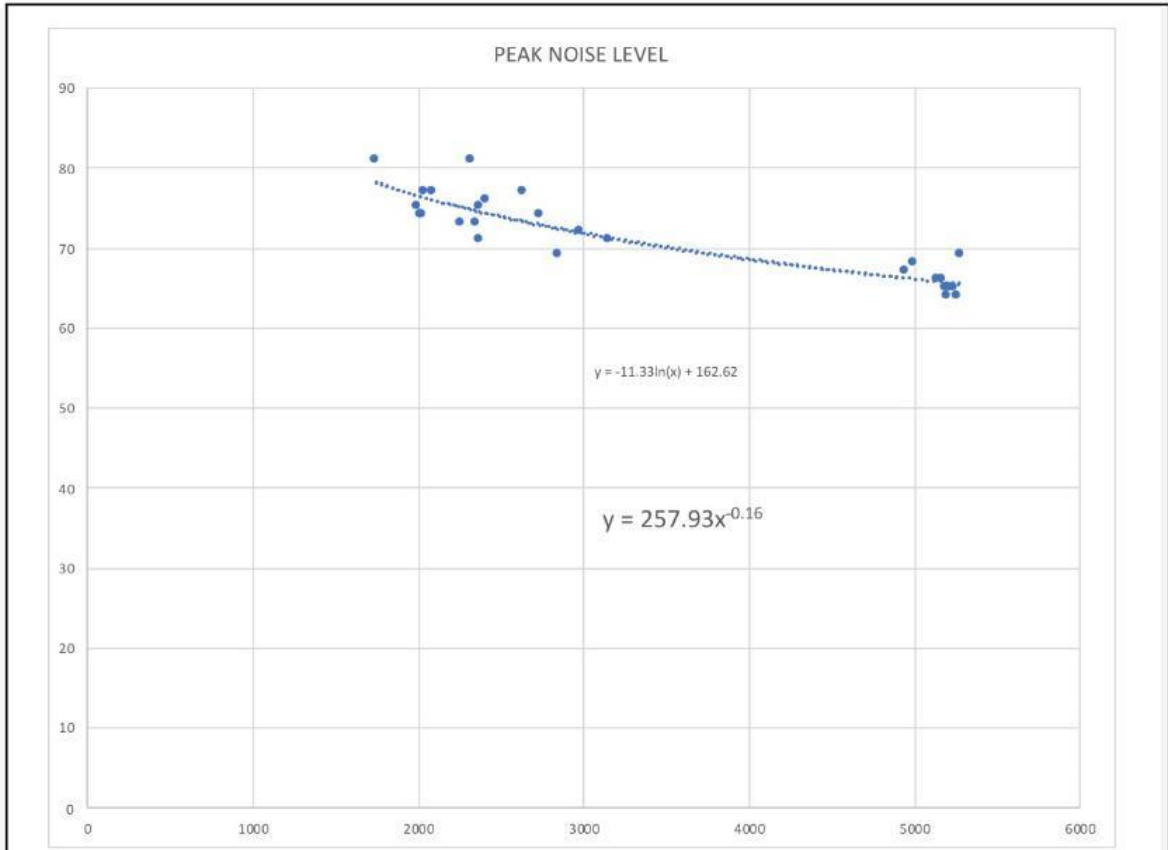
9

### **Illegal nighttime noise abatement agreement**

10

There is general consensus that the post 10 pm departures were moved from the 275 degree departure, now referred to as the ZZOOO departure, to a vector departure of 290 degrees, without any environmental assessment. Multiple searches at the FAA have confirmed that there are no documents associated with this move. Consultants working for the Airport Authority refer to this departure as unapproved by the FAA.

The recent Flight Procedures Analyses (FPA) and Part 150 study culminated with a new procedure going before the SDCRAA board members for approval to submit to the FAA portal. I would hope that the SDCRAA would not approve this new procedure, but would send the Noise Abatement Office back to first assess the original issue.



COMMENTER P1

11

The two pictures below quantify the impact on Mission Beach associated with the original implementation of the nighttime 290 noise abatement agreement. The first picture shows data collected from the Airport Authority Webtraks site. The second picture shows the two relevant departure tracks; the bottom red line is the ZZOOO procedure and the top red line is the 290 nighttime departure track. Specifically, noise monitor data was collected for departures on the post 10 pm 290 and for ZZOOO departures on 24 and 25 June, 2021. The reference location for distance measurements is my house on Avalon Court in Mission Beach and Mission Beach noise monitor at the jetty was used to obtain noise data.

Analysis of the data indicates that moving the post 10 pm departures increased the noise levels in Mission Beach by about 7.2 dB. This does not include the 10 dB penalty mandated by the FAA for post 10 pm departures. Keep in mind that these are the most disruptive departures of the entire day. The residents of Mission Beach did not deserve this noise impact when it was implemented, and certainly does not now as these issues have surfaced for the first time.

It is for the reasons alluded to above and others that the noise assessment associated with this expansion at SDIA should not be approved.

## Responses to Commenter P1

P1-1. Section 1.4.1 and Appendix A1, Section A2.2 of the EA discuss the need for the proposed taxiway improvements. As is shown in Tables A1-1 and A1-2 in Appendix A1 of the EA, aircraft operational delays occur due to the lack of dual taxiway flow at the airport. SDCRAA has discussed delays associated with the single runway system as activity levels grow, and that information included the consideration of delays caused by the lack of dual taxiways.

Section 1.3.3 of the EA has been modified, as shown by underlined and strikeout text here in this response, as follows, to provide clarity about the effects of the Proposed Project:

“This EA also considered the effect that ~~the Proposed Project, including the~~ additional gates ~~and improved taxiway flow,~~ would have on ~~airfield airport~~ capacity. The existing 51 gates ~~and, 28 [Remain Overnight] RON positions, and taxiway system~~ at SAN can accommodate the runway constrained airfield capacity of SAN (approximately 292,000 annual aircraft operations). ~~Improving the taxiway efficiency would not alter the runway’s acceptance rate for aircraft or increase operational capacity; the taxiway improvement would reduce delays for aircraft to reach and depart their gates, as well as facilitate transition to the opposite end of the runway, by allowing bidirectional taxi movement adjacent to the terminals.~~ Without the Proposed Project, SAN would serve the forecasted annual enplanements using all of its terminal gates along with some RONs acting as hardstands<sup>8</sup> during the daytime hours. Multiple RON spots are capable of accommodating [Airplane Design Group] ADG-V aircraft. Therefore, increasing the number of gates ~~and enabling dual parallel taxiways~~ would not increase SAN’s ability to ~~handle~~ accommodate more aircraft operations than what it ~~is limited can~~ now with the single runway. ~~No changes to the runway configuration, aircraft fleet mix, number of operations, time of aircraft operations, air traffic procedures, or airspace would occur as a result of the Proposed Project.”~~”

The SDCRAA has presented public information over the past years about on-airport aircraft delay conditions at SAN. Captured in the delay analysis in Tables A1-1 and A1-2 in Appendix A1 of the EA has been where delay is or would be incurred, including taxiway delay. Much of the public discussion focused on the delay caused when the capacity of the airfield has been exceeded, but the information about on-ground movement delay has been presented.

P1-2. Comment noted. The existing nighttime curfew, enacted prior to the 1990 Airport Noise and Capacity Act and, thus, grandfathered, that affects departures between 11:30 p.m. and 6:30 a.m. would not be affected by the Proposed Project. As the curfew would not be affected by the Proposed Project, further considerations of it are outside the scope of this EA.

P1-3. Section 1.3.3 and Appendix A2 of the EA document forecasts used in the EA, including the fleet mix considerations, as well as the FAA’s approval of the forecasts. These forecasts underwent review by the FAA before their approval for use in the EA. The commenter refers to flight tracks, which are discussed in Appendix F2, Section 6 of the EA. The Proposed Project would not affect flight tracks or arrivals and departures procedures into SAN as noted in Section 4.12.3.2 of the EA. Flight tracks were obtained from the SAN Aircraft Noise and Operations Management System (ANOMS), as discussed in Appendix F2, Section 6. Further the commenter was not specific concerning perceived errors. See also Response to Comment P1-8 below.

P1-4. Comment noted. Section 4.12 of the EA states that implementation of the Proposed Project would not change the number of aircraft operations, type of aircraft, nor flight paths that would

<sup>8</sup> A “hardstand” represents an aircraft parking area where passengers are transported between the aircraft and the terminal via a shuttle bus, or walk, and typically board the aircraft or deplane through the use of portable stairs or, for those with mobility limitations, a portable elevator.

otherwise occur in 2026 and 2031 under the No Action Alternative. The comment about the use of satellite-based navigation is beyond the scope of this EA as it is not a component of the Proposed Project, nor would satellite navigation be affected by the Proposed Project. The data used for the aircraft noise analysis for the proposed replacement passenger terminal is valid for this purpose. See also Response to Comment P1-3 above.

P1-5. Comment noted.

P1-6. Comment noted. See Responses to Comments P1-3 and P1-4 above. As stated in Section 4.12.4 of the EA, the proposed improvements would not change the noise level from operations between the No Action Alternative and the Proposed Project. Therefore, no mitigation measures are required.

P1-7. See Response to Comment P1-1 above. Appendix A1, Section A2.2 of the EA provides information about delay occurring on the taxiway system that supports the need for the proposed taxiway improvements. The Proposed Project enabling dual taxi capability would not alter the airfield capacity of SAN, as described in Section 1.3.3 of the EA.

P1-8. See Responses to Comments P1-1, P1-3, and P1-4 above. The commenter states, “One key flawed aspect of the input data is the inaccuracy of the 2018 departure totals and the disparity between the 2018 versus the 2026 and 2031 projections.” The commenter is not specific about flaws nor clear on how the data set presented in Table 3 in their comment relates to the 2026 and 2031 projections used in the EA. As required by FAA Order 1050.1F, the EA compares the future Proposed Project conditions with the future (i.e., 2026 and 2031) No Action condition. As described in Section 4.12 of the EA, the Proposed Project would not change aircraft noise; the Proposed Project and the No Action activity levels, fleet mix, flight tracks, and resulting noise conditions would be the same. The relationship between future (2026 and 2031) conditions and existing (2018) conditions is inconsequential relative to the NEPA EA impacts analysis. As noted in Section 1.3.3 of the EA, the FAA conducted a review of the forecasts documented in Appendix A2 of the EA and determined them appropriate for use in the NEPA analysis. It should also be noted that the 2018 data used in aircraft noise modeling reflects an average annual day, and thus cannot be compared to “multiple dates in both 2018 and 2019” as referenced in Comment P1-9. See also Response to Comment P1-9 below. The day-evening-night distribution data used in the noise analysis for 2018 was derived from the SAN ANOMS as discussed in Appendix F2, Section 3 of the EA. Following FAA Order 1050.1F, noise exposure contours are to reflect an average annual day, as described in Appendix F1 of the EA.

P1-9. The airport noise exposure contours prepared for this EA used the Community Noise Equivalent Levels (CNEL) and represent average annual day conditions, as noted in Section 4.12 and Appendix F of the EA. Thus, as the commenter collected data for certain specific days in 2018 and 2019, it does not necessarily represent what happens throughout the year or on an average annual day. Thus, the daily and weekly fleet mix and daily activity levels vary relative to average annual conditions. See also Response to Comment P1-3.

P1-10. See Response to Comment P1-4 above. The analysis of past flight procedure changes is beyond the scope of this EA. As stated in Section 4.12.3.2 of the EA, the proposed replacement passenger terminal and proposed taxiway improvements would not alter the approach and departure procedures used by aircraft at SAN.

P1-11. See Responses to Comments P1-4 and P1-10 above.

**Commenter P2**  
**Richard S. Phillips**

COMMENTER P2

July 27, 2021



BY: .....

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

RE: Comments on Draft Environmental Assessment Airfield Improvements & Terminal 1 Replacement

Dear Mr. Anasis,

Below are general and some specific comments regarding the Draft Environmental Assessment (Draft EA) for San Diego International Airport's proposed airfield improvements and Terminal 1 Replacement Project.

**Propose Project and Need**

The Proposed Project is summarized in the Notice of Availability as:

- Construction of Taxiway A and relocation of part of Taxiway B;
- Construction of a replacement Terminal 1;
- Relocation and demolition of SDCRAA's existing administration offices (formerly known as the Commuter Terminal);
- Construction of an automobile parking structure adjacent to the replacement terminal and airport circulation and roadway improvements;
- Expansion of the Central Utility Plant and the Storm Water Capture and Reuse System;
- Relocation of five and elimination of two designated Remain Overnight (RON) aircraft parking positions;
- Relocation of three Federal Aviation Administration (FAA) Airport Surface Detection Equipment – Model X (ASDE-X) sensors; and
- Construction of various utility connections.

In February 2020, the San Diego County Regional Airport Authority (SDCRAA) approved the Final EIR for San Diego International Airport's (SDIA) Airport Development Plan (ADP). The project scope and other elements of the approved ADP are noted in section 1.2.3 *Proposed Project Components* in the final EIR. Several projects, project components, mitigation measures and other conditions contained in the ADP Final EIR are not included in the Draft EA Proposed Project or are not fully analyzed.

Although not a comprehensive list, components that seem to be absent from the Draft EA include modification/improvements to Terminal 2, demolition of existing support facilities, removal and/or relocation of existing airport buildings, on-site roadway circulation development, and several major public transportation system improvements.

1

**Proposed Components Not Subject to FAA Approval**



## COMMENTER P2

The Draft EA's narrative and tables lists several components asserting FAA approval is not required. However, several projects and undertakings such as demolitions, relocation of buildings, and necessary mitigation measures found in the ADP's EIR are required elements of the project and necessary in order to implement the Proposed Project contained in the Draft EA. The demolition of existing buildings, relocation of historic buildings, and project phasing are not included in the Draft EA but are necessary components in order to implement the Proposed Project. Although SDIA plans to use non-FAA funds for projects that were excluded from the Draft EA's assessment, several are contained in the approved EIR for the ADP and must be implemented prior to or during the Draft EA's Proposed Project implementation. Project or elements of projects necessary for or related to the completion of the Proposed Project should not be excluded from analysis and should be within scope of the federal environmental assessment.

1

### Forecast Activity Levels and Airport Capacity

The Proposed Project's projected aircraft activity levels are the same level as the No Project (do nothing) alternative. The Draft EA indicates since the Proposed Project does not include runway or runway improvements along with SDIA's single runway and curfew restrictions that aircraft activity levels and capacity would not be affected and be the same as No Project scenario. This is illogical and does not take into consideration how the Proposed Project may induce additional aircraft activity and create runway capacity issues in earlier years. Common sense indicates taxiway improvements and aircraft ground circulation efficiencies as well as adding new gates that accommodate larger aircraft would induce air traffic growth and potentially create future runway capacity issues.

2

For many years SDIA representatives have decried the limitation of the single runway to justify need for expansions or potential relocation. SDIAP's *Airport Development Plan Project Summary* brochure states the need as "fueled by the tremendous growth seen in passenger volumes over the last several years" noting 2018 passenger traffic increased 10% over 2017, and "The airport has broken the record for passenger numbers for five consecutive years." <sup>1</sup> The Draft EA impacts assessment, section 4.13.1.3, *Impacts* states, "The Proposed Project would continue to sustain and grow SAN's role in the regional economy by helping to accommodate future growth in aircraft and passenger growth at SAN [underline mine]. Although it would not increase the number or change the type of operations of aircraft at the airport."

Airport passengers arrive at SDIA on aircrafts, not by other transportation means. With a preliminary cost of over \$3.0 billion, the contention that no additional aircraft activity capacity will be added it poses the question: Why do the project if it does not provide additional airport/ aircraft operational capacity?

The Proposed Project's demolition of Terminal 1 and demolition and/or relocation of other existing SDIA facilities are necessary components for implementation of the Proposed Project. Aircraft taxiway additions and reconfigurations, construction of a 1.2 million square foot terminal (3 1/2 times larger than the existing T1), 30 gates - two of which will accommodate large (ADG-V) aircraft, the additional overnight aircraft parking, as well as other significant on and off-site improvements will induce more aircraft traffic events. The Draft EA needs to reconsider and analyze the project's impacts of creating inducted growth in aircraft activity and contribution to runway capacity issues in earlier years.

<sup>1</sup>SDCRAA, Airport Development Plan Project Summary [www.SAN.ORG/Plan](http://www.SAN.ORG/Plan).

## COMMENTER P2

**Alternatives**

All the alternatives considered in the Draft EA, except the preferred Proposed Project, are quickly dismissed and one obvious alternative ignored. Specifically, Alternative 2 from the ADP's Final EIR indicates, "Alternative 2 is environmentally superior alternative as it would reduce the significant impacts related to air quality, GHG emissions, traffic, and historical resources."<sup>2</sup> And what seems like an obvious alternative was not addressed - relocation of the runway northward. MCRD is federal land and SDIA should explore future plans of the Marine for this training facility. The U.S. armed forces have conducted various base realignments studies and implementation over the years and have relocated facilities to and with other locations as was done with the Naval Training Center (NTC) property in 1993. Former NTC land and structures were provided to local governments and in fact, portions of the former NTC were transferred to SDIA. This option should be evaluated as an alternative.

3

**Affected Environment**

The Draft EA dismisses several direct and indirect environmental impacts to the Detailed Study Area (DSA) and the General Study Area (GSA). For the GSA, the Draft EA only evaluated noise, land use, social economic impacts, Land and Water Conservation Fund funded projects.

4

The Draft EA dismisses most of the DSA and GSA impacts as not meeting significance thresholds, no threshold are established by the FAA, or the unsound reasoning that the Proposed Project will not induce any additional aircraft activity growth than would otherwise occur.

**Air Quality and GHG**

Table 3.4-2 shows several air pollutants in the project area are not in compliance with state or federal air quality standards. The Draft EA justifies that the air quality thresholds are not met because the Preferred Project emissions would be same as No Action alternative. Because the Draft EA uses the reasoning that aircraft activity - which is the largest contributor of air pollutant emissions - would be the same whether the Project was undertaken or not abdicates SDIA's responsibility to plan for and take action to address air quality issues in project area and GSA to help address non-compliance factors. These air quality factors are largely contributed to by airport/aircraft activity. The Draft EA should take into consideration the induced growth of aircraft activity that will be spurred by the Proposed Project and measures to meet air quality compliance standards.

5

Similarly, aircraft landings and take offs are the largest contributor of GHG as noted in table 3.6-1. Section 3.6.1 states, "There are not significance threshold for aviation GHG emissions and it is not required for the NEPA analysis...". The Draft EA should review any pending GHG standards or guidance under development by the current administration and asses the Proposed Project to those standards ([https://ceq.doe.gov/guidance/ceq\\_guidance\\_nepa-ghg.html](https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg.html).) or use California environmental review standards for GHG as a surrogate significance standard. The second part of the sentence noted above, "given the small percentage of emissions that aviation projects contribute" should cite the source for such a claim or delete that portion of the sentence.

**Cultural Resources/****Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund**

<sup>2</sup> SDIA, Airport Development Plan, Final EIR, January 2020.

## COMMENTER P2

The Draft EA quotes portions of Department of Transportation Act noting:

Section 4(f) of the DOT Act requires that the Secretary of Transportation may approve a proposed transportation project that requires the use of publicly owned land of a public park, recreational area, or wildlife or waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local (underline mine) significance only if:

- (1) There is no prudent and feasible alternative that would avoid using those resources.
- (2) The program or project includes all possible planning to minimize harm resulting from the use.

Use of the Section 4(f) property includes both physical and constructive uses.

The Draft EA's list of Historical Resources in the Affected Environment is missing several Historic Districts established by local jurisdictions, notably the South Park Historical District and some historic districts in North Park area of San Diego. The Draft EA should review the City of San Diego's website <https://www.sandiego.gov/planning/programs/historicpreservationplanning/historicdistricts> and California Historical Resources Inventory Data base to ascertain historical districts and structures in the GSA.

6

The Draft EA list four Section 6(f) recreational resources within the GSA that obtained funding from the Land and Water Conservation Fund Act. Analysis need to be done regarding impacts of impacts on "constructive uses" on these public recreational resources, particularly the impacts of noise and air pollution impacting the use and enjoyment of these public outdoor recreation facilities.

Two buildings potentially meet the National Register Criteria Consideration for historic designation in the DSA: the United Airlines Hanger & Terminal Building (UAHT) and the Convair Wind Tunnel Building (CWT). The Draft EA states the UAHT is planned to be moved from its current location to another location prior to implementation of the Proposed Project and is therefore not part of the Proposed Project.

It should be noted FAA Order 1501F guidance for determination of significance and significance thresholds includes:

*Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance cannot be avoided by terming an action temporary or by breaking it down into component parts.*

Determination of significance thresholds and necessary mitigation for such resources cannot be avoided by excluding or piecemealing of a project (see ADP discussion above), implementation timing, non-use of federal funds, or other avoidance procedures or actions.

**Noise**

The Draft EA indicates implementation of the Proposed Project will not increase aircraft-generated noise impacts as it would happen anyway. This finding is inconsistent with findings of the ADP's Final EIR. Noise impacts were found to be a "Significant Impact" in the Final EIR. The Proposed Project will further increase the size of the CNEL noise contours and impacts on noise sensitive land uses and population including increasing the number of residential units,

7

COMMENTS P2

schools, places of worship, and historic resources impacted within the future noise contours. An important element of noise mitigation in the ADP's Final EIR is reliance on FAA funding for the Sound Insulation Program. The Final EIR made implementation of that mitigation measure conditioned on receiving federal funds for the mitigation measure's feasibility. The contention in the Draft EA that noise impacts cannot be found significant, as they would be the same whether the Proposed Project was not undertaken or not, jeopardizes and may inadvertently sabotage SDIA's commitment under the ADP's Final EIR to seek and apply for federal funding for sound attenuation programs. 7

The Draft EA only provides an estimated number of existing houses of worship fails to provide sufficient detail on the location of houses of worship, both existing and projected. The Draft EA needs to list the houses of worship in the current and projected future CNEL noise contours in a table format, similar to the list compiled for schools, in order that these houses of worship may be aware of proposed impacts. 8

Other noise mitigation measures noted by the FAA such as Continuous Decent Arrival for aircraft operations [https://www.faa.gov/about/office\\_org/headquarters\\_offices/apl/research/science\\_integrated\\_modeling/noise\\_mitigation/](https://www.faa.gov/about/office_org/headquarters_offices/apl/research/science_integrated_modeling/noise_mitigation/) and other noise mitigation measures used by other airports are not presented or evaluated. These additional noise control measures should be explored to address the excessive noise created by aircraft operations at SDIA. 9

**Environmental Justice**

The criteria used to assess potential environmental justice impacts in the Draft EA include a review of census tracts in the GSA that (1) have a population of 50 percent or more exceeding the federal poverty level; and/or (2) have a minority population of 50 percent or more. 10

Table 3.14-2 clearly shows that five of the 31 Census tracks examined in the GSA have minority populations of 50% or greater. Figure 3.14-3 shows one Census track in the GSA is 30-33% is below the national poverty level.

Clarification and definition of the criterion "meaningfully greater" used in the Draft EA needs to be provided. The Draft EA used this undefined term to determine whether areas in the GSA meet a significance threshold levels. Evaluation of the impacts and establishment of potential mitigations for the specific identified areas identified in the Draft EA with minority populations of 50% or more needs to be developed.

**Conclusion**

The projects and impacts in Draft EA for Airfield Improvements and Terminal 1 Replacement Project should be comprehensively analyzed with the full scope of projects contained the Airport Master Plan and Final EIR. Several projects or components of projects are purposely excluded from the Draft EA's analysis although necessary as precursors to completing the project or components of projects. The Draft EA needs to take into account the induced growth of aircraft activity created by the Propose Project and comprehensively analyze direct, constructive and cumulative impacts. 11

Sincerely,  
Richard S. Phillips  
South Park



## Responses to Commenter P2

- P2-1. Comment noted. As explained above in Response A2-5, the proposed SAN ADP is not the Proposed Project evaluated in this federal EA. Section 1.3 of the EA describes the primary components of the Proposed Project to be implemented by SDCRAA, of which the SDCRAA is seeking FAA approval or funding for certain components, in accordance with the requirements of the National Environmental Policy Act (NEPA), as further described in Section 1.3. As indicated in Section 1.5 of EA, recent changes in federal law have required the FAA to revisit whether FAA approval is needed for certain types of airport projects throughout the nation. On October 5, 2018, HR 302, the “*FAA Reauthorization Act of 2018*” (the Act) was signed into law (P.L. 115-254). In general, Section 163(a) limits the FAA’s authority to directly or indirectly regulate an airport operator’s transfer or disposal of certain types of airport land. Thus, FAA must disclose that certain portions of the Proposed Project are beyond FAA’s authority to approve. As the commenter notes, the FAA has determined that there are some project components over which FAA has approval authority (as listed in Table 1-1 of the EA), and other elements that are needed for the Proposed Project, for which the FAA does not have approval authority (see Section 1.3.2 and Table 1-1 of the EA). The list of components evaluated in this EA differs from that addressed in the California Environmental Quality Act (CEQA) document referenced by the commenter, because it does not include projects that do not require FAA approval authority and are not related to the Proposed Project or are not ripe for consideration under NEPA at this time. Other facilities, such as the airline support facilities, were determined by the FAA to have independent utility from the projects addressed in the EA (see Section 4.16 of the EA) and underwent all required environmental reviews. FAA is not required to reconcile differences between state and federal environmental documents. Various mitigation measures included in the Final EIR and associated Mitigation Monitoring and Report Program are reflected in the EA as either Project Design Features/Commitments (see EA Appendix A4) or the SDCRAA has committed to implementing the measures independent of the EA Proposed Project (see Section 4.0, SDCRAA Transportation-Related Improvements, of EA Appendix G).
- P2-2. Section 1.3.3 and Appendix A2 provide extensive information about the forecasting process used for the EA. The Proposed Project would not induce aviation activity. While the Proposed Project would reduce taxiway congestion associated with the existing single taxi direction, it would not alter the runway’s operating capacity, as discussed in Section 1.3.3, and would not increase the airfield capacity.

Section 1.3.3 of the EA has been modified, as shown by underlined and strikeout text here in this response, as follows, to provide clarity about the effects of the Proposed Project:

“This EA also considered the effect that the Proposed Project, including the additional gates and improved taxiway flow, would have on airfield ~~airport~~ capacity. The existing 51 gates ~~and~~, 28 [Remain Overnight] RON positions, and taxiway system at SAN can accommodate the runway constrained airfield capacity of SAN (approximately 292,000 annual aircraft operations). Improving the taxiway efficiency would not alter the runway’s acceptance rate for aircraft or increase operational capacity; the taxiway improvement would reduce delays for aircraft to reach and depart their gates, as well as facilitate transition to the opposite end of the runway, by allowing bidirectional taxi movement adjacent to the terminals. Without the Proposed Project, SAN would serve the forecasted annual enplanements using all of its terminal gates along with some RONs acting as hardstands during the daytime hours. Multiple RON spots are capable of accommodating [Airplane Design Group] ADG-V aircraft. Therefore, increasing the number of gates and enabling dual parallel taxiways would not increase SAN’s ability to ~~handle~~ accommodate more aircraft operations than what it ~~is limited~~ can now with the single runway. No changes to the runway configuration, aircraft

fleet mix, number of operations, time of aircraft operations, air traffic procedures, or airspace would occur as a result of the Proposed Project”

The commenter cited text from the SDIA’s Airport Development Plan Project Summary is a reference to the improved quality of customer service that the Proposed Project would enable.

The key drivers of aviation activity are discussed in Appendix A2 and focus on population, per capita income, and airport facility limitations. The Proposed Project would not affect population and per capita income. The facility limitations at SAN have been evaluated and are noted in Section 1.3.3 and in Appendix A2. Without the Proposed Project, SAN could serve the forecast constrained activity levels by using existing gates and remote hardstands, as demonstrated in Appendix A3 of the EA. Reducing taxiway congestion would not increase the operating throughput of the runway, which is noted at about 290,000 annual operations.

With regard to the commenter’s statement about “*demolition of Terminal 1 and demolition and/or relocation of other existing SDIA facilities are necessary components for implementation of the Proposed Project,*” Figure 1-3 of the EA identifies facilities to be removed. Facilities that would be removed as part of the Proposed Project are identified with alphabetic labels and described in the figure legend. As also shown in Figure 1-3, there are several buildings that would be removed prior to construction of the Proposed Project, which are separate and independent from the Proposed Project.

The purpose and need for the Proposed Project components are described in Section 1.4 and in detail in Appendix A1, Sections A2.2 through A2.5 of the EA. The purpose of the replacement Terminal 1 is associated with meeting local building code and improved customer service needs, not increasing capacity since capacity of the airport is limited by the single runway.

- P2-3. Regarding the commenter’s reference to Alternative 2 (Reduced Scale) in the SAN Airport Development Plan Final EIR, the identification and evaluation of that alternative occurred as part of the CEQA environmental review process, which is separate from the NEPA review process, and the FAA is not required to reconcile differences between state and federal environmental documents. It should be noted that the EA, in Section 2.3.2.3, evaluates a reduced scale alternative that calls for a smaller Terminal 1 facility; Section 2.3.2.3 of the EA considers an alternative that includes removing portions of Terminal 1. This alternative was eliminated from further consideration in the EA, because it would not meet the purpose and need of the Proposed Project. As such, the EA already includes consideration of a reduced scale alternative in Section 2.3.2.3.

The commenter also suggests relocating the runway north into the U.S. Marine Corps Recruit Depot (MCRD) San Diego property. Use of the MCRD property for meeting the taxiway and terminal need was considered in Section 2.3.2 of the EA. This alternative did not pass the alternatives screening, because it would not meet purpose and need. Use of MCRD property, as suggested by the commenter, would require the military installation to be closed. Since there are no plans being considered at this time to close or relocate MCRD San Diego, it is not a reasonable alternative to meeting the purpose and need. Sections 2.3.2.1 and 2.3.2.2 of the Final EA reflect that the land is also not available. Relocating the runway onto the MCRD is not a reasonable alternative, because the land is not available for use by the SDCRAA and alternatives that would use a smaller portion of the MCRD for the taxiway do not meet the purpose and need (see Sections 2.3.2.1 and 2.3.2.2 of the EA).

- P2-4. The EA examined the effects of the Proposed Project across all environmental resource categories as required by FAA Orders 1050.1F and 5050.4B (see Section 3.3 and Chapter 4 in their entirety). Further, as described in Section 3.2 of the EA, the GSA is defined as the area where both direct and indirect impacts may result from the development of the Proposed Project. The purpose of the GSA is to establish the study area for impacts to resource categories that are regional in scope and scale, including noise, land use, socioeconomic impacts, and Section 4(f) and 6(f) resources. As

such, the appropriate EA study area for resources categories that are *not* regional in scope or scale is the DSA.

FAA Order 1050.1F and FAA Order 5050.4B identify the thresholds of significance or factors to be considered when determining significance of potential impacts. To gauge impacts, NEPA requires the evaluation of future conditions with the proposed **future** project be compared to the same **future** period under a “no action” alternative, referred to as the project-related impacts. The project-related impacts were then compared with the FAA’s guidance on determining significance. Under CEQA, the impacts of a proposed project are compared to an “existing conditions,” termed the “baseline,” which is the physical environmental conditions as they exist at the time the Notice of Preparation for the Draft EIR is published, or if no notice of preparation is published, at the time environmental analysis is commenced. FAA is not required to reconcile any differences between the requirements of CEQA and NEPA.

P2-5. Section 1.3.3 of the EA states that the Proposed Project would not alter the number and type of aircraft operations. The analysis of air quality and climate shows that emissions would not be affected by the Proposed Project with the exception of the short-term temporary construction emissions, as described in Sections 4.3 and 4.5 of the EA. FAA Order 1050.1F states, “*FAA has not identified significance thresholds for aviation or commercial space launch GHG emissions, nor has the FAA identified specific factors to consider in making a significance determination for GHG emissions.*” There are currently no federally accepted methods of determining significance applicable to aviation or commercial space launch projects given the small percentage of emissions they contribute. A footnote has been added to Section 3.6.1 of the EA in support of the statement that aviation projects contribute to a small percentage of GHG emissions (i.e., aircraft, in general, account for roughly three percent of all anthropogenic GHG emissions globally). The Council on Environmental Quality (CEQ) has noted that “*it is not currently useful for the NEPA analysis to attempt to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and to understand.*”<sup>9</sup> Accordingly, FAA has indicated it is not useful to attempt to determine the significance of such impacts. There is a considerable amount of ongoing scientific research to improve understanding of global climate change and FAA guidance will evolve as the science matures or if new federal requirements are established.<sup>10</sup> GHG emission inventories for construction of the Proposed Project and the operation of the Proposed Project and the No Action Alternative are disclosed for general information purposes in Section 4.5 of the EA.

P2-6. The South Park Historic District is located approximately 2.5 miles east of the Proposed Project site, within the eastern portion of the GSA. The historic North Park neighborhood, within which potential historic districts are located, is located north of Upas Street and east of Balboa Park, which is outside of the GSA.<sup>11</sup> Figure 3.8-1 delineates the boundary of the GSA and indicates the locations of historic resources located within the GSA, while Table 3.8-1 provides the names of the historic resources shown in that figure. The South Park Historic District has been added to Table 3.8-1 of the EA as ID letter YY and has also been added to Figure 3.8-1 of the EA. The addition of this historic district does not affect the impacts analysis/conclusions included in the EA. Similar to other historic resources located within the GSA that are shown in Figure 3.8-1 of the EA, all of which are closer to the Proposed Project site than the historic districts referenced above,

<sup>9</sup> U.S. Department of Transportation, Federal Aviation Administration – Office of Environment and Energy, *1050.1F Desk Reference, Version 2*, Chapter 3. Climate, February 2020. Available: [https://www.faa.gov/about/office\\_org/headquarters\\_offices/apl/environ\\_policy\\_guidance/policy/faa\\_nepa\\_order/desk\\_ref/media/desk-ref.pdf](https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf).

<sup>10</sup> U.S. Department of Transportation, Federal Aviation Administration – Office of Environment and Energy, *1050.1F Desk Reference, Version 2*, Chapter 3. Climate, February 2020. Available: [https://www.faa.gov/about/office\\_org/headquarters\\_offices/apl/environ\\_policy\\_guidance/policy/faa\\_nepa\\_order/desk\\_ref/media/desk-ref.pdf](https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf).

<sup>11</sup> Historic Resources Group, on behalf of City of San Diego, *Greater North Park Community Plan Area – Historic Resources Survey*. April 2021, Figure 1. Available: <https://www.sandiego.gov/sites/default/files/legacy/planning/programs/historical/pdf/surveydocs/110422npdraftsurvey.pdf>.

implementation of the Proposed Project would not result in direct or indirect impacts on those resources – see Section 4.7 of the EA. More specifically, as explained in Section 4.7.3.2 of the EA, operation of the Proposed Project would not have any direct impacts to Section 4(f) resources within the GSA and would not result in any conversion of Section 6(f) properties to uses other than public outdoor recreation. With respect to the potential for constructive use (i.e., indirect impacts under Section 4(f)), operation of the Proposed Project would result in the same number and type of aircraft operations as the No Action Alternative and, therefore, would have the same noise levels (see Section 4.12.3). Historic resources within the GSA may be exposed to higher noise levels from increased aircraft operations at SAN in the future; however, such noise exposure would not constitute a constructive use impact of the Proposed Project, because these noise levels would occur regardless of the Proposed Project.

Section 3.8 of the EA identifies those resources that have received funding under Section 6(f) of the *Land and Water Conservation Fund Act*. As indicated in Section 4.7.1 of the EA, potential impacts to Section 6(f) resources were evaluated in terms of whether the Proposed Project would convert such properties in whole or in part to uses other than public outdoor recreation. Constructive use is not a Section 6(f) impact. The impact focus on whether there would be a conversion to uses other than public outdoor recreational uses is consistent with Section 6(f)(3) of the *Land and Water Conservation Fund Act*. Section 4.7.3 of the EA clearly states under the Proposed Project, there would be no impacts to Section 6(f) resources.

Section 3.10 of the EA discusses historic resources located within the Area of Potential Effects (APE) and describes the methodology and criteria for identifying significant historic resources, specifically, those resources that are listed or eligible for listing on the National Register of Historic Places. As described in that section, the United Airlines Hangar and Terminal (UAHT) and the Convair Wind Tunnel Building qualify as significant historic resources. With regard to the potential cumulative impacts to the UAHT building, the cumulative impacts analysis presented in Section 4.16.7 of the EA notes that the Proposed Project would not contribute to cumulative impacts to historic resources and includes a cross reference to Section 4.9.3 of the EA. As indicated in Sections 3.10.2.1 and 4.9.3.2 of the EA, the UAHT is proposed to be relocated in conjunction with a project that is separate from, and independent of, the Proposed Project, and that relocation would occur prior to construction of the Proposed Project. As such, neither the construction nor the operation of the Proposed Project would contribute to impacts to the UAHT, given its absence from the subject area. This conclusion is supported by a letter from the California SHPO dated August 17, 2021 completing the Section 106 consultation process (see Appendix E1 of the EA). In their letter to the FAA, the California SHPO specifically stated: “1) SHPO finds the APE delineation adequate to account for direct and indirect effects to historic properties; 2) SHPO concurs that the Convair Wind Tunnel Building and the United Airlines Hangar Terminal Building are eligible for inclusion the National Register of Historic Places (NRHP); 3) SHPO concurs that Terminal 1 and the Pacific Southwest Airlines Administrative and Maintenance Building are ineligible for listing on the National Register of Historic Places; 4) SHPO understands that the San Diego Airport Authority will accommodate a request by the Viejas Tribal Government that a Kumeyaay cultural monitor be allowed to observe excavation associated with the San Diego International Airport development plan, as outlined in [FAA’s] May 21, 2021 letter. 5) SHPO concurs that the undertaking, as described in your May 21, 2021 letter, will not adversely affect historic properties.”

- P2-7. The noise analysis for this EA was prepared in accordance with FAA Orders 1050.1F and 5050.4B. The Proposed Project, when compared to the same year No Action, would not alter aircraft noise exposure conditions. The replacement passenger terminal and proposed taxiway improvements would not change how aircraft arrive and depart the airport. See Response to Comment P2-1 above relative to the differences between NEPA and CEQA impact analysis requirements. FAA is not required to reconcile differences between state and federal environmental disclosure documents.



The thresholds of significance for airport noise are described in Section 4.12 of the EA. Table 4-1 of FAA Order 1050.1F states the threshold of significance for noise is when: “*the action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*” For example, an increase from DNL 65.5 dB to 67 dB is considered a significant impact, as is an increase from DNL 63.5 dB to 65 dB. The FAA does not make environmental determinations based on the impacts to the grants it may or may not dispense for other programs such as the Part 150 Noise program. SDCRAA’s current Part 150 Noise program update must take into account changes that would occur to the airport during the time period under review for the noise study, independent of its impact on the noise contours.

- P2-8. Table 4.12-5 of the EA states the number of places of worship exposed to the different levels of aircraft noise (i.e., 60-70 CNEL, 70-75 CNEL, etc.) is exactly the same with the Proposed Project as without the Proposed Project (i.e., No Action Alternative). The locations of places of worship relative to aircraft noise levels with and without the Proposed Project are shown in Figure 4.12-1 for 2026 and in Figure 4.12-2 for 2031. Per the requirements of FAA Orders 1050.1F and 5050.4B, mitigation is considered when a Proposed Project causes an adverse effect. As stated in Section 1.3.3 of the EA, the Proposed Project would not alter aircraft arrivals and departures and associated noise emissions.
- P2-9. The comment about Continuous Descent Arrival procedures for aircraft arriving into SAN is outside the scope of this EA. As stated in Sections 1.3.3 and 4.12 of the EA, the proposed replacement passenger terminal and associated taxiway improvements would not change how aircraft arrive and depart SAN. Thus, analysis of other possible procedures to reduce off-airport noise impacts are not appropriate for this EA.
- P2-10. The comment correctly states that there are minority and low-income populations within the study area as identified in Section 4.13.2.3 of the EA. As described in the methodology for the environmental justice analysis in Section 4.13.2.1 of the Final EA, the following two criteria were used to assess the presence of minority and low-income populations within the study area: (1) census tracts that have a population of 50 percent or more exceeding the federal poverty level and/or census tracts that have a minority population of 50 percent or more; and (2) a minority or low-income population in the analysis area that is “meaningfully greater” than that of the surrounding areas. These criteria are identified as a determining factor for identifying minority populations in the CEQ guidance document, *Environmental Justice Under the National Environmental Policy Act (1997)* (available at [https://www.epa.gov/sites/default/files/2015-02/documents/ej\\_guidance\\_nepa\\_ceq1297.pdf](https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf)). This guidance document states that “Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.” Section 4.13.2.1 of the EA has been modified to include a reference to this CEQ Guidance document.

Minority and low-income populations were identified in the study area based on the 50 percent numerical criteria. Regarding the *meaningfully greater* criteria, the CEQ guidance does not identify a numerical threshold for determining what constitutes a “meaningfully greater” population. As identified in Section 4.13.2.2, the study area for the Proposed Project does not have either a larger percentage of minority or low-income populations than the City of San Diego or San Diego County. Specifically, on average, the minority population in the study area is 15 percent lower than the County and 18 percent lower than the City. The percent of low-income population is approximately 5.9 percent lower than the County on average and 7.1 percent lower than the City. Therefore, the minority and low-income population is less than that of the region and the meaningfully greater criteria would not apply. Once FAA determines that there is a minority or

low-income population, an analysis is conducted to determine if there would be disproportionately high and adverse effect on minority and/or low-income populations based on the following definition for a “disproportionately high and adverse impact” as identified in the U.S. Department of Transportation (DOT) Order 5610.2(b) (see Section 4.13.2.2 of the EA):

- Disproportionately high and adverse effect on minority and low-income populations means an adverse effect that:
  - Is predominately borne by a minority population and/or a low-income population; or
  - Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.
  - Disproportionately falls on minority and/or low-income populations even after benefits, including economic benefits, or the program, policy, or activity that accrue primarily to the affected minority and/or low-income populations are factored into the analysis.<sup>12</sup>

As identified above, consistent with the methodology and thresholds identified in the EA, it was determined that several census tracts in the study area have a greater than 50 percent population of minority and/or low-income residents. Thus, the EA evaluated whether the Proposed Project would adversely affect these residents more severely than the general population. The analysis in Section 4.13 of the EA shows that the individual census tracts with a low-income and/or minority population of 50 percent or greater are typically located near the edges of the study area and, thus, less affected by the Proposed Project than the communities closer to SAN. Further, the analysis shows that no significant impacts relative to any of the resource categories in Chapter 4 of the EA are expected to occur during construction or operation of the Proposed Project. Thus, the Proposed Project would not cause a disproportionately high and adverse impact to a low-income or minority population that is predominately borne by a minority population and/or a low-income population or that is greater in magnitude than the adverse effect that will be suffered by the general population. Therefore, the low-income and minority population would not be disproportionately impacted by the Proposed Project and no mitigation is required.

P2-11. See Responses to Comments P2-1 through P2-10 above.

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<sup>12</sup> The EA has been modified to update the DOT Order 5610.2(a) citation and to include the third bullet consistent with the DOT Order 5610.2(b) dated November 2020, available: <https://www.transportation.gov/regulations/dot-order-56102b-department-transportation-actions-address-environmental-justice>. The revision does not change the analysis or the conclusions presented in the EA.