Peninsula Community Planning Board

February 4, 2008

San Diego County Regional Airport Authority
Attn: Airport Planning
P.O. Box 82776
San Diego, CA
92138-2776

Sent Via Fax, email attachment and US Post

Dear Sirs,

Please find attached the comments from the Peninsula Community Planning Board's Airport Committee regarding the Draft Environmental Impact Report for the SDIA Master Plan. We appreciate your acceptance of these comments and trust that your efforts to mitigate or remove all environmental impacts resulting from the continued expansion of Lindbergh Field.

Also attached are individual comments drafted by concerned citizens in the Point Loma area that are to be considered as individually submitted but enclosed herein to ensure that they are considered.

Sincerely,
Lance G. Murphy
Chair, Airport Committee
Peninsula Community Planning Board

Attachments

Cc/ PCPB Members

PCPB Comments Regarding SDIA Master Plan Draft EIR dated October 2007

1. Summary

The Draft EIR is deficient in that it inappropriately uses the No Project Alternative to establish the baseline for determining the impacts of the Project. As a result, the DEIR fails to consider many impacts to be in the Project study area. And, for those items that were analyzed, the use of the No Project Alternative as the baseline for environmental impact analysis results in the impacts being inappropriately deemed insignificant or mitigated to a degree less than significant. As a result, significant future impacts to regions in the vicinity of the Airport that are directly attributable to growth in Airport activity are determined to be baseline conditions not subject to mitigation. The No Project to Project impact analysis in the DEIR circumvents the need to mitigate airport growth impacts on the surrounding communities while providing on-site mitigation measures for that growth.

CEQA guidelines clearly states that the baseline for analysis should be the existing environmental setting. CEQA Guidelines Section 15126.6 (e)(1) states, "The no project alternative analysis is not the baseline for determining whether the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline."

As noted by the SANDAG staff at the January 19, 2008 meeting:
"The traffic analysis assumes that the proposed airport improvements do not generate additional trips on the road network. Projected growth in air passengers is not attributed to airport improvements identified in the airport master plan, and is assumed to occur whether or not the proposed airport improvements are made. In other words, the revised DEIR does not include a "plan-to-ground" impact comparison. Therefore, traffic impacts are understated."

2. Safety

The operations of the Airport are approaching the theoretical limits of the single runway and are resulting in an overstressed condition that creates unacceptable hazards to the aircraft, passengers and surrounding communities. As recently as mid-January there was a runway incursion that occurred at SDIA, reported attributable to FAA Controller being over-worked. In effect that incident is one of hundreds occurring across the country as the FAA is seeing its staff of trained controllers retire and the remaining having an unacceptable level of overtime.

This is also leading to a condition similar to NASA's inability to acknowledge its limitations and causing unsafe operations. It is only natural for an organization in public scrutiny to avoid the appearance of incompetence, the inability to acknowledge then leads to the next level of risk – denial. As recently as yesterday, 3 February there were runway issues that caused flights to reroute to alternative airports when West winds eliminated the option of using runway 9 for ILS landings – leaving only runway 27 (a non-precision, localizer only landing). In the fog and rain of that afternoon there were multiple 'missed

approaches' on landing, with some aircraft aborting their San Diego destination. When asked, the San Diego Tribune reported:

"Dozens of arriving and departing flights were delayed at Lindbergh Field yesterday evening, but an airport spokesman blamed that mostly on bad weather elsewhere."

Again, this is an example of the next phase of hazardous operations – denial of the problems involved with Lindbergh Field. In reality, I was to meet guests at the airport on Sunday afternoon to find that the plane never arrived but had 3 missed-approaches and finally diverted to Long Beach Airport due to fuel limitations and the runway closure at Lindbergh. It is noteworthy that fully 60% of the 50 passengers opted to exit the aircraft in Long Beach rather than risk the flight back to Lindbergh. None of this is acknowledged by the staff of SDIA in the news reports.

As the airport approaches its operating limits it is statistically challenging its ability to conduct safe operations. While today there are many operating obstacles in the form of limited gates, taxiways, passenger throughput, and general airfield configuration, these natural buffers relieve the stress on the human components of Pilots and Flight Controllers so that they are not the sole limitation. When the runway becomes the single constraint, as proposed by this Master Plan and discussed continuations of facility improvements, there will be unbelievable and incontrovertible stress on the critical human components to maintain the production of landings and take-offs.

None of these safety issues is considered in the Draft EIR. There are no methods or mitigation considerations to identifying the impending safety breeches and preempt the hazardous growth of potential collisions and crashes.

3. Traffic

The DEIR is deficient in that it inappropriately uses the No Project Alternative to establish the baseline for determining the impacts of the Project. As a result, the DEIR fails to consider many roadway segments and intersections that would otherwise be in the Project study area. And, for those facilities that were analyzed, the use of the No Project Alternative as the baseline for traffic impact analysis results in the impacts being inappropriately deemed insignificant or mitigated to a degree less than significant. As a result, significant future impacts to transportation facilities in the vicinity of the Airport that are directly attributable to growth in Airport activity are determined to be baseline conditions not subject to mitigation. The No Project to Project impact analysis in the DEIR circumvents the need to mitigate airport growth impacts on the surrounding communities while providing on-site mitigation measures for that growth.

CEQA guidelines clearly states that the baseline for analysis should be the existing environmental setting. CEQA Guidelines Section 15126.6 (e)(1) states, "The no project alternative analysis is not the baseline for determining whether the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline."

Chapter 5 of the DEIR (pg 5-1) notes CEQA Guidelines Section 15126.6 (e)(3)(B) as an argument for using the No Project alternative as the baseline for impact analysis. This argument is flawed for at least two reasons. First, the cited Section begins with the conditional clause, "If the project is other than a land use or regulatory plan…" The project description for the DEIR notes that the Project is a Proposed Airport Land Use Plan. Second, even if Section 15126.6 (e)(3)(B) were assumed to apply, the discussion in the Guidelines section relates to the analysis of the impacts of the No Project Alternative for comparison purposes to the impacts of the Project. It does not suggest that the analysis of the impacts of the Project should use the environmental setting of the No Project Alternative as the baseline for analysis of the Project.

The environmental impacts of the Project must be analyzed against baseline conditions. That is the existing environmental setting, not some modeled future environmental setting analyzed with the No Project alternative. The assumption that air traffic will continue to grow with or without the project cannot be used as a basis for arguing that the significant environmental impacts of that growth are not significant in the context of a project whose purpose is to support that very growth. The arguments given in the DEIR for using the No Project Alternative as the baseline for impact analysis are akin to making a nonsensical argument that a freeway widening project need not consider environmental impacts related to noise, air quality, etc, as being significant because the widening project is only serving to provide adequate levels of service for the traffic that will occur with or without the freeway widening. In fact, a very similar argument is made in the SDIA DEIR. Section 3.2 of the DEIR states, "Implementation of the near-term Airport Master Plan recommendations is needed because forecast growth cannot be reasonably accommodated within the existing Airport facilities. Without these improvements, passenger traffic through the existing terminal buildings will become severely congested during longer periods of each day and Level of Service would be reduced further beyond its existing degraded level."

The DEIR is also deficient in its traffic analysis because it does not fully analyze the feasibility of the proposed traffic mitigation measures proposed in the DEIR. CEQA Statutes Section 21002 states "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." The analysis of the feasibility of proposed mitigations must be included in the EIR for Project consideration by the Decision-maker. The analysis cannot be pushed off to a future date of mitigation implementation. Yet, Chapter 1.7 of the DEIR states that "Subsequent to implementation of any required mitigation a peak hour roadway analysis would be conducted as part of a mitigation feasibility study to determine specific mitigation

measures to be implemented." Additionally, the DEIR proposes traffic mitigations on roadways outside of the jurisdiction of the Airport Authority and indicates that the feasibility of these mitigations will be discussed with the impacted jurisdictions at a later date.

Chapter 5.3.3.8 and 5.3.3.9 provide significance criteria for on-site circulation impacts. It should be noted that unlike all other circulation impact criteria in the DEIR, the on-site impacts are not compared to the No Project Alternative. Rather, the on-site traffic impacts are analyzed as the acceptability of levels of service on-site and at access points to public roadways irrespective of how these would operate in the No Project Alternative. As a result, the Project appropriately proposes to mitigate impacts when they occur on or immediately adjacent to the airport where they would directly impact airport operations. This approach to analyzing the impacts of the project results in greatly diminishing the purported impacts of the project to the off-site circulation system while supporting the mitigation of the Project's on-site traffic impacts.

Chapter 5.3.4 provides rigorous analysis of existing traffic conditions in the Project vicinity. However, the DEIR does not analyze the impacts of the project using the existing conditions as the baseline for analysis. Thus, the rigorous analysis of existing conditions serves no purpose for the Decision-Maker. One can only assume that the existing conditions analysis is only included because of CEQA requirements. What is also required is that the Project's impacts should be considered in light of these existing conditions and not some theoretical assessment of potential future impacts under a No Project Alternative.

Chapter 5.3.5.1 acknowledges that the Project increases Airport capacity. The impact analysis in the DEIR considers only those impacts which will occur after the existing SDIA on-site facilities have been used to their full capacity. However, the environmental setting of maximum use of existing facilities is a hypothetical setting which will not occur if the Project is approved. The No Project Alternative used as the basis for environmental impact analysis will never occur if the capacity enhancing project is approved. And, while it is used for the basis of the DEIR analysis, there is insufficient analysis in the DEIR to determine if the level of activity assumed under the No Project Alternative can even be served by the existing circulation system serving SDIA and the surrounding communities. Yet, the traffic levels assumed under the no project alternative for 2020 are used as the baseline for the Project impact analysis. There is no attempt to identify appropriate mitigation to address Airport traffic impacts that will occur between existing conditions and forecasted 2020 traffic volumes.

The use of the No Project Alternative as the baseline for analysis also results in inappropriately reducing the study area for the traffic impact analysis. The study area is determined by looking at the peak hour volume generated by the project at intersections and street/freeway segments in the vicinity of the project. If the volume from the project exceeds established threshold volumes for freeway or regionally significant arterial segments, then those facilities must be included in the study area. For other facilities, locations where increases in the volume to capacity ratio that exceed established

thresholds must be included in the study area. Thus, using the no project alternative rather than existing conditions as the baseline for analysis results in a greatly reduced amount of project traffic and a much smaller study area for determining project impacts.

Table 5-3.20 assumes sizeable reductions in non-SDIA traffic on Rosecrans in the 2030 scenario. These reductions are based upon assumed construction of missing connectors at the I-8/I-5 interchange. These connectors are not assumed in the 2030 Regional Transportation Plan adopted by SANDAG in November 2007 and should not be included in the project analysis. The inclusion of the connectors in the 2030 model runs used for the SDIA DEIR results in a reduction of trips in corridors accessed by SDIA trips traveling to the west on North Harbor Drive. The 2030 model takes advantage of this and assigns 32% of the SDIA trips westbound on North Harbor Drive and 67% eastbound (the trip distribution in the existing airport traffic pattern is 15% westbound and 84% eastbound) The deletion of the I-5/I-8 connector will result in an airport trip distribution pattern more similar to the existing traffic patterns. Thus, traffic impacts for the 2030 scenarios are understated. The study area and impacts to intersections and segments should be reanalyzed to reflect the updated Regional Transportation Plan.

Table 5-3.20 also assumes that Nimitz Blvd between Harbor and Rosecrans has the capacity of a four lane urban major. However, this street segment does not have turn pockets. Left turns are made from the #1 lane reducing the capacity of the roadway. The segment capacity should be adjusted in the table.

Tables 5.3-22 through 5.3-26 do not include intersections in the Peninsula, Midway, and Ocean Beach planning areas that will clearly be impacted by short and long term growth in airport traffic. These include intersections along Rosecrans Street, Nimitz Blvd and Camino del Rio W that will be used to access the communities and the freeway system. The inappropriate technique of using the No Project alternative compared to the proposed Project to determine the impacts of the Project (except for on-site impacts) results in a greatly reduced study area and avoids identifying feasible mitigation for Project impacts. While it is true that adoption of the No Project alternative would not require the identification of mitigation and development of a Mitigation, Monitoring and Reporting Program, it does not follow that the No Project alternative can therefore be used as a baseline for determining Project impacts and feasible mitigation. If the Airport Authority wishes to avoid mitigating the impacts of future increases in airport traffic, then the Board should adopt the No Project Alternative.

5.3.8.1 identifies mitigation for North Harbor Drive that will require the City of San Diego to adopt a new roadway classification. The section also identifies several roads that will need to be reclassified in order to implement the proposed improvements. The proposed improvements are not consistent with the City's Circulation Element and will require a General Plan amendment. This should be identified in the Land Use section of the DEIR. The section also identifies a number of street segments where capacity would be increased through widening or the removal of parking. Analysis of the impacts of this widening and parking removal should be included in the DEIR. Discussions with the City of San Diego and CCDC to determine the feasibility of these improvements should

occur and the results of those determinations should be included in the DEIR. Otherwise, the decision-maker will be unable to make Findings on the feasibility of the Project's traffic mitigation measures.

4. Noise

The Draft EIR does not adequately address the noise impacts from the future increase in operations. As discussed in the Summary above, we believe that the noise impact is understated because the Draft EIR is using incorrect assumptions in the Baseline analysis for the NO PROJECT ALTERNATIVE. As stated in the LAX EIS/EIR dated April 2004:

In addition to the CNEL contours prepared for the 1996 baseline and Year 2000 conditions, new legal developments have required the inclusion of additional information in this EIS/EIR. During the period of preparation of this EIS/EIR for the master plan development at LAX, the California Court of Appeal (in Berkely Jets) found that the noise impacts disclosed by the Oakland International Airport EA/EIR for development of cargo facilities and their attendant nighttime operations were, for CEQA purposes, inadequately addressed by the CNEL metric alone. The court ruled that supplemental single event analyses that have been provided solely as additional material for informational purposes should have been further expanded upon and used to delineate the effects of single event noise resulting from project actions" (LAX Master Plan Final EIS/EIR, April 2004)

The San Diego Draft EIR does not adequately consider the Single Event noise impacts on residents that will be awakened and annoyed by the increased departures facilitated by the Master Plan expansion.

PCPB Comments Regarding SDIA Master Plan Draft EIR dated October 2007

Following submitted by Jarvis Ross,

CHAPTER ONE: EXECUTIVE SUMMARY

This Environmental Impact Report was developed in accordance with the California Environmental Quality Act. Public Resources Code §§ 21000 et. seq. and the Guidelines for Implementation of the California Environmental Quality Act (California Code Regulations Title 14., §§ 15000-15387). The

Comment: The subject Environmental Impact Report ***was not developed*** in accordance with the California Environmental Quality Act Public Resources Code et. seq. Section 21003 (b), (c) and (f); Section 21083 (1), (2) and (3); Section 21100 (2) (A) & (B), and (4).
Furthermore under California code Regulations Title 14 15000-15387 Article 3 Section 15042 the Airport Authority board has the authority and therefore the legal responsibility to disapprove the subject project based upon, "significant effects upon the environment that would occur if the project were approved as proposed."
Based upon the subject EIR's own Executive Summary Tables 1-1 and 1-2 they project increased passengers and a need for a parking garage which means increased flights and increased vehicular ground transportation. Both of the foregoing will unequivocally result in environmentally detrimental increased air and noise pollution. The both have already been clinically identified as contributing to or causing health problems in school children. Under Title 14 Article 10 Section 15141 the voluminous hard copy subject draft E.I.R is in gross violation of the spirit of this declaration. Section 15142 under the requirements of interdisciplinary approach the subject EIR fails to responsibly place adequate weight upon the qualitative factors and places to much emphasis on quantitative, economic and technical factors. Section 15143 reinforces that the emphasis of the EIR should be upon, "the significant effects on the environment."

California Environmental Quality Act requires the preparation of an Environmental Impact Report for any public agency action that may have significant environmental impacts. An Environmental Impact Report is an objective, full-disclosure document to: [1] inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; [2] identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts; and [3] identify, where necessary and feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts. This Environmental Impact Report includes both PROGRAM and PROJECT

Comment: The preceding statement indicates that the Airport Master Plan under CEQA required an EIR due to potential (may have), "significant environmental impacts." [CEQA Section 15064 (a)(1)]
By virtue of the fact that the Airport Authority did not exercise CEQA Art. 1 section 15002 (f) (2) it moves to the level of affirming that the subject Airport Master Plan proposal ***does have significant environmental impacts.***

The Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. As a result of comments received on the May 2006 document this Draft Environmental Impact Report considers potential environmental impacts through the year 2030. Regional transportation plans use 2030 as a planning horizon. Therefore, analyzing impacts of the Proposed Project through 2030 allows a direct comparison with regional transportation plans. Although the environmental analysis for potential impact considers operational growth for the Airport through 2030 no additional improvements are proposed for San Diego International Airport beyond those needed to accommodate growth through 2015. The San Diego International Airport Master Plan considers improvements conceptually through 2030; however, the implementation of specific improvements is developed only through 2015. Future phases of planning for San Diego International Airport will focus on specific improvements beyond 2015. As these future improvements are proposed and defined, additional environmental review, as required by law, will be undertaken by the San Diego County Regional Airport Authority.

Comment: The preceding text is convoluted. On one hand it implies that sequential phases of development at Lindbergh field will take place if the initial one is approved and the environmental analysis anticipates this. It then implies that the cumulative environmental impacts would have to be evaluated in the future. It infers that the long range phase impacts have not been evaluated. Typically this would give weight to the future argument that phase one, if approved, has already compromised the environment. Therefore the then monetary investment in the Phase One terminal expansion should not be compromised by not proceeding with the remaining phases despite their cumulatively increased impacts upon the environment.

1.1 Introduction and Background

San Diego International Airport is located in the northwest portion of the downtown area within the City of San Diego. The existing Airport site is severely constrained by its location. San Diego International Airport is bounded by North Harbor Drive and San Diego Bay to the south, the Navy water channel and Liberty Station to the west, the Marine Corps Recruit Depot to the north, and Pacific Highway and Interstate 5 to the east. Land in the vicinity of the San Diego International Airport is densely developed and has high developable value due to San Diego International Airport's proximity within two miles from Downtown San Diego.

Comment: The last sentence in the above paragraph presents but one of the strongest arguments ***for not proceeding*** with the proposed subject airport expansion at Lindbergh Field from both environmental and economic standpoints. Surrounding area density represents an increased threat environmentally to residents from increased air pollution, noise pollution, and safety. The last of these across the nation and as pointed out more recently here in San Diego on January 16th at Lindbergh Field (Source: Union-Tribune January 23, 2008) as a consequence of overworked air traffic controllers and the resulting incidents.

San Diego International Airport is the smallest major airport site in the United States, consisting of 661 acres. San Diego International Airport has a single, 9,401-foot-long 200-foot-wide east-west runway, making it the busiest single-runway commercial airport in the nation. San Diego International Airport's air service continues to grow based upon the growing region's demand for air travel. No changes to the runway configuration or an additional runway are included in the Proposed Project.

Comment: This second paragraph under 1.1 makes an irrefutable case for ***not pursuing*** the proposed project. It is already the busiest single-runway commercial airport in the world. Not mentioned but its approach and departure, RPZ's also make it among the most dangerous both to the aircraft and those upon the ground. Most recently (January 3, 2008) the S.D. Airport Authority approved human occupancy uses in the Shoreline Plaza area

of liberty Station in direct violation of Federal, State and their own ALUCP guidelines. Prior military use and their occupancy and the right of municipalities to over rule Airport Authorities land use decisions does not extend the legal right for the Airport Authority to compromise it's responsibilities under the Federal, State and it's own ALUCP guidelines. As a consequence the proposed project elevates the level of environmental impacts of which most important are health and safety hazards.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

Comment: According to the trust wording stated above the trust lands (original? subsequently acquired? or both?) are to serve, "a statewide public purpose." That could be a park, golf course or in this city it could be condemned as blighted and hotels built there. Furthermore the FAA is empowered to shut an airport down for various reasons which would void the airport usage.

1.1.1 San Diego County Regional Airport Authority

San Diego International Airport was dedicated as the San Diego region's municipal airport on August 28, 1928. On December 18, 1962, the San Diego Unified Port District (Port District) was created when the State Legislature approved Senate Bill 41, which was certified by the County Board of Supervisors. The Port District's purview included ownership and operation of San Diego International Airport. More recently, the San Diego County Regional Airport Authority Act of 2002 created the San Diego County Regional Airport Authority as a local entity of regional government to oversee operation of the San Diego International Airport. The bill required the San Diego County Regional Airport Authority to adopt a comprehensive airport land use plan for all of San Diego County and conduct an airport site selection program to identify a long-term regional airport solution. On January 1, 2003, as required by the Airport Authority Act, the ownership and operation of San Diego International Airport was transferred to the San Diego County Regional Airport Authority from the Port District.

The transfer of Airport ownership and operation from the Port District on January 1, 2003, shifted planning responsibilities, operation, and control of the San Diego International Airport to the San Diego County Regional Airport Authority. The San Diego County Regional Airport Authority is governed by a nine-member Board. The San Diego County Regional Airport Authority Board is responsible for all policy and planning decisions for San Diego International Airport and serves as the lead agency in accordance with the California Environmental Quality Act. The Airport property remains held in trust by the Port as State Tidelands and is restricted for use to trust purposes. Because of this restriction, the property must be used to serve a statewide public purpose and the San Diego County Regional Airport Authority cannot use the property or designate a land use for the property for any purpose other than Airport use.

Comment: Paragraph one indicates that the current Airport Authority has failed to fulfill it's legal obligation under S.D.C.R.A.A. Act of 2002 regarding the requirement to conduct an airport site selection program to identify a long term regional airport solution.

1.1.2 Airport Master Plan

An airport master plan is a concept for future development of an airport. The goal of the San Diego International Airport Master Plan is to provide a financially and environmentally responsible guideline for future Airport development that will accommodate forecast aviation demand and remain adaptable to either a short-term or long-term future for the existing Airport site.

In order to meet this goal of the Airport Master Plan, the following overall objectives were set to guide future development at San Diego International Airport:

1. Improve levels of service for Airport customers/users
2. Improve Airport safety and security for Airport customers/users
3. Utilize property and facilities efficiently
    a. Maintain balance of passenger volumes and operations among the Airport's facilities.
    b. Improve tenant facilities
4. Enhance Airport access as part of the region's transportation system
5. Enhance regional economy by serving demand for air service
6. Prepare measured, incremental improvements that are cost effective and respond to the region's forecast for air service for passengers and cargo
7. Involve stakeholder and community input
8. Consider compatibility with surrounding land uses and Airport Authority policies.

Comments: Items 1-6 in 1.1.2, primarily are economic arguments for continued development of Lindbergh Field. As such under CEQA EIR guidelines they are not valid for consideration except as to their adverse environmental impacts upon the broader areas of airport influence. Item 7. with regard to public input as indicated in 1.8 table 1-6 there were only 21 responses to the May 2006 Draft EIR. None of these are indicated to have been from private citizens and only two were from community planning groups. The limited response brings into question the level of public outreach. The public meeting held at Portuguese Hall in Point Loma in 2006 met with resounding opposition to the Lindbergh Field Airport Master Plan yet there is no mention of it.
Item 8. in 1.1.2 needs little consideration. Anyone with common sense would acknowledge from their own observations and countless documents published by the S.D. Airport Authority in 2006 and preceding years that Lindbergh Field has been and is incompatible with surrounding land uses primarily for the reasons indicated in Executive Summary 1.8 Figure 1-1 (The following represent approximently 3/4ths of the volume of concerns.)

(1) Human Health Risk
(2) Noise
(3) Traffic
(4) Air Quality

1.1.3 Airport Site Selection Program

From 2003 to November, 2006, the Airport Authority conducted a comprehensive study of relocating the region's primary commercial airport or enhancing San Diego International Airport's capacity with a connecting inter-tie across San Diego Bay to transport passengers and cargo to the airfield and runways on Naval Air Station North Island. It is important to note that although the Airport Site Selection Program

process was being conducted concurrent with the San Diego International Airport Master Plan process, the two processes were separate and not interdependent. The voters of San Diego County determined in November 2006 that use of MCAS Miramar by 2020 for a commercial airport facility as commercial facility would not be considered to meet San Diego's long-term transportation needs.

The Airport Master Plan is intended to identify and set forth a measured, incremental improvement program for existing San Diego International Airport that addresses the more immediate needs of the Airport, and was developed irrespective of the outcome of the Airport Site Selection Program process.

Comment: The then Airport Authority did authorize an exhaustive study of relocating the regions primary commercial airport. Exhaustive in that the study encompassed the absurd (proposal 6) to the ridiculous i.e. desert sites requiring unaffordable high speed transit and a declining customer base. Unfortunately what the voters turned down in 2006 was not the potential use of Camp Elliot but an ill conceived joint use proposal of MCAS (West) Miramar which was associated with the ballot. This ballot defeat has been misconstrued as authorizing the discontinuance of seeking relocation for long term needs and pouring money into an environmentally unsound expansion of SDIA for relatively short term use. In 2007 an airport authority board member is reported to have stated at a public meeting at the Point Loma Nazarene University that State Senator Chris Kehoe's bill banned the continued site selection process. At a subsequent Peninsula Community Planning Board meeting a representative of Senator Kehoe flatly denied that accusation. The last paragraph indicates an incremental improvement program of improvements (expansion)
of the present SDIA. To the public impacted by the airport this equates to a stealth approach.

1.1.4 Activity Forecast and Planning Horizon Used for Environmental Analysis

The San Diego County Regional Airport Authority prepared and published a new aviation activity forecast in June 2004. The forecast analyzed future aviation activity and demand in the San Diego Region through 2030. As indicated previously, the Draft Environmental Impact Report issued by the San Diego County Regional Airport Authority in May 2006 limited environmental consideration to the year 2015. Due to comments received on the May 2006 document, this Draft Environmental Impact Report considers potential environmental impacts through the year 2030.

The forecast is based on regional growth and economic trends as well as events that impacted aviation activity, such as the terrorist attacks of September 11, 2001. The forecast included both a low and high growth scenario and included a forecast of passengers, operations, and air cargo for San Diego International Airport. The forecast was prepared by SH&E and included both a low and high growth scenario and was approved by the Federal Aviation Administration in June of 2005. The unconstrained high growth scenario comports with the Federal Aviation Administration's 2007 Terminal Area Forecast for SAN. Growth in both passengers and operations has exceeded the forecast growth in 2004, 2005, and 2006, the first three full years after the forecast was completed. Because the trend at San Diego International Airport is tracking above the high growth scenario, the high growth scenario will be used for analysis in this Environmental Impact Report. A summary of the passenger volume forecast is shown in Table 1-1.

Comment: Just as September 11, 2001 had a negative impact upon air travel so will the current economic fallout impact air travel projections based upon 2004 data. The major difference is that the current crisis will very likely have a much longer duration due to the combination of inflationary impacts of fuel across the spectrum of the economy and the subprime mortgage collapse impact also upon a broad range of the economy. The SH&E Aviation Activity Forecast of 2004 and the use of, "tracking above the high growth

scenario" as indicated above coupled with the recent economic events make the data in 1.1.4 Table 1-1 questionable at best and more than likely invalid..

be expanded. Although the No Project Alternative theoretically could accommodate projected 2020 activity, the gating exercise did not account for additional delays resulting from the high congestion, lack

Comment: The preceding statement of accommodation until 2020 in 1.1.4 would appear to compromise much of the argument for any expansion at Lindbergh Field especially in terms of long term demand and it's overriding need for relocation. The additional delays resulting from high congestion are speculative over the short term (2015) due to economic factors mentioned above.

1.2 Summary of Proposed Project (Preferred Alternative)

The Proposed Project is the Airport Master Plan. The Airport Master Plan consists of two components: preparation of an Airport Land Use Plan; and the implementation of certain improvements under the Master Plan to meet forecast demand through 2015. In consideration of these Airport Master Plan objectives, the Proposed Project objectives are as follows:

1. Provide adequate facilities to accommodate air service demand (forecast growth through 2015) while improving levels of services, Airport safety and security, and enhancing airport access.
2. Develop facilities that utilize the current Airport property and facilities efficiently and in consideration of compatibility with surrounding land uses.
3. Provide for future public transit options in airport land use planning.

Comment: Under 1.2 (1.) above air service demand as stated in earlier comments (1.1.4) is based upon outdated and optimistic data (2004-2006) and does not reflect current adverse events (2007-2008) The elements touted are largely ones of economic benefit and per CEQA not relevant to an EIR excepting their negative environmental impacts. (2.) The current facilities are incompatible with surrounding land use i.e.densely populated with large commercial areas and the city plan to increase population density in the urban areas. (3.) Providing for future public transit options in ALUP at Lindbergh Field is full of sound and theory but signifies nothing in terms of reality.(as exampled by MTS's light rail proposal from Old Town to University City)

PCPB Comments Regarding SDIA Master Plan Draft EIR dated October 2007

Comments from Bill Ingram, Point Loma resident

There are three major issues that have to be addressed from the information in the EIR.

Safety: Lindbergh Field is the busiest single-runway in the world and it is only a matter of time before an unforeseen circumstance will create a crash of an airplane at Lindbergh. (Like the recent Boeing 777) and the recent runway incursion between the Hawker Jet still on the runway while the Southwest Airline jet took off.

Flight schedule increasing from 600 current flights to 818 projected flights will jam up the runway and not provide proper spacing between flights landing and taking off. **EIR – Appendices. A**

What is the airport authority going to do to prevent these dangers?

Noise and Environment: Children in schools, residents, and customers in local businesses cannot talk because of the noise of the airplanes. Schools have 164.5 min/day =496 hours per year of potential loss of education. The FAA says that the airport is in violation of increasing the number of schools next to the airport. **Appendices. B-40**

Along with increased flights the EIR indicates there will be significant increases over CEQA thresholds of Nitrogen oxides, sulfur oxides and particulate matter falling from aircraft. Over 400 tons are being dumped on people.

Traffic will increase from 87, 000 to 135,000 and the overflow into Point Loma will be an increase of 100% because of the overflow from the airport. This does not include traffic derived from all other development in the area, such as Marriott – Sponge Bob, Liberty Station, and Harbor Island Hotels etc.

Thinking down the road further than 2015, 2030 or 2050 is imperative. **Put our major airport in East Elliot where it belongs.** It will provide two runways and cargo handling capability.

Bill Ingram
3328 Macaulay
San Diego, 92106
619-222-1031

PCPB Comments Regarding SDIA Master Plan Draft EIR dated October 2007

Comments from Suhail Khalil – Point Loma Resident:

January 29, 2008

Mr. Alan Bersin
Executive Committee Chair
Ms. Thella Bowens
President / CEO
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

RE: comment to AIRPORT MASTER PLAN (AMP) DRAFT ENVIRONMENTAL IMPACT REPORT dated October, 2007

Dear Mr. Bersin & Ms. Bowens:

Please find my understanding and comments regarding Draft EIR document mentioned above as follows:

SDCRAA completed its DEIR on a "**No Project Alternative**" development baseline. Unfortunately, this approach does not allow the public or decision makers to analyze existing environmental settings as it compares to development impacts when determining if a proposed project impact may be "significant", pursuant to California Environmental Quality Act (CEQA) and National Environment Protection Act (NEPA) guidelines. As you are aware, labels of "significant" impact require additional studies to mitigate impact, if feasible, whereas "insignificant" impact labels do not require any further study or mitigation.

Capital improvements proposed in Phase 1 AMP to existing San Diego International Airport (SDIA) facilities include four elements: **Airfield, Terminal, Ground Transportation, Airport Support.** Proposed projects focus on incremental improvements to SDIA including construction of 10 new gates to Terminal 2 and a Remain-Over-Night parking structure to commence 2009 and be completed by 2011. The next Phase 2 of the AMP is expected to have a broader scope and focus on complete development that addresses a full integration of all capital improvements to maximize operations at SDIA beyond 2020. AMP Phase 2 implementation is expected to commence 2015 and includes improvements to the Teledyne Ryan property, a northern taxiway (safety concerns), acquisition of adjacent properties, relocation of airside operations, traffic mitigation on congested streets, adding roads and intersections serving SDIA, construction of an inter-modal transportation center at the north side of SDIA, relocation of landside operations to the north, consolidated rental car facility, and funding for a Regional Transportation Plan. Phase 1 of the AMP projects are expected to relieve projected pressures on daily operations beyond 2010 including: projected delays at commercial gates and projected pressures on existing taxiways from commercial, cargo and general aviation flights. The total number of operations (departure & arrivals) projected to increase 50% from current levels, nearing 302,652 total operations annually by 2030. Increased traffic congestion on Harbor Drive and increased CO2 emissions (pollution) is expected to increase significantly due to increased operations projected.

It's my understanding that you intend to adopt a **DEIR Memorandum of Understanding** between SANDAG and the City of San Diego to ensure all CEQA and NEPA guidelines are met. Also, that you will work to seek Federal Aviation Administration approvals for funding "Off-Airport Improvements" including: freeway ramps serving proposed inter-modal transportation center, mitigation of traffic congestion on North Harbor Drive and improvements of vehicular airport access from Washington, Grape, Hawthorne and Laurel Streets. It remains clear that SDIA hours of operation will not change, relocation alternatives for SDIA may be available by the year 2015 and that existing curfew violation rules and regulations are to remain the same. Public safety must never be compromised. Pollution, noise and traffic impacts must be mitigated to ensure our quality of life. I appreciate your leadership to ensure these processes are kept open and transparent for additional government agencies and public input.

Sincerely,

Suhail Khalil
Point Loma Resident
(619) 224-1527 - Office
(619) 224-4175 - Fax
MorningStar.RESVC@cox.net

PCPB Comments Regarding SDIA Master Plan Draft EIR dated October 2007