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September 18, 2006

Mr. Ted Anasis,
Manager - Airport Planning
San Diego County Regional Airport Authority
P.O. Box 82776, San Diego, CA 92138-2776

Board Members

Subject: Response to Draft Environmental Impact Report
Airport Master Plan, dtd. May 2006

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Mr. Anasis,

The Peninsula Community Planning Board represents one of the most heavily impacted communities surrounding the San Diego International Airport. We have tried to work with the Airport Authority in better understanding the assumptions of the Draft Environmental Impact Report (Draft EIR) and have concluded that either there is a gross misstatement of the facts or an intentional attempt to mislead the community, public agencies and regulatory authorities.

We believe that a principal error driving the entire analysis assumes that there is no net difference in the forecasts of Airport traffic (passengers, aircraft and vehicles) between the "No Project" and either proposed alternative. The Airport Authority has repeatedly assumed that their forecast of demand will occur, even without the proposed expansion of Gates, Taxiways, Aircraft Parking, Roadways, and Vehicle Parking. Based on this assumption, the Airport Authority is effectively declaring no difference between the impact of "No Project" and either alternative on the Noise, Air Quality, Biotic Communities, Coastal Resources, Hazards, etc. As a result there is little recognition of the incremental impact caused by the expansion over the 'status quo' represented by the "No Project".

The Peninsula Community Planning Board has consistently challenged the forecasts of the Airport Authority and has previously stated its concerns for the impact on our community. This entire Draft EIR is based on a recent forecast that is unreliable and understated. To date the actual operations of the Airport have consistently exceeded the 'High' forecast, which is now being used in the Draft EIR as the 'expected' level of passengers and flights. The most recent meeting of the Airport Noise Advisory Council has heard the Planning Manager, Ted Anasis, declare this forecast as the 'Worst Case' approximation of the traffic at San Diego International Airport. If this is the 'Worst Case', how come it has been consistently exceeded?

Throughout the Draft EIR there are statements concerning the negative impact on the airport efficiency and passenger experience if the proposed expansion doesn't occur (the "No Project Alternative"). In Section 4.3.5, the Draft EIR summarizes the impacts of the "No Project Alternative" (emphasis added):

4.3.5 Summary of No Project Alternative

Without expanding facilities to serve the forecast demand for air service in and out of San Diego, it is not possible for San Diego County Regional Airport Authority to maintain existing levels of service. ***The No Project Alternative would result in a steady deterioration of levels of service due to an overall increase in delay associated with overburdened passenger processing and other facilities. As delay continues to increase with demand, costs would begin to rise for the passengers and airlines using San Diego International Airport.*** This is directly in conflict with the Airport's goal of providing facilities that can meet the forecast demand for operations and passengers in an environmental responsible manner as laid out in the Airport Master Plan.

This simple summary of the "No Project Alternative" should be reflected in the analysis of the net difference in forecast of passengers and the ability of the Airport to provide facilities to support the number of aircraft operations – as compared to the forecast using the comprehensive enhancement provided by the Master Plan improvements. In every analysis the Draft EIR has assumed that the number of passengers, aircraft flights and vehicles will be the same with only minor differences in timing and delays, obviously an analysis with an inappropriate bias.

This bias is clearly evident in the following excerpt from page 2-5 of the Draft EIR:

The Airport Master Plan used the single-runway constrained forecast to develop airport requirements for airfield, terminal and ground transportation facilities. While each of these facilities has unique characteristics, they operate collectively as a system for moving people and goods. The capacity of this Airport system is limited by its constraining component, the single runway. Capacity improvements made to the terminals and ground transportation components in this situation will increase the level of service experienced by the user without increasing the overall capacity of the San Diego International Airport.

The above citation explains that the ultimate capacity constraint is the single runway, we agree. BUT there are impacts on the daily passenger demand and operational efficiency that will result in a general decrease of passengers, flights and vehicle trips if these other facility elements are not improved as proposed in the Airport Master Plan.

Based on these facts, the Peninsula Community Planning Board (PCPB) rejects the entire analysis of the "No Project Alternative" and requests that a formal economic and operational analysis is performed to identify the differences in the forecasts (with and without the Master Plan improvements). Based on the forecast for the constrained (existing) facilities, we would expect a mitigation plan for all increases in environmental issues that result from the increased capacity of the Airport.

The PCPB (through their Airport Noise Advisory Council -ANAC representative) has requested and briefly reviewed the previous Draft EIR for the Immediate Action Plan (IAP) – the last expansion of the Airport that created Terminal 2 – West. It is noteworthy that there are obvious differences in the estimating procedures for traffic between the two Draft EIRs:

PCPB Response to Draft EIR – Airport Master Plan

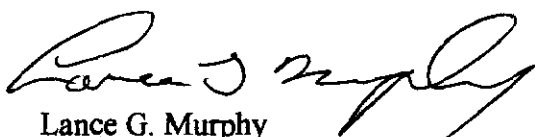
In the 1992 Draft EIR for the IAP, the Port District established significant shortfalls in both Aircraft Operations and Passengers with and without the proposed expansion. In the current EIR there is no such shortfall. Simple comparisons of the facilities improvement for the two expansions are nearly identical for the IAP and the current Airport Master Plan (AMP). With the IAP the first half of the Terminal 2 – West facility was constructed. With the current AMP this terminal will effectively double in size. In the IAP the parking and traffic routing was significantly improved; the current MAP also adds significant traffic elements.

Basically, the question is: If the 1992 Draft EIR forecasted a reduced demand and capacity without the improvements, why doesn't the current Draft EIR have a similar forecast impact?

The PCPB has specific concerns about the increased traffic and capacity of San Diego International Airport with the proposed Airport Master Plan. It is our concern that the following increased environmental impacts will occur with the expansion:

1. The increased number of flights will increase the noise as measured by the CNEL.
2. The increased number of flights will also significantly increase the number of noise events (over flights) regardless of the general reduction of noise for each flight as the fleets of planes become quieter.
3. The air pollution caused by the increased flights will add to health problems for our residents.
4. The traffic congestion will shift a significant number of vehicles to exit the airport to the West into our neighborhoods as the limited Harbor Drive capacity to the East causes a bottleneck. This is exacerbated by the planned increase in parking facilities at the airport. The Draft EIR forecasts that the ratio of departing vehicles (west vs. east) will remain the same as the number of vehicle trips increase – this is a faulty assumption not supported by any analysis or 'common sense'.
5. The ground hazards and noise caused by increasing the number of flights on this limited runway will be evidenced in an increase of 'head to head' diversions over our neighbors to the south of the 275 degree departure path.
6. The number of late night (curfew hours) departures will increase noise impacts as the airport provides added capacity to load and depart.
7. The number of late night and early morning arrivals (legally allowed during curfew hours) will increase both noise and ground hazards for our community based on the increased number of overnight parking, gates and cargo operations provided by the proposed Master Plan.
8. The 'missed approach' ground hazards and noise will increase with the increased capacity provided by the proposed Master Plan.

In summary, this current Draft EIR is fatally flawed and the above items cannot be effectively reviewed to judge the environmental impacts given the inaccurate forecast in the "No Project Alternative".



Lance G. Murphy
Airport Committee Chair
Peninsula Community Planning Board