



**OCEAN BEACH PLANNING BOARD, INC.**  
P.O. Box 70184, Ocean Beach, CA 92167

---

Thank you for giving the Ocean Beach Planning Board an opportunity to review and comment on the May 2006 draft Environmental Impact Report, which pertains to the proposed expansion of the San Diego International Airport. Key components of the proposed expansion include the addition of 10 new jet gates to Terminal 2 West and the construction of a new parking structure, among other improvements.

The draft EIR notes that, in 2015, the number of passengers flying in and out of SDIA is expected to reach 22.8 million, an increase of more than 30% from 2005. Similarly, the draft EIR notes that the number of flights in and out of the Airport is expected to reach more than 700 per day in 2015, a gain of 25% versus 2005.

The draft EIR goes on to state that the implementation of the proposed expansion "is needed because forecasted growth can not 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 will be reduced further beyond its existing degraded level." The draft EIR also notes that "these factors could possibly induce airlines to reduce" their flight offerings "even if their projected flight schedules could technically be accommodated."

As required by the California Environmental Quality Act, the draft EIR compares the expected impacts of the proposed expansion versus the impacts of a "No Project" alternative, under which none of the proposed expansion would take place. In this comparison, the draft EIR states that the No Project alternative "does not provide for adequate level of service to accommodate growth forecast through 2015. The draft EIR notes that areas of deficiency under the No Project alternative are expected to include ticketing, security screening, passenger hold rooms, baggage claims, airport access roads and parking areas, and airport support facilities.

Despite this broad range of projected deficiencies under the No Project alternative - and despite the acknowledged potential for a reduction in airline flight offerings - the draft EIR maintains that *the growth in the number of passengers and flights traveling to and from SDIA would be equivalent* under either the proposed expansion or under the No Project alternative. As a result, the draft EIR concludes that *the proposed expansion would not result in any additional airplane noise* to be borne by the communities surrounding the airport.

In the opinion of the Ocean Beach Planning Board, the draft EIR fails to develop this conclusion comprehensively, particularly considering that the conclusion seems to contradict the stated reason for expanding SDIA: to accommodate projected growth. In our opinion, the final EIR for the proposed expansion of SDIA should improve on the analysis in the draft EIR by incorporating these elements:

- case studies of similar terminal expansions at other airports, and these expansions' impact on the number of flights and passengers serviced by the airports
- analysis of the potential extent of passenger "switching" to other airports and/or means of transportation given the sharp decline in SDIA customer service levels predicted under the No Project alternative
- in general, evidence to support or to refute the draft EIR's claim that SDIA's passenger and flight numbers will be the same with or without the proposed expansion

Again, we appreciate the opportunity to review and comment on the May 2006 draft EIR. By doing so, we hope to contribute to the achievement of the stated goal of the Airport Master Plan: to provide a financially and environmentally responsible guideline for future Airport development.

Tom Gawronski, Ph.D.  
Chairman, Ocean Beach Planning Board