SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.400.2400 WWW.SAN.ORG

March 27, 2009

Ms. Sherilyn Sarb
District Director
California Coastal Commission
7575 Metropolitan Dr. Suite 103
San Diego, CA 92108

RE: Letter of Justification for Terminal 2 Expansion and Elevated Roadway, San Diego International Airport

Dear Ms. Sarb:

This letter serves to summarize and justify the key project components described in the Coastal Development Permit (CDP) application for the Expansion of Terminal 2 and the Elevated Roadway directly in front of Terminal 2 at San Diego International Airport (SDIA), operated by the San Diego County Regional Airport Authority (SDCRAA).

The Terminal 2 Expansion and Elevated Roadway are proposed consistent with the adopted San Diego International Airport Master Plan (May 2008) to serve the forecast growth in passenger and enhance visitor access to the San Diego region. A detailed project description was submitted with the CDP application including engineered site plans of the project components.

Terminal 2 Expansion

The Terminal 2 Expansion includes 10 additional aircraft gates and an expanded concourse to the existing passenger terminal that will serve the forecast growth in passengers and improve the airport users experience at SDIA as the primary airport gateway to the San Diego region. The primary components of the Terminal 2 Expansion include 10 new hold rooms, passenger circulation areas, and enhanced passenger processing areas including check-in, airline ticketing services, and baggage conveyance systems. The additional aircraft gates have been designed to accommodate newer aircraft standards, including the Boeing 787 "Dreamliner", as well provide flexibility in the design of airport facilities that can serve both domestic and international air service. The improvements to Terminal 2 also serve to expand and modernize the security check points to meet federal security and airport industry standards, which comprise a portion of the increased terminal square footage. In addition, the expanded concessions area in Terminal 2 is proposed to expand food choices and retail services which will enhance a visitor/airport user's experience.

Elevated Roadway and Circulation Improvements

Another component is the Elevated Roadway at SDIA that will serve Terminal 2. The Elevated Roadway will provide a new second level curbfront for departing passenger drop-offs; passenger arrivals and the transit plaza would remain on the first level. The Elevated Roadway will double the linear curbfront available for vehicles within the existing footprint of the on-airport circulation system, and will include a "Smart Curb" providing a terminal-grade passenger check-in area including airline/skycap services, baggage check-in and electronic ticket kiosks. By separating the arrival and departure curbfront for vehicles and doubling the linear length on two separate levels, the Elevated Roadway will: a) decongest the existing ground-level curbfront that currently serves both departing and arriving passengers; and b) improve the level of service for airport passengers at Terminal 2. This project will require the relocation and reconstruction of vehicle access ramps and several existing ancillary facilities in the existing parking area for Terminal 2, including the United Service Organizations (USO), parking management office, and the expansion of the central utility plant.

Enhancing Transit Use

SDIA provides a convenient and efficient travel option for many visitors to the San Diego region via the airport's convenient location in downtown San Diego and proximity to existing transportation systems. Rail access for passengers to the San Diego/Southern California region is provided every 12-15 minutes via the "Airport Flyer" bus from the airport to the Santa Fe station to make connections to light rail (San Diego Trolley), the coastal commuter rail (the Coaster), and heavy rail (Amtrak). In addition, the SDCRAA has implemented an airport-operated, employee-only non-stop shuttle bus to the Old Town Transit Station to provide additional transit connections for airport employees. The proximity of these transportation options to SDIA is particularly important to increase the use of public transportation to airport. The SDCRAA has developed an Airport Transit Plan to improve the passenger and employee transit services and is working with the region's transportation agencies to implement additional improvements. Other airports in Southern California are also striving to increase airport connections to regional transit, but SDIA has the advantage of a convenient location in close proximity to regional transit for airport passengers (i.e., compare Los Angeles International Airport and the location of the Union Station in downtown Los Angeles).

Increasing Transit Use and Reducing Traffic/Air Emissions

During the planning and environmental review of the Airport Master Plan, the region's transportation agencies and public all commented consistently that expanding parking at SDIA was not supported as it was perceived this would increase vehicle traffic. Perhaps the most "leading edge" of this project is the assumption of increasing reliance on public transportation to serve airport passengers. In coordination with the City of San Diego and the San Diego Association of Governments (SANDAG), this will be a major airport terminal expansion encouraging airport users to utilize existing public transportation rather than expand vehicle parking. Unlike other facilities that have constructed additional parking facilities, the San Diego region's transportation agencies have commented repeatedly that if airport facilities have a shortfall in parking, then there will be increased use of public transportation or car-pooling by passengers (together with continued information to explain ground transportation alternatives to passengers). In other words, the transportation agencies have stated that creating a parking constraint or cost will shift resident passenger mode choices from vehicles to public transit.

This approach may be forward-looking as the SDCRAA was advised by the transportation agencies and the commenting public that reducing the availability of vehicle parking at the airport may reduce airport-related vehicle trips and traffic congestion on North Harbor Drive, a key visitor-serving route. In addition, the transportation agencies and public comments assume that by reducing available parking at the terminals, this in turn would reduce vehicle trips and air emissions and thus SDIA must consider this approach in order to reduce passenger and employee reliance on individual automobile use that requires vehicle parking. The SDCRAA evaluated the proposed project with and without a parking structure in the certified Environmental Impact Report (EIR). However, the parking structure has not been authorized at this time, and is not included as a component in this application. Additional parking facilities may not be needed in the future if the demand for parking is met by increased transit use by airport passengers.

Relationship to Future Airport Planning

The SDCRAA adopted the San Diego International Airport Master Plan and certified the related EIR in May 2008. The Airport Master Plan and EIR addressed facility needs through the year 2015 and evaluated environmental impacts through the planning horizon year 2030, as requested by transportation planning agencies. Prior to the Airport Master Plan, the SDCRAA authorized the remediation of the former Naval Training Center landfill (approved by the Coastal

Commission on April 10, 2008, CDP 6-07-108). The landfill remediation was initiated in 2008 and will be completed by mid 2009. The aircraft apron and Remain Over Night aircraft parking apron were addressed in CDP 6-08-66 and approved by the Coastal Commission on March 11, 2009. This application is the next step in completing the facilities needed for the south portion of the airport.

From 2008 to March 2009, a multiple agency planning effort (titled Destination Lindbergh) was led by the City of San Diego, SANDAG and the SDCRAA to identify the long-term, ultimate "build-out" of SDIA in conjunction with direct connections between the airport to the region's freeway and transit systems, including a transportation center adjacent to the airport. Preliminary plans identified in Destination Lindbergh are consistent with the airport uses contemplated in the adopted Airport Master Plan, particularly ground transportation and airport support uses identified on the north side of the airport along Pacific Highway. However, Destination Lindbergh is still the subject of collaborative discussions with the local regional agencies, and no formal plan has been adopted. Further discussions with other agencies and stakeholders affected by Destination Lindbergh will be required to evaluate and implement long-term plans. In the meantime, the SDCRAA will continue to plan and entitle the airport facilities and improvements identified in the adopted Airport Master Plan and needed through the year 2015.

Relationship to Chapter 3. Coastal Resources Planning and Management Policies

Chapter 3 of the Coastal Act is the standard of review assumed for the proposed project. With respect to Article 2. Public Access, SDIA is a public access facility serving the entire San Diego region and Southern California. With respect to Article 4. Marine Environment, the property boundaries of SDIA do not include any waterfront areas or bayfront areas. However, SDIA's proximity to coastal resources requires an evaluation of Sections within Article 4 including marine resources, biological productivity and water quality. The proposed project is evaluated in relation to the following coastal resources planning and management policies:

1. Environmentally Sensitive Habitat Areas / Water Quality

Section 30230 (Marine resources, maintenance) of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will

maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 (Biological productivity, water quality) of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The prior coastal development permit (CDP 6-08-66) provided considerable detail on the water quality program for the airport, and was conditioned to provide a monitoring program for stormwater runoff treatment control performance. The only project-related components in this application that are being added to that program are the treatment of roof materials and roof drainage. To begin, the SDCRAA intends to construct the roof using a minimum of galvanized metal components, thus limiting a major source of zinc, which is a stormwater pollutant of concern at SDIA. The documentation previously provided in support of CDP 6-08-66 indicated that the portion of the roof top drainage from the new terminal that reaches the airside of the new building would be directed to the StormFilter treatment system. The capacity of the StormFilter treatment system has been designed to manage this portion of the roof runoff. That portion of the roof top drainage from the new terminal that reaches the landside of the new building is being treated by down-spout filters incorporated into the roof runoff drainage system.

With respect to the elevated roadway and surface parking areas, the new project components will replace areas that are currently entirely paved with both paved surfaces and some new landscaped areas, resulting in a decrease in total impervious area. The proposed configuration of the elevated roadway will require portions of current building footprints and surface parking to be replaced with landscaped areas. New landscaped areas both reduce stormwater runoff and provide opportunities that the SDCRAA will use to create drainage swales and other low impact development (LID) features to infiltrate runoff from the impervious areas of the elevated roadway and parking lots. In addition, the portion of the elevated roadway located adjacent to the terminal will be completely roofed, with the elevated roadway itself acting as a roof over the portion of the lower roadway system located adjacent to the terminal. These roofing features reduce the amount of pavement exposed to rains, and thus

reduce stormwater pollutant loads considerably in comparison to existing conditions.

The modernization of the airport roadway system will decrease the surface area contributing to stormwater runoff volumes and incorporate LID design features (which currently do not exist) that both reduce stormwater runoff volumes and provide a measure of stormwater runoff treatment control. These new features will greatly lower the overall contribution of pollutants of concern from the airport to San Diego Bay.

Finally, the SDCRAA has developed a comprehensive stormwater management program for the whole of SDIA, as described in the SAN Storm Water Management Plan (SWMP) dated March 2008. The SWMP requires the implementation of a wide array of operational stormwater pollutant source control and treatment control best management practices (BMPs), including regularly scheduled street sweeping on both the landside and airside portions of the airport. The program also requires that site design, source control, project-specific, and treatment control BMPs are incorporated into all new development projects (a process referred to as Standard Urban Stormwater Mitigation Planning or the SUSMP process). The plans for the terminal expansion and roadway improvement being proposed are currently being reviewed under the SDCRAA SUSMP process. The SWMP also includes on-going BMP effectiveness monitoring and mechanisms to ensure continuous process improvements.

2. Public Access

Many policies of the Coastal Act address the provision, protection and enhancement of public access to and along the shoreline, in particular, Sections 30210, 20211, 30212.5, 30221, 30223 and 30252. These policies address maintaining the public's ability to reach and enjoy the water, preventing overcrowding by providing adequate recreational area, protecting suitable upland recreational sites, and providing adequate parking facilities for public use. In addition, Section 30604(c) requires that a specific access finding be made for all development located between the sea and first coastal roadway. In this case, such a finding can be made. The airport itself is a visitor-serving facility bringing persons from all over the world to visit coastal resources in the San Diego region. With respect to water quality and the enjoyment of coastal waters, as the staff report for CDP 6-08-66 explained, a storm drain associated with the apron project will discharge into the San Diego Bay Boat Channel. The development and maintenance of public access to and along the boat channel has been made a condition of approval for all development on Liberty Station, and the proposed project will not adversely impact any public access requirements for the site. No

impacts to public access or recreation will result from the project, consistent with the Chapter 3 requirements of the Coastal Act.

3. Sensitive Resources

Section 30230 and Section 30240 require that sensitive coastal resources be protected. There is no environmentally sensitive habitat on the project area. Moreover, the only sensitive biological resources on the airport are the nesting ovals for the California least terns, located over 1.5 miles on the east side of the airport. Therefore, this project will not have any effect on such sensitive resources.

4. Local Coastal Planning

Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

SDIA was previously under the coastal permit jurisdiction of the Port of San Diego and the standard of review for coastal development permits was the certified Port Master Plan. However, legislation which took effect in January 2003 transferred authority over airport property to the SDCRAA. The Airport is now within the Commission's permit jurisdiction. As discussed above, the proposed project is consistent with the public access, biological resources and water quality protection policies of Chapter 3 of the Coastal Act. The proposed project does not prejudice the ability of the Commission to review future airport expansion projects. Although the Airport is not anticipated to be subject to a LCP, approval of this project would not prejudice the preparation of a LCP by some other agency or the airport itself consistent with the requirements of Chapter 3.

5. Consistency with the California Environmental Quality Act (CEQA)

Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing the timing of construction will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. All of the components of the proposed project were evaluated in the Final EIR certified May 2008, including project alternatives with and without a parking structure. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

Conclusion

The SDCRAA requests that the staff find that the proposed project as submitted and with the conditions normally applied to such projects, is consistent with the California Coastal Act. The SDCRAA respectfully requests a June hearing for this matter, in order to allow sufficient time for condition compliance prior to the onset of construction. Please contact me at (619) 400-2478 with any questions.

Sincerely,

TED ANASIS, AICP
Manager, Airport Planning

TA/ljt

cc: Diana Lilly, California Coastal Commission
Jack Gregg, California Coastal Commission

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.400.2400 WWW.SAN.ORG

June 4, 2009

Ms. Sherilyn Sarb
Deputy Director
California Coastal Commission
San Diego Area
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4421

RE: Coastal Development Permit Application #6-09-15/Terminal 2 Expansion
Response to incomplete letter dated June 3, 2009

Dear Ms. Sarb:

This letter is sent in response to your letter dated June 3, 2009 requesting additional information related to the Airport Authority's Coastal Development Permit Application #6-09-15/Terminal 2 Expansion ("Permit"), and as a consequence of the need for this information, apparently deeming our March 27, 2009 application incomplete. This is the second such letter we have received, having responded to your first letter dated April 27, 2009 requesting information and clarification.

In our original application, the Airport Authority requested that the California Coastal Commission ("CCC") consider the Airport Authority's Permit at its June meeting. We received no reaction to this date in your first, April 27, 2009 response, to which we promptly responded on May 15, 2009. In that May 15, 2009 response, we asked for a July hearing date. We have not had any written response to that proposal.

In order to facilitate your review and to increase the chances that this item will be heard in July or as early thereafter as possible, each of the CCC's requests is set forth below followed by the Airport Authority's response.

In respectfully asking for a July hearing date, we make the following observations. For several years, the Airport Authority has worked closely with the San Diego office of the CCC on ALL aspects of the San Diego International Airport "Airport Master Plan". A Final EIR that extensively analyzed and addressed numerous issues including traffic, air quality and a specific section on greenhouse gases was certified in May 2008. The EIR was circulated to the CCC. In addition, the Airport Authority gave presentations to the CCC members and staff in 2008 and 2009, including the topic of the proposed expansion of Terminal 2. Although the Airport Authority is not claiming that the CCC began actual permit review on this Terminal 2 expansion prior to the Permit filling, it cannot be overlooked that as recently as the March staff report on the Airport Authority's Aircraft Apron/Stormwater Outfall project, the CCC observed in approving the project earlier this year that the apron would serve the new gates at the Terminal 2 expansion.

The Airport Authority has been addressing the questions raised in your June 3rd letter for the past two years while working with CCC staff, and is disappointed that these questions could not have been raised prior to this point. Because of the extensive and acknowledged coordination between our agencies, the Airport Authority believes that this application should not be treated as a matter of first impression. Since 2005, the CCC has been invited to participate in monthly Airport Transit/Roadway Committee meetings which provide the opportunity to collaborate with all of the regional transit agencies and provide substantive input on the development of the airport transit plan programs and their nexus to coastal resources.

That said, the Airport Authority offers the following answers to the questions posed in the CCC letter. Our staff and air quality/transit planners are available to answer any further questions via a conference call or meeting at your office.

CCC QUESTION #1: The information submitted on GHG emissions did not separate out the emissions types and amounts that would be generated by the proposed terminal from the projected emissions for the entire Airport Master Plan Improvements. Please provide project specific GHG data, or explain why this data cannot be separated from overall airport emissions.

AIRPORT AUTHORITY RESPONSE # 1:
GHG's associated with the operation of SAN Airport Master Plan were calculated and reported upon as part of the *SAN Master Plan Final Environmental Impact Report* (EIR).[1] These data include baseline (2004) and future-year (2015, 2020, 2025, and 2030) emissions attributable to aircraft, auxiliary power units (APU), ground support equipment (GSE), motor vehicles (on and off-airport), stationary sources (boilers and generators), and electrical usage. Construction-related GHG emissions associated with the Master Plan projects were similarly calculated.

From these data, GHG emissions associated (as CO_2 equivalent) with the Terminal 2 Expansion and Elevated Roadway projects have been segregated or estimated and listed in Table 1. Table 1 illustrates, as discussed in the EIR, that continued operational growth is accommodated beyond 2020 with the Terminal 2 Expansion. The increase in GHG emissions indicated in the 2025 and 2030 timeframes represent the emissions associated with the additional 20 and 40 daily operations, respectively accommodated by the Terminal 2 Expansion. As detailed in the EIR, the Terminal 2 Expansion does not induce operations but accommodates them at an adequate level of service. Specifically, the operational levels with and without the Terminal 2 Expansion are exactly the same through the year 2020 and thus emissions differences are only expected beyond 2020.

[1] *Final Environmental Impact Report (EIR)* for the San Diego International Airport Master Plan, April 2008, see Section 5.19 and Appendix F (www.san.org/documents/amp/Apr08_EIR).

Table 1: GHG Emissions (metric tons as CO_{2e}) Associated with the Terminal 2 Expansion and Elevated Roadway Projects

Year	Elec. Usage	Stationary Sources	Motor Vehicles	APU / GSE	Aircraft	Construction	Totals
2010	3,943	508	135	0	0	1,101	5,687
2015	3,943	508	314	0	0	0	4,765
2020	3,943	508	593	0	0	0	5,044
2025	3,943	508	1,348	580	52,842	0	59,220
2030	3,943	508	2,527	1,347	132,104	0	140,429

Electrical Usage and Stationary Sources are based on the square footage of the Terminal 2 Expansion project. Construction emissions are attributable to both the Terminal 2 Expansion and the Elevated Roadway projects. Motor Vehicle, APU/GSE, and aircraft emissions are all attributable to the Terminal 2 Expansion (a conservatively high assumption). Overall, these values represent <1 to 6 percent of airport totals between the years 2010 and 2030, respectively. Importantly, these data were originally prepared for the environmental review process and do not include the emission reductions associated with the measures proposed in the Memorandum of Understanding (MOU) between the Airport Authority and the Attorney General, the SAN Air Quality Management Plan (AQMP), or other energy/emission reduction initiatives at the airport, by the airlines, or the other airport tenants.

CCC QUESTION #2: *Identify the Specific Measures set forth in Exhibit A to the MOU between the Airport Authority and the Attorney General that will be implemented, how the implementation will occur and if they are proposed as part of this application.*

AIRPORT AUTHORITY RESPONSE #2:
The Specific Measures contained in the MOU address energy- and GHG-reduction opportunities and encompass a wide array of activities, operations and facilities associated with the airport, its tenants, and the traveling public. Several of these measures directly apply to the Terminal 2 Expansion and elevated terminal roadway projects and are listed in Table 2. Each of the items set forth in Table 2 is part of the Authority's application to CCC.

Table 2: MOU Exhibit A Measures that Apply to Terminal 2 Expansion / Elevated Terminal Roadway Projects

No.	Measure Description	Implementation Process
1. Reduction in Aircraft On-the-Ground Energy Use		
a.	Landside Power and Preconditioned Air at All New Gates	All new gates associated with the Terminal 2 Expansion Project will be equipped with landside power and preconditioned air. Design plans and documents are being prepared for construction beginning in 2010.
2. Reduction of Landside Energy Use		
a.	Replacement of Existing Tow Vehicles with Electric or Alternative Fuel Aircraft Pushback Tractors	Beginning January 1, 2010, the Authority, the airlines and other tenants will begin to replace existing tow vehicles with electric or alternative fuel equipment. This includes tow vehicles at the new Terminal 2 gates.
b.	Replacement of Shuttles with Electric or Alternative Fuel Vehicles	Beginning January 2010, the Authority will implement an incentive-based program to induce shuttle service operators (e.g., hotel, door-to-door, parking) to replace existing vehicles with electric or alternative fuel vehicles. This includes shuttle vehicles that use the new terminal elevated roadway facility.
3. Use of Green Materials and Sustainable Design		
a.	Use of Cool Roofs (or Solar Panels) and Cool Pavements	As part of the design process for the Terminal 2 Expansion project, the contractor is undertaking a project-level Carbon Footprint Management Plan. This will ensure that the design, construction and operation of the new facility comply with the MOU as well as the LEED certification program.
b.	Constrict All New Facilities to Meet LEED Certification (or equivalent), With a Target of Silver or Better	
4. Use of Green Construction Methods and Equipment		
a.	Use of Construction Equipment Running on Alternative Fuels or Particulate Traps	Beginning January 2010, the Authority will require contractors to use alternative fuels or employ particulate traps, to the extent permitted by law and that equipment is commercially available. This applies to the Terminal 2 Expansion / Elevated Roadway Projects.
5. Coordination and Encouragement of Tenants to Address GHG		
a.	Recycling	The Authority has just won its sixth consecutive Recycler-of-the-Year Award by the City. This program will be extended to the airlines and tenants that occupy and use the Terminal 2 Expansion Project.
c.	Reduction of Carbon Footprint	The Authority is continually advancing its Sustainability Policy. The Authority is also preparing to implement its Air Quality Management Plan. Both are intended to aid the reductions of energy usage and the carbon footprint airport-wide and will be applied to the airlines, tenants and other users of the Terminal 2 Expansion Program.

CCC QUESTION # 3: If there are outstanding studies or plans of Specific Measures that must be completed prior to the Airport Authority's decision to implement any of the Specific Measures, please indicate what processing remains and when the final determinations will be made as to whether these Specific Measures will be implemented.

AIRPORT AUTHORITY RESPONSE #3:
To aid in the implementation of the Specific Measures contained in the MOU, the Authority has begun preparation of a multi-faceted AQMP. "Exhibit A" to the MOU contains specific deadline dates for implementation which the Authority intends to meet. In summary, the AQMP comprises the following:

- GHG and Criteria Pollutant Emissions Inventory for Baseline (2010) Conditions associated with the airport.
- Identification and evaluation of energy and emission reduction measures airport-wide, including funding sources.
- Coordination with airlines, airport tenants and other stakeholders on the implementation requirements, responsibilities and timetables.

The development and implementation of the AQMP is on schedule and will be completed in December 2009.

Finally, as part of the design process for the Terminal 2 Expansion project, the contractor is also undertaking a project-level Carbon Footprint Management Plan. This will ensure that the design, construction and operation of the new facility comply with the MOU and the AQMP.

CCC QUESTION #4: The Airport Transit Plan has "Planned" improvements and various "study tiers" discussing when implementation could occur, but it is not clear which measures are actually proposed and planned for implementation, and which are suggestions for future studies or policies which may or may not be implemented. The letter submitted indicates three transit improvements in the Airport Transit Plan (Airport Employee Transit Incentive Program; Express Bus to Old Town Transit Center; and Remote Parking/Terminals). Are these the only improvements in the Airport Transit Plan currently proposed to be evaluated for eventual implementation or are there measures in the plan that have been approved for implementation? What mitigation will address the traffic and parking impacts if these measures are not found to be feasible?

AIRPORT AUTHORITY RESPONSE #4:
Because the CCC has identified airport transit as an issue related to coastal resources [Section 30252 of the Coastal Act and Subdivisions (4) and (5)] it is important to consider the following information as background before addressing the questions identified in the letter.

- *There is existing transit service to San Diego International Airport and high connectivity to the regional transit system today.* MTS operates Route 992 (formerly the Flyer) with 12-15 minute service directly to the curb front of Terminals 1, 2 and the Commuter Terminal. Route 992 is an express bus that circles from North Harbor Drive to the Santa Fe Depot station and Broadway in downtown San Diego with connectivity to other bus, trolley/light rail, Coaster, and Amtrak service. This same existing service has stops all along North Harbor Drive that allow access to the Embarcadero, Harbor Island, Spanish Landing and also additional service via Route 923.

Approximately 1,600 airport users ride the Route 992 on a daily basis to access the airport. We would welcome the CCC's collaborative participation on the Airport Transit/Roadway Committee to provide substantive input on how to increase transit ridership on existing transit service by coastal access users. As you are aware, the Airport Transit/Roadway Committee meets monthly and includes all of the transportation/transit agencies in the San Diego region including SANDAG, Caltrans, MTS, NCTD, Port of San Diego, and the City of San Diego.

- *The proposed project does not generate significant traffic impacts.* As stated in the Final EIR certified in May 2008, increases in traffic are forecasted to occur before 2030 both with and without the proposed project. Traffic volumes are forecasted to increase if passenger volumes continue to increase, regardless of whether the terminal expansion and elevated roadway are ever constructed. The extensive analysis in the Final EIR identifies that traffic through the year 2030 will increase with and without the proposed project. As a result the EIR identifies specific roadway and intersection improvements as mitigation and does NOT propose or rely on the Airport Transit Plan as mitigation. The Airport Transit Plan has a goal to increase transit use to 4 to 6 percent of airport users and is discussed in the EIR for informational purposes. Section 5.3.8 of the Final EIR identifies mitigation measures proposed to improve street segments and intersections to address traffic impacts. Additional planning has been conducted since the certification of the Final EIR to further develop the mitigation measures and coordinate with the agencies with jurisdiction over the roadways, intersections, and right-of-way involved.

- *There are no parking impacts identified in the Final EIR.* San Diego International Airport provides 3,160 surface parking spaces within walking distance of the terminals and these are designated and priced as short-term. Today, the Airport has a deficiency of 2,800 parking spaces and is forecast to grow to 5,000 spaces needed by 2030. By not providing enough parking at the terminals currently, airport users have necessarily shifted to numerous options for ground access to the airport terminals, many if not all of which contribute to the advancement of the very Coastal Act policies in question here. They may utilize existing transit, shared ride vans/shuttles, taxis, pick up/drop off by private vehicles or parking at off-airport long-term parking facilities. There are approximately 6,000 parking spaces in long-term parking lots, including three parking structures, located off San Diego International Airport and operated by private operators. Additional parking structures have been proposed by private operators and the Port of San Diego that may serve airport users and other Embarcadero uses such as cruise ships and San Diego Bay.

  The Final EIR evaluated two alternatives: an Airport Master Plan with a 5,000 space parking structure and without a 5,000 space parking structure. There were no significant impacts to parking identified with either alternative. Because there was no significant impact to parking, there were no mitigation measures required. The Airport Transit Plan is not a mitigation measure as there are no significant impacts to parking.

The Airport is not constructing a parking structure. Based upon feedback from regional transit agencies, residents surrounding the airport, and private parking operators, the Airport Authority has selected the alternative without a parking structure. The application for the Terminal 2 expansion and the elevated roadway does not include a parking structure and it is anticipated that up to approximately 500 surface

parking spaces in front of Terminal 2 will be eliminated by the elevated roadway. It is anticipated that airport users will continue to utilize existing transit services, shared ride vehicles and off-airport parking facility shuttles to reach the passenger terminals. It is likely that other entities and applicants will propose parking structures within or adjacent to the Coastal zone to serve airport users since the Airport Authority will not be providing expanded parking based upon public and agency input. With the above information as background, the following paragraphs address the specific responses to the questions regarding the Airport Transit Plan:

- *Purpose of the Airport Transit Plan and Airport Transit/Roadway Committee.* The Airport Authority recognizes that there are ways to improve connectivity to the airport, and began preparation of an Airport Transit Plan and formation of the Airport Transit/Roadway Committee to foster input and consideration of additional transit programs for airport employees and passengers. The Airport Authority recognizes that it is a leader in the transportation industry and has a keen understanding of the forecast for its airport employees and passengers as well as a commitment to increasing passenger satisfaction. The Airport Authority also recognizes that it is not a regional transit agency and cannot legally participate in many ostensibly feasible strategies relating to transit. Therefore, the Airport Authority developed the Airport Transit Plan to:

    - Analyze and document the travel behaviors of airport users (passengers and employees)
    - Establish the feasibility of transit programs that would enhance airport transit service or increase transit ridership by airport users
    - Design transit programs in a manner to provide convenient, seamless connectivity to the existing regional transit system or develop airport-dedicated transit services
    - Identify the operating and capital costs to develop these transit services
    - Identify the funding sources to operate any airport-dedicated transit services that adhere to federal restrictions on the use of airport funds and pursue grant opportunities for operating and capital costs

The three transit programs identified are the measures that may increase transit ridership by both airport employees and passengers and are within the jurisdiction of the Airport Authority to implement. The feasibility and the specific implementation of these transit programs are under further evaluation to identify the frequency of service, potential locations and operations, and funding sources. Because airport transit programs provide service from off-airport locations, there are strict federal regulations governing the use of airport funds to implement transit programs which ensure that the programs are used solely by airport users (employees and passengers). In addition, careful consideration must be given to the specifics of the program to make sure that the program will be utilized by passengers. The Airport Authority has not approved all of these programs for implementation. Since 2005, however, the Airport Authority has invited the CCC to participate as a stakeholder agency, along with the staff of the other transportation/transit agencies to provide input and communicate how transit programs will be effective.

Under the Airport Transit Plan study, 26 potential measures were identified to improve and/or increase transit service to and from the airport. The list of measures was developed in collaboration with the Airport Transit/Roadway Committee and represents a comprehensive list of potential improvements.

The list was divided into three "study tiers" or recommendation categories. Tier 1 and Tier 2 projects were recommended by the committee as measures that should be considered for implementation, with Tier 2 projects requiring feasibility analysis prior to implementation. As the list was developed in collaboration with regional transportation agencies, many projects on the list are projects that the Airport Authority has no legal authority to implement. For example Improvement II-6, Reduce Flyer (Route 992) Headways to less than 12 minutes, would require MTS to change its operating plan for Route 992. The Airport Authority can only encourage the MTS to implement this change. We do not have the authority to implement it ourselves.

The Airport Authority has determined that three measures, II-4 Airport Transit Incentive Program, II-8 Express Bus to Old Town Transit Center and II-9 Remote Parking/Terminals along I-15, I-805 and Escondido Transit Center, would be brought forward for further review as having the greatest potential for increasing transit ridership and were also measures that the Airport Authority has the authority to implement. It is assumed that a marketing program, measure I-4, would be included in the introduction of any new service proposed under these measures.

These three transit programs are being evaluated further for implementation and have not been approved for full implementation although portions of two programs are already in place, as described in the following paragraphs. Again, these three transit programs are not mitigation measures for traffic impacts as such impacts will occur with and without the proposed project, and with and without even the Airport Transit Plan. The Airport Authority may consider even adaptive management techniques for transit needs, working with all stakeholders and seeking new ways to encourage transit use by airport users.

The Airport Transit Plan measures proposed for further evaluation are:

Transit Plan II-4 - Airport Employee Transit Program

The Airport Employee Transit Program provides transit and rideshare benefits to employees of the Airport, as documented in the August 2008 Airport Transit Plan, Appendix A, Improvement II-4. The program is identified as having the potential to attract new employee transit riders and rideshare participants. Specific numbers will depend on elements of the program. The schedule for evaluation and implementation is estimated to take up to 12 months; however, some components of the program have already been implemented.

Program Cost:

- Capital Cost: $0 to $100,000 depending on what incentives are included in the program.
- Annual Operating Cost: $0 to $2.5 million depending on what incentives are included in the program.

Next Steps are identified in Appendix A of the Transit Plan and include:

- Conduct a study, including cost-benefit analysis, to develop and evaluate an exhaustive list of potential transit incentives

- Develop employee incentive program identifying opportunities to increase employee transit ridership, based on the study described above
- Coordinate with airport tenants/TSA during development of the employee incentive program to identify opportunities for tenant/employee participation

Step 1 and 2 identified above are underway and the following components of the program have been implemented:

- Transit subsidies and incentives (pre-tax purchase of Compass cards) for the Airport Authority's 375 employees
- Incentives and marketing to all 5,000-6,000 employees based at the airport
- Employee Express Bus

Transit Plan II-8 - Old Town Express Bus

The Old Town Express Bus program would be extended eventually to airport passengers. The Old Town Express Bus connects the Green Line Trolley and Coaster to the airport terminals and is currently being operated in its first phase as a demonstration program for employees, as documented in the August 2008 Airport Transit Plan, Appendix A, Improvement II-8. The program is identified as having the potential to attract new employee transit riders and rideshare participants, increasing ridership by up to 1.0%. The schedule for evaluation and implementation is estimated to take up to 9 months; however, the first phase of the program, a demonstration program for employees, has already been implemented.

Program Cost:

- Capital Cost: $2.4 to $2.9 million
- Annual Operating Cost: $2.3 to $2.35 million

Next Steps are identified in Appendix A of the Transit Plan and include:

- Coordinate with Old Town Community Parking Advisory Committee
- Prepare parking management plan for OTTC
- Determine feasibility of including regular Amtrak stop at OTTC
- Prepare operational study
- Identify opportunity to provide airline ticketing kiosks or other services at the station
- Integrate with overall branding/marketing program
- Procure buses for route

Transit Plan II-9 - Remote Parking/Terminals

The Remote Parking/Terminals would provide a dedicated express bus service to the airport from remote parking/terminal facilities. Currently a feasibility study is underway and identification of potential parking/terminal locations will be dependent upon the analysis of passenger origin information currently being collected as part of an extensive passenger survey which will be completed in July 2009, as documented in the August 2008 Airport Transit Plan, Appendix A, Improvement II-9. The

program is identified as having the potential to attract new employee transit riders and rideshare participants, increasing ridership by up to 1.5%. The schedule for evaluation and implementation is estimated to take 3-4 years.

Program Cost:

- Capital Cost: $19.2 to $64.6 million
- Annual Operating Cost: $4.7 to $9.3 million

Next Steps are identified in Appendix A of the Transit Plan and include:

- Market analysis to identify terminal locations and access corridors
- Complete parking analysis to determine if space is available at identified park and ride locations
- Complete a remote terminal management study/plan
- Identify opportunity to provide airline ticketing kiosks or other services at the remote facility
- Integrate with overall branding/marketing program

In conclusion to the Question #4 response, the Airport Transit Plan and the Airport Transit/Roadway Committee are ongoing adaptive programs. Since 2005, the Airport Authority has invited the CCC to participate as a stakeholder agency in an Airport Transit/Roadway Committee, along with the staff of the other regional transportation/transit agencies to provide input and communicate how transit programs will be effective. The Airport Transit Plan would benefit from the CCC's input on the specific transit programs developed to provide a clear nexus with coastal resources. The Airport Transit/Roadway Committee welcomes the CCC to provide substantive and detailed input on how airport users will utilize airport transit beyond the 26 programs identified in the Transit Plan, and the relation of this information to coastal resources and the California Coastal Act. In addition, if there are other programs that would increase transit use by airport users, the CCC has an opportunity to provide the details of those potential programs for inclusion and further feasibility and ridership analysis in the Airport Transit Plan.

CCC QUESTION #5: The Transit Plan states that the Land Use Plan evaluated in the FEIR assumes development of a consolidated rental car facility, a transit center in the north area adjacent to Pacific Highway, and a dedicated transit corridor linking north area development to the terminals in the south. Please clarify the status of approval of these facilities, and how the analysis in the Land Use Plan was able to rely on the development of these facilities if they have not yet been designed or approved.

AIRPORT AUTHORITY RESPONSE #5:
The Airport Land Use Plan was analyzed at a programmatic level consistent with planning and environmental review standards. Further project-level planning and further environmental review will be conducted. The Airport Land Use Plan analysis in the Final EIR incorporates airport uses that would generate the largest volume of airport-related vehicle trips resulting in the preparation of a worst-case analysis in accordance with CEQA. In addition, facilities and right-of-way that would increase transit or high occupancy vehicles as an alternative to using existing city streets were planned in the Airport Master Plan. None of these facilities have been designed or approved but were included in the Airport Master Plan to serve as guidance in the planning of airport facilities, similar to a City's General Plan. It is

an accepted planning practice to begin planning land uses in a Master Plan and evaluate the planned future uses in a programmatic environmental review document. The leased state tidelands can only be used by the Airport Authority for airport uses, and the Land Use Plan identifies the needed airport land uses to meet the forecast demand for airport services through the year 2030.

Destination Lindbergh. The City of San Diego, SANDAG and the Airport Authority recently completed an extensive collaborative planning effort to address the long-term ground access needs of San Diego International Airport. The Destination Lindbergh plan identified major transit connections and facilities including an intermodal transit center and connections to high speed rail both of which are the responsibility of the City of San Diego and SANDAG. In addition, the Destination Lindbergh improvements will be included in SANDAG's 2011 Regional Transportation Plan and the Airport Authority will conduct planning for connectivity to those facilities on the airport property along Pacific Highway.

This application is not seeking a permit or approval from the CCC for Destination Lindbergh or the Airport Land Use Plan. This would require a separate coastal development permit application. In addition, there are numerous land acquisition, right-of-way and airport stakeholder/tenant coordination that are required before these projects can be contemplated for project design or approval.

CCC QUESTION #6: Which measures in the Airport Transit Plan are proposed to be implemented prior to or concurrent with operation of the proposed terminal? Please provide additional specifics on how and when implementation will occur.

AIRPORT AUTHORITY RESPONSE #6:
The measures in the Airport Transit Plan are not designed to serve only the passengers and employees associated with the proposed terminal expansion, but rather would serve the entire airport. Therefore the proposed transit improvements may be implemented BEFORE or CONCURRENT WITH OPERATIONS of the proposed Terminal 2 Expansion. The following provides the specifics on which airport users would be served and the nexus to the proposed Terminal 2 Expansion and the timing of the program.

1) BEFORE. The Airport Employee Incentive Program was implemented in 2008 including subsidies for Airport Authority employees who utilize transit and an airport employee shuttle bus connecting the airport to the Old Town Transit Center. In addition, a marketing program promoting employee transit use to the over 5,000 airport employees has been implemented to promote the free airport employee shuttle to Old Town.

2) CONCURRENT WITH OPERATIONS. Extending the Old Town Shuttle Bus to passengers is under evaluation to determine the frequency and costs of adding regular bus service. This transit program also requires addressing concerns from the MTS and the California Department of Parks and Recreation. Both agencies have expressed concern that this transit program be implemented in a careful manner to ensure that airport passengers do not utilize the parking lot at the Old Town Transit Center for free remote parking and displace visitors to the State's most profitable state park.

3) CONCURRENT WITH OPERATIONS. The potential I-15 and I-805 corridors and locations are presently being identified and evaluated. When passenger origin data is available from an on-going Air Passenger Survey of 6,000 departing passengers, the locations will be analyzed to determine if sufficient ridership potential is available to support this type of "Flyaway" service. If the feasibility analysis shows that service is feasible, a demonstration program will be launched. The specific timing of operating a successful "Flyaway" program is dependent upon the remote site preparation which involves, (a) selecting the best geographic location and passenger catchment area, and (b) required land acquisition and parking construction.

As stated previously, the Airport Transit Plan was provided in the Final EIR for informational purposes. The Airport Authority's commitment to improving transit access is not contingent upon the Terminal 2 Expansion project alone. Improving transit access is an overall airport-wide goal and an Airport Authority commitment. The Airport Authority is committed to establishing and implementing an effective program, including considerable funding of transit demonstration programs and employee incentives.

Final Plans and Studies

In conclusion, as a resource and reference to plans and studies completed to date, all of the following documents are posted on the Airport Authority website at www.san.org:

- San Diego International Airport Master Plan, May 2008
- San Diego International Airport Master Final Environmental Impact Report, May 2008
- Memorandum of Understanding (MOU) with California Attorney General, May 2008
- Findings of No Significant Impacts (FONSI) prepared by FAA and Environmental Assessment for San Diego International Airport – Near Term Improvement Environmental Assessment, April 2009
- San Diego International Airport Transit Plan, August 2008
- Destination Lindbergh Technical Report, March 2009.

Please contact me at tanasis@san.org or (619) 400-2478 if I can provide any further information or answer any further questions. Our staff and air quality/transit planners are available to answer any further questions via a conference call or meeting at your office.

Respectfully,

Ted Anasis, AICP
Manager – Airport Planning
San Diego County Regional Airport Authority

cc: Peter Douglas – Executive Director, California Coastal Commission
Lee McEachern, District Manager, California Coastal Commission
Deborah Lee, District Manager, California Coastal Commission
Diana Lilly – Coastal Planner, California Coastal Commission
Hope Schmeltzer – General Counsel, California Coastal Commission