



October 17, 2019

SDCRAA
Attn: Ted Anasis
P.O. Box 892776
San Diego, CA 92138-2276
E-mail: planning@san.org

Re: Peninsula Community Planning Board's ("PCPB") comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report ("DEIR")

Dear Mr. Anasis:

This letter is to provide the Peninsula Community Planning Board's ("PCPB") comments and objections to the San Diego Airport's Recirculated Draft Environmental Impact Report ("DEIR"). These comments are being provided on behalf of the residents of Point Loma. In general, we object to the DEIR as all the benefits of the Airport expansion go to the Airport Authority and the airlines. However, the burdens of increased noise and pollution all unfairly fall on the residents of Point Loma, and other surrounding communities, such as Ocean Beach. The Airport's position in the DEIR is that these issues of noise and pollution are "significant but unavoidable harm" to the human health of Point Loma residents. This is offensive and unacceptable. As outlined below, there are procedures in place to address these human health issues. This should be done first. Thus, the DEIR should not be approved or move forward until real harms to human health are properly addressed.

Below are more detailed comments on our objections to the DEIR and our request for the Airport Authority to follow the proper order of actions, which places human health concerns first, and before Airport and airline profits.

PCPB Comments and Objections to DEIR

The San Diego County Regional Airport Authority ("SDCRAA") and the FAA have forecasted airport operations will increase by 15% through 2026, to a rate of one arrival or departure every 86 seconds, 17 hours a day, 365 days a year, regardless of whether the Airport Development Plan ("ADP") is built or not. Thus, the SDCRAA is promoting a \$3 Billion ADP proposal which includes:

1. 11 additional gates and additional "Remain Overnight" aircraft parking places that will increase air traffic arrivals late into the night and stretch the morning departures well into mid-morning



2. A new office building for their management, staff and Directors
3. New restaurants, bars and seating for passengers

... all “to improve the passenger experience”—without regard to the impact on our Point Loma community

Unfortunately, the DEIR does not commit any moneys to protect the health of persons in Point Loma or in other affected communities. Instead, the ADP will significantly accelerate the airport’s growth rate to reach operational capacity within several years, resulting in:

- 3 times current noise impacts by 2026 (according to SDCRAA data)
- Human health consequences for cardiac, stress, sleep disturbances, cancer and cognitive learning, as documented by the World Health Organization
- Greater safety risks from increased Missed Approaches
- Increased evening and nighttime arrivals and departures, especially with the additional “Remain Overnight” aircraft parking places. Early morning noise impacts will adversely harm the health of Point Loma residents
- Increased pollution and climate impacts from increased aircraft operations
- More and louder, low flying wide body aircraft

The SDCRAA, FAA, and the airlines are focused on increasing their revenues and profits at the expense of our impacted communities. They want more flight operations to handle more passengers, but without regard for the impacts on those affected. This is particularly troubling in light of the ongoing Flight Path & Procedure and Part 150 Studies, which are scheduled to be completed by 2021, resulting in recommendations to mitigate jet noise. The significant and harmful impacts of the SDCRAA’s proposed ADP and associated growth will be borne by the surrounding communities and the tens of thousands of residents and small businesses in Point Loma, and other affected communities, including Mission Hills, South Park, Golden Hill, Mission Beach, Ocean Beach, Pacific Beach, and La Jolla.

In fact, the SDCRAA has not undertaken any efforts to monitor or analyze the annual accumulation of hydrocarbon residue on Point Loma residents.

Moreover, these unmitigated impacts, as represented by the AA data and in the DEIR, are in direct conflict with:



- a) The FAA's Reauthorization Act of 2018, requiring studies to be conducted on human health issues, implicitly before expansion projects resulting in more noise are undertaken;
- b) The SDCRAA's CEO commitment to "[b]eing a good neighbor to surrounding communities, especially when it comes to noise mitigation" and;
- c) The intent and purpose of Title 21 of the Cal. Code of Regulations, which provides regulations designed to cause SDCAA to work to (1) "diminish" noise problems; (2) hold SDCRAA responsible for "controlling and reducing the noise impact area in communities; and (3) to "protect the public from noise and to resolve incompatibilities between airports and their surrounding neighbors."

Therefore, the PCPB demands that SDCRAA withdraw and suspend the Revised Draft Environmental Impact Report, and instead do things in the proper order, as follows:

- 1. Complete the already pending Flight Path & Procedure and Part 150 Studies, assessing commercial jet and airport operation noise mitigation measures;**
- 2. Gather and assess the medical evidence regarding the human health risks of the proposed SDIA airport expansion and the associated substantial increase in flight operations, including cardiac, stress, cancer, sleep disturbances, and cognitive learning;**
- 3. Conduct a program to monitor and analyze the annual accumulation of hydrocarbon residue on Point Loma residents, and analyze the toxicity of the hydrocarbon residue on human health; and**
- 4. Only after steps 1, 2 & 3 are completed, consider the proposed ADP expansion plan which will increase flight operations and impact the surrounding communities; and in that context (a) consider realistic alternatives to reduce the project scope, (b) reduce or eliminate the additional jet "Remain Overnight" parking places, (c) require quieter Stage 4 & 5 jet engines during morning and evening operations, and (d) provide funding for meaningful noise and pollution mitigation programs.**

Thank you for consideration of this information.

Sincerely, 

Bob Goldyn, Chairman (PCPB)

Approved by an Action of the Peninsula Community Planning Board on 17 October 2019.