

## Peninsula Community Planning Board

3667 Voltaire Street, Post Office Box 6883

San Diego CA 92116

*Chairman, Charles J. Mellor*

March 18, 2010

Senator Christine Kehoe  
California State Senate – 39<sup>th</sup> District  
2445 5<sup>th</sup> Avenue, Suite 200  
San Diego, CA 92101

Honorable Mayor Jerry Sanders  
City of San Diego, City Administration Building  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

**Re: The Role / Responsibility of the ALUC in creating Airport Land Use Compatibility Plans and support to appoint San Diego City Council District 2 representative as member of SDC Regional Airport Authority.**

Dear Senator Christine Kehoe and Mayor Jerry Sanders:

Recent actions of the San Diego County Regional Airport Authority (SDCRAA) have led the Peninsula Community Planning Board to believe that the San Diego Airport Land Use Commission (ALUC) needs clear direction to consider all impacts in establishing quality land use compatibility plans around airport influence areas. We strongly support appointing a representative from San Diego City Council District 2 as a voting member on San Diego County Regional Airport Authority prior to commencing the Airport Land Use Compatibility Plan (ALUCP) process for San Diego International Airport at Lindbergh Field to ensure transparency and accountability.

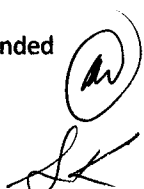
The San Diego ALUC is the Airport Authority Board whose singular purpose is the optimization of airport operations. The Peninsula Community Planning Board is already on record raising concerns about the ability of a single purpose entity, the ALUC, to self certify their own environmental documents which support their own adopted master plans. We continue to be concerned that ALUC governance directs its body to give greater emphasis to one aspect of the California Airport Land Use Planning Handbook (Handbook) and to ignore another aspect of the Handbook. The result is unbalanced ALUCP's and unbalanced land use planning.

Quality land use planning like the General Plan for the City of San Diego should take into consideration all land use concerns and all impacts. Previous actions by the SDCRAA related to impact assessment of safety, environmental quality, and economics have been mishandled in regards to the directions set forth by the Handbook.

The Public Utilities Code specifically states, "that it is the purpose of the ALUC to minimize excessive safety and noise risks. SDCRAA representative at CA ALUP Handbook meeting in Ontario confirmed that the major goal of the ALUC was to maximize safety and to reduce liability as much as possible. Reduction in liability is specifically to benefit ALUC, the airport operator, and the pilots. The word "excessive" was left out in describing safety risks that should be minimized. Safety was instead focused on reducing liability to the aviation community, not protecting private and public interests surrounding the airport influence areas.

The Community Planning Groups of both Kearny Mesa and Otay Mesa expressed concerns during the CEQA process that the ALUCPs affecting their respective communities had significant land use impacts. Yet, the San Diego ALUC concluded without any substantial evidence that any potential land use impacts can simply be relocated elsewhere and the impacts can then be transferred to individual projects rather than to the ALUCPs. ALUC adopted ALUCP's for all San Diego County urban airports on January 25, 2010 based on environmental reviews at the Negative Declaration level, despite Senator Kehoe's letter dated December 17, 2009 and several communities and organizations including San Diego Chamber of Commerce, Economic Development Corporation and Building Industry Association urging EIR's to ensure full public accountability and transparency.

The direction given to the ALUC by SDCRAA airport staff and their legal counsel in creating ALUCPs recommended that individual jurisdictions have the responsibility to evaluate the economic impacts of the ALUCPs on their



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communities. This recommendation was reinforced at the recent public outreach meeting on the update of the Handbook held at Ontario Airport on February 9, 2010. The Handbook response to comments regarding San Diego ALUCP goes so far as to say, "the economic elements are outside the purview of the ALUC". Therefore, ALUC was directed to ignore the conclusion of the City of San Diego Independent Budget Analyst who concluded; "It is important to note that some changes proposed in the draft ALUCP's could have significant economic impact to the City of San Diego's communities." (IBA Report Number: 09-68 Dated July 23, 2009)

We ask that the ALUC analyze all guidance and factors given in the Handbook to create balanced land use planning as reflected in the award winning General Plan for the City of San Diego, which includes a section on economic prosperity. The sole purpose of the ALUC is to maximize safety without consideration of economic, environmental or land use impacts. Airport planning (ALUCP) responsibility to the jurisdictions is to have responsibility to include land use concerns consistent with their general plans.

In 2006, hearings were held by Senator Kehoe and Ducheny and Assembly Members Plescia, Salas, and Saldana. After the October 10, 2006 hearing, the Committee issued a summary report (1383-S) which included 18 staff findings and 14 recommendations. We request that recommendations 13 and 14 be implemented.

**Recommendation 13:** The elements of over-flight, airspace protection, noise and safety are required by the Caltrans Handbook to be assessed in making a land use compatibility determination. Revise the Caltrans Handbook to add an analysis of "economic impacts and effects on land use" caused by those elements.

**Recommendation 14:** Amend the Public Utilities Code Section 21670 (Appendix B) to include a statement that one of the purposes of planning is to find a balance between economic and physical development goals of the community and the goal of aviation safety.

We request that a clear direction be given to the ALUC to consider all impacts in establishing quality land use compatibility plans around airport influence areas or ALUC authority be given to the local jurisdictions that are impacted. This action can be best ensured by the appointment of a representative from San Diego City Council District 2 as a voting member on San Diego County Regional Airport Authority prior to commencing the Airport Land Use Compatibility Plan (ALUCP) process for San Diego International Airport at Lindbergh Field.

Respectfully,

  
Charles J. Mellor  
PCPB Chair

  
Suhail Khalil  
PCPB Airport Committee Chair

CC: San Diego City Council  
San Diego Regional Airport Authority  
Senator Denise Moreno Dulcheny, 40<sup>th</sup> District  
State Assembly Member, Mary Salas – 79<sup>th</sup> District  
State Assembly Member, Lori Saldana – 76<sup>th</sup> District  
San Diego County Building Industry Association  
San Diego Economic Development Corporation  
San Diego Chamber of Commerce  
San Diego Community Planners Committee  
Congresswomen Susan Davis – 53<sup>rd</sup> District