

July 23, 2021

Mr. Ted Anasis, Manager, Airport Planning
San Diego County Regional Airport Authority
3225 North Harbor Drive, 3rd Floor
San Diego, CA 92101

Re: Draft Environmental Assessment (EA) for the San Diego International Airport (SAN)
Airfield Improvements and Terminal 1 Replacement Project (June, 2021)

Dear Mr. Anasis:

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the San Diego International Airport (SAN) Airfield Improvements and Terminal 1 Replacement Project (June, 2021). At its July 22, 2021 meeting the Peninsula Community Planning Board approved the transmittal of the following comments.

The Airfield Improvements and Terminal Replacement Project proposes improvements throughout the airport, including airfield improvements, improvements to the airport roadway system and the replacement of the existing Terminal 1. However, only those project components that are subject to Federal Aviation Administration (FAA) approval are the subject of the Draft EA. Our comments are confined to those aspects of the project that require FAA approval. Those project components include the following:

- Replacement of the existing Terminal 1 and associated improvement and construction of a new approximately 1,210,000 square foot terminal containing 30 gates, an addition of 11 new gates
- Partial relocation of Taxiway B and the construction of a new parallel Taxiway A southerly of Taxiway B
- Reconfiguration of the existing Remain Overnight (RON) aircraft parking areas
- Construction of a new on-airport roadway for inbound vehicle, pedestrian and bicycle traffic and new on-airport circulation roadways to serve the proposed new terminal, with grade separated arrival and departure curbs

While we recognized that the existing Terminal 1 is an aging facility that does not meet either current codes or the expectations of travelers, we have concerns regarding the scale of the proposed development, the number of new gates proposed and the failure to provide a discussion of meaningful and practical alternatives to the proposed project.

Alternatives Analysis

The alternatives analysis considers on-site three alternatives to the proposed terminal replacement project, the renovation of the existing terminal in place, the relocation to the north

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side (which has been suggested and rejected in the past) and the removal of portions of Terminal 1 to accommodate the proposed new Taxiway A.

The need for additional terminal space and gates described in the Purpose and Need section of the EA could also be achieved through the renovation of the existing terminal and construction of a new, smaller terminal located in the vicinity of the former Commuter Terminal. While this alternative might not achieve the additional 11 gates proposed in the Preferred Alternative, it could achieve the goal of providing improved passenger service without resulting in the enormous increase in building scale and bulk compared to the Preferred Alternative. As proposed, the total floor area of Terminal 1 would increase from 284,300 square feet to 1,210,000 square feet. The goal of increasing the level of customer service could be achieved with a building with a significantly smaller footprint and a reduced number of additional gates. We believe that the EA should examine this reasonable alternative.

We also find the off-site alternatives analysis lacking in its evaluation in the use of other airports to alleviate congestion at SDIA. The Cross Border Express serving Tijuana International Airport (TIJ) has proven to be successful and, given its planned expansion, could further serve flights currently served by SDIA or forecast to serve the San Diego region in the future. The alternatives analysis should have given greater consideration to the use of Cross Border Express and TIJ to serve the San Diego region's air travel needs.

Air Quality

While we recognize that that total project related emissions resulting from the proposed project do not exceed the de minimis threshold as stated in the EA, the Peninsula community remains concerned about the impacts of airport operations on the air quality of the community and of the region. We strongly encourage SDIA to continue to emphasize the use of low- or no-emission ground service equipment, pre-cooled air at boarding bridges, ground power to minimize the use of auxiliary power units and the use of electric on-airport shuttles.

Airport Noise

While we cannot argue that the proposed project will result in significant noise impacts, given the EA's assertion that the number and type of operations will be the same under the proposed project or the no-project alternative, the Peninsula community remains concerned over the noise Impacts on our community. We note that the number of housing units within the 65 CNEL contour totals 7,805 units, the SDIA's residential sound insulation program has treated only 3,819 dwelling units as of June, 2019. We strongly encourage SDIA to accelerate the pace of providing sound insulation throughout our community and those to the east of the airport.

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Again, we appreciate the opportunity to provide comments on the Draft EA for the SAN Airfield Improvements and Terminal 1 Replacement Project.

If you have any questions, you can contact me at fkosmo@wilsonturerkosmo.com. Thanks.

Sincerely,



Frederick Kosmo, Chair
Peninsula Community Planning Board