

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
PHONE (619) 688-3137  
FAX (619) 688-4299  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

Governor's Office of Planning & Research

**NOV 04 2019**

**STATE CLEARINGHOUSE**

November 4, 2019

11-SD-5

San Diego International Airport Development Plan  
Recirculated DEIR SCH# 2017011053

Mr. Ted Anasis  
San Diego County Regional Airport Authority  
P.O. Box 82776  
San Diego, CA 92138

Dear Mr. Anasis:

Thank you for including the California Department of Transportation (Caltrans) in environmental review process for the San Diego International Airport Development Plan. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

**Traffic****Section ES.10.5 "Summary of Traffic and Circulation Mitigation measures and Significant and Unavoidable Impacts":**

- Starting on page ES-81, please provide exhibits for the mitigation measures described. Striping and bike lane configurations may need clarification by means of providing an exhibit.
- MM-TR-I-4b "Improve the Intersection of Grape Street at State Street/I-5 Southbound Ramps": Caltrans involvement should be discussed in the description of this mitigation. Construction of ramps at Laurel Street under this mitigation measure may be required, so stating there are no changes to existing roadways may not be correct. Please clarify.
- MM-TR-RS-4a: "Improve Palm Street from Pacific Highway to Kettner Boulevard": This mitigation measure implies directing traffic to Southbound

Mr. Ted Anasis  
November 4, 2019  
Page 2

I-5 via Laurel Street to Pacific Highway to Palm Ave and should be discussed with Caltrans. Additional mitigation measures may be needed if the additional traffic requires ramp improvements at the Kettner SB On-ramp. Caltrans involvement should be discussed in the description of the mitigation measure.

The Draft EIR states that “any proposed freeway mitigation measure is not considered feasible, because there are no planned freeway improvement projects in the San Diego Regional Transportation Plan or Caltrans Interstate 8 (I-8) and I-5 Transportation Concept Report for this segment or other applicable Interstate or Highway segment plans.” The reasoning that there are no freeway improvement projects currently identified in the vicinity is not justification to be exempt from mitigation for the project’s direct impacts. Other means of mitigation need to be implemented. The San Diego International Airport serves both the San Diego and Imperial County Regions. Limiting mitigation measures to just the vicinity of the airport should be reconsidered, and other regional mitigation measures explored.

The Draft EIR needs to identify the regional impacts and how to improve regional methods to efficiently transport passengers to and from the airport. Appendix R-K “Regulations and Requirements Regarding Use of Federal Funds and Airport Revenues as Related to Mitigation Measures” includes a letter (dated Aug. 27, 2019) to the Federal Aviation Administration (FAA) requesting San Diego County Regional Airport Authority (SDCRAA) funds to be used for roadway and intersection improvements for a specific list of projects that are referred to in Exhibit C, attached to the referenced letter. Exhibit C attached to that letter identifies \$1,371,000 in Roadway Mitigation Costs and \$6,096,700 in Intersection Mitigation Costs.

In section “3.14.6 Project Impacts” the DEIR states, “SDCRAA has submitted specific requests to the FAA for it to allow funding of off-Airport mitigation measures” and “SDCRAA’s funding contributions of up to \$350 million, could be utilized along with other regional agencies’ investments in potential off-Airport transportation and transit projects that improve access to the Airport, pending approval of the Airport Development Plan and its environmental review.” Please discuss the difference between the \$7,467,000 in specific off-airport improvements requested of the FAA and the “funding contributions of up to \$350 million”. SDCRAA should request additional FAA approval for the use of

Mr. Ted Anasis  
November 4, 2019  
Page 3

airport funds for off-site transportation projects that mitigate significant project impacts.

3.14 Traffic and Circulation: Please consider alternate language for transportation mitigation measures that are currently identified as infeasible. SDCRAA is awaiting a FAA decision on the current request for off-airport transportation mitigation identified in Exhibit C of the Aug. 27, 2019 letter to FAA and should consider requesting additional funds for other identified significantly impacted transportation facilities. Given that funds can be requested from FAA for additional off-airport transportation mitigations, any locations or roadway and freeway segments that are significantly impacted by the project should not be considered as infeasible to mitigate as indicated throughout Section 3.14 of the DEIR. "Fair share" contributions to future local, regional, or state projects should also be considered.

### **Regional Transportation Plan (RTP 2019) – San Diego Forward**

The San Diego International Airport Intermodal Transit Facility and I-5 Direct Connector Ramps project are identified in the SANDAG Regional Transportation Plan (RTP). This project is currently unfunded. Based on the overall magnitude of impacts identified in the DEIR to transportation facilities, it is recommended that a "fair share" contribution towards the advancement of this project or other future projects that connect I-5 to a future Intermodal Transportation Center, Grand Central Station, or the San Diego International Airport be considered. Other strategies to assist in developing these projects can include potentially acquiring right-of-way to facilitate the construction of such projects.

Additionally, local stakeholders and Caltrans are currently working on a Comprehensive Multimodal Corridor Plan (CMCP) that may include airport access improvements. SDCRAA should also consider a "fair share" towards this study.

### **Multimodal/Complete Streets**

*Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System* directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and vehicle miles traveled associated with distinct traffic generators. Caltrans supports appropriate measures to avoid, minimize, or mitigate transportation impacts on and off the State Highway System to reduce vehicle miles traveled to and from the San Diego International Airport. Caltrans

Mr. Ted Anasis  
November 4, 2019  
Page 4

supports SDCRAA's consideration to encourage airport users to use alternative modes of transportation such as transit, rail, shared vehicle rides, and shuttles to reduce vehicle miles traveled per capita to and from San Diego International Airport.

Caltrans supports Transportation Demand Management (TDM) strategies like those identified in Mitigation Measure MM-TDM-1.

**Right-of-Way**

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Caltrans appreciates the opportunity to continue coordination efforts with the SDCRAA and looks forward to continuing our collaboration efforts.

If you have any questions, please contact Roger Sanchez-Rangel, of the Caltrans Development Review Branch, at (619) 688-6494 or by e-mail sent to [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

Sincerely,



Maurice Eaton, Branch Chief  
Local Development and Intergovernmental Review Branch