

Comment Letter L2

From: Litchney, Seth <Seth.Litchney@sandag.org>
Sent: Friday, March 02, 2018 12:38 PM
To: LUEG, PalomarMP
Cc: Hentrich, Katie
Subject: McClellan-Palomar Airport Master Plan Update Draft PEIR – SANDAG Comments
Attachments: SANDAG Comment Letter_McClellan-Palomar Airport Master Plan Update DPEIR.pdf

Dear Ms. Curtis,

Thank you very much for the opportunity to comment on the County of San Diego’s McClellan-Palomar Airport Master Plan Update Draft PEIR. Please see the attached comments from SANDAG, and contact me if you have any questions or concerns.

L2-1
↓

Thank you.

Seth Litchney
Senior Regional Planner

SANDAG
(619) 699-1943
401 B Street, Suite 800, San Diego, CA 92101



[Facebook](#) | [Twitter](#) | [YouTube](#)



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

March 2, 2018

File Number 3300300

Ms. Cynthia Curtis
Environmental Planning Manager
County of San Diego
5510 Overland Avenue, Suite 410
San Diego, CA 92123

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North County Transit District
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

Dear Ms. Curtis:

SUBJECT: McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report

Thank you for the opportunity to comment on the County of San Diego's McClellan-Palomar Airport Master Plan Update (MPU) Draft Program Environmental Impact Report (PEIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

L2-1
cont.

San Diego Forward: The Regional Plan

Throughout the document, please reference the 2015 Regional Plan where appropriate, as opposed to the 2050 Regional Transportation Plan. Suggested language is included below:

"San Diego Forward: The Regional Plan (2015 Regional Plan) combines the region's two most important existing planning documents: the Regional Comprehensive Plan (RCP) and the Regional Transportation Plan and its Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the 2015 Regional Plan.

L2-2

On April 24, 2015, SANDAG released the draft of San Diego Forward: The Regional Plan for public comment, with a closing date of July 15, 2015. A final plan was adopted by the SANDAG Board of Directors on October 9, 2015."

Long-Range Transportation

SANDAG encourages the County of San Diego to consider the project’s impact on future transit routes within the vicinity of the project area, including:

- Route 440 (Carlsbad to Escondido Transit Center via Palomar Airport Road)
- Route 650 (Chula Vista to Palomar Airport Road Business Park via Interstate 805 [I-805]/ Interstate 5 [I-5] Peak Only)
- Route 653 (Mid-City to Palomar Airport Road via Kearny Mesa/I-805/I-5)
- Airport Express routes

L2-3

Airport Multimodal Accessibility Plan

The Draft PEIR references the SANDAG Airport Multimodal Accessibility Plan (AMAP), but roadway and transit access improvements proposed in the AMAP are not included in the project. Please consider incorporating the following AMAP improvements, which are referenced in the Draft PEIR, into the MPU:

- Widen Palomar Airport Road from six to eight lanes between I-5 and Hidden Valley Road
- Construct additional entrance to the airport terminal at Owens Avenue
- Modify North County Transit District’s Route 445 to serve the airport terminal for more direct access to the terminal, which would provide connectivity to COASTER service at the Carlsbad Poinsettia Station
- Add a bus stop near the terminal building as part of the Route 445 modification

L2-4

For more details, please refer to the AMAP, which can be found at sandag.org.

Transportation Demand Management

Please consider the integration of Transportation Demand Management (TDM) strategies to help mitigate traffic impacts and reduce parking demand as airport demand increases. TDM strategies to consider include:

- Promotion of shared mobility service (e.g., on-demand rideshare and shuttle service) as a means of transportation to and from the airport to reduce trips made by private automobiles
- Provision of adequate curb space to facilitate passenger pick-up and drop-off for rideshare and shuttle service
- Provision of interactive transportation kiosks that display real-time information about regional transit services, bikeshare, carshare, rideshare, and other transportation options

L2-5

- Encouragement of airport employees to use transportation alternatives to driving alone. Consider providing secure and convenient bike parking and amenities such as showers, lockers, and bicycle repair stands for airport employees

Please consider partnering with iCommute, the SANDAG TDM Program, to promote regional TDM programs and services to employees. The iCommute employer services program can work with the airport to offer customized commuter benefit programs that promote transportation alternatives to employees, including the SANDAG Vanpool Program, Guaranteed Ride Home service, support for carpooling, and bike encouragement programs. More information on available regional TDM programs is available at iCommuteSD.com.

L2-5 cont.

Other Considerations

A number of SANDAG resources are available for additional information on or clarification of TDM programs, TDM strategies, and the AMAP. The following pertinent resources can be found at sandag.org:

- SANDAG Regional Parking Management Toolbox
- Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities
- San Diego Airport Multimodal Accessibility Plan

L2-6

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
 c/o SANDAG
 401 B Street, Suite 800
 San Diego, CA 92101

L2-7

SANDAG appreciates the opportunity to comment on the County of San Diego’s McClellan-Palomar Airport MPU Draft PEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,

SETH LITCHNEY
 Senior Regional Planner

SLI/KHE/kwa

Response to Letter L2
San Diego Association of Governments (SANDAG)

- L2-1** The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the project.
- L2-2** This comment requests adding reference to the 2015 San Diego Forward: The Regional Plan instead of the 2050 Regional Transportation Plan. As requested, the PEIR Section 3.1.5.1 has been revised to reflect the 2015 Regional Plan.
- L2-3** The comment encourages the County to consider the Master Plan Update's potential impact on future transit routes within the vicinity of the Airport. As requested by the City of Carlsbad, the PEIR included an analysis of potential impacts to multi-modal levels of service, including bicycle, pedestrian, and transit. As described in PEIR Section 2.5.4.6, the project would not result in impacts to these multi-modal methods of transportation, including transit. Furthermore, implementation of the Master Plan Update would not preclude the development or the public's utilization of future transit routes. The County supports the utilization of transit to reach the Airport. Therefore, no changes to the PEIR have been made in response to this comment.
- L2-4** This comment asks the County to consider incorporating various improvements identified in SANDAG's Airport Multimodal Accessibility Plan (AMAP) into the proposed Master Plan Update. The comment is correct that the Master Plan Update does not propose roadway or transit access improvements. In part, this is because the Master Plan Update's PEIR did not identify significant impacts to these facilities requiring mitigation. Furthermore, improvements identified in the Master Plan Update focus on facilities located within the airport boundary. As noted in PEIR Objective 7, major reconstruction of existing businesses, infrastructure, and transportation systems can have significant impacts on an airport and the surrounding area. Such projects add cost, impact operations, capacity, and can have unintended environmental impacts. The project (i.e., Master Plan Update) should minimize changes to the surrounding community and infrastructure.

The County agrees that the four improvement projects cited in this comment would be valuable to the community and region; however, these improvements are not within the County's scope or jurisdiction, and as discussed above these improvements are not required to implement the proposed Master Plan Update. Therefore, while the AMAP is referenced in the PEIR for the purposes of discussing air quality and greenhouse gas emissions, the County is not required to incorporate AMAP improvements into the Master Plan Update. Implementation of the Master Plan Update would not preclude the development of such improvements by SANDAG or the City of Carlsbad. Therefore, no changes to the PEIR have been made in response to this comment.

- L2-5** The comment requests the County to consider integrating Transportation Demand Management (TDM) strategies to help mitigate traffic impacts and reduce parking demand as airport demand increases. In general, the County supports TDM strategies to help alleviate traffic congestion.

However, as noted in the PEIR, a traffic impact at the intersection of Palomar Airport Road / El Camino Real (TR-2) was identified as a result of the proposed Master Plan Update. In accordance with City of Carlsbad Mobility Element Policy 3-P.11, this intersection is exempt

from City LOS standards, which requires implementation of TDM or Transportation System Management (TSM) strategies. As such, Mitigation Measure M-TR-2 is proposed to implement a TSM strategy in coordination with the City of Carlsbad as owner of the surrounding roadway network. As individual Master Plan Update elements are proposed that would trigger Impact TR-2, the County is amenable in coordinating with City staff to identify specific mitigation, as applicable. Furthermore, this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Therefore, no changes to the PEIR have been made in response to this comment.

- L2-6** The comment provides citations for additional information regarding TDM programs and strategies, and the AMAP. No response is required.
- L2-7** The comment provides SANDAG's contact information for additional notifications. This information has been added to the County's distribution list, and additional environmental documents (i.e., portions of the recirculated Draft PEIR and these responses) have been provided to SANDAG as requested.