

City of Coronado



Final EIR Prepared for the Airport
Land Use Compatibility Plan for
NASNI

September 1, 2020

City of Coronado



1825 STRAND WAY
CORONADO, CA 92118
WWW.CORONADO.CA.US

(619) 522-7300
FAX (619) 522-2407

February 13, 2020

Mr. Ralph Redman, Manager, Airport Planning Department
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA. 92138-2776

Also Submitted Via Email to: Alucpcomments@san.org

SUBJECT: Comments from the City of Coronado on the North Island Naval Air Station (NASNI) Draft 2019 Airport Land Use Compatibility Plan (ALUCP) and the ALUCP Draft Environmental Impact Report (DEIR)

Dear Mr. Redman:

The City of Coronado (City) submits the following comments to the San Diego County Regional Airport Authority (SDCRAA) regarding the proposed 2019 Airport Land Use Compatibility Plan ("ALUCP" or "project") for the Naval Air Station North Island ("NASNI"), and its Draft Environmental Impact Report ("EIR"). These comments were prepared with the assistance of the planning, aviation, noise and other experts whose qualifications are included in Exhibit 1.

This letter sets forth detailed reasons why the Draft ALUCP and Draft EIR are legally deficient, and do not meaningfully respond or address past City comments and concerns. The City urges SDCRAA to no longer pursue its efforts to adopt the Draft ALUCP for the following reasons: it is not required to be adopted at this time; it is based on stale and outdated information; and would have severe economic impacts on the City and its property owners. Nevertheless, should SDCRAA decide to proceed with the ALUCP, the deficiencies in the Draft ALUCP and Draft EIR must first be remedied by substantially revising the Draft ALUCP and Draft EIR, and recirculating the Draft EIR for additional public comment.

Summary of City Comments

The City strongly objects to the approach and direction that SDCRAA is taking to address existing NASNI operations relative to the existing built-out City of Coronado. Our position remains that the ALUCP is neither warranted nor required at this time, as the City and NASNI developed concurrently over time and have effectively co-existed for over 100 years. The City was incorporated prior to the existence of NASNI.

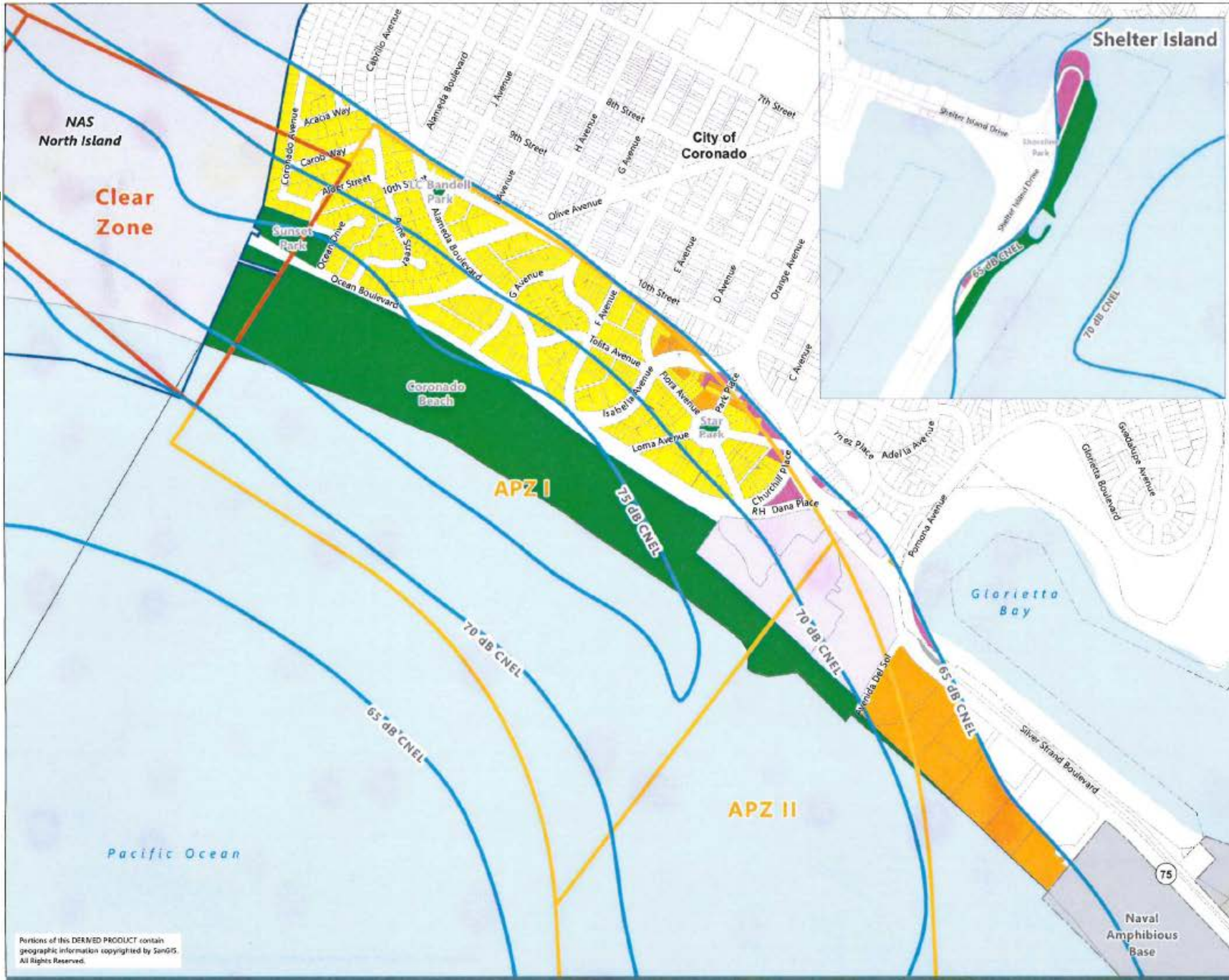
Large swaths of the City are located within the boundaries of the proposed ALUCP's safety and noise contours, and therefore would be subject to restrictions that would preclude and deter further investment and development. Further, the ALUCP's noise and safety contours are based entirely on an outdated Air Installation Compatible Use Zones ("AICUZ") Update prepared by the Navy in 2011. The 2011 AICUZ future horizon year was 2020, thus rendering it obsolete for developing a long-range land use plan.

City of Coronado



CEQA EIR Process

1. Draft EIR Comment period
2. Response to Comments/Final EIR
3. Certification of EIR
4. Adoption of Project/Plan



**AIRPORT
LAND USE
COMMISSION**

LEGEND

- Naval Air Station Property Boundary
- Federal Lands
- San Diego Unified Port District
- Municipal Boundaries
- Clear Zone Boundary
- Accident Potential Zone (APZ) I & II Boundaries
- CNEL Noise Contours
- Existing Development**
- Commercial/Retail/Office
- Hotel-Motel
- Open Space
- Residential - Multifamily
- Residential - Single Family
- Transportation/Parking/Utility
- Water



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours), Figure 5-3 on page 5-7 (safety zones); SanGIS, SANDAG Technical Services, 2017 (existing development);
 Prepared By: Ricordo & Associates, Inc., August 2019.

**Exhibit 2-4
ALUCP Safety Zones
and Noise Contours**

Portions of this DERIVED PRODUCT contain geographic information copyrighted by SanGIS. All Rights Reserved.

City of Coronado



- Coronado is built out and was incorporated prior to NASNI being established;
- The ALUCP would place severe limits on further investment and development;
- The noise and safety contours were based on an outdated AICUZ that had a horizon year of 2020;
- The ALUCP exceeds the SDCRAA's authority which is limited to planning for areas **not** already devoted to incompatible uses;
- The ALUCP is neither warranted nor required at this time as the AICUZ used to develop the ALUCP has reached its horizon year and the mandate to prepare an ALUCP for NASNI was suspended in 2010;
- The alternatives analysis provided in the EIR is inadequate for CEQA purposes; and
- SDCRAA has prematurely approved the proposed ALUCP prior to completing the CEQA review by insisting the 2011 AICUZ must form the basis of the ALUCP and failing to accept mitigation measures or alternatives.

City of Coronado



- **Request to speak by 4PM on Wednesday, September 2nd at:**

<https://www.san.org/Airport-Authority/Public-Comment>

- **To submit written comments via email by 8AM on Thursday September 3rd at:**

clerk@san.org

City of Coronado



Final EIR Prepared for the Airport
Land Use Compatibility Plan for
NASNI

September 1, 2020