Agreement Regarding
Naval Base Point Loma Old Town Campus

WHEREAS, this Agreement is entered into by the United States Department of the Navy ("Navy"), a Federal agency, and the San Diego Association of Governments ("SANDAG"), a California public agency, together which shall be known as the "Parties"; and

WHEREAS, the Navy has maintained facilities and a significant presence in San Diego for more than one hundred years; and

WHEREAS, the use of information technology, artificial intelligence, and cyber warfare have become a central component to the Navy's mission in defense of our Nation; and

WHEREAS, the Navy's Naval Information Warfare Systems Command ("NAVWAR") and Naval Information Warfare Center Pacific ("NIWC PAC") currently reside at Naval Base Point Loma's Old Town Campus ("Old Town Campus"); and

WHEREAS, the Old Town Campus is a substandard and obsolete facility incapable of sustaining the Navy's emerging requirements; and

WHEREAS, the Navy is considering the redevelopment of the Old Town Campus to include a recapitalized NAVWAR and NIWC PAC facility; and

WHEREAS a redeveloped NAVWAR and NIWC PAC facility in the San Diego region would serve the best interests of the Department of the Navy while continuing to contribute to the economic vitality of the San Diego region; and

WHEREAS, SANDAG is the San Diego region's Metropolitan Planning Organization ("MPO") and has a mission to plan for and construct a transportation system to meet the future needs of the San Diego region; and

WHEREAS, SANDAG has identified the need for a multi-modal regional transportation facility to serve as a connection linking the people of the San Diego region to the San Diego International Airport ("Transit Center"); and

WHEREAS, the Navy and SANDAG agree that a potential Transit Center located at the Old Town Campus may considerably improve the transportation options for people, including military personnel and Department of Defense employees, regionwide to connect with and use the San Diego International Airport; and

WHEREAS, the Navy and SANDAG now desire to enter into this Agreement describing a planning process intended to lead to the redevelopment of the Old Town Campus, to include a potential Transit Center and the redevelopment of NAVWAR and NIWC PAC facilities; and
NOW, THEREFORE, the Parties agree as follows:

1. The Navy and SANDAG agree that achievement of Navy requirements to leverage the Old Town Campus site to provide mission capable facilities for NAVWAR, NIWC PAC, and other tenant commands of Old Town Campus are the primary goal of this agreement.

2. The Agreement will allow flexibility in designing and delivering a high-density, mixed-use development compatible with the military missions of the Naval Base Point Loma and its tenant commands.

3. The Navy and SANDAG agree that the redevelopment of the Old Town Campus to include the establishment of a potential Transit Center and the provision of new facilities for NAVWAR may be beneficial to the Navy and San Diego region.

4. SANDAG agrees to fund and procure technical studies needed to support the development of an environmental document in compliance with the California Environmental Quality Act (CEQA) for redevelopment of the Old Town Campus; the Navy may rely on relevant CEQA documentation, as appropriate, for its compliance with its Record of Decision under the National Environmental Policy Act (NEPA). SANDAG's obligation to provide any funding is subject to the approval of the SANDAG Board of Directors.

5. The Navy and SANDAG agree to cooperate on preparation of appropriate environmental documentation with the Navy as the lead agency for NEPA compliance. Navy shall have no responsibility for any compliance with the CEQA or state and local laws that do not apply to the Navy, although Navy will cooperate with SANDAG in helping SANDAG meet its independent environmental requirements.

6. Construction and redevelopment of any improvements on the Old Town Campus, including a potential Transit Center, are contingent upon satisfying the applicable requirements of NEPA and CEQA, and executing the required real estate decision documents to move forward with the project.

7. The Navy and SANDAG will cooperate and use best efforts to maintain progress on the planning process to redevelop the Old Town Campus in accordance with the timelines described within the Project Development Schedule shown in Exhibit A to this Agreement.

8. SANDAG may seek funding from other stakeholders, including the U.S. Department of Transportation and State of California, to assist with the cost of public improvements.
9. All obligations under this Agreement are contingent upon compliance with all applicable federal, state, and local laws. SANDAG and the Navy shall proactively implement measures to ensure that any perceived or actual conflict of interest is neutralized and/or mitigated, as appropriate. Further, SANDAG and the Navy will ensure that proprietary and/or sensitive information generated beyond the conceptual level is safeguarded from unauthorized disclosure by way of a Non-Disclosure Agreement with its consultants or by other contractual provision. Both the Navy and SANDAG will report any potential conflicts of interest to one another, as well as the measures employed to mitigate or eliminate the conflict.

10. No alteration of or amendment to this Agreement shall be valid unless made in writing and signed by the Navy and SANDAG.

11. Neither the Navy nor SANDAG may assign this Agreement, in whole or in part, without prior written consent of the other Party. Any waiver, modification, consent, or acquiescence with respect to any provision of this Agreement to be effective must be set forth in writing and duly executed by or on behalf of the Party to be bound thereby. No waiver by any Party of any agreement provision hereunder will be deemed a waiver of any other agreement provision.

12. Wherever possible, each provision of this Agreement shall be interpreted in such a manner as to be valid under applicable law, but, if any provision of this Agreement is invalid or prohibited thereunder, such invalidity or prohibition shall be construed as if such invalid or prohibited provision had not been inserted herein and shall not affect the remainder of such provision or the remaining provisions of this Agreement.

13. No third-party beneficiaries are intended or contemplated by this Agreement.

14. Any notice required hereunder shall be in writing and shall be addressed as follows:

**NAVY:**

Navy Region Southwest  
Attention: Executive Director  
937 Harbor Drive  
San Diego, VA 92132

Naval Facilities Engineering Command Southwest  
Attention: Commanding Officer  
1220 Pacific Highway  
San Diego, CA 92132
or to such other address as a Party may indicate in a written notice to the other Party. All notices and communications given under this Agreement shall be deemed to have been duly given and received: (i) upon personal delivery, or (ii) as of the third (3) business day after mailing by United States certified mail, return receipt requested, postage prepaid, addressed as set forth above, or (iii) the immediately succeeding business day after deposit (for next day delivery) with Federal Express or other similar overnight courier system, or (iv) twenty-four (24) hours after facsimile transmittal with confirmation of receipt and followed by personal delivery, United States mail, or overnight delivery as specified in this Section.

15. This Agreement may be executed in any number of identical counterparts, each of which shall be deemed to be an original, and all of which together shall be deemed to be one and the same instrument when each Party has signed one such counterpart. In addition, properly executed, authorized signatures may be transmitted via facsimile or electronic mail and upon receipt shall constitute an original signature.

16. The Navy and SANDAG agree that neither Party shall have any obligation to enter into a future, binding agreement with regard to the matters described herein, although the Parties agree to work in good faith to explore fully such matters. The Parties expressly agree and acknowledge that the relationship established by virtue of this Agreement does not constitute a partnership, joint venture, agency agreement, or employment agreement. This Agreement does not document nor provide for the exchange of funds or manpower between the Parties, nor does it make any commitment of funds or resources. Nothing in this Agreement creates, or shall be construed to create, an actual or coercive deficiency in violation of the Anti-Deficiency Act, 31 U.S.C 1341 et seq.

17. This Agreement shall remain in effect for three (3) years or may be terminated in writing based on a lack of substantive progress on an agreed-upon schedule, whichever is sooner. The Parties may extend the duration of this Agreement for successive periods of time upon mutual written agreement.
18. The Navy and SANDAG agree that either Party may share this Agreement with individuals or the public in accordance with its policies on the release of records.

19. This Agreement supersedes the Memorandum of Understanding between the Department of the Navy and the San Diego Association of Governments executed on June 17, 2019.

IN WITNESS WHEREOF, the Parties have executed this Agreement on the date of signature shown below.

THE UNITED STATES DEPARTMENT OF THE NAVY

By: [Signature]
Richard V. Spencer
Secretary of the Navy

Date: 

SAN DIEGO ASSOCIATION OF GOVERNMENTS

By: [Signature]
Hasan Ikhrata
Executive Director

Date: 

CITY OF SAN DIEGO

By: [Signature]
Kevin L. Faulconer
SANDAG Board Member

Date: 

EXHIBIT A: PROJECT DEVELOPMENT SCHEDULE

This schedule lays out a process to develop the requirements for a solicitation to redevelop the Navy's Old Town Campus.

September 2019

Memorandum of Agreement: -The parties will establish a written statement of their goals for the project and a notional timeline to supersede June 2019 MOU.

Development of Exchange Concept – Both parties will meet to discuss timeline, expectations, challenges, and the initial framework of an exchange. Specific issues to be discussed include site environmental baseline and status of NAWWAR requirements/design.

Determination of Funding – SANDAG to request approval for funding to initiate site planning.

Determination of Authority: DON will assess the need for authorizing legislation, and if necessary, initiate the drafting of legislation for the FY21 federal legislative process. Otherwise, DON will use existing legislative authorities.

October 2019

Completion of NAWWAR facility requirements documents – DON will complete facility requirements documents.

Environmental Baseline: Both parties will exchange information on known site conditions and start a site environmental study.

Initial Site Plan—This will be a high-level schematic of one or more plans for potential development on the site that will show location of buildings and other facilities.

November 2019

Facility Plan—This will be a high-level plan for each building or facility on the site describing its purpose, characteristics and physical and functional relationship to other elements of the site plan.

December 2019

Initiation of NEPA process – Commencement of all relevant environmental planning documents.

Environmental Clearance Scope and Timeline—Development of an environmental clearance processes required for the site and for facilities to connect the site to the surrounding community and infrastructure. Also included will be a timeline for environmental clearance activities and the ultimate Record of Decision(s).

January 2020
Project Development Timeline—Establish a timeline for the development of each building and facility on the site. It will lay out the phasing for the development of the project.

Request for Expressions of Interest—Issuance of a Request for Expressions of Interest that will ask developer teams to express their interest in responding to an upcoming solicitation. The RFEI will discuss the project based on the best information available. It will ask respondents to discuss the members of their proposed teams, the roles of each team member and the potential role of the team in designing, building, operating, maintaining and financing elements of the project.

March 2020

Conceptual Plan of Financial Participation—This will be a high-level plan indicating the sources of funding and finance for the project. It will include assumptions on the level and type of financial participation and the potential participation of other governmental funding and financing partners at the federal, state and regional level. It may also discuss the potential ways the selected developer(s) might participate in the funding and finance of the project.

Identification of Third-Party Agreements Required—Agreements that will ultimately be required with other governmental or private sector entities will be identified and proposed timelines for reaching agreements will be delineated.

Agreement on Potential Role of the Developer(s)—Agreements that will describe the role of the developer(s) in the project and on whether to seek one developer for the entire site or leave open the possibility for multiple developers to be selected for the site.

Initiate Design of NAVWAR facilities—Upon selection of a preferred site, initiate design with the plan to transition to design/build or other project acquisition method once the ROD had been signed and congressional authorization is received, if necessary.

April 2020

Preparation of Final Solicitation Materials for Approval by Principals—Based on internal review of the parties and industry comments, the parties will prepare the final solicitation materials for approval by principals of each party.

October 2020

Receive Congressional Authorization—If necessary, receive congressional authorization.

December 2020

Record(s) of Decision signed.
From: PIO  
To: Clerk of the Board  
Subject: FW: Lindbergh Field at Capacity  
Date: Friday, September 20, 2019 5:55:08 PM

-----Original Message-----
From: Gary Wonacott <gwonacott@hotmail.com>
Sent: Friday, September 20, 2019 8:32 AM
To: PIO <PIO@sandag.org>
Cc: jennifercampbell@sandiego.gov
Subject: Lindbergh Field at Capacity

In 2-6 years, this will be the headlines in the San Diego Union Tribune. But sooner than that, you will begin to hear about the on-taxiway delays of 20-30 minutes and longer. There are already 20-30 minute delays from 6:30 am to 7:15 to 7:30 am, which will start to happen from 10 am to 2 pm next.

The Airport Authority in 2018 had a consultant perform an analysis that quantified the financial benefit of Lindbergh to the San Diego region at about $12B annually, but when the airport approaches and hits capacity, and is then a constrained airport, the San Diego region will begin to lose hundreds of millions of dollars annually from lost enplanements.

The Airport Authority tried to hide, which may be a little unfair, in their first terminal one expansion draft EIR that the airport is so close to capacity by under projections of future operations. And, even now in their second try, the consultant has made several optimistic assumptions projecting loss of revenue beginning in 2034. I am just wondering if anyone there is asking the Airport Authority any questions about what is coming, regardless of how the residents of the City of San Diego voted in 2006. But, perhaps the questions have been asked, and everyone is just hoping that the laws of physics are wrong? Just asking!

Regards,

Gary Wonacott  
Resident  
San Diego
To whom it may concern:

I am a subcommittee member for the University Community Plan. This is a multi year project that will update the land use, housing, and mobility elements of the University Community Plan area.

One of the issues that comes up at every meeting is how to get people out of their cars - or more able to drive a shorter distance and then connect to public transportation. The upcoming completion of the trolley blue line is obviously an exciting opportunity. However it doesn't solve enough.

When we were brainstorming this past Tuesday several people noted a small area that offers a cluster of solutions to local public transit connections. The area is the south end of Gilman, and southwest end of La Jolla Colony. The opportunities identified:

1) create a transportation hub - allowing Amtrak, Coaster, and trolley connections. There is no trolley, amtrak, or coaster station there... but all tracks pass closely to the east side of 5 at La Jolla Colony.

2) Provide a bike pedestrian bridge across the train and trolley tracks at the west end of Rose Canyon. Currently there is not legal way to cross the tracks if bikes or pedestrians follow the path through Rose Canyon.

The hub would allow transfers from Amtrak and the Coaster to the trolley line and vice versa.

There is an existing park and ride lot on the west side of I-5, on Gilman. This provides local residents who wish to connect to the Trolley, Amtrak, or the Coaster. For those in south UC (south of Rose Canyon, north of Marian Bear Park, the access on the trails through rose canyon would allow a nature filled walk to this transportation hub.

Thank you for considering this idea.

Katie Rodolico
UCCA representative to the UCPG CPU subcommittee.
I think that expanding the freeways vs. more coasters would be more beneficial for the community. Specifically I travel on the 52 freeway and that freeway needs to be expanded especially with new housing being built in east county. Thanks in advance for your consideration in this matter.
Tessa,

The board should refuse to fund the new trains.

NCTD wants money for trains while reducing the terminal parking spots, which will reduce the number of riders. The Oceanside Terminal has 1200 parking spots that they plan to reduce to 500 to build condos on taxpayers land. Where are riders going to park? What a colossal waste of taxpayer’s money.

A grass roots organization in Oceanside is starting called STOP-NCTD (Save Trains Oceanside Parking). Local residents (I live beside the terminal) are very upset. Expect petitions soon. Media has been contacted.

Bryan Ireland
San Diego Logistics Manager
Global Supply Chain Management
Raytheon
858-522-2864

8248 Mercury Ct
San Diego, Ca 92111
REQUEST...

PUT THE FUNDS TOWARDS ROADS!

Sandra Simpson
Fallbrook, CA
September 19, 2019

Via Electronic Mail
Chair Steve Vaus and Members of the Board of Directors
SANDAG
401 B Street
San Diego, CA 92101

RE: Proposed FY 2020 Capital Program Budget Amendment

Save Our Forest and Ranchlands (“SOFAR”) and the Cleveland National Forest Foundation (“CNFF”), two organizations dedicated to progressive land use planning and the protection of vital natural resources, submit the following comments on the proposed amendment to the FY 2020 Capital Program Budget scheduled for consideration at the September 27, 2019 meeting of the SANDAG Board of Directors (“Board”). The amendment would fund nearly $600 million in planning, environmental, design and construction activities related to some 30 projects throughout the region.

The amendment includes funding for important transit projects, including procurement of additional “rolling stock” that will support more frequent trolley and COASTER service. We are pleased to see that staff proposes to program at least some of the funding for these transit projects into the current RTIP.

As the Board deliberates the proposed amendment and similar proposals in the future, we would ask that the Board keep one basic question in mind: how will the projects under consideration contribute to achieving critical state and local housing goals and greenhouse gas (“GHG”) reduction goals, consistent with SANDAG’s legal responsibilities? Given the gravity of the housing and climate crises facing our region, all of our actions need to take a big picture view.

Recently the San Diego region has undergone a paradigm shift in the ability to truthfully answer the above question, which is paramount to informed political discussion and decision making. That paradigm shift is none other than the arrival of a new SANDAG Planning Director who has brilliantly cleared the decades-long fog surrounding the role of transit in solving some of the most intractable problems facing the people and the environment. In a series of public
statements at the beginning of his tenure he has courageously pointed out how transit has been deliberately undermined and freeways artificially promoted. Transit, he said, should be brought to a state which is competitive with the auto in order to make our cities and their people, services and businesses thrive. And one of the most unrelenting of social problems facing our region is the housing crisis, which functional transit in a functional city should be designed to solve. To Director Hasan’s everlasting credit he has pointed out that we have yet to begin to build a functional transit system.

While SOFAR and CNFF applaud Director Hasan’s efforts and support funding for long-overdue transit projects, we also recognize that much more must be done. Neither housing nor climate goals can be met unless housing and transit are developed concurrently. Good transit supports good, affordable housing in locations that make sense while also reducing vehicle miles traveled (“VMT”) and GHG emissions. Accordingly, we ask that the Board keep another big-picture question in mind when evaluating this and other funding proposals: **how do the projects under consideration support the development of sufficient quantities of affordable, transit-focused housing?**

SANDAG does not write on a blank slate. Relevant housing and GHG reduction goals adopted by the state of California, the City of San Diego, and SANDAG include the following:

- 40% reduction in GHGs below 1990 levels by 2030 (SB 32; Health & Safety Code § 38566)
- 80% reduction in GHGs below 1990 levels by 2050 (Executive Orders S-3-05 and B-30-15)
- 50% transit, walk and bike mode share for commuters within a ½ mile of a major transit stop in City of San Diego by 2035 (Climate Action Plan, City of San Diego)
- 150% increase in transit mode share (SANDAG’s *Urban Area Transit Study*[^2])
- Adequately plan to meet the housing needs of everyone in the community ([California](http://www.hcd.ca.gov/community-development/housing-element/index.shtml)).

Meeting these goals is not only reasonable, but also urgently required if we are going to solve the severe housing and climate challenges faced by the San Diego public.

SANDAG also has specific legal responsibilities. The California Supreme Court has emphasized that Executive Order S-3-05—which first established California’s long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050—merits consideration because it “expresses the pace and magnitude of reduction efforts that the scientific community believes necessary to stabilize the climate.” *Cleveland National Forest Foundation v. SANDAG* (2017) 3 Cal.5th 497, 515. The Court also held that agencies like SANDAG must ensure that their analysis “stays in step with evolving scientific knowledge.” *Id.* at 519.

Executive Order S-3-05 reflected reduction goals derived from the 2007 Fourth Assessment Report by the Intergovernmental Panel on Climate Change (“IPCC”), which represented the best


available science at the time. Since 2007, however, “evolving scientific knowledge” confirms that even more dramatic emissions reductions are necessary to avoid severe—and even catastrophic—climate impacts. In October 2018, the IPCC published a report warning that we have only a few more years at best to sharply reduce GHG emissions before drastic climate change impacts become all but inevitable. Even as scientists warn we must dramatically increase the pace of GHG reductions, emissions from California’s transportation sector continue to rise—increasing by 6 percent from 2013 through 2017 (the most recent year for which data are available). SANDAG’s planning and analysis must “stay in step” with this evolving scientific context.

SANDAG also has a legal responsibility to consider both specific mitigation strategies and broad-scale alternatives that reduce GHG emissions and VMT. Cleveland National Forest Foundation v. SANDAG (2017) 17 Cal.App.5th 413. The Court pointed to a number of mitigation measures in SANDAG’s own Climate Action Strategy, including:

- Supporting the planning and development of smart growth areas through transportation investments and other funding decisions; offering incentives for transit-oriented developments in smart growth areas; coordinating the funding of low carbon transportation with smart growth development; and encouraging parking management measures that promote walking and transit use in smart growth areas. Id. at 433-34. The Court also held that SANDAG must consider broader planning alternatives that significantly reduce VMT, again drawing on specific examples from the Climate Action Strategy: “increase and prioritize funding and system investments for public transit and transit operations, increase the level of service on existing routes and provide new public transit service through expanded investments, and improve the performance of public transit with infrastructure upgrades.” Id. at 436-37. Again, SANDAG’s actions must reflect consistency with these principles.

Again, we must emphasize that state and local climate and housing goals are achievable only if land use and transportation are addressed together. The mitigation measures discussed in the Court of Appeal’s 2017 decision reflect the close relationship between smart growth and the availability of transit. Indeed, the main point of SB 375 was to require regional agencies like SANDAG to align land use and transportation planning in a manner that reduces greenhouse gas emissions. Government Code § 65080(b)(2)(B).

These synergies also are recognized in the Urban Area Transit Strategy and Housing Element of the City of San Diego’s General Plan. The Housing Element includes this goal:

Ensure the provision of sufficient housing for all income groups to accommodate San Diego’s anticipated share of regional growth ...in a manner consistent with the

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3 IPCC 2018, Global Warming of 1.5°C; Summary for Policymakers, at https://www.ipcc.ch/sr15/chapter/spm/
development pattern of the Sustainable Communities Strategy (SCS), that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas.

It is clear that the region has failed to meet its affordable housing goals. Nevertheless, the data are still shocking. In September 2017, SANDAG published a Regional Housing Progress Report that compared housing permitted in the region over the period 2010-2016 (7 years) compared to 10-year goals established in 2011.

As shown in the figure above, the region permitted only 9% of the low- and moderate-income housing needed over the first 7 years of the 10-year plan. We obviously need a radical change in approach and a true commitment to constructing large amounts of infill housing. While the goal will be to build as much affordable housing as possible, increasing the housing supply generally will help bring down the cost of housing that has been inflated by housing scarcity.

This is where housing and transportation policy must come together. Infill housing will need to be located where there is sufficient transit service in order to reduce the need for costly structured parking, reduce traffic impacts, and reduce the overall cost of housing and transportation. Housing and transit mutually reinforce one another. You cannot have one without the other. The City of San Diego recently updated its development regulations to reduce parking requirements in walkable mixed-use areas with good transit service. The “yes in my backyard” (YIMBY) movement is showing that public opinion on infill housing is changing.

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The San Diego region has long been plagued by a poor transit, bike, and walk system that serves relatively few people and serves them poorly. Despite the plethora of plans over decades that have been prepared for the region, the transit work-trip mode share in the County is shockingly low, especially in comparison to metropolitan areas the world over.\(^7,8\)

Moreover, even though commuting by transit may generally take longer than commuting by auto when considering door-to-door travel times, the transit time penalty is greater in the San Diego region than in other large regions of California.\(^9\) This makes transit unattractive to those with a choice, and those without a choice are simply out of luck.\(^10\)

SANDAG’s *Urban Area Transit Study* (UATS) also was intended to address these problems. It states:

*The overarching goal of the UATS is to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region. The vision calls for a network of fast, flexible, reliable, safe, and convenient transit services that connect our homes to the region’s major employment centers and destinations. Achievement of this vision would make transit a more appealing option for many trips, reducing the impact of vehicular travel on the environment and on public health.*

Other key goals included:

- Making transit more time-competitive with automobile travel;
- Maximizing the role of transit within the broader transportation system; and


\(^9\)Calculated from California Household Travel Survey data. [https://www.brookings.edu/wp-content/uploads/2016/07/SanDiegoCA-1.pdf](https://www.brookings.edu/wp-content/uploads/2016/07/SanDiegoCA-1.pdf)
Reducing vehicle miles traveled and greenhouse gas emissions in the region. (p. TA 7-5)

The UATS goals for home-to-work transit mode share (Table TA 7.2) include:

- 30%+: downtown San Diego
- 20-25%: Central Core
- 15-20%: University City
- 10-15%: Sorrento Mesa, Kearny Mesa, Oceanside/Escondido Corridor and urbanized areas in the North Central Coastal Area, the Central Coastal Area, and the Coastal South Bay

Fulfilling the goals of the UATS will require a commitment to transit as a complete system rather than as a set of separate, isolated projects. To be successful, transit, bike, and walk infrastructure must be complete. To initiate the UATS Plan, a first-phase, complete transit bike and walk system should be modeled to be built in the next 12 years in the Urban Core as defined within the UATS, and especially within the City of San Diego, the LOSSAN corridor, Sprinter corridor, and the Blue Line corridor. This will reach the largest number of potential customers and also provide the backbone for subsequent extensions.

In our view, a planning scenario focused on meeting housing and climate goals likely would not include any more road expansion, as transit has been and continues to be severely underfunded compared to roadway projects. Transit, bike, and walk mobility and auto-based mobility serve different land use purposes. Transit supports development of affordable infill housing in ways that freeway expansion cannot.

Furthermore, every mile of pavement that is constructed to serve auto-based mobility increases vehicular travel and GHG emissions. In research conducted for the California Air Resources Board, Handy and Boarnet concluded that roadway capacity expansion does not reduce congestion or GHG emissions:

Thus, the best estimate for the long-run effect of highway capacity on VMT [vehicle miles traveled] is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG [greenhouse gas] in the long-run.¹¹

This finding has been adopted by the Governor’s Office of Planning and Research (OPR) in its 2017 Technical Advisory on Evaluating Transportation Impacts in CEQA.¹² The Court of Appeal also echoed this point in Cleveland National Forest Foundation v. SANDAG (2017) 17 Cal.App.5th 413, 437. The Court noted that congestion relief “is not necessarily an effective long-term strategy” due to the risk that congestion projects, despite short-term efficiency gains, ultimately will induce additional travel that partially or fully offsets any short-term GHG reductions. Id. Congestion relief projects alone are unlikely to reduce VMT or GHG emissions.

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¹² http://opr.ca.gov/docs/20171127_Transportation_Analysis_TA_Nov_2017.pdf
SANDAG’s past planning efforts have not only been deficient, but also have been repeated failures in spite of warnings from the courts, the public, and the planet itself. We hope that Director Hasan’s arrival signals at least the beginning of a fundamental and critically necessary shift in direction.

In sum, while we support additional funding for long-overdue transit expansion, we also must remind the Board to keep the big picture—and the questions posed at the beginning of this letter—in mind. SANDAG needs to develop a comprehensive scenario that would at least meet the state’s GHG reduction goals for 2030 and 2050, if not reflect current scientific information demanding even deeper cuts in emissions. Similarly, with regard to the local housing crisis, SANDAG needs to develop a 50% transit, bike, and walk mode share alternative necessary to activate and support infill housing that is already zoned in the urban core.

We cannot meet pressing social and environmental challenges by rehashing old project scenarios. Fortunately, the state and local policies and court decisions discussed above—including SANDAG’s own guidelines—can help point the way toward meeting the housing and climate crises. The public needs to see what it would take for the region to build a world-class transit system and affordable, infill housing beginning with a complete, first phase transit, bike, and walk system in the Central Core, the LOSSAN Corridor and the Sprinter corridor. The Board must keep its eye on the broader questions confronting the region, and ultimately must ensure that its project-level decisions serve a much larger vision—one adequate to confront both the housing crisis and the climate crisis.

Duncan McFetridge
Director, CNFF
President, SOFAR

cc: Rachel Hooper and Kevin Bundy, Shute Mihaly & Weinberger LLP
August 27, 2019

Honorable Chairman Steve Vaus  
San Diego Association of Governments  
401 “B” Street, Suite 800  
San Diego, CA 92101  

Dear Chairman Vaus:

The BIA submits this letter in follow up of our commentary made at your last RHNA-subject related Board Meeting. It also augments our list of issues we formally raised in writing on August 1st.  We support Staff’s RHNA housing spread as shown on “Table 2: Estimated Allocation based on Request #1: Equal Weighting to Transit and Jobs Component.” Table 2 responds to Board Member Requests – released by SANDAG on August 23, 2019. For decades, the building industry has been required to adhere to regulations that promoted a “jobs-to-housing balance.” Moving away from critically weighing the “jobs-to-housing balance” factor jeopardizes the key economic driver of our regional economy. Transit by itself does not create jobs, while job growth always follows housing growth and housing is where jobs go to sleep at night. Besides, as your staff critically notes, “Providing equal weighting to the transit and jobs components could meet the objectives in state law as both the transit and jobs components can lead to reduced greenhouse gas reductions, promote infill development, and provide a mix of housing types to all jurisdictions.”

We, therefore, cannot support the estimated allocation per Table 1, which reflects a methodology that arbitrarily assigns a 2/3 weighting to Transit and only a 1/3 weighting to Jobs. As we noted before, Board adoption of Table 1 would uniquely remove far too many high potential housing units from the Unincorporated County area. We do not believe it is equitable for the cities to absorb the unmet housing demand created by the County’s 3 Million residents. Adoption of Table 1 would result in more congestion on the I-15 freeway when County residents are forced into longer commutes to and from their County jobs. Our support for the Table 2 housing allocation - specifically the increased allocation to the County - is provided, while observing that “8,855 units” is still far too low to meaningfully dent the region’s overall housing need.

Finally, we hope that all of SANDAG’s member jurisdictions shall adopt the Table 2 housing allocation figures and make these their true housing goals for the 6th RHNA Cycle. Allow us to remind you that we are in a severe housing supply crisis, that the SANDAG Region missed the current RHNA cycle allocation by well over 50% and that – as a consequence – the State will not sit idly by to see this performance repeated.

Respectfully,

Borre Winckel  
President & Chief Executive Officer

CC: SANDAG Board of Directors  
    Hasan Ikhrata, SANDAG Executive Director  
    Seth Litchney, SANDAG Regional Planner
<table>
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<td>6,522</td>
<td>3,753</td>
<td>10,275</td>
<td>(830)</td>
</tr>
<tr>
<td>Coronado</td>
<td>-</td>
<td>1,430</td>
<td>1,430</td>
<td>429</td>
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<tr>
<td>Del Mar</td>
<td>-</td>
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<td>232</td>
<td>69</td>
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<td>El Cajon</td>
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<td>2,357</td>
<td>3,611</td>
<td>331</td>
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<tr>
<td>Encinitas</td>
<td>418</td>
<td>1,445</td>
<td>1,863</td>
<td>309</td>
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<tr>
<td>Escondido</td>
<td>5,853</td>
<td>2,854</td>
<td>8,707</td>
<td>(900)</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>920</td>
<td>256</td>
<td>1,176</td>
<td>199</td>
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<tr>
<td>La Mesa</td>
<td>2,090</td>
<td>1,543</td>
<td>3,633</td>
<td>(164)</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>836</td>
<td>388</td>
<td>1,224</td>
<td>(135)</td>
</tr>
<tr>
<td>National City</td>
<td>3,135</td>
<td>1,944</td>
<td>5,079</td>
<td>(358)</td>
</tr>
<tr>
<td>Oceanside</td>
<td>2,926</td>
<td>2,342</td>
<td>5,268</td>
<td>(175)</td>
</tr>
<tr>
<td>Poway</td>
<td>-</td>
<td>1,884</td>
<td>1,884</td>
<td>565</td>
</tr>
<tr>
<td>San Diego</td>
<td>57,290</td>
<td>47,747</td>
<td>105,037</td>
<td>(2,864)</td>
</tr>
<tr>
<td>San Marcos</td>
<td>1,254</td>
<td>2,123</td>
<td>3,377</td>
<td>261</td>
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<tr>
<td>Santee</td>
<td>418</td>
<td>966</td>
<td>1,384</td>
<td>165</td>
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<tr>
<td>Solana Beach</td>
<td>418</td>
<td>474</td>
<td>892</td>
<td>17</td>
</tr>
<tr>
<td><strong>Unincorporated County</strong></td>
<td><strong>836</strong></td>
<td><strong>8,019</strong></td>
<td><strong>8,855</strong></td>
<td><strong>2,155</strong></td>
</tr>
<tr>
<td>Vista</td>
<td>836</td>
<td>2,106</td>
<td>2,942</td>
<td>381</td>
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<tr>
<td>Region (Totals)</td>
<td>85,842</td>
<td>85,843</td>
<td>171,685</td>
<td>-</td>
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</tbody>
</table>
Good morning SANDAG Board representatives and staff.

Greetings from Austria, Germany, Croatia, Montenegro, Albania, Bosnia and Herzegovina.

For the past four weeks I have been pedaling through these beautiful countries and embracing life on a bike and being inspired by the great bike infrastructure and all the benefits that biking and ecotourism bring to each of these countries. While I pedal, I also think of home, SANDAG, and all of you.

I urge you to support the proposed amendments and Hasan’s vision so that SD can begin to shift the way we move people and to help create a healthy future for our children.

I was impressed with Munich, Germany as the number one bike friendly city with 18% bike mode share goal and I can totally visualize this in San Diego and especially Escondido, Vista, San Marcos, and Oceanside. The landscapes are similar with rural areas and the larger cities being connected by the Inland Rail Trail. There is also transit in place with the Coaster, Sprinter, and the BRT down the I-15 - these just need to become more efficient and more well known as a great option for your residents. Ideally new housing should be located within the downtown areas along these transit corridors.

As cities embrace more sustainable living and invest in local bikeways in their cities, people will be able to move more freely within their cities to do the local errands and daily commutes without the need for a car. A connected bikeway, such as the Inland Rail Trail connects people from Escondido to Oceanside and has so much potential to bring great benefits of ecotourism to the region.

We must adapt, be resilient and change as our future calls for it. We must act quickly to provide a bright future that supports healthy lifestyles, happier residences, and a vibrant economy of active living.

As a third generation living in San Diego, growing up in Bonita, and having family in the San Pasqual Valley over the past 25 years, I have great appreciation for the region, the 18 beautiful cities in the county of San Diego, and the opportunities to shift our lifestyles in SD. And I know that we can become a wonderful county to commute by bike.

As you know me from speaking at SANDAG, I am a voice for the future generations of hope, health, and joy when one commutes by bike and becomes more conscious of our environment. I urge you to please support Hasan and ask for more active transportation projects for each of your cities, more education, more encouragement, to create more vibrant cities and healthier communities. I do believe Escondido has potential to become a little Amsterdam with residents, children, and tourists enjoying their commutes by bike.

One of the greatest joys of riding in Germany and Austria is to see the very young happy children enjoying their independence on the bike, as well as the older generations of all abilities, staying active, healthy and social within their surroundings. Ebikes are so popular and great options for more people to ride.

San Diego has so much opportunity to be one of the greatest cities to commute by bike and improvements to transit can help make our commutes feasible and efficient for the large population of people that would go by bike if there were safe bike facilities. Terrain, weather, nor long distances should be an excuse. If the infrastructure is there, people will ride. That is evident in all my travels.
Thank you for your time, consideration, and leadership.

I am traveling from Munich to Vienna this week and wishing you all the best for a healthy future.

Nicole Burgess
BikeSD Board President
From: Lonnie Cornaire <cornaire_lonnie@hotmail.com>
Sent: Saturday, September 21, 2019 3:21 PM
To: PIO <PIO@sandag.org>; service-sd-ca@autoreturn.com; kevinfaulconer@sandiego.gov; cityattorney@sandiego.gov
Subject: Tow

I live at 4155 W. Point Loma Blvd. SDCA 92110
You have recently taken away 40 % parking from the street and replaced our parking with bike lanes.
I know for a fact that WE the tenants on said street won the vote against bike lanes.
 When the on street parking went away so did the street sweeping and the city signs that inform of street sweeping. Now the street is dirty because you wanted bike lanes that nobody uses. A vehicle was allowed to park on one side of the street from Friday afternoon to the following Friday morning. If your vehicle was left during street sweeping, you were given a ticket of about 30 $.
Well, my truck was towed this morning for not being moved after 72 hrs. I have lived at this location for 7 yrs and have parked my truck on the street for that period without receiving a ticket or being towed. I drove it to work at least once a week for all those years. When the street sweeping signs were taken away the only sign erected was a bike lane sign. No sign saying no parking for longer than 3 days.

YOU OWE ME 368.00$

I expect my check to be in the mail by Sept 27th. All of your departments are at fault. I don’t care who pays me, but somebody will .

Lonnie Cornaire
4155 W. Point Loma Blvd. Apt 205
SDCA 92110
619-368-1188
Greetings ---

I understand there's some sort of vote coming up this week on how to spend the money that the voters clearly stated should be spent on ROADS.

Please advise whoever is on this board that they must carry out the will of the people. The people VOTED to spend THEIR tax MONEY to fix THEIR ROADS.

Thank you ---
Kenneth Wisniewski
P.O. Box 303
Julian, California 92036
Hi.
We need to solve this issue of the price changes effective sept 1 2019 as it relates to the senior day pass fair price. I am speaking of seniors with proof of id and NO compass card wanting a day pass. The price should be $3.00 for the day pass and a $2.00 fee for no compass card therefore making their fee total of $5.00.

There is nothing posting confirming this amount on the website or the take one. Also the bus drivers DO NOT have an option for a $5.00 fee.

I have been in contact with MTS re this. Compass card staff also believe it should be $5.00 for the above. I want to know what the prices are supposed to be.

I would assume that would be the same for students without a compass card if they have a student id?

Thanks,

Sharon Beckas
7465 Olivetas Ave. #221
La Jolla, CA 92037
858.456.2019
University City is unique in that the community has lobbied government for decades to remove key roads and a train station. The illustration to the left shows where a train station has always been planned. At a location where Amtrak passes at Gillman and I-5.

Unfortunately the Governor to Gillman connector was removed from the city plan before the Blue Line was designed. It was removed under the premise that the Regents Road Bridge would be built but the community recently had that road taken off the city plan as well.

Today University City residents have to get on freeways to travel within their own community adding millions of pounds of carbon to the atmosphere each year, along with wasted man hours and gasoline. Ambulance service times are increased, conflagration egress paths removed along with bike and pedestrian access. Most Blue Line stations are a mile or two apart but the distance between the Balboa and Nobel Drive stations is 5 miles.
University Cities Unfinished Roads and Missing Train Station

In University City key roads and a train station have been removed from the plan. The illustration to the left shows where a train station has always been planned. At a location where Amtrak passes at Gillman and I-5. Unfortunately the Governor to Gillman connector was removed from the city plan before the Blue Line was designed. It was removed under the premise that the Regents Road Bridge would be built but that road taken off the city plan by well paid lobbyists. Lobbyists relied on faux democracies of their own creation and they were careful to avoid a city ballot.

Today University City residents need freeways to travel within their own community adding millions of pounds of carbon to the atmosphere each year, along with wasted man hours and gasoline. Ambulance service times are increased, conflagration egress paths removed along with bike and pedestrian access. Most Blue Line stations are a mile or two apart but the distance between the Balboa and Nobel Drive stations is 5 miles.
September 25, 2019

SANDAG
401 B Street, Suite 800
San Diego, California 92101
clerk@sandag.com

Subject: September 25, 2019. Airport Connectivity Subcommittee.
Item 3. Recommended Concepts for Improved Regional Airport Connectivity.
The La Playa Plan (LPP) Concept. A Full Tidelands Reclamation Project.
Central Mobility Hub with Subterranean Automated People Mover (APM) Route adjacent
Train Tracks and Pacific Highway, Instead of Concept 2 Surface/Elevated APM Route

Dear SANDAG:

Thank you for the opportunity to provide comments on this thorough preliminary feasibility analysis of
four concepts.

1. Seismic

Specifically, thank you for confirming that active faulting of the Rose Canyon Fault Zone needs to
be confirmed or denied at the Preliminary Design Phase for both the Old Town and Airport
properties, in order to save money.


Page 61. "Comprehensive Geotechnical Fault Hazard, Environmental, and Hazardous
Materials studies should be performed during the Preliminary Design Phase."

Page 62. "Crossing an active fault will increase the cost of all structures. Late
identification of a fault during construction may cause unknown cost and construction
delays. Extensive Geotechnical Investigation, and Fault Studies will be required."

Prior all government agencies including SANDAG, City of San Diego, County of San Diego,
Port of San Diego, and the San Diego County Regional Airport Authority (SDCRAA) stated that
fault investigations are only needed prior to Building Permits being issued, or after Construction
has already started, or not at all. Also, all government agencies stated that the Airport and the
Old Town Midway Corridor were Categorically Exempt, and outside the boundaries in official
Alquist-Priolo (AP) Maps, therefore fault investigation were not required at all. But fault
investigations could be done on a volunteer basis by the SDCRAA, Port, and the City.

To resolve these issues, please update the old 2003 Point Loma Quadrangle (16 years-old) and 1991
La Jolla Quadrangle (28 years-old) AP-Maps with guidance from our State Geologist to include the
Airport, Midway Corridor, Old Town, Sports Arena, Mission Bay, La Jolla, and Point Loma for the
Point Loma Fault as areas for further investigation for potential inclusion into new and updated AP-
Maps and Zones. Also, please require all existing fault investigations with third-party approvals to be turned into the State Geologist to update the old AP-Maps. Then require the Port and Airport Authority to confirm or deny active faulting as part of the Port’s upcoming Port Master Plan (PMP), and the SDCRAA’s Airport Development Plan (ADP) through funding of their own. Currently in their CEQA documents, neither government agency has planned to confirm or deny active faulting during their “Preliminary Design Phase” because they are considering themselves exempt, and have legal loopholes to not knowing.

Please ask for State Legislation to move all regional planning and CEQA-level project of the Airport and Port to SANDAG.

2. FAA Grandfathered Airport Revenue.

Also thank you for confirming that normally-restricted Federal Aviation Administration (FAA) Airport Revenue funds could be used to pay for projects off-airport grounds with the approval of the Los Angelica FAA Airport District Officer (ADO). This is great news that local government acknowledges the availability of use of previously hoarded Airport Revenue for off-site mitigation, transportation projects to the airport, and a Central Mobility Hub outside the airport’s footprint.

This acknowledgement that hoarded and normally-restricted Federal Aviation Administration (FAA) Airport Revenue funds could have always been used to pay for the San Diego International Airport (SDIA) mitigation projects for the Rental Car Center (RCC) including connector ramps to Interstate 5, and local road improvements is great movement forward.

Currently, the official SANDAG guiding legal analysis on the use of Airport Revenue is the March 9, 2018, SANDAG Executive Committee Item 7 San Diego Regional Airport Authority: Federal Funding and Responsibilities. Page 4 of the report stated: “As discussed below, the Airport Authority under Federal Law is prohibited from spending Airport Revenue for Off-Airport Transportation Facilities. Virtually all Revenue of the Airport Authority is so restricted.”

www.tinyurl.com/20180309a

https://sandag.org/index.asp?fuseaction=meetings.sc&mid=EC030918&cName=Executive%20Committee&mType=Regular%20Session&mDate=3/9/2018
Audio: 45 Minutes to 1 Hour and 11 Minutes.

Please see Audio Time 53-56 minutes for the Loophole under FAA requirements for allow Airport Revenue funding for off-site transportation projects including transit to the airport and an Intermodal Terminal Center (ITC).

Thank you for the great discussion on the availability of normally-restricted airport revenue through a new $500 million agreement with the Airlines, which comes from Airport Revenue which makes up 46% of Total Revenues. However, at SDIA the citizens of the State of California are also allowed access to other 54% Non-Airport Revenue sources due to being 1 of 12 Grandfathered Airports located on State Tidelands. Other non-aviation Non-Airport revenue sources include leases, fees, sale taxes, and other revenue sharing agreements with third-parties.

<table>
<thead>
<tr>
<th>SDIA CAFR Revenues</th>
<th>FY-2018</th>
<th>FY-2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Revenue</td>
<td>$123,157,000 46%</td>
<td>$116,381,000 47%</td>
</tr>
<tr>
<td>Non-Airport Revenue</td>
<td>+ $142,674,000 54%</td>
<td>+ $132,466,000 53%</td>
</tr>
<tr>
<td>TOTAL REVENUE</td>
<td>= $265,831,000</td>
<td>= $248,847,000</td>
</tr>
</tbody>
</table>

As part of this Airport Connectivity project please ask the State Lands Commission (SLC) for a Legal Opinion if San Diegan International Airport (SDIA) gave up their Grandfathered Airport Revenue Diversion status with the creation of the SDCRAA away from the Port of San Diego.

If Grandfathered Airport status is acknowledged, then there will be Billions in additional Airport Revenue dollars that in theory could pay for these Regional Transportation project under the control of our elected officials through SANDAG. If the full La Playa Playa planned is analyze for a subterranean transportation corridor from Mission Bay to the Border, additional value can be created and funded with help of Federal and State Reclamation and Water bonds.

### 3. The La Playa Plan.

The La Playa Plan is a continuation of the 1908 and 1926 Nolan Plans, which established Lindbergh Field – San Diego International Airport (SDIA), Pacific Highway, Harbor Drive, regional transportation infrastructure, and public government buildings on our publicly-owned Waterfront mostly founded on uncompacted, loose, hydraulic fills. The La Playa Plan will “future proof” the public and private lands through a full State Public Trust Tidelands Reclamation project by taking out all the hydraulic fills, so foundations for new free subterranean lands can be founded on competent soils, not subject to flooding, or sea level rise. Both the Navy Broadway Complex (NBC) and Seaport Village will be design using Bathtub foundations specifically to combat climate change.

The depths to competent formational material under the liquefiable bay fill range from zero adjacent west of the train tracks to approximately 40 feet near Terminals 1 and 2.

Instead of hauling out dredge soils, we ask SANDAG to request a formal evaluation to potentially reclassification of Mineral Resources Zone (MRZ) for Urbanized Areas for the Airport, Port, Pacific Highway, Midway Corridor, Mission Bay from MRZ-1 to MRZ-2. Then recycle and use spoils for use as construction material and Beach Replenishment projects.

The La Playa Plan is part of the new Green New Deal (GND) for resource efficiency, which focuses on maximizing the use of our natural State Public Trust Tidelands for the financial benefit of all. The GND public works projects would create new jobs, combat climate change, build new and free subterranean space, take out all hydraulic fills, recycle raw materials, while adapting partially reclaimed land to full reclamation for sea level rise, using the regional planning powers of SANDAG. Please see the attached document for a full public trust tidelands reclamation project.

The LPPC Subterranean APM Route would provide proof of concept for the La Playa Plan. Which could then be used all along San Diego Bay to create up to a zero to 40-foot subterranean corridor for transportation projects and storm water capture. This would help low income communities along San Diego Bay, and help with social equity issues by creating wealth.

We would like to present an additional concept for CEQA Review called the La Playa Plan Concept (LPPC) for a Full Tidelands Reclamation Project funded in part by Grandfathered Airport Revenues.

The La Playa Plan Concept is similar to Concept 2. However, instead of At-Grade, Surface, and/or Elevated Automated People Mover (APM) Route, the APM Route would be subterranean, and located adjacent west of the existing Train Corridor and/or Pacific Highway, without encroaching into private property and existing underground utilities.

In addition, there would only be one stop at the Rental Car Center (RCC) instead of the two stops in Concept 2. Since the tunnel can be exposed to the air at every level and not a tunnel, normal fire mitigations measures are feasible.

Also, a new United States Bulkhead Elevation will be established, to combat climate change and sea level rise problems on liquefiable soils. All first-story building elevation will be built to at least the new US Bulkhead height. And a shallow tunnel system design would be used, where all liquefiable soils would be excavated, down to formational grade.

Page 28 states: “Another suggestion was to create a shallow tunnel system of roadways, to and from the airport for improved connectivity. This concept was not carried forward due to cost, impacts to the community, and design and construction challenges. It would be expensive and challenging to construct in the soils made up of bay fill and around the airport from the surface level to roughly 40 feet deep (see Figure 4-2).”

The 40-foot depth to formational materials may be a maximum, not minimum depth to formational materials. It is reasonable to assumed the depth to formational material at the Airport Transit-Ready Areas located between Terminals 1 and 2 along North Harbor Drive is 40 feet. However, adjacent and west of the train tracks, the elevation to competent formation materials may only zero to ten feet. Therefore, an actual analysis of depth to formation materials should be analyzed in the upcoming CEQA review for a subterranean route along Concept 2 APM Route, and adjacent and west of the train tracks.

The maximum 40-foot depth to formation materials is a plus, not a minus. Up to three level of transportation corridors could fit into a 40-foot high tunnel opened to the air. Including a subterranean APM Route, and In-bound and Out-Bound Airport Traffic. Please reanalyze our La Playa Plan for a shallow tunnel system to create a Full Tidelands Reclamation project on liquefiable soils. That would create subterranean space 15 to 40 feet deep to future-proof and combat climate change and sea level rise through the use of connection of Structural Bathtub Foundations to create new transportation routes.

Regards,

Katheryn Rhodes 619-402-8688 rhodes@laplayaheritage.com
La Playa Heritage Incorporated

371 San Fernando Street
San Diego, California 92106

Corporation. Currently FTB Suspended. C3405170

Katheryn Rhodes. Principal Engineer
laplayaheritage@gmail.com
619-402-8688

The La Playa Plan (LPP) is a full Tidelands Reclamation Project. The LPP includes all the areas shown in SANDAG's Attachment 1 map.

The LPP will create new subsurface space 10 to 40 feet below existing grade which can be used for new underground transportation corridors, and urban storm water capture through the use of cisterns and structural bathtub foundations. Bathtub foundations will consist of waterproof and watertight bulkheads, similar to shipyard dry dock configurations. Bathtub foundations can be used for sea level rise adaptations throughout our State Tidelands under control of the San Diego Unified Port District (SDUPD), as a proof of concept that can also be used for all future buildings at San Diego International Airport (SDIA). The bathtub foundations would start directly west of the train track, and will get rid of the seismic hazard of liquefaction, and provide a stable foundation for any development project.

The LPP will remove the seismic hazard of liquefaction and recycles loose bay muds. The LPP requires foundations to be embedded into competent formation soils, west of the railroad tracks, and allows mining of Mineral Resources in San Diego Bay. The LPP will sort and recycle minerals to create raw materials for construction of new subsurface space and regional beach sand replenishment programs.

All these areas shown in the map are subject to the seismic hazard of liquefaction, active fault creep from the Rose Canyon Fault Zone (RCFZ), sea level rise, tidal influence, flooding, and chronic unindation. During King Tides, at the old Midway Post Office south of SPAWAR and north of MCRD, sea water subject to tidal influence is rising up, flooding, breaking the asphalt, and creating chronic unindation conditions and broken water mains and sewer mains at Midway Drive in the City of San Diego at the same elevation as SPAWAR and Pacific Highway.
March 4, 2019

SANDAG Airport Connectivity Subcommittee
Attention: Janet Bessent, Associate Contracts and Procurement Analyst.
Janet.Bessent@sandag.org


The La Playa Plan is a continuation of the 1908 and 1926 Nolan Plans, which established Lindbergh Field – San Diego International Airport (SDIA), Pacific Highway, Harbor Drive, regional transportation infrastructure, and public government buildings on our publically-owned Waterfront mostly founded on uncompacted, loose, hydraulic fills. The La Playa Plan will “future proof” the public and private lands through a full State Public Trust Tidelands Reclamation project by taking out all the hydraulic fills, so foundations for new free subterranean lands can be founded on competent soils, not subject to flooding, or sea level rise.

The La Playa Plan is part of the new Green New Deal (GND) for resource efficiency, which focuses on maximizing the use of our natural State Public Trust Tidelands for the financial benefit of all. The GND public works projects would create new jobs, combat climate change, build new and free subterranean space, take out all hydraulic fills, recycle raw materials, while adapting partially reclaimed land to full reclamation for sea level rise, using the regional planning powers of SANDAG.

The La Playa Plan:

- Is a Full State Public Trust Tidelands Reclamation Project of the Airport, Port, and Midway corridor to create new and free subsurface space (15 to 50 feet deep) to be used for multi-modal transportation system from the Mexico Border to La Jolla to reduce Green House Gases (GHS), create subterranean parking, and also serve as an Urban Storm Water Capture System.

- Includes all lands located on the attached City of San Diego Seismic Safety Maps for Grids 16, 17, and 20. The areas in yellow are designated Geological Hazard Category 31 High Potential for Liquefaction, shallow groundwater, major drainage, hydraulic fills.

- Includes establishment of a new United States U.S. Bulkhead Elevation for San Diego Bay. The porous U.S. Bulkhead Elevation was first established in 1850, and never changed. The engineering used on our State Public Trust Tidelands has not advanced in 169 years.

- Includes sea level rise adaptations and urban storm water capture using structural cistern bathtub foundations, waterproof and watertight bulkheads, and shipyard dry dock configurations. This proof of concept can be used anywhere with hydraulic fills including at United States military installations subject to tidal influences.
• Removes the seismic hazard of liquefaction on fill soils, and recycles loose bay muds. Requires foundations to be embedded into competent formational soils, west of the railroad tracks.

• Allows mining of Mineral Resources in San Diego Bay. Sort and recycle minerals to create raw materials for construction of new subsurface space and regional beach sand replenishment programs. Our State Public Trust Tidelands are classified as Mineral Resource Zone MRZ-1 “Areas of No Mineral Resource Significance” for Urbanized areas. Requires the State Mines and Geology Board (SMGB) to re-analyze and potentially re-classify our public State Public Trust Tidelands as MRZ-2 instead.

• Confirms that San Diego International Airport (SDIA) is 1 of 12 Grandfathered Airports documented in the September 30, 2009 FAA Airport Compliance Manual guiding document. See Page 228 [https://www.faa.gov/documentLibrary/media/Order/5190_6b.pdf](https://www.faa.gov/documentLibrary/media/Order/5190_6b.pdf) Therefore, SDIA is located on our State Public Trust Tidelands, and is similar to San Francisco International Airport (SFIA) on State Tidelands, not LAX, and is allowed to divert billions in Airport Revenue off site. Specifically for transit to the airport or an Intermodal Terminal Center (ITC). Other Grandfathered Airports on State Tidelands include San Francisco, the Port Authority of New York and New Jersey (PANYNJ), Boston, Chicago, Washington DC, St. Louis, Denver, Hawaii, etc.

• Advocates all CEQA-level Capital Improvement Programs (CIP) decisions of both the Airport and Port be made by our elected officials at SANDAG, our Metropolitan Planning Organization (MPO) through new State Legislation. Leaving daily operations to the Airport and Port Boards and staffs. Similar to the current SANDAG arrangements with Metropolitan Transit Service (MTS) and North County Transit District (NCTD) where Capital projects are approved and managed by SANDAG staff. With daily operations managed by transit staff after the completion of construction.

“La Playa” translates to “The Beach” in Spanish. In 1850 the United States Army Corps of Engineers (USACE) started dredging San Diego Bay for navigation of ships, established the bay-wide US Bulkhead Elevation, and built porous Bulkheads. The partial reclamation project used the dredged material for ship navigation channels to create new loose hydraulic fill lands for Lindbergh Field, Harbor Island, the Midway corridor including Naval Base Point Loma Old Town Complex (NBPL OTC), the Embarcadero, and expanded North Island for the US Navy.

The current location of the Port Building, surrounding leased parking lots, and Pacific Highway should be analyzed as an alternative locations for the new Grand Central Station. The critical surrounding infrastructure improvements necessary to support this concept includes a Full State Public Trust Tidelands Reclamation Project. After creation of subterranean lands, Pacific Highway, a new trolley to the airport, and parking should be relocated underground.

The Nolan Plan included a joint City and County of San Diego government headquarters along San Diego Bay. The San Diego County Administration Center (CAC) completed in 1938 was funded by President Franklin Delano Roosevelt’s (FDR) New Deal Program, the Works Progress Administration (WPA). The CAC building located at 1600 Pacific Highway used a structural bathtub foundation with two levels of subterranean basements, to get rid of the seismic hazard of liquefaction, and to protect against climate change. Due to porous Bulkheads, except for Port
Headquarters at 3165 Pacific Highway, all other structures in the jurisdiction of the Airport and Port are founded on partially reclaimed lands, mostly on piles. Due to an extremely low water table, our State Tidelands are subject to flooding and chronic inundation, and prone to the seismic hazard of liquefaction.

The key risk to SANDAG for this project is Seismic Hazard Avoidance and the legal loophole to not confirm or deny active faulting in the planned areas. There is large potential for active fault rupture of the active Rose Canyon Fault Zone (RCFZ), which traverses the airport, and parallels Interstate 5 and Pacific Highway. However, no public agency in San Diego County has turned in active fault investigations to the State Geologist to update the old 2003 Point Loma Alquist-Priolo Maps, and the Downtown Special Studies Zone northern boundary is Laurel Street, and does not include the Airport, Midway, Old Town, Pacific Highway, or North Harbor Drive. The State Geologist should be contacted to provide guidance to create a new Special Studies Zone and update the Alquist-Priolo maps with existing and new scientific evidence that has been hidden for decades.

Our public lands are regional assets that belong to the Citizens of the State of California. Despite their insistence, our State Public Trust Tidelands land assets are not owned by the San Diego County Regional Airport Authority (SDCRAA), SDIA, the San Diego Unified Port District (SDUPD,) or their staff. San Diego has created a beautiful world-class public airport on our State Public Trust Tidelands by hoarding billions in public FAA Airport Revenue onsite, through political maneuvers and purposeful misrepresentation of Federal and State laws. Grandfathered FAA Airport Revenues are to be used for on- and off-site mitigation and regional transportation integration planning. Due to failure to finance mitigation projects including known traffic impacts of the Rental Car Center (RCC), the 2008 SDIA Airport Master Plan, and associated Final Environmental Impact Report (EIR) have been violated.

At the March 9, 2018 SANDAG Executive Committee, the SDCRAA and SANDAG legal staff both denied that SDIA has Grandfathered Airport Revenue status that allows the use of normally restricted Airport Revenues offsite. And that FAA has banned the Airport from using Revenue for offsite mitigation or transit projects to the airport. http://tinyurl.com/20180309a Audio Time 53-56 Minutes. https://sandag.org/index.asp?fuseaction=meetings.sc&mid=EC030918&cName=Executive%20Committee&mType=Regular%20Session&mDate=3/9/2018

By sharing the billions in FAA Airport Revenue wealth, and applying for State and Federal water reclamation funding to combat climate change, the San Diego Region can have a first class public transportation system that would allow SANDAG, CALTRANS, the Navy, the Port, and the Airport to fund new construction projects to meet their Green House Gas (GHG) reduction goals.

Regards,

Katheryn Rhodes, PE
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Attachment 1: January 30, 2019. www.tinyurl.com/20190130a
The La Playa Plan. A Full State Public Trust Tidelands Reclamation Project.
Areas in Yellow are Hydraulic Fills subject to Liquefaction.
January 30, 2019

SANDAG Airport Connectivity Subcommittee
Meeting Date: February 5, 2019.


The La Playa Plan is a continuation of the 1908 and 1926 Nolan Plans, which established Lindbergh Field – San Diego International Airport (SDIA), regional transportation infrastructure, and public government buildings on our publically-owned Waterfront.

"John Nolen took the city to task for having a plan that was "not thoughtful, but, on the contrary, ignorant and wasteful.""

https://archive.org/details/sandiegoacompre00nolegoog/page/n7
https://www.countynewscenter.com/before-waterfront-park-there-was-the-nolen-plan/

The Nolan Plan included a joint City and County of San Diego government headquarters along San Diego Bay. The San Diego County Administration Center (CAC) completed in 1938 was funded by President Franklin Delano Roosevelt’s (FDR) New Deal Program, the Works Progress Administration (WPA). The CAC building located at 1600 Pacific Highway used a structural bathtub foundation with two levels of subterranean basements, to get rid of the seismic hazard of liquefaction, and to protect against climate change. Due to porous Bulkheads, except for Port Headquarters at 3165 Pacific Highway, all other structures in the jurisdiction of the Airport and Port are founded on partially reclaimed lands, mostly on piles. Due to an extremely low water table, our State Tidelands are subject to flooding and chronic inundation, and prone to the seismic hazard of liquefaction. There is large potential for active fault rupture of the active Rose Canyon Fault Zone (RCFZ), which traverses the airport, and parallels Interstate 5 and Pacific Highway.

The La Playa Plan is part of the new Green New Deal (GND) for resource efficiency, which focuses on maximizing the use of our natural State Public Trust Tidelands for the financial benefit of all. The GND public works projects would create new jobs, combat climate change, build new subterranean space, recycle raw materials, while adapting partially reclaimed land for sea level rise, using the regional planning powers of SANDAG.

The La Playa Plan:

- Is a Full State Public Trust Tidelands Reclamation Project of the Airport, Port, and Midway corridor to create subsurface space (15 to 50 feet deep) to be used for multi-modal transportation system from the Mexico Border to La Jolla to reduce Green House Gases (GHS), create subterranean parking, and also serve as an Urban Storm Water Capture System.

- Includes establishment of a new United States U.S. Bulkhead Elevation for San Diego Bay. The porous U.S. Bulkhead Elevation was first established in 1850, and never changed. The engineering used on our State Public Trust Tidelands has not advanced in 169 years.
Includes sea level rise adaptations and urban storm water capture using structural cistern bathtub foundations, waterproof and watertight bulkheads, and shipyard dry dock configurations. This proof of concept can be used at United States military installations subject to tidal influences. See Page 8 for a discussion on cisterns for arid climates.

Removes the seismic hazard of liquefaction and recycles loose bay muds. Requires foundations to be embedded into competent formational soils, west of the railroad tracks.

Allows mining of Mineral Resources in San Diego Bay. Sort and recycle minerals to create raw materials for construction of new subsurface space and regional beach sand replenishment programs. Our State Public Trust Tidelands are classified as Mineral Resource Zone MRZ-1 “Areas of No Mineral Resource Significance” for Urbanized areas. Requires the State Mines and Geology Board (SMGB) to re-analyze and potentially re-classify our public State Public Trust Tidelands as MRZ-2 instead.

Confirms that San Diego International Airport (SDIA) is 1 of 12 Grandfathered Airports documented in the September 30, 2009 FAA Airport Compliance Manual guiding document. See Page 228 https://www.faa.gov/documentLibrary/media/Order/5190_6b.pdf Therefore, SDIA is allowed to divert billions in Airport Revenue off site. Specifically for transit to the airport or an Intermodal Terminal Center (ITC). Other Grandfathered Airports on State Tidelands include San Francisco, the Port Authority of New York and New Jersey (PANYNJ), Boston, Chicago, Washington DC, St. Louis, Denver, Hawaii, etc

Advocates all CEQA-level Capital Improvement Programs (CIP) decisions of both the Airport and Port be made by our elected officials at SANDAG, our Metropolitan Planning Organization (MPO) through new State Legislation. Leaving daily operations to the Airport and Port Boards and staffs. Similar to the current SANDAG arrangements with Metropolitan Transit Service (MTS) and North County Transit District (NCTD) where Capital projects are approved and managed by SANDAG staff. With daily operations managed by transit staff after the completion of construction.

“La Playa” translates to “The Beach” in Spanish. In 1542, Juan Rodriguez Cabrillo sailed into San Diego Bay. At that time, the bay was silted up by San Diego River, and the low shallow draft did not allow for ship navigation. Therefore, Cabrillo had to drop his ship’s anchor near the mouth of the bay, and use rowboats to get to the shore at “La Playa” in Point Loma.

Both Old Town and La Playa neighborhoods were part of the original Pueblo Lands of San Diego and were subdivided in 1849, before California became a State in 1850. In 1850 the United States Army Corps of Engineers (USACE) started dredging San Diego Bay for navigation of ships, established the bay-wide US Bulkhead Elevation, and built porous Bulkheads. The partial reclamation project used the dredged material for ship navigation channels to create new fill lands for Lindbergh Field, Harbor Island, the Midway corridor including Naval Base Point Loma Old Town Complex (NBPL OTC), the Embarcadero, and expanded North Island for the US Navy.

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San Diego County Regional Airport Authority (SDCRAA), SDIA, the San Diego Unified Port District (SDUPD,) or their staff. San Diego has created a beautiful world-class public airport on our State Public Trust Tidelands by hoarding billions in public FAA Airport Revenue onsite, through political maneuvers and purposeful misrepresentation of Federal and State laws. Grandfathered FAA Airport Revenues are to be used for on- and off-site mitigation and regional transportation integration planning. Due to failure to finance mitigation projects including known traffic impacts of the Rental Car Center (RCC), the 2008 SDIA Airport Master Plan, and associated Final Environmental Impact Report (EIR) have been violated.

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By sharing the billions in FAA Airport Revenue wealth, and applying for State and Federal water reclamation funding to combat climate change, the San Diego Region can have a first class public transportation system that would allow SANDAG, CALTRANS, the Navy, the Port, and the Airport to fund new construction projects to meet their Green House Gas (GHG) reduction goals.

By the creation of new and free subsurface space through a full tidelands reclamation, the La Playa Plan could ultimately incorporate and fund all three Request for Information (RFI) Categories. Category 1 Automated People Mover (APM) or Similar Service. Category 2 San Diego Grand Central Station (SDGCS) Mobility Hub, and Category 3 Transportation System and Demand Management Technologies and Pricing Strategies.

Regards,

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Attachments:


Attachment C. April 2016, Excerpts from the Southern California Association of Governments (SCAG), Findings of Fact and a Statement of Overriding Considerations (FOFSOC) 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (RTP SCS). http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitA_FOFSOC.pdf
Hi SDIA, SDCRAA, and Mr. Ted Anasis:

Thank you for the opportunity to comment on this infrastructure project for the three, 1.15-million gallon, above-ground, 58 feet diameter, and 58 feet high Fuel Tanks.

This email serves as my official public comment. In the future please provide email addresses in the NOP, EIR, and CEQA documents for the public to use. Allow emails, instead of asking only for hardcopies of letters to be mailed or delivered. I do not have a printer.

Please confirm or deny active faulting at the CEQA Stage for the new and expanded Fuel Tanks through valid fault investigations turned into the State Geologist. Although the Airport is not within an Alquist-Priolo (A-P) Earthquake Hazard Zone, active faulting was confirmed at the east side of the Airport property as part of the Rental Car Center. Therefore active faulting through the whole of the Airport footprint on liquefiable soils should be investigated for the first time.

For the last 15 years, the active Fault Investigations and corresponding letters to the State Geologist to update the AP-Maps since 2003 have not been sent in accordance with State law PRC 2697. Please discuss how you will turn in all fault investigations into the State Geologist to update the old 2003 Point Loma Quadrangle AP-Maps, and confirm or deny active faulting in consultation with the State Geologist and SANDAG. Even though the Downtown Special Studies Zone and AP-Maps have Harbor Drive as their Northern Boundary, and stop abruptly at Airport property due to failure to send scientific planning evidence to the State.

Instead of above-ground tanks, unknown foundations, or a foundation on piles, please consider a bathtub structural foundation that gets rid of all liquefiable soil material so the structure can be founded on bedrock @ 30 to 40 feet below grade. So the top of the structures are not 58 feet above current grade. The partially below-grade Tanks would replace liquefiable soils and their foundations would be embedded into competent formational soils.

Bathtub foundations were used for the County Administration Center (CAC) and the Port Headquarters. And are planned for Manchester Pacific Gateway Navy Broadway Complex (NBC), and Seaport Village.

In addition, instead of only concrete containment dike walls between fuel container tanks, please consider using a watertight bulkhead configuration, similar to dry docks.

Regards,

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3.0 CISTERN STRUCTURAL FOUNDATION.

The report states the following: “Protecting and improving water quality in bays and at beaches should be a top priority... San Diego’s beaches and bays are invaluable tools for promoting the city’s economy... Water supply is a competitive deterrent for the entire region.”

Cisterns have been used in arid desert climates like San Diego throughout recorded history in areas such as Morocco, Istanbul, Greece, and Africa to capture, collect, and clean water. Cisterns can be used to capture rain water and storm water; collect the first flush/rain urban storm water runoff to improve the water quality of our beaches and bays; and storage of clean water created through NASA’s new forward osmosis process and desalinization techniques. See Figure 5 for excerpts from the Wikipedia entry for Cisterns.

In order to stop water pollution from entering San Diego beaches and bays, Bioretention Basins and Oil/Grit Separators are required to capture urban storm water runoff, especially during the first flush and rains of the season. Water finds its way to the point of least resistance because of gravity. Therefore, urban storm water runoff should be captured at the lowest elevation possible which is sea level and areas of reclaimed Public Trust tidelands. See Figure 6 for areas of Undocumented Fill (Quf) shown in brown, in San Diego Bay, Mission Bay, and the Midway/Sports Arena area.

Instead of limiting the San Diego Convention Center Phase III Expansion project to existing reclaimed tidelands under the control of 5th Avenue Landing LLC; a new complex can be built upon a Cistern Structural Foundation instead of expensive and noisy driven piles on what now is water; east of the United States Bulkhead line in red. Our idea for a proposed multi-purpose NFL Chargers Stadium/Convention Center Phase III Expansion/Cistern Structural Foundation (NFLCS/CC/CSF) can be used as a test case for subterranean infrastructure projects in San Diego for future publically funded development projects. If proven to be cost effective and pay for itself, the idea of building Cisterns under new development projects on reclaimed tidelands to collect, capture, and clean urban storm water runoff can be used county-wide. The additional pre-designed subterranean Cisterns using a Bulkhead configuration can be built by the local shipyards. Proposed locations include the planned North Embarcadero Vision Plan (NEVP) project, the Chula Vista Bayfront Master Plan, the San Diego International Airport (SDIA) Lindbergh Field Intermodal Transportation Facility, and any future improvement to the city-owned Sports Arena and Qualcomm Stadium in Mission Valley. Liquefiable soils and differential settlement cause many water and sewer main breaks, which further erode San Diego’s crumbling infrastructure.

The use of Cistern Structural Foundations will include the removal of compressible liquefiable soils so the foundation system of the Cistern underwater can be founded on hard formational soils. The use of water-proof Cisterns also reduces the need for expensive foundation system for high-rise, high-load structures on reclaimed tidelands, including stone columns and/or driven piles.
Underwater bathtub foundations are used in many international infrastructure projects, but not in San Diego. We believe this is due to the original Convention Center construction which includes a system to pump water continuously in order to keep the subterranean parking lots dry and in use. Due to the careless Engineering design of a non-waterproof bathtub foundation at the Convention Center which is costly to maintain; San Diego is afraid, with good cause, about building any infrastructure projects under Mean Sea Level in the Downtown Special Fault Study Zone, and in Alquist-Priolo Earthquake Fault Zones on Public Trust Tidelands. As such, Caltrans engineers should oversee the Cistern Structural Foundation, so the age-old idea can be used successfully in San Diego as a great example of Sustainable Green Design.

Water-tight Cisterns and underground vaults also stop drinking water from evaporating into the air. In San Diego we estimate that surface water reservoirs lose approximately 4 feet of water per year, due to evaporation and climate conditions. The cost to the San Diego region is hundreds of millions of dollars every year in water bought and paid for, then conveyed to surface from the Colorado River, to San Diego County surface water reservoirs and lakes. Where the expensive imported water evaporates into the air before the water can be used by citizens. Thus lowering San Diego’s Economic Competitiveness.

Transit to Airport Start at 1% in 2008. Still at 1% in 2019.
@SANDAG Funding Failure. In 2008 promised 14% Transit to the Airport.
Denied FAA Grandfathered Airport Status
http://tinyurl.com/20180309a
@SanDiegoAirport SDIA SAN SDCRAA pretends FAA Airport Revenue could not be used offsite.
FAA Grandfathered Airport Revenue Status Diversion Loophole due to pre-1982 Airports on Tidelands
http://www.blogofsandiego.com/BlogArchives/2007-2nd-Quarter.htm#06/08/07a …
$67 Million in Toxic Soil Clean-Up costs at NTC @Liberty_Station
http://www.blogofsandiego.com/BlogArchives/2007-2nd-Quarter.htm#06/08/07a
Okay with Phase III after sea level rise is mitigated
Seawall is not watertight.
Solution Watertight and Resilient Seawall
https://en.wikipedia.org/wiki/The_Bathtub …
Use Structural Cistern Bathtub Foundation planned for Navy Broadway Complex @ManchesterMFG Pacific Gateway & @Seaport_Village
A cistern (Middle English cisterne, from Latin cisterna, from cista, box, from Greek kistê, basket) is a receptacle for holding liquids, usually water. Often cisterns are built to catch and store rainwater. They range in capacity from a few liters to thousands of cubic meters (effectively covered reservoirs).

Cisterns are commonly used in areas where water is scarce, either because it is rare or because it has been depleted due to heavy use. Early on, the water was used for many purposes including cooking, irrigation, and washing. Present day cisterns are often only used for irrigation due to concerns over water quality. Cisterns today can also be outfitted with filters or other water purification methods when the water is meant for consumption. It is not uncommon for cisterns to be open in some way in order to catch rain or to include more elaborate rain-catching systems. It is recommended in these cases to have a system that does not leave the water open to mosquitoes or algae, which are attracted to the water and then potentially carry disease to nearby humans.

Some cisterns sit on the top of houses or on the ground higher than the house, and supply the running water needs for the house. They are often supplied not by rainwater harvesting, but by wells with electric pumps, or are filled by manual labor or by truck delivery. Very common throughout Brazil, for instance, they were traditionally made of concrete walls (much like the houses, themselves), with a similar concrete top (about 5 cm. thick), with a piece that can come out for water filling and be re-inserted to keep out debris and insects. Modern cisterns are manufactured of plastic (in Brazil with a characteristic bright blue color, round, in capacities of about 10k and 50k liters). These cisterns differ from water tanks in the sense that they are not completely enclosed and sealed with one form, rather they have a lid made of the same material as the cistern, which is removable by user.

To keep a clean water supply, the cisterns must be kept clean. It is recommended to inspect them regularly, keep them well-enclosed, and to occasionally empty them and clean them with an appropriate dilution of chlorine and to rinse them well. Well water must be inspected for contaminants coming from the ground source. City water has up to 1ppm (parts per million) chlorine added to the water to keep it clean, and in many areas can be ordered to be delivered directly to the cistern by truck (a typical price in Brazil is BRL$50, USD$20 for 10k liters). If there is any question about the water supply at any point (source to tap), then the cistern water should not be used for drinking or cooking. If it is of acceptable quality and consistency, then it can be used for (1) toilets, and housecleaning; (2) showers and hand washing; (3) washing dishes, with appropriate sanitation methods, and for the highest quality, (4) cooking and drinking. Water of non-acceptable quality for the before mentioned uses may still be used for irrigation. If it is free of particulates but not low enough in bacteria, then boiling may also be an effective means to prepare the water for drinking.

Many greenhouses use cisterns to help meet their water needs, especially in the USA. Some countries or regions, such as Bermuda and the U.S. Virgin Islands have laws that require rainwater harvesting systems to be built alongside any new construction, and cisterns can be used in these cases. Other countries, such as Japan, Germany and Spain, also offer financial incentives or tax credit for installing cisterns. Cisterns may also be used to store water for firefighting in areas where there is an inadequate water supply.
Figure 6 – Reclaimed Public Trust Tidelands are shown in the color Brown as Quaternary Artificial Fill (Qaf).

The areas of undocumented fill (Qaf) in the City of San Diego includes Port tidelands around San Diego Bay, where the liquefiable soils can be replaced by Cistern Structural Foundations embedded into formational soils.

Proposed projects in the planning stage include the North Embarcadero Vision Plan (NEVP) project, the Chula Vista Bayfront Master Plan project, and the San Diego International Airport (SDIA)/Lindbergh Field Intermodal Transportation Center.

Future projects may include the city-owned Sports Arena in the Midway area, and the Kinder-Morgan Fuel spill at Qualcomm Stadium.

If our proposed water-proof subterranean multi-purpose NFL Chargers Stadium/Convention Center Phase III Expansion/Cistern Structural Foundation (NFLCS/CC/CSF) is built, then the great idea of using Cisterns under new development projects on reclaimed tidelands and liquefiable soils to collect, capture, and clean urban storm water runoff can be used county-wide as an example of Green Engineering Design.


Fault Investigations required prior to preparation of Project Designs. Not at the too late Building Permit Stage. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the 2016 RTP/SCS, discussed in the Statement of Overriding Considerations.

**SCAG Mitigation Measures** Section VI. G. Geology and Soils.

MM-GEO-1(a): SCAG shall facilitate minimizing future impacts to geological resources from exposure of people or structures to potential substantial adverse effects involving including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, landslides; substantial soil erosion or loss of topsoil; off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; and being located on an expansive soil through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts. Such efforts shall include web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as Toolbox Tuesday Training series and sharing of associated online training materials. Resource agencies, such as the U.S. Geological Survey, shall be consulted during this update process. Consult the USGS for Seismic Mitigation measures and guidance.

Plus consult State Geologist to update 1992 La Jolla and 2003 Point Loma Quad A-P Maps.

**Project-Level Mitigation Measures**

MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:

- **Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault.**

  Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC.

- **Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological

Caltrans's Memorandum To Designers (MTD) 20-10 Fault Rupture

Fault Investigations required for Bridges in Transportation VI-51 projects in addition structures for human occupancy. Site-specific measure to be incorporated into the project designs. Therefore, fault investigations required early in design, and should not to wait until the Building Permit Stage. Which is too late and increases costs dramatically.
Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards.

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. Missing Active Fault Rupture.

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

Fault Investigations required prior to preparation of Project Designs. Not at the too late Building Permit Stage.

**Impact GEO-2**

Potential to result in substantial soil erosion or the loss of topsoil.

**Impact:**

Significant and Unavoidable

**Finding:**

Implementation of SCAG Mitigation Measure MM-GEO-1(a) and Project-Level Mitigation Measure MM-GEO-2(b) will reduce impacts related to the potential to result in substantial soil erosion or the loss of topsoil, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

**Rationale:**

The above finding is made based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. The potential to result in substantial soil erosion or the loss of topsoil would be significant. Implementation of