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 (SDCAA) 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.
### SDIA CAFR Revenues

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<tr>
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<th>FY-2018</th>
<th>FY-2017</th>
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<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>
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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 formational 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 formational 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,

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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 use 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 formational 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 formation 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 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
La Playa Heritage
371 San Fernando Street San Diego, California 92106
laplayaheritage@gmail.com (619) 402-8688 cell

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.
Areas in Yellow are Hydraulic Fills subject to Liquefaction.

City of San Diego
SEISMIC SAFETY STUDY
Geologic Hazards and Faults

Legend

Geologic Hazard Categories

- Low
- Moderate
- High
- Very High

- Preferred Groundwater Sources
- Favourable Geologic Structures
- Minor or No Erosion
- Low Risk

- Potential Groundwater Sources
- Neutral Geologic Structures
- Moderate Erosion
- Moderate Risk

- Non-Preferred Groundwater Sources
- Unfavourable Geologic Structures
- Severe Erosion
- High Risk

- Preferred Groundwater Sources
- Favourable Geologic Structures
- Minor or No Erosion
- Low Risk

- Potential Groundwater Sources
- Neutral Geologic Structures
- Moderate Erosion
- Moderate Risk

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- Unfavourable Geologic Structures
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- High Risk

Development Services Department
GRID TILE: 17
GRID SCALE: 800
DATE: 4/3/2008
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.

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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 with 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.

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.

By the creation of new and free subsurface space though 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,

Katheryn Rhodes, PE
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371 San Fernando Street San Diego, California 92106
laplayaheritag@gmail.com (619) 402-8688 cell

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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San Diego, California 92106>
619-402-8688
laplayaheritage@gmail.com
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
@San Diego Airport 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 κιστή, 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.

**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
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.

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
Dear Hasan, Coleen,

I presume that many of you are also torn between Concept 1 (for its very fast and attractive connect time to the airport) and Concept 2 (for getting rid of the old-fashioned and extremely inconvenient buses to the car rental facility). Below is an idea which merges the benefits of both concepts, while potentially keeping the cost the same, call it Concept 1.5 (figure below):

- make a shorter tunnel (shorter by 20%) which ends up half way between the Mobility Hub and the Car Rental Facility
- run above-ground APM tracks from northern tunnel exit to both sides, they might even be at level-ground, saving elevated track costs
- run APM trains alternatingly from terminal to either Mobility Hub or Car Rental Facility, shown in orange and magenta colors in figure below (they would use the same single-track tunnel)

Benefits:
a) very fast connect time from Mobility Hub to terminal
b) equally fast connect time between terminal and Car Rental Facility
c) no more car rental buses
d) needs only a total of 1 mile above-ground tracks (0.5 mile in each direction), that cost might be similar to saving 20% of tunnel length

I realize this means bringing up the tunnel on one side from below 40’ depth (while on the south it can end below the terminal hub), but this is done in many places with trains, metros, etc and should not pose a big hurdle, especially since that would be far away from the runway (less FAA concerns).

Coleen told me she could add this idea to today’s meeting notes. That would be wonderful.
Best regards,
Uwe

On 1/27/19 11:23, Ikhrata, Hasan wrote:

Hello Mr. Use Send
Thanks for your email. Looking forward to meeting you and your wife. We have an airport subcommittee meeting on February 5th at 12:30. Please join us at the meeting and you can speak part of the public comment period. If you come please seek me out so we can meet. Appreciate your support and interest.
Hasan

Sent from my iPhone