CALIFORNIA COASTAL COMMISSION
SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
(619) 767-2370

Wed 19b

Addendum

March 2, 2009

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item 19b**, Coastal Commission Permit Application **#6-08-66 (San Diego Airport Authority)**, for the Commission Meeting of March 11, 2009.

Staff recommends the following clarifications be made to the above-referenced staff report:

1. On page 3, the following paragraph of Special Condition #1 shall be revised as follows:

> Unless authorized in writing by the California Department of Fish and Game (DFG) or the U.S. Fish & Wildlife Service (Service), no in-water work shall occur between February 15th to September 15th of any year, to avoid the breeding seasons of threatened or endangered avian species nesting in the vicinity.

2. On page 6, the third complete paragraph shall be revised as follows:

> Special Conditions #1 and #3 require the applicant to implement the water quality BMP program as proposed. Condition #1 also requires that monitoring for turbidity must occur during all water activities, and corrective action taken as required by the USFWS. In addition, unless authorized in writing by the California Department of Fish and Game (DFG) or the U.S. Fish & Wildlife Service (Service), no in-water work is allowed to occur between February 15th to September 15th of any year to avoid the breeding seasons of any threatened or endangered avian species nesting in the vicinity. Therefore, as conditioned, foraging habitat or nesting activities for the least tern and brown pelican will not be adversely affected.

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SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.400.2400 WWW.SAN.ORG

W19b

March 3, 2009

Bonnie Neely, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

WED – 3/11/09
Item 19 b

SUBJECT: Statement of Applicant, San Diego County Regional Airport Authority regarding the Aircraft Remain Over Night (RON) Apron Project at San Diego International Airport

Dear Madam Chair and Members of the Coastal Commission:

The San Diego County Regional Airport Authority (SDCRAA) is the owner and operator of San Diego International Airport. The Authority is in agreement with the staff report prepared February 26, 2009 and the staff recommendation and the conditions of approval with the exception of Condition 1, which we believe will be clarified by the staff addendum as further explained below.

For the past 10 months our staff and consultants have been working with your staff on a project known as the Aircraft Remain Over Night (RON) Apron , a concrete apron over a remediated landfill to support the circulation of taxiing aircraft and the parking of aircraft that remain over night and provide air service the following morning. A Power Point presentation is attached that summarizes this project for the Commission. This project is over the same geographic area addressed in the Commission's approval last year of a remediation project (CDP 6-07-108, April meeting, Thursday Item 19b). The remediation project is well underway and scheduled for completion in June 2009.

This project serves a number of important airport functions including providing needed aircraft parking positions and 10 new parking positions west of the future planned expansion of Terminal 2. Regardless of any future changes in the airport, this aircraft apron is necessary for aircraft operations, circulation and parking. The aircraft apron project will cover the completed remediation area and install an important water quality filtration system.

Authority staff has worked closely with the CCC staff on the water quality program and supports the staff recommendation for monitoring. With respect to Condition 1, however, it is the Authority's understanding that the construction restriction from February 15 to September 15 applies only to any construction in the water, although this specific is omitted from the condition. The CCC staff has advised the Authority at the time of this writing that the condition will be proposed for amendment to add this clarification, and will be presented to the Commission in an Addendum the Authority does not yet have. With that adjustment, the Authority can accept all of the conditions of approval.

SAN DIEGO
INTERNATIONAL
AIRPORT

Letter from Applicant 3

The Authority appreciates the staff work on this project and I may be reached at (619) 400-2478 or at tanasis@san.org to answer any questions of the Commission.

Regards,

Signature on file

Ted Anasis, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

Attachment: Power Point Presentation – San Diego International Airport Master Plan

Distribution:
Ms. Sherilyn Sarb, District Manager, California Coastal Commission, San Diego Coast District

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URS

W19b

February 26, 2009

Ted Anasis
Manager, Airport Planning
San Diego Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

Subject: San Diego International Airport Aircraft Remain Overnight (RON) Apron Project – Summary of Potential Effects from Copper and Zinc in Discharges from the Outfall
San Diego, California
URS Project No. 27687028.03000

Dear Mr. Anasis:

URS Corporation (URS) has evaluated the potential for adverse effects on aquatic resources in the Navy Boat Channel as a result of discharges from a new outfall for the Aircraft Remain Overnight (RON) Apron Project in a letter report to you dated February 26, 2009. We summarize the results of our evaluation herein relative to that letter report.

Storm water from the Aircraft RON Apron Project area will be treated by a brand of storm filter called StormFilter, which has a reported range of removal efficiency for dissolved copper of 2% to 87%, and dissolved zinc of 10% to 48%. Storm water from the filter will be discharged to the Navy Boat Channel via a new outfall. To ascertain the potential for effects on aquatic resources, we compared the volume of water and concentrations of dissolved copper and zinc in treated runoff discharging from the new outfall to the volume of water and tidal behavior of water in the Navy Boat Channel.

We have calculated that the tidal exchange at the outfall location in the Navy Boat Channel is as high as approximately 484.7 million liters of water. Tidal exchanges occur at this location twice each day. Tidal exchange will result in substantial dilution of water discharged from the outfall, and water within the Navy Boat Channel is flushed from the channel to San Diego Bay with each tide cycle. As further detailed in the attached letter report, the levels of dissolved copper and zinc that the new outfall will contribute to waters in the Navy Boat Channel are not expected to result in adverse effects on or observable toxicity in marine biological resources because the discharge concentrations are low, and tidal dilution and channel flushing will substantially reduce even further these already low concentrations.

Sincerely,

URS CORPORATION

Signature on file

Bill Magdych, Ph.D.
Principal Scientist

URS Corporation
1615 Murray Canyon Road, Suite 1000
San Diego, CA 92108
Tel: 619.294.9400
Fax: 619.293.7920

Water Quality Letters from Applicant

5

URS

February 26, 2009

Ted Anasis
Manager, Airport Planning
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA 92138-2776

Subject: San Diego International Airport Aircraft Remain Over Night (RON) Apron Outfall Project – Evaluation of Potential Effects from Copper and Zinc in Discharges from the Outfall
San Diego, California
URS Project No. 27687028.03000

Dear Mr. Anasis:

INTRODUCTION

The San Diego International Airport Aircraft Remain Over Night (RON) Apron Biology Technical Report (URS 2009) has addressed the potential for adverse effects on marine biological resources in the Navy Boat Channel as a result of discharges from the Aircraft RON Apron project. Appropriate mitigation measures were proposed to be undertaken during and after construction of the proposed outfall. The assessment contained in the Biology Technical Report concluded that no adverse effect on biological resources is anticipated with regard to potential sedimentation during construction or alteration of water salinity from storm water discharge. The Biology Technical Report has demonstrated that sediment/erosion control BMPs that will be implemented during construction are feasible and effective in avoiding and minimizing adverse effects on biological resources in the Navy Boat Channel. The Biology Technical report has also established that adverse effects are not anticipated regarding changes in bay water salinity. It has been demonstrated that changes in salinity are unlikely and of minimal effect if encountered.

The Urban Storm Water Mitigation Plan for Aircraft RON Apron Project at San Diego International Airport (USMP) has identified Cu (copper) and Zn (zinc) as potential metals of concern. This letter concludes that discharge concentrations of such metals are minor and are likely to have no adverse effect on the receiving water of the Navy Boat Channel, because of the volume of water exchanged twice daily in the channel with the tides. Metals concentration estimates have been calculated using methods similar to those performed in the Biology Technical Report with regard to changes in channel salinity.

Attachment A to this letter provides references cited herein. Attachments B and C provide tables and Figure 1 referenced herein. Attachment D provides Figure 3 from the Biology Technical Report (URS 2009).

URS Corporation
1615 Murray Canyon Road, Suite 1000
San Diego, CA 92108
Tel: 619.294.9400
Fax: 619.293.7920

ESTIMATED NAVY BOAT CHANNEL EMBAYMENT VOLUME

The Navy Boat Channel Forms a closed embayment to the north and west of the existing outfall (see Attachment D to this letter). This embayment provides a relevant point to measure tidal exchange and flushing of water from the Navy Boat Channel relative to discharges from the outfall because the embayment is well defined and allows evaluation of discharges from the outfall through the cycle of rising and falling tides (water is flushed from the channel to San Diego Bay during the falling tide). The volume of the embayment was estimated using surface area information obtained from aerial photographs and bathymetric data. The embayment surface area was estimated to be 940,467 ft^2 (21.6 acres) (see Fig. 3 of the Biology Technical Report). This volume of water was estimated in order to quantify potential concentrations of Cu and Zn. It is defined as the area outlined in Figure 3 of the Biology Technical Report. The average depth relative to mean sea level was estimated by visually quantifying bathymetric information retrieved from Maptech.com and was determined to be approximately 15 ft. The approximated volume of the embayment is 399,466,000 liters (L). This is assumed to be the mean embayment volume. Mean tide elevations, relative to NGVD 29 and affiliated embayment volumes are provided in Table 1.

From this information, the intertidal volume was estimated. Intertidal volume is equal to the area of the embayment multiplied by the water-level change between low and high water (Sverdrup 2003). This volume of water enters and leaves the embayment during each tidal cycle (every 12 hours). The most extreme intertidal volume (152,330,000 L) occurs between mean higher high water (MHHW) and mean lower low water (MLLW). What is to be considered, for the purposes of this discussion, as the average or normal intertidal volume (107,856,000 L) occurs between mean high water (MHW) and mean low water (MLW) (Table 1).

ESTIMATED STORM WATER DISCHARGE VOLUME

The runoff from the Aircraft RON Apron was calculated using the 2-year, 6-hour; 5-year, 6-hour; 10-year, 6-hour; and 100-year, 6-hour storms with Type B rainfall distribution pursuant to the 2003 San Diego County Hydrology Manual guidelines. The 6-hour storm duration runoff values are considered more appropriate in this case because the watershed is less than one square mile (0.06 square mile), and therefore, the 6-hour storm duration represents a storm pattern that is more realistic and likely to be encountered at the San Diego International Airport (URS 2009). Calculated discharge volumes are presented in Table 2.

ESTIMATED CU AND ZN CONCENTRATIONS

Table 3 presents predicted effluent concentration ranges for Cu and Zn that may occur in discharges from the outfall (San Diego County Regional Airport Authority 2009). Median effluent concentration levels were taken from the BMP Recommendations Report for Storm Drainage System BMP Program at San Diego International Airport (SDIA) San Diego, California. The

concentration ranges were then derived by multiplying the SDIA median concentration by the percent removal of the filter.

The subsequent predicted effluent concentration ranges for Cu and Zn were used to estimate the amount of Cu and Zn transported to the embayment. The lower and upper concentration were multiplied by various discharge volumes associated with storm events of different frequencies. Results are provided in Tables 4 through 6.

Tables 7 through 9 present metals concentrations of embayment water assuming full mixing of storm water discharge and embayment water for various storm events. The estimated quantities of Cu and Zn provided in Tables 7 through 9 were divided by embayment volumes in order to derive embayment concentrations of the metals in question. The concentrations are dependant upon the storm frequency and surface water elevation. The estimates do not account for transformation from total to dissolved phases and vice versa as a result of changes in pH.

The concentrations estimated in Tables 7 through 9 are the predicted contribution of the proposed outfall to the embayment. This information is not an attempt to quantify the concentration of metals from all sources in the Navy Boat Channel. These metals contributions should be considered conservative. The embayment area, as it is defined in Figure 3 of the Biology Technical Report, was delineated so that the possible effects of estimated storm water discharge volume and potential metals concentrations could be quantified. The proposed outfall will actually discharge to the entire Navy Boat Channel, which discharges to San Diego Bay and represents a much greater volume of water than what has been defined as the embayment area. Therefore, the fully mixed concentrations of metals presented in Tables 7-9 are considered to be conservative and probably over estimate concentrations that will be observed in the Navy Boat Channel.

MIXING AND DILUTION

A Southern California Coastal Water Research Project (SCCWRP) 2006 study conducted in San Diego Bay, Mission Bay, Oceanside Harbor, and Dana Point Harbor concluded that concentrations of dissolved copper were influenced by both proximity to sources as well as the potential for mixing and dilution. Sampling locations with the highest vessel density and lowest water circulation were found to have higher concentrations of dissolved copper compared to locations with lower vessel densities and greater water circulation (Schiff 2006).

The density of vessels in the Navy Boat Channel is lower than other areas of San Diego Bay. Figure 1 of the Biology Technical Report serves as an excellent demonstration. The Navy Boat Channel (Former San Diego River Channel) contains far fewer vessels than the West Basin of Harbor Island. The 2006 SCCWRP study found that dissolved copper concentrations ranged from 9.1-10.4 micrograms/L in the West Basin of Harbor Island (WBHI). Because vessel density in the Navy Boat Channel is much less than that of the WBHI and the orientation of the Navy Boat

Channel is more conducive to tidal exchange than is the WBHI, it is assumed that dissolved copper concentrations would be lower in the Navy Boat Channel.

The volume of water transported to the embayment via the proposed discharge outfall (Table 2) is minimal compared to the intertidal volumes discussed above. The 10-year discharge volume from the outfall (5,921,000 L) would constitute approximately 5% of the average intertidal volume and approximately 4% of an extreme intertidal volume. A large portion of this discharge water would be transported out of the embayment during one tidal cycle.

Tidal flushing, as well as transport to sediments have been documented as the main factors which determine the level of Cu in the water column (Chadwick *et al.*, 2004). Figure 1, which was taken directly from Chadwick *et al.*, 2004 demonstrates that the outfall location and the Navy Boat Channel are located in one of the least impacted areas of San Diego Bay with regard to dissolved copper. The location and orientation of the Navy Boat Channel facilitates tidal flushing. The channel is located in the north end and in close proximity to the mouth of the Bay (Figure 1). The area where the boat channel meets San Diego Bay is open and water is permitted to enter and exit the channel without obstruction unlike other boat basin areas. The increased ease of tidal exchange allows for dilution and interchange of ocean and channel water.

TOXICITY

The 2006 SCCWRP study concluded that although 86% of the marina area sampled was in exceedance of state water quality standards, that only 21% of the marina area was identified as toxic. Toxicity identification evaluations were conducted at the most toxic sites. Toxicity was attributed to trace metals, specifically copper. Toxicity was assessed using *Mytilus galloprovincialis* and was defined as the point where mean normal embryo development equaled 70% of the control group. Toxicity was found to be approximately 10 micrograms/L of dissolved copper (Schiff *et al.*, 2006).

Dissolved copper concentrations in the Navy Boat Channel are predictably much lower than concentrations found in WBHI indicating that Navy Boat Channel concentrations of dissolved copper are probably well below toxic levels. The contribution of dissolved copper to the channel from the proposed outfall is negligible and would most likely not elevate concentrations to toxic levels (Table 7).

The tidal influence and its ability to exchange channel and ocean water will also assist in negating potential adverse affects of the proposed discharge. The volume of water transported to the channel via the outfall is only a fraction of the volume that is exchanged twice daily during tidal flux. A large majority of the discharged storm water will be removed from the channel diminishing dissolved copper's ability to reach toxic levels in the area. This statement has been reinforced by the findings of SCCWRP 2006.

At the time of this reporting, we have not identified quantitative levels of zinc that are considered toxic relative to San Diego Bay or the specific project site. Some general concerns for zinc have been identified in the literature (Schiff *et al.,* 2003); however, no specific information was provided to demonstrate that problems with zinc concentration occur within San Diego Bay. The levels of zinc that would result from the new outfall will be very minor, and appear to be so low that adverse effects on marine biological resources are not expected to occur.

Sincerely,

URS CORPORATION

Signature on file

Bill Magdych, Ph.D.
Principal Scientist

Signature on file

Brian Felten
Fisheries/Aquatic Biologist

BM:ml

Attachments:

Attachment A References
Attachment B Tables
Attachment C Figure 1
Attachment D Figure 3 from the Biology Technical Report

Attachment A

References

11

References

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Schiff, K., Bay, S., Diehl, D. 2003. Stormwater Toxicity in Chollas Creek and San Diego Bay, California. Environmental Monitoring and Assessment. Springer Netherlands. Volume 81 Numbers 1-3. January 2003.

Schiff, K., Brown, J., Diehl, D. 2006. Extent and Magnitude of Copper Contamination in Marinas of the San Diego Region, California. Southern California Coastal Water Research Project. Technical Report #483. March 31, 2006.

Sverdrup, K.A., Duxbury, A.C., Buxbury, A.B. 2003. An Introduction to the World's Oceans, Seventh Edition. McGraw Hill.

San Diego County Regional Airport Authority, 2009. Letter Response to email from Jack Gregg of February 6, 2009, regarding Remain Over Night (RON) Apron Project at San Diego International Airport. February 18, 2009.

URS. 2009. San Diego International Airport Remain Over Night (RON) Apron Biology Technical Report. January 8, 2009.

Attachment B

Tables

B

Table 1
Estimated Embayment Volume
(Rounded to Nearest 1,000 L for Display Purposes)

Tide	Surface Water Elevation	Estimated Embayment Volume (L)
MHHW	3.2	484,685,000
MHW	2.47	465,244,000
MSL	0	399,466,000
MLW	-1.58	357,389,000
MLLW	-2.52	332,356,000

Data taken from West Consultants Inc. 2005

Relative to NGVD 29

MHHW-mean higher high water

MHW-mean high water

MSL-mean sea level

MLW-mean low water

MLLW-mean lower low water

Table 2
Storm Event Outflow Volumes (L)
(Rounded to Nearest 1,000 L for Display Purposes)

	2 yr	5 yr	10 yr	100 yr
Proposed Outflow	3,700,000	5,181,000	5,921,000	9,251,000

Volume estimation based on 6 hour events

Table 3
Predicted Effluent Concentrations

Contaminant	% Removal	SDIA Median Concentration (micrograms/L)	Predicted Effluent Concentration Range (micrograms/L)	
			Lower (micrograms/L)	Upper (micrograms/L)
Total Copper	5-77	60	10	60
Total Zinc	21-71	110	30	90
Dissolved Copper	2-87	30	4	30
Dissolved Zinc	10-48	No Data	-	-

Percent removal values represent range of percent removal values taken from:

NJ Corp. for Advanced Technologies, 2007

Contech Stormwater Solutions Inc., 2003

Minton, 2004

California Department of Transportation, 2004

Lenhart et al.

Noling, Kellems

Table 4

Estimated Load of Dissolved Copper (Cu_{diss})
From Proposed Outfall by Storm Event (micrograms)
(Rounded to Nearest 1,000 micrograms for Display Purposes)

Percent Removal	2 yr	5 yr	10 yr	100 yr
2%	111,013,000	155,419,000	177,621,000	277,533,000
87%	14,802,000	20,722,000	23,683,000	37,004,000

Estimation based on 6 hour events and median discharge concentration of 30 micrograms/L

Table 5

Estimated Load of Total Copper (Cu_{tot})
From Proposed Outfall by Storm Event (micrograms)
(Rounded to Nearest 1,000 micrograms for Display Purposes)

Percent Removal	2 yr	5 yr	10 yr	100 yr
5%	222,027,000	310,837,000	355,243,000	555,067,000
77%	37,004,000	51,806,000	59,207,000	92,511,000

Estimation based on 6 hour events and median discharge concentration of 60 micrograms/L

Table 6

Estimated Load of Total Zinc (Zn_{tot})
From Proposed Outfall by Storm Event (micrograms)
(Rounded to Nearest 1,000 micrograms for Display Purposes)

Percent Removal	2 yr	5 yr	10 yr	100 yr
21%	333,040,000	466,256,000	532,864,000	832,600,000
71%	111,013,000	155,418,000	177,621,000	277,533,000

Estimation based on 6 hour events and median discharge concentration of 110 micrograms/L

Table 7

Estimated Cu_{diss} Concentration (micrograms/L) of Embayment at Varying Pool Elevations

			2% Removal Efficiency				87% Removal Efficiency			
Tide	Surface Water Elevation	Estimated Embayment Volume (L)	2 yr	5 yr	10 yr	100 yr	2 yr	5 yr	10 yr	100 yr
MHHW	3.2	484,685,000	0.2290	0.3207	0.3665	0.5726	0.0305	0.0428	0.0489	0.0763
MHW	2.47	465,245,000	0.2386	0.3341	0.3818	0.5965	0.0318	0.0445	0.0509	0.0795
MSL	0	399,466,000	0.2779	0.3891	0.4446	0.6948	0.0371	0.0519	0.0593	0.0926
MLW	-1.58	357,389,000	0.3106	0.4349	0.4970	0.7766	0.0414	0.0580	0.0663	0.1035
MLLW	-2.52	332,356,000	0.3340	0.4676	0.5344	0.8350	0.0445	0.0624	0.0713	0.1113

Table 8

Estimated Cu_{tot} Concentration (micrograms/L) of Embayment at Varying Pool Elevations

			5% Removal Efficiency				77% Removal Efficiency			
Tide	**Surface Water Elevation**	**Estimated Embayment Volume (L)**	**2 yr**	**5 yr**	**10 yr**	**100 yr**	**2 yr**	**5 yr**	**10 yr**	**100 yr**
MHHW	3.2	484,685,000	0.4581	0.6413	0.7329	1.1452	0.0763	0.1069	0.1222	0.1909
MHW	2.47	465,245,000	0.4772	0.6681	0.7636	1.1931	0.0795	0.1114	0.1273	0.1988
MSL	0	399,466,000	0.5558	0.7781	0.8893	1.3895	0.0926	0.1297	0.1482	0.2316
MLW	-1.58	357,389,000	0.6212	0.8697	0.9940	1.5531	0.1035	0.1450	0.1657	0.2589
MLLW	-2.52	332,356,000	0.6680	0.9353	1.0689	1.6701	0.1113	0.1559	0.1781	0.2783

Table 9

Estimated Zn_{tot} Concentration (micrograms/L) of Embayment at Varying Pool Elevations

			21% Removal Efficiency				71% Removal Efficiency			
Tide	**Surface Water Elevation**	**Estimated Embayment Volume (L)**	**2 yr**	**5 yr**	**10 yr**	**100 yr**	**2 yr**	**5 yr**	**10 yr**	**100 yr**
MHHW	3.2	484,685,000	0.6871	0.9620	1.0994	1.7178	0.2290	0.3207	0.3665	0.5726
MHW	2.47	465,245,000	0.7158	1.0022	1.1453	1.7896	0.2386	0.3341	0.3818	0.5965
MSL	0	399,466,000	0.8337	1.1672	1.3339	2.0843	0.2779	0.3891	0.4446	0.6948
MLW	-1.58	357,389,000	0.9319	1.3046	1.4910	2.3297	0.3106	0.4349	0.4970	0.7766
MLLW	-2.52	332,356,000	1.0021	1.4029	1.6033	2.5051	0.3340	0.4676	0.5344	0.8350

Attachment C

Figure 1

Figure 1

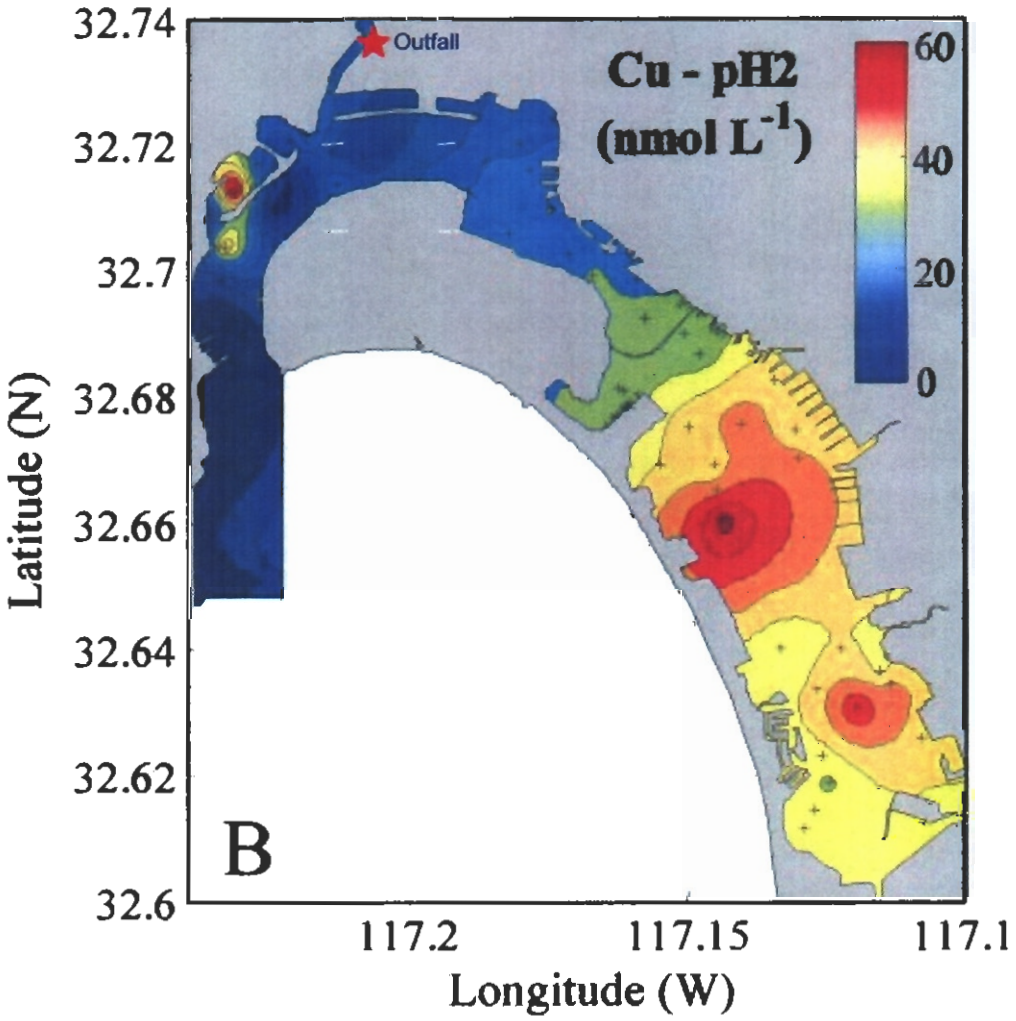

Figure taken from Chadwick *et al.*, 2004

RB

Attachment D

Figure 3 from the Biology Technical Report

SOURCES:
SanGIS (roads Jan. 2008, hydro basins Jun. 2003, parcels Oct. 2008); Digital Globe (aerial Mar. 2007).

EMBAYMENT AREA
SAN DIEGO INTERNATIONAL AIRPORT
RON APRON PROJECT

URS

100 0 100 200 Feet

SCALE: 1" = 200' (1:2400)
SCALE CORRECT WHEN PRINTED AT 8.5X11

CREATED BY: LG	DATE: 12-23-08	FIG. NO:
PM: WM	PROJ. NO: 27687028.01000	3

Path: G:\gis\projects\27\27687028\map_docs\mxd\RON_embayment_area.mxd, 12/23/08, lisa_garvey

W19b

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATION

Date and time of communication:

Location of communication: Letter

Person (s) initiating communication: Ted Anasis, Manager – Airport Planning; San Diego County Regional Airport Authority; (619) 400-2478; tanasis@san.org

Person (s) receiving communication: Commissioner Patrick Kruer

Name or description of project: San Diego County Regional Airport Authority (SDCRAA) March 11, 2009 Item 19b – Aircraft Remain Over Night (RON) Apron

Detailed substantive description of content of communication:

The SDCRAA forwarded a CD and a printed briefing presentation providing an overview and description of a new project at the San Diego International Airport (Lindbergh Field). SDCRAA is in full agreement with the recommendations of the staff report and accepts all conditions recommended by staff, with the exception as noted below.

The project consists of the installation of a large paved area to be used as an aircraft apron for the circulation and parking of aircraft that Remain Over Night (RON). This project would be necessary for airport operations with or without any further expansion of the airport. The apron paving covers an area addressed last year by the Commission with respect to remediation of the Naval Training Center disposal area.

The project design incorporates a sophisticated water quality and monitoring program aimed at removal of pollutants of concern. The project's outfall to the Navy Channel has also been designed to avoid eelgrass, and construction will be closely monitored in accordance with the recommendations of the USFWS. SDCRAA knows of no opposition to this project.

The SDCRAA's only comment is that the condition on Page 3, second paragraph of the staff report (Condition 1) states that no work may occur from Feb 15 to Sept 15 but does not reference that this restriction is just for "in water construction". This is somewhat inconsistent with the staff report at page 6, which emphasizes these precautions for water areas. This has been discussed with CCC staff and they have agreed to revise this condition on Page 3 and a related reference on Page 6 in an Addendum that would be mailed on March 9, 2009.

(If communication included written material, attach a copy of the complete text of the written material.) Attached

3/4/09
Date

Signature on file
Signature of Commissioner

If the communication was provided at the same to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the Commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

DS

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATION

Date and time of communication:
(For messages sent to a Commissioner by mail of facsimile or received as a telephone or other message, date time of receipt should be indicated.)

Location of communication: Telephone

Person (s) initiating communication: Andi Culbertson

Person (s) receiving communication: Commissioner Dan Secord

Name or description of project: San Diego County Regional Airport Authority (SDCRAA) March 11, 2009 Item 19b – Remain Overnight (RON) Parking Apron

Detailed substantive description of content of communication:

The SDCRAA forwarded a CD and a printed briefing book showing a new project at the San Diego International Airport (Lindbergh Field). SDCRAA is in full agreement with the recommendations of the staff report and accepts all conditions recommended by staff, with the exception as noted below.

The project consists of the installation of a large paved area for parking of aircraft overnight, known as "RON" or "Remain Overnight Parking". This project would be necessary for airport operations with or without any further expansion of the airport. The apron paving covers an area addressed last year by the Commission with respect to remediation of the Naval Training Center disposal area.

The project design incorporates a sophisticated water quality and monitoring program aimed at removal of pollutants of concern. The project's outfall to the Navy Channel has also been designed to avoid eelgrass, and construction will be closely monitored in accordance with the recommendations of the USFWS. SDCRAA knows of no opposition to this project.

The SDCRAA's only comment is that the condition on Page 3, second paragraph of the staff report (Condition 1) states that no work may occur from Feb 15 to Sept 15 but does not reference that this restriction is just for "in water construction". This is somewhat inconsistent with the staff report at page 6, which emphasizes these precautions for water areas. This has been discussed with CCC staff and they have agreed to revise this condition on Page 3 and a related reference on Page 6 in an Addendum that would be mailed on March 2, 2009.

3-2-09

Signature on file

W 23

DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication:	March 2, 2009 2pm
Location of communication:	Telephone
Person initiating communication:	Andi Culbertson
Person receiving communication:	Commissioner Steve Blank
Name of project:	San Diego County Regional Airport Authority (SDCRAA) March 11, 2009 Item 19b – Remain Overnight (RON) Parking Apron

Substantive description of content of communication:
San Diego County Regional Airport Authority is in full agreement with the recommendations of the staff report and accepts all conditions recommended by staff, with the exception as noted below.

The project is the installation of a large paved area for parking of aircraft overnight. This is necessary for airport operations with or without any further expansion of the airport. The apron paving covers an area approved last year by the Commission -the remediation of the Naval Training Center disposal area.

The project design incorporates a water quality and monitoring program. The project's outfall to the Navy Channel is designed to avoid eelgrass, and construction will be closely monitored in accordance with the recommendations of the USFWS. San Diego County Regional Airport Authority knows of no opposition to this project.

The applicants only comment is that the condition on Page 3, second paragraph of the staff report (Condition 1) states that no work may occur from Feb 15 to Sept 15 but does not reference that this restriction is just for "in water construction". This is somewhat inconsistent with the staff report at page 6, which emphasizes these precautions for water areas. This has been discussed with commission staff and they have agreed to revise this condition on Page 3 and a related reference on Page 6 in an Addendum that would be mailed on March 2, 2009.

Note: The SDCRAA forwarded a CD and a briefing book for the project. They indicated that staff and all commissioners received this material.

Signature on file

Monday, March 02, 2009
Date

Signature of Commissioner

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATION

Date and time of communication: (For messages sent to a Commissioner by mail of facsimile or received as a telephone or other message, date time of receipt should be indicated.)	3/5/09 1:30 p.m.
Location of communication:	Telephone
Person (s) initiating communication:	Andi Culbertson
Person (s) receiving communication:	Commissioner Bonnie Neely, Chair
Name or description of project:	San Diego County Regional Airport Authority (SDCRAA) March 11, 2009 Item 19b – Remain Overnight (RON) Parking Apron

Detailed substantive description of content of communication:
The SDCRAA forwarded a CD and a printed briefing book showing a new project at the San Diego International Airport (Lindbergh Field). SDCRAA is in full agreement with the recommendations of the staff report and accepts all conditions recommended by staff, with the exception as noted below.

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Signature on file

Date: Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceedings and provide the Executive Director with a copy of any written material that was part of the communication.

Coastal Commission Fax: 415 904-5400

RECEIVED

MAR 0 5 2009

CALIFORNIA
COASTAL COMMISSION

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATION

Date and time of communication: 3/5/09 2:30p.m.
(For messages sent to a Commissioner
by mail of facsimile or received as a
telephone or other message, date
time of receipt should be indicated.)

Location of communication: Telephone

Person (s) initiating communication: Andi Culbertson

Person (s) receiving communication: Commissioner Dave Potter

Name or description of project: San Diego County Regional Airport Authority (SDCRAA) March 11, 2009 Item 19b – Remain Overnight (RON) Parking Apron

Detailed substantive description of content of communication:

The SDCRAA forwarded a CD and a printed briefing book showing a new project at the San Diego International Airport (Lindbergh Field). SDCRAA is in full agreement with the recommendations of the staff report and accepts all conditions recommended by staff, with the exception as noted below.

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(If communication included written material, attach a copy of the complete text of the written material.) Attached

3/5/09
Date

Signature on file
Signature of Commissioner

If the communication was provided at the same to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the Commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

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CALIFORNIA COASTAL COMMISSION
SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
(619) 767-2370

W 19b

Filed:	October 24, 2008
49th Day:	December 12, 2008
180th Day:	April 22, 2009
Staff:	D. Lilly-SD
Staff Report:	February 26, 2009
Hearing Date:	March 11-13, 2009

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-08-66

Applicant: San Diego County Regional Airport Authority Agent: Ted Anasis

Description: Construction of a 29.85-acre concrete apron over a remediated landfill to accommodate 10 new "remain overnight" (RON) aircraft parking positions and 10 new aircraft parking spaces west of the planned future expansion of Terminal 2 West, and construction of a new 60-inch storm drain outfall draining to the San Diego Bay boat channel, with approximately 12 tons of riprap placed. Other components of the project include a one-story, 5,715 sq.ft. waste disposal facility; lighting and aircraft signage, a 21-foot high blast fence located between the RON parking area and adjacent off-airport structures and land uses, electrical and other utility connections, and storm drain and storm water improvements.

Site: Northeast corner of McCain Road and Spruance Road (former Naval Training Center), San Diego International Airport, San Diego, San Diego County. APN 760-062-01, 760-039-61, 760-039-58, 760-039-67, 450-Index.

Substantive File Documents: Certified Port Master Plan; CDP 6-03-22, 6-07-108.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed apron and new storm drain. The project will upgrade an existing substandard storm drain to current City standards, which include current water quality Best Management Practices. The subject site is located on a landfill currently undergoing remediation (#6-07-108). The apron will be located on top of the remediated site. The project has been conditioned to ensure no impacts to sensitive biological resources or water quality result from the development. The project does not include any terminal upgrades or additions.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: ***I move that the Commission approve Coastal Development Permit No. 6-08-66 pursuant to the staff recommendation.***

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Mitigation and Monitoring Program During In-Water Construction/Construction Schedule. The applicant shall implement the following construction BMPs to avoid or minimize reductions in water clarity during construction:

Sediment Controls:

- Turbidity Curtain
- Stone Filter Inlet Protection
- Gravel Bag Storm Drain Inlet Protection
- Rock Check Dam
- Silt Fence
- Temporary Sediment Basin

Erosion Controls:

- Rock Diversion Dam
- Wind Erosion Control/Construction Site Watering

Monitoring of construction activities that occur within the water during the bird breeding season between April 1 and September 15 of a given year shall occur per the requirements of the U.S. Fish and Wildlife Service (USFWS). Daily monitors shall be provided during this time while construction within the water occurs. Daily reports regarding turbidity and observations of least terns and brown pelicans in the vicinity of the project shall be filed with the USFWS during this monitoring. Monitoring reports shall identify potential adverse impacts and corrective actions proposed. Corrective actions may include changes in construction activity up to and including stoppage of work as required by the USFWS. However, no changes to the approved project itself shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

Unless authorized in writing by the California Department of Fish and Game (DFG) or the U.S. Fish & Wildlife Service (Service), no work shall occur between February 15th to September 15th of any year, to avoid the breeding seasons of threatened or endangered avian species nesting in the vicinity.

Any exceptions to the monitoring requirements must be reviewed and approved in writing by the USFWS. The permittee shall undertake development in accordance with the approved construction schedule. Any proposed changes to the monitoring shall be reported to the Executive Director. No changes to the approved schedule shall occur without an amendment to this coastal development permit unless approved in writing by the USFWS, and the Executive Director determines that no amendment is required.

2. Final Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, final site, storm drain, and building plans for the proposed development. Said plans shall be in substantial conformance with the plans submitted with this application dated May 9, 2008.

The permittee shall undertake the development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

3. Water Quality BMPs. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for review and written approval of the Executive Director, a monitoring program, prepared by a licensed water quality professional, that will provide an assessment of the effectiveness of the treatment control Best Management Practices (BMPs) constructed as part of the Remain Over Night Apron Project. The monitoring plan shall document how:

a. The project treatment control BMPs will treat all dry weather runoff and all storm runoff from the project for storms smaller than or equal to the 85th percentile design storm (0.55 in./24 hours for volume based BMPs and 0.2 in./hr for flow based BMPs);
b. The operation and maintenance program and the filter media used for the Storm Filter high rate media filter BMP are effective at achieving project load reduction objectives.

4. Polluted Runoff BMPs associated with the RON project. The applicant shall implement all water quality BMPs identified in the Urban Storm Water Mitigation Plan for Remain Over Night Apron Project at San Diego International Airport, San Diego, California (USWMP) dated January 8, 2009.

5. Other Permits. **PRIOR TO THE COMMENCEMENT OF CONSTRUCTION**, the applicant shall provide to the Executive Director, copies of all other required federal, state or local permits for the development. The applicant shall inform the Executive Director of any changes to the development required by any of these other permits. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description. The proposed project is construction of a 29.85 acre concrete apron to accommodate 10 new "remain overnight" (RON) aircraft parking positions, and 10 new aircraft parking spaces west of the planned future expansion of Terminal 2 West at the San Diego International Airport. The RON apron will provide aircraft parking positions, internal taxi lane circulation, and taxi lane linkage to existing Taxiway B at the west end of the airfield. The project also includes construction of a new 60-inch storm drain outfall draining to an arm of the San Diego Bay called the Navy Boat Channel, with approximately 250 cubic feet of riprap placed over approximately 655 cubic feet of ¾ inch gravel fill (approximately 12 tons of rock). Other components of the project include a one-story, 5,715 sq.ft. waste disposal facility including solid waste compaction facilities, airline sanitary waste disposal equipment, and a vehicle wash rack for ground service equipment vehicles; lighting and aircraft signage, a 21-foot high blast fence located between the RON parking area and adjacent off-airport structures and land uses, electrical and other utility connections, and storm drain and storm water improvements. Special Condition #2 requires that final plans be submitted consistent with the submitted preliminary plans.

The proposed apron would be located on the site of the landfill remediation project approved by the Commission in April 2008 (6-07-108), at the northeast corner of McCain Road and Spruance Road. Although the subject site is planned to be part of the future expansion of Terminal 2 West, that project will be reviewed by the Commission as part

of the overall Airport Master Plan in the future, and the proposed apron does not depend upon any future development to operate as airplane storage and for waste disposal facilities.

The one-story waste disposal facility would be located on the northwest side of the proposed apron, and would not be visible from Harbor Drive, or have any impact on scenic resources. No new landscaping is proposed.

The San Diego International Airport was previously under the coastal permit jurisdiction of the Port of San Diego. However, legislation transferred authority over airport property to the newly created San Diego County Regional Airport Authority (SDCRAA) in January 2003. Thus, the airport is now within the Commission's permit jurisdiction, and Chapter 3 is the standard of review.

2. Environmentally Sensitive Habitat Area/Water Quality. Section 30230 of the Coastal Act states:

> Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

> The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The proposed project involves constructing an approximately 30-acre concrete apron and constructing a new drainage pipe with approximately 12 tons of new riprap. There is an existing outfall draining the currently unimproved site; however, the airport has determined that the existing outfall lacks sufficient capacity to handle drainage from the project site. The applicant looked at potential alternatives to the construction of a new storm drain, including disposal of site runoff to the sanitary sewer system or construction of an on-site detention system. However, the City of San Diego Metropolitan Wastewater Department was not willing to accept storm drain runoff from the project, and there is insufficient room on the site to accommodate the size detention facility that would be required to handle runoff from the site. In addition, above ground storm water

basins are considered a hazardous wildlife attractant, which are not permitted in the vicinity of an airport.

The proposed drainage pipe will be located on an existing channel embankment currently lined with scattered rock and debris. The proposed riprap is needed to dissipate wave and tide driven forces against the proposed pipe and to stabilize the bank. The applicant prepared an eelgrass survey consistent with the National Marine Fisheries Southern California Eelgrass Mitigation Policy. The survey found eelgrass at the location originally proposed for the outfall; thus, the length of the outfall was modified to avoid any impacts to eelgrass. Thus, no direct impacts to biological resources are anticipated.

The project will require a Clean Water Act Section 404 nationwide permit from the Army Corps of Engineers (ACOE). With regard to potential impacts to water quality, both construction and project Best Management Practices (BMPs) have been incorporated into the project. For example, during construction, turbidity curtains will be used for in-water construction, filters will be located around all drain inlets, and construction site watering and erosion controls will be used. These controls will minimize sediment entering the water and avoid an extensive adverse plume. Special Condition #4 requires the applicants to submit copies of any other required permits prior to the commencement of construction.

Special Conditions #1 and #3 require the applicant to implement the water quality BMP program as proposed. Condition #1 also requires that monitoring for turbidity must occur during all water activities, and corrective action taken as required by the USFWS. In addition, unless authorized in writing by the California Department of Fish and Game (DFG) or the U.S. Fish & Wildlife Service (Service), no work is allowed to occur between February 15th to September 15th of any year to avoid the breeding seasons of any threatened or endangered avian species nesting in the vicinity. Therefore, as conditioned, foraging habitat or nesting activities for the least tern and brown pelican will not be adversely affected.

Project BMPs include the use of 1.75 acres of pervious pavement covering the infield/swale area adjacent to the taxi lane shoulder pavement as an infiltration area for storm water runoff from 9.6 acres of the terminal apron and shoulder pavements. The balance of the new impervious surfaces created by the project will drain runoff up to the 85th percentile design storm (0.2 inches per hour) to a Storm Filter proprietary high rate media filter as described in the Urban Storm Water Mitigation Plan for Remain Over Night Apron Project at San Diego International Airport, San Diego, California January 2009 (USWMP). In addition, the San Diego International Airport has a comprehensive stormwater mitigation program for the entire airport that includes extensive site design, source control and project specific BMPs known as the SAN Storm Water Management Plan dated March 2008. This plan includes a weekly sweeping of all airport pavements and an ongoing BMP effectiveness study.

The documents provided by the SDCRAA describe the site design, source control, and priority development project BMPs and the basis for selecting those BMPs. The USWMP

specifies that the project will include the following Site Design BMPs: minimize impervious surfaces consistent with the project purpose, include pervious pavement and gravel base rock to capture runoff from 9.6 acres of new impervious surfaces, minimize soil compaction in the area of pervious pavement, and energy dissipaters (rip rap) will be placed at the discharge of the storm drain system into the bay,

The project includes the following Source Control BMPs specified in the USWMP: storm drain signage at each inlet, the RON Apron Waste Disposal Facility is covered with a roof and paved to contain leaks and contact with precipitation, and manually activated spill containment valves are incorporated into manhole unit at five locations downstream of the trench drains. In addition, many operations and maintenance procedures are designed to prevent polluted runoff such as:

1. Provision of the appropriate level of employee, tenant and public training or education in non-storm water discharge management, i.e., spill response and prevention, non-stormwater pollution prevention, and hazardous materials management.
2. Limitation of the availability of outdoor water supplies (hose bibs) and posting of appropriate use signs to discourage uses that may pollute the storm drain system/receiving water.
3. Notification of Airport Operations and the Airport Authority Environmental Affairs Department if there is any evidence of illicit connections or illegal discharges.

The project includes the following Priority Development Project (PMP) Individual BMPs described in the USWMP: Equipment Wash Racks (which are self contained, covered with a roof, equipped with a clarifier, and connected to the sanitary sewer) and roadway BMPs which are addressed in the Treatment Control BMP section below.

The primary Treatment Control BMP selected for use was the Storm Filter media filtration system supplied by Contech. This proprietary BMP consists of a series of media filter cartridges within an underground concrete vault. The filtration unit consists of one underground vault containing 162 cartridges filled with filter media. Stormwater is treated as it flows through the filter media, removing oil and grease, total suspended solids, and metals. The filtration unit was designed according to flow-based numeric sizing criteria based on the maximum flow rate of runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event. To prevent tidal inundation into the filtration device, a backflow prevention device will be installed on the storm drain outfall. In addition, the pervious pavement area detains and infiltrates runoff from the design storm (0.55 inches per 24 hours) so that runoff is treated by adsorption of pollutants in soil layers beneath airport pavement.

The SDCRAA acknowledges that the effectiveness of the selected BMPs will vary depending on stormwater conditions, operation and maintenance and the media type used in the Storm Filter BMP. The SDCRAA currently has an airport wide effectiveness study, but has not yet designed a study to evaluate the effectiveness and most effective

operation of the Storm Filter high rate media filter system. In order to provide regulatory agencies and the SDCRAA information to assure that the Storm Filter BMP will be operated in a manner that is effective at protecting coastal resources, Special Condition #3 requires that an effectiveness monitoring program for that be designed and submitted to the Executive Director for approval. Special Condition #4 requires that the project stormwater mitigation program be conducted as described in the Urban Storm Water Mitigation Plan for Remain Over Night Apron Project at San Diego International Airport, San Diego, California (USWMP) dated January 8, 2009.

The Commission's water quality staff have reviewed the project and determined that the Best Management Practices (BMPs) will adequately mitigate any potential impacts to the environmental quality of San Diego Bay (See attached Exhibit #4, memo dated February 22, 2009). As conditioned, the proposed project is not expected to have any adverse impacts on water quality or sensitive biological resources. Therefore, as conditioned, the proposed project is consistent with the resource protection policies of the Coastal Act.

3. Public Access. Many policies of the Coastal Act address the provision, protection and enhancement of public access to and along the shoreline, in particular, Sections 30210, 20211, 30212.5, 30221, 30223 and 30252. These policies address maintaining the public's ability to reach and enjoy the water, preventing overcrowding by providing adequate recreational area, protecting suitable upland recreational sites, and providing adequate parking facilities for public use. In addition, Section 30604(c) requires that a specific access finding be made for all development located between the sea and first coastal roadway. In this case, such a finding can be made.

The subject storm drain will discharge into the San Diego Bay Boat Channel. The development and maintenance of public access to and along the boat channel has been made a condition of approval for all development at the former NTC, and the proposed project will not adversely impact any public access requirements for the site. No impacts to public access or recreation will result from the project, consistent with the Chapter 3 requirements of the Coastal Act.

4. Local Coastal Planning. Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The San Diego International Airport was previously under the coastal permit jurisdiction of the Port of San Diego and the standard of review for coastal development permits was the certified Port Master Plan. However, legislation which took effect in January 2003 transferred authority over airport property to the newly created Airport Authority. Thus, the airport is now within the Commission’s permit jurisdiction. As discussed above, the proposed project is consistent with the public access, biological resources and water quality protection policies of Chapter 3 of the Coastal Act. The proposed apron expansion is a stand-alone project, and approval of the apron does not prejudice the

ability of the Commission to review future airport expansion projects. Although the Airport is not anticipated to be subject to a LCP, approval of this project would not prejudice the preparation of a LCP consistent with the requirements of Chapter 3.

5. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing the timing of construction will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

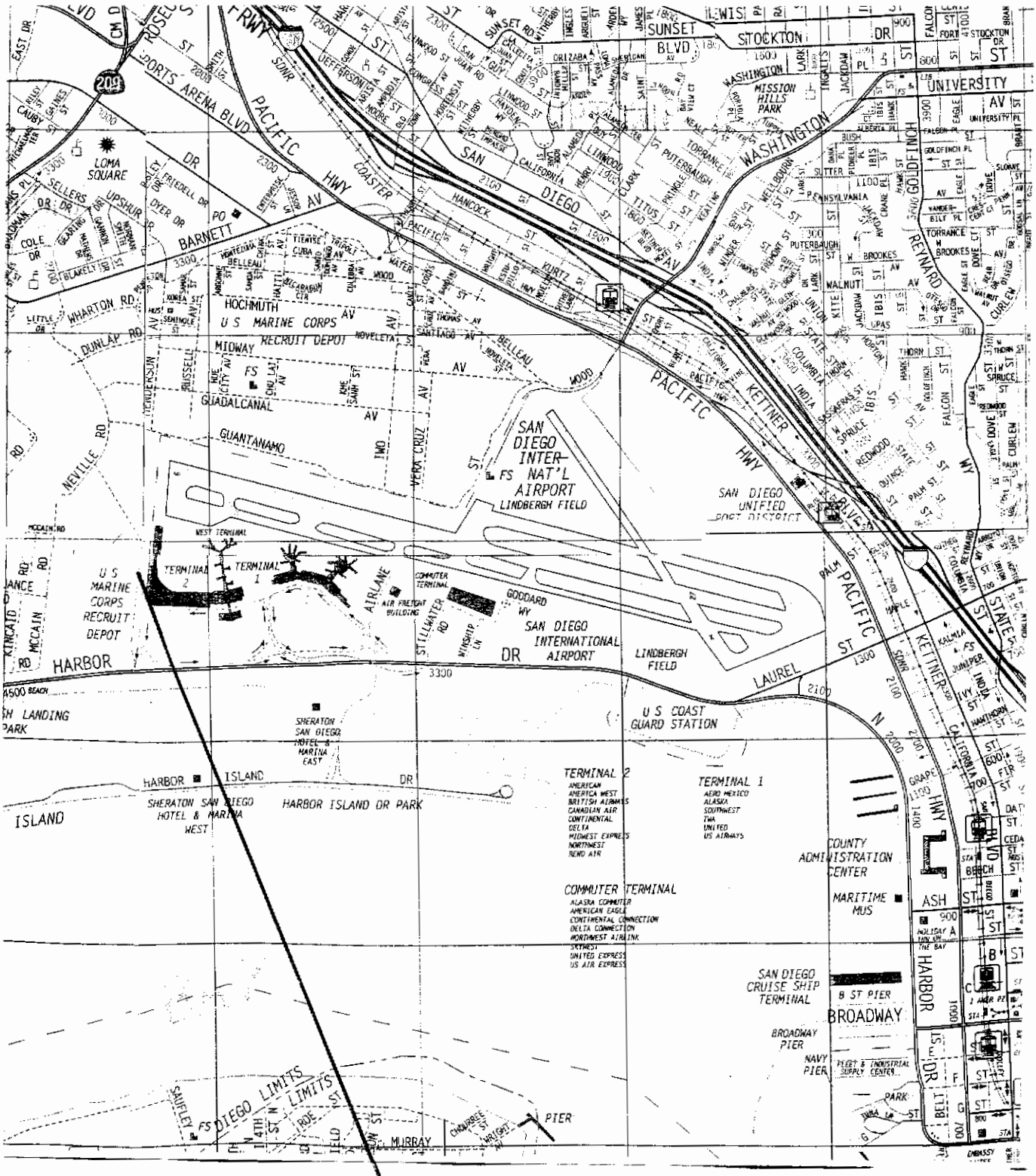


EXHIBIT NO. 1
APPLICATION NO.
6-08-66
Location Map
California Coastal Commission

Terminal Improvements NOT included in proposed project

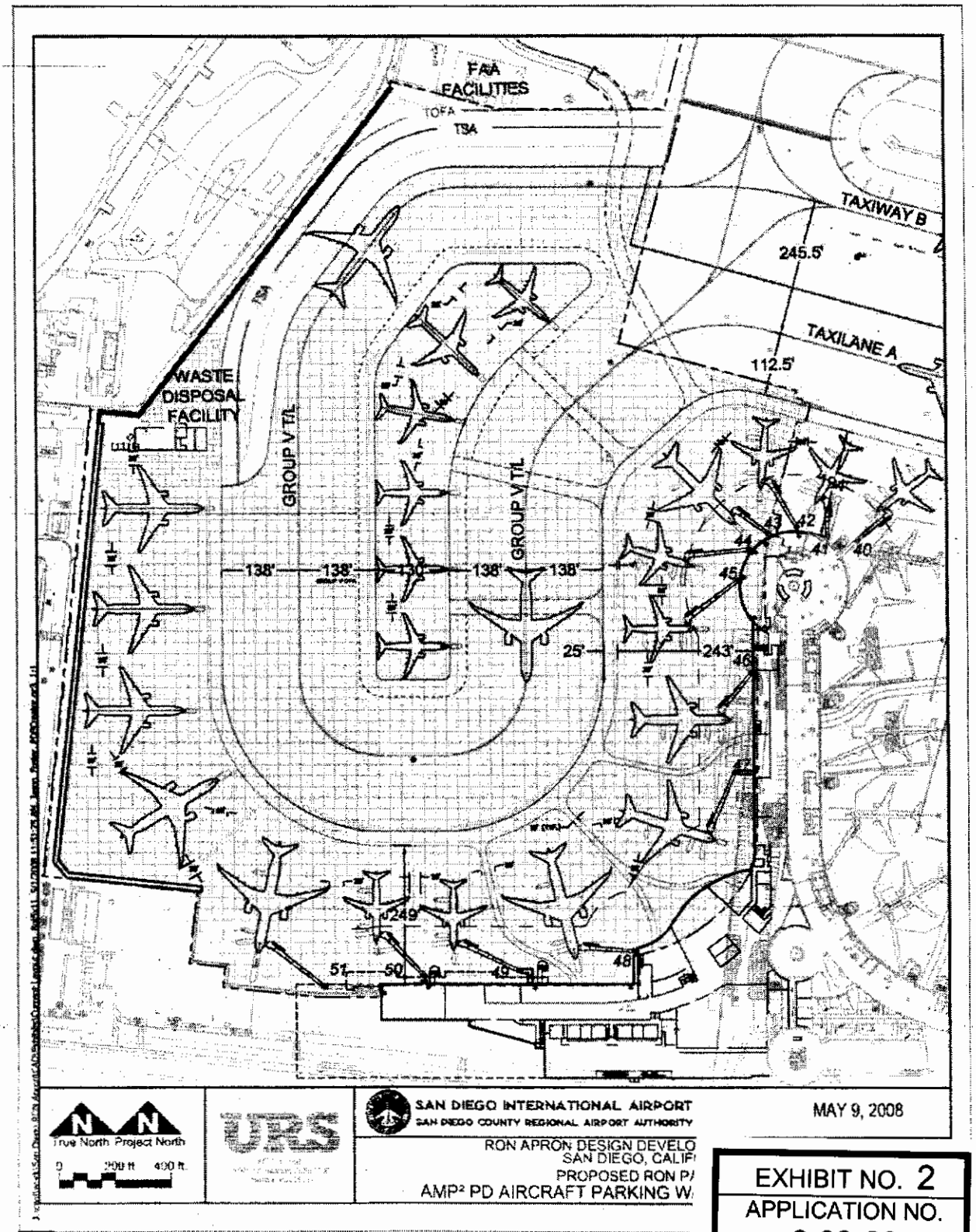
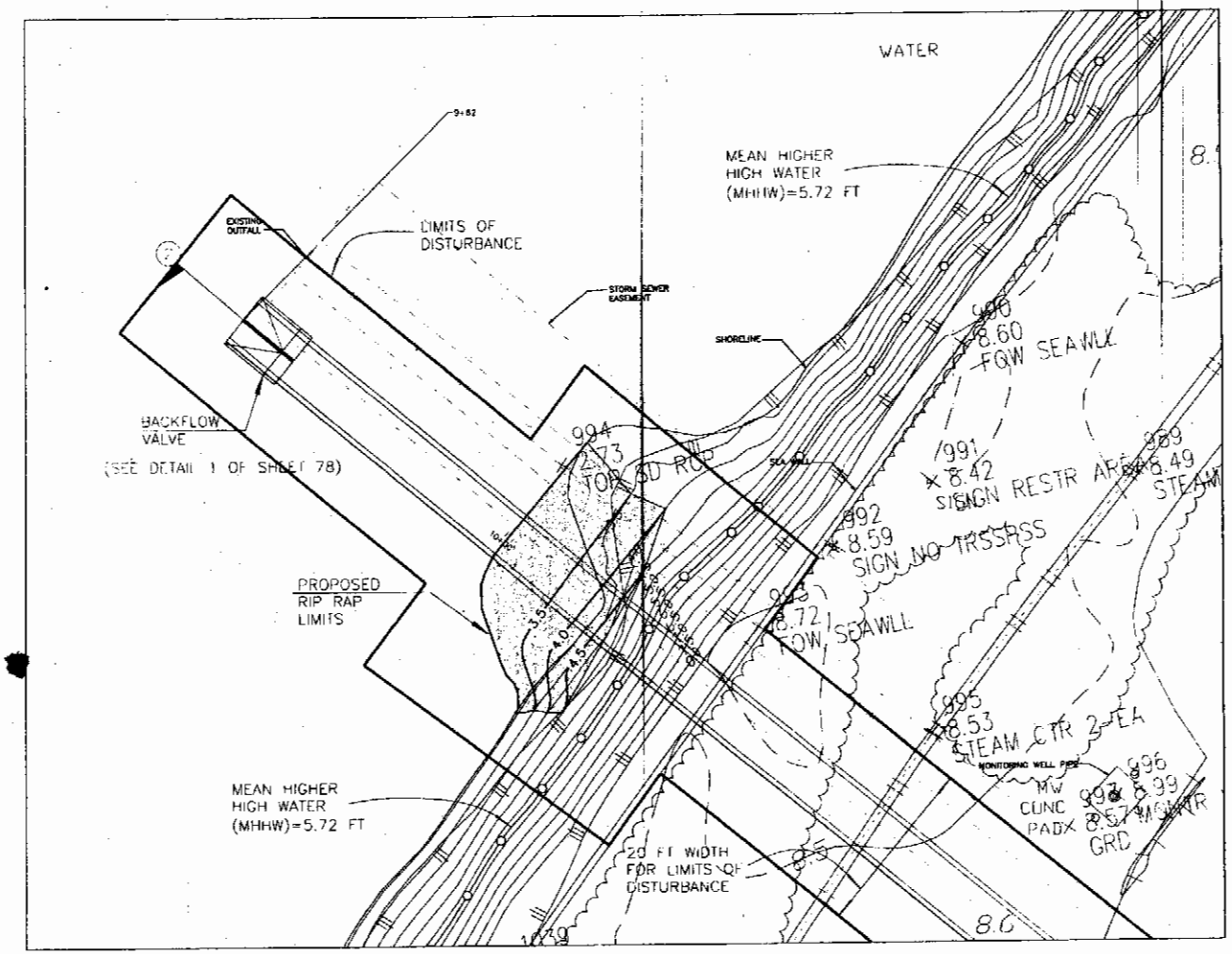
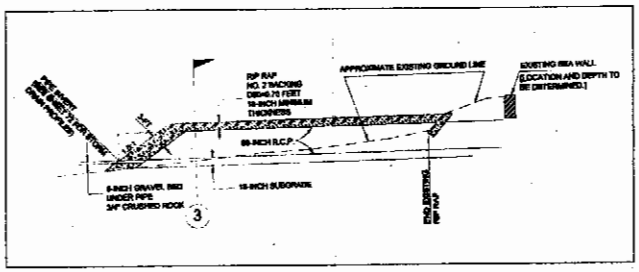


Figure 1
AMP² PD Aircraft Parking w/URS Modific

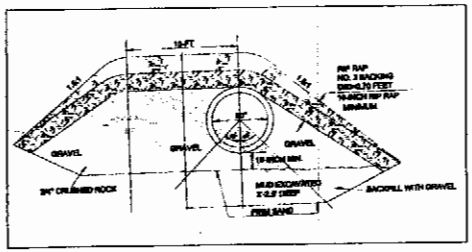
EXHIBIT NO. 2
APPLICATION NO.
6-08-66
Apron Site Plan
California Coastal Commission



1 / 8577 STORM DRAINAGE OUTFALL PLAN
SCALE: 1 INCH = 5 FEET



2 / 7777 ELEVATION: 60-INCH RCP OUTFALL
SCALE: NTS



3 / 7777 CROSS SECTION: 60-INCH RCP OUTFALL
SCALE: NTS

EXHIBIT NO. 3
APPLICATION NO.
6-08-66
Storm Drain Outlet
California Coastal Commission

GRAPHIC SCALES
0 10 ft 20 ft

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SAN DIEGO INTERNATIONAL AIRPORT
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

SAN DIEGO INTERNATIONAL AIRPORT
RON APRON DESIGN DEVELOPMENT-PHASE II
STORM DRAINAGE OUTFALL PLAN AND DETAILS

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February 22, 2009

MEMORANDUM

To: Diana Lilly
From: Jack Gregg, Ph.D., R.G.
Water Quality Supervisor
Re: San Diego Airport Remain Over Night (RON) Apron project Water Quality

Summary:

The San Diego Airfield Remain Overnight Parking (RON) Apron project, as proposed, includes a runoff control system designed to treat stormwater from the 85th percentile storm event, minimize runoff pollutants generated on site using source control best management practices and capture and treat all dry weather runoff. Since the project creates 37.9 acres of new impervious surface it is required to implement treatment control Best Management Practices (BMPs), in addition to site design and source control BMPs and develop a plan describing the stormwater and dry weather runoff controls. The San Diego County Regional Airport Authority (SDCRAA) has developed plans describing in detail the overall airport polluted runoff control plan and the specific BMPs being developed to address the runoff from the RON project.

Documents Reviewed:

For this project, the Coastal Commission's water quality staff reviewed the following documents supplied by the San Diego County Regional Airport Authority (SDCRAA): BMP Recommendations Report for Storm Drainage System BMP Program at San Diego International Airport, March 2006 (BMP Report), Urban Storm Water Mitigation Plan for Remain Over Night Apron Project at San Diego International Airport, San Diego, California January 2009 (USWMP), the San Diego County Regional Airport Authority Standard Urban Storm Water Mitigation Plan (SUSWMP), the January 9, 2009 letter from Ted Anasis to Sherilyn Sarb (January 9 letter); and the February 18, 2009 letter from Ted Anasis to Jack Gregg (February 18 letter). Staff also reviewed documents supplied by the RWQCB including: the Navy Clean 3 Program, Final Remedial Investigation Report for IR Site 12, the Boat Channel, Former Naval Training Center, San Diego, California (October 2003).

Background

The RON project will discharge stormwater and treated dry weather runoff to the Navy Boat Channel, an arm of the San Diego Bay at the west end of the airfield. The Navy Boat Channel has been subjected to contaminated discharges from past last uses such that the sediments, water quality and habitat have been adversely impacted. The adverse conditions in this channel are being evaluated by the San Diego Regional Water Quality Control Board (RWQCB) and the US Navy for possible cleanup. At the present time the channel has not been included in the state's Clean Water Act Section 303(d) list of impaired water bodies. Nevertheless the elevated levels of heavy metals, organic chemicals, and hydrocarbons serve to identify pollutants of concern for any project discharging to the channel. The Airport used this list of pollutants of concern (POCs) to design the water quality control program associated with the RON project.

The project includes construction Best Management Practices (BMPs), site design BMPs, source control BMPs, and treatment control BMPs designed to address the potential runoff from the site. Since the project storm water outfall will create fill in the Navy Boat Channel, the project will require a Clean Water Act (CWA) Section 404 permit from the US Army Corps of Engineers and a CWA Section 401 Water Quality Certification from the San Diego Regional Water Quality Control Board (RWQCB). The RWQCB are currently working on the 401 certification to ensure that this project meets all state water quality requirements, especially evaluating mitigation of the impacts of the outfall structure on eel grass habitat. The RWQCB staff will also be evaluating the compliance of the overall project with applicable stormwater permits. The RWQCB staff plans to have staff recommendations by the end of February 2009, but final action by the staff and the board will likely occur after action by the Coastal Commission. The project will be subject to the requirements of both the statewide Construction Storm water Permit (Construction General Permit 99-08-DWQ) and the San Diego Municipal Storm Water Permit (R9-2007-0001).

The applicant has submitted the Urban Storm Water Mitigation Plan for Remain Over Night Apron Project at San Diego International Airport, San Diego, California January 2009 (USWMP) describing how the project will capture and treat all dry weather runoff from the site and runoff from the 85th percentile of storm event using site design, source control and treatment control BMPs. Stormwater from 9.6 acres of new impervious surfaces will drain to 1.75 acres of pervious pavement will detain and infiltrate up to the 85th percentile storm event (0.55 inches per 24 hours). Runoff from the balance of the project area will drain to a Storm Filter proprietary high rate media filter before discharging to the Navy Boat Channel.

Best Management Practices

The USWMP specifies that the project will include the following Site Design BMPs: minimize impervious surfaces consistent with the project purpose, include pervious pavement and gravel base rock to capture runoff from 9.6 acres of new impervious surfaces, minimize soil compaction in the area of pervious pavement, and energy dissipaters (rip rap) will be placed at the discharge of the storm drain system into the bay,

The project includes the following Source Control BMPs specified in the USWMP: storm drain signage at each inlet, the RON Apron Waste Disposal Facility is covered with a roof and paved to contain leaks and contact with precipitation, and manually activated spill containment valves are incorporated into manhole unit at five locations downstream of the trench drains. In addition, many operations and maintenance procedures are designed to prevent polluted runoff such as:

1. Provision of the appropriate level of employee, tenant and public training or education in non-storm water discharge management, i.e., spill response and prevention, non-stormwater pollution prevention, and hazardous materials management.
2. Limitation of the availability of outdoor water supplies (hose bibs) and posting of appropriate use signs to discourage uses that may pollute the storm drain system/receiving water.
3. Notification of Airport Operations and the Airport Authority Environmental Affairs Department if there is any evidence of illicit connections or illegal discharges.

The project includes the following Priority Development Project (PMP) Individual BMPs described in the USWMP: Equipment Wash Racks (which are self contained, covered with a roof, equipped with a clarifier, and connected to the sanitary sewer) and roadway BMPs which are addressed in the Treatment Control BMP section below.

The primary Treatment Control BMP selected for use was the StormFilter media filtration system supplied by Contech. This proprietary BMP consists of a series of media filter cartridges within an underground concrete vault. The filtration unit consists of one underground vault containing 162 cartridges filled with filter media. Stormwater is treated as it flows through the filter media, removing oil and grease, total suspended solids, and metals. The filtration unit was designed according to flow-based numeric sizing criteria based on the maximum flow rate of runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event. To prevent tidal inundation into the filtration device a backflow prevention device will be installed on the storm drain outfall. In addition, the pervious pavement area detains and infiltrates runoff from the design storm (0.55 inches per 24 hours) so that runoff is treated by adsorption of pollutants in soil layers beneath airport pavement.

BMP Selection Process

The SDCRAA conducted an extensive study to determine a suite of BMPs that would serve to protect coastal water quality. Since the project needs to accommodate the movements, operations and maintenance and parking of commercial airplanes, there are numerous constraints on the types of treatment control BMPs that can be used. These include that the BMPs cannot attract wildlife, must fit within limited areas and, if placed under taxiways, must support aircraft.

The USWMP describes the process that the Airport conducted to select the treatment control BMP for this project on page 4-22:

> "Given the siting constraint of not being able to incorporate BMPs aboveground within the RON Apron Project area, underground BMP systems such as settling basins, media filters, and high-rate media filters were evaluated. Settling basins and media filters are designed to capture and treat the water quality volume (WQV). Each of these technologies, therefore, requires a large area to capture the WQV. Settling basins were further eliminated from consideration because their pollutant removal performance is not as effective as media filters and high-rate media filters.
>
> Based on the above analysis, URS [the project consultant] narrowed the list of treatment control BMPs to infiltration facilities or practices (LID) [Low Impact Development], media filters, and high-rate media filters. To comply with the Municipal Permit LID requirements, a pervious infiltration area was incorporated into the project. The porous infiltration area treats 9.6 acres of the 37.9-acre project site. Refer to Section 4.4.1 and Appendix E for details.
>
> To determine the most feasible BMP to treat stormwater runoff from the remaining 28.3 acres of the project site, URS performed a feasibility analysis of three treatment control BMPs (StormFilter®, CDS®, MFS, and Austin Sand Filter); two of these BMPs (StormFilter® and CDS® MFS) are high-rate media filters, and the Austin sand filter is a media filter (refer to Appendix F). As a result of the feasibility analysis, the StormFilter® was selected. "

These two treatment control BMPs are designed to treat the pollutants of concern for the San Diego International Airport (including total aluminum, total and dissolved copper, total iron, TSS, and total zinc).

Monitoring Program

In response to questions about SDIA's stormwater monitoring program, airport authority staff provided the following description of their program:

"While the Authority has conducted stormwater runoff monitoring since 1994, in the 2006/2007 wet weather season, the Authority made significant revisions to our stormwater monitoring program. In the 2006/2007 wet weather season, the Authority expanded the monitoring program to address three objectives: 1) to comply with the NPDES Permit requirements applicable to the airport; but more importantly 2) to identify and characterize pollutants-of-concern (POCs) (source identification monitoring) and 3) to measure BMP effectiveness....", and

"The source identification sampling effort is a multi-year effort designed to identify and rank sources of pollutants of concern at the airport in terms of annual mass loading in stormwater, identify the potential for reduction in the concentrations of these pollutants of concern through BMP implementation, and identify that combination of sources best addressed through BMP implementation to achieve pollutant load reduction objectives. As many as 6 storms will be sampled each year of the program."

The following describes the pollutants of concern that are targeted by the monitoring program:

"San Diego International Airport (SDIA)...has been subject to the requirements of the General Industrial Permit since 1992. The General Industrial Permit outlines the water quality analyses that must be performed on stormwater runoff samples collected at the airport at least twice each year. The analytes are: pH, total suspended solids (TSS), total organic carbon (TOC), specific conductance (SC), biological oxygen demand (BOD), chemical oxygen demand (COD), ammonium (NH3), toxic chemicals, and other pollutants that are likely to be present in stormwater discharges in significant quantities. The 2005 Site Audit (Mactec, 2005) reviewed a 10-year history of stormwater runoff sampling data for SDIA to identify the "other pollutants that are likely to be present in stormwater discharges in significant quantities." The 2005 Site Audit reported the "other pollutants" to be (in order of descending significant quantities): copper (total and dissolved), total zinc, total aluminum, total iron, total lead, total petroleum hydrocarbons (TPH), methylene blue active substances (MBAS), and ethylene glycol. ... Copper and zinc were identified as the pollutants that are likely to be present in stormwater discharges in the most significant quantities since they exceeded the benchmark values (used in the 2005 Site Audit evaluation) more than 50 percent of the time (that is, they had the highest exceedance frequencies airport-wide and the highest benchmark exceedance frequencies for most of the outfalls and drainage basins). The SDCRAA stormwater sampling programs now use copper and zinc as the main pollutants to monitor when assessing stormwater BMP effectiveness and overall improvements in runoff quality

Water Quality Summary

The documents provided describe the site design, source control, priority development project BMPs and treatment control BMPs, and the basis for selecting those BMPs. The SDCRAA acknowledges that the effectiveness of the selected BMPs will vary depending on stormwater conditions, operation and maintenance and the media type used in the Storm Filter BMP. The SDCRAA currently has an airport wide effectiveness study, but has not yet designed a study to evaluate the effectiveness and most effective operation of the Storm Filter high rate media filter system. In order to provide regulatory agencies and the SDCRAA information to assure that the StormFilter BMP will be operated in a manner that is effective at protecting coastal resources a condition should be included that requires that an effectiveness monitoring program for that be designed and submitted to the Executive Director for approval.

As described above, the Coastal Commission's water quality staff has reviewed the site investigation reports and water quality plans for the Lane Field site. The project plans include a system of construction BMPs, site design BMPs, source control BMPs, and recommends treatment control BMPs that will adequately protect the aquatic organisms and other bay resources from site cleanup activities, construction activities, post-construction storm water and dry weather runoff. The site cleanup and construction activities will be closely regulated by both state (RWQCB) and local agencies. I would recommend that the Commission find that the proposed development, as conditioned, is consistent with Sections 30230 and 30231 of the Coastal Act.