



Save Our Heritage Organisation

Saving San Diego's Past for the Future

Monday, August 27, 2018

San Diego County Regional Airport Authority
Attn: Ted Anasis
P. O. Box 82776
San Diego, CA 92138

Re: draft EIR comments for Airport Development Plan (No. 2017011053)

Mr. Anasis,

After reviewing the draft Environmental Impact Report (EIR) for the Airport Development Plan (No. 2017011053), Save Our Heritage Organisation (SOHO) strongly urges the Authority to: 1) retain the historically intact Brutalist and Futurist style primary facade of Terminal One; 2) retain and relocate the c. 1931 United Air Hanger/Terminal, the oldest building on site; 3) historically evaluate and mitigate the airport runway itself as well as the widening of Route 163, a State Scenic Highway; and 4) consider the Climate Action Plan and historical resources with regard to the best use of developable land (not parking).

As noted within the Historical Resources Study for the draft EIR, the Brutalist style of the Terminal One primary (south) façade includes Futurist stylistic influences and “remains the same today as when it was built in 1967,” (p. 3.0-7), which means it continues to retain high integrity of design and material. Further, this Modern style is characteristic of both the 1967 period of development when the Airport initially expanded, “a response to an escalating increase in passengers traveling,” (p. 3.0-5), and reflects the original sense of place created by this rare combination of architectural styles. Significant under Criterion A/1, for a significant contribution to the broad patterns of history, the construction of Terminal One enabled Lindbergh Field to dock and maintain large jet engine aircraft, an advance into the jet age of aviation, and reflects the modernization of San Diego through an increase in air traffic. Also significant under Criterion C/3 (primary south façade only), the façade of Section A is minimally altered and continues to reflect the distinct characteristics of Brutalism and Futurism from 1967. The primary façade of Terminal One should be retained and included within the development plan because this façade continues to illustrate a high degree of historical integrity, is significant under Criteria A/1 and C/3, and provides a unique sense of place due to its architectural style.

The c. 1931 United Airlines Hanger and Terminal (UAHT), once relocated already to save from demolition, should also be retained and relocated again on the site. Significant under Criterion A, this is the oldest surviving structure associated with the earliest period of Lindbergh Field's development between 1928 and 1933. Found previously significant under Criterion C as well, this building is also an example of an early aircraft hanger (and its construction) that is typical of the period. Although no longer found significant for architecture, the loss of integrity noted within the Historical Resources Survey is a result of this building being determined significant and relocated once already, which warrants additional consideration in this case due to the high level of significance under Criterion A and San Diego's role in the larger aviation and space age industry. The UAHT building must not be demolished.

Additional historical resources to include and evaluate within the Historical Resources Survey are the existing runway itself and Route 163, which is a state scenic highway. Not only is it crucial to identify

these historical resources within the survey and historical narrative itself, but the draft EIR and alternatives must take these resources into consideration, and any proposed mitigation should be specified. Specifically, the southeast corner of the existing runway was approximately the original fill area, where both takeoffs and landings occurred until the airport was completed in 1928. This is also where Hawley Bowlus test flew what was likely the first American designed and built sailplane in 1928. In addition, several other aircraft designs took off for the first time from this runway, including the first production PBY Catalina, XPB2Y-1 Coronado, and XB-24 Liberator, which makes this runway even further historically significant and necessary to evaluate. In addition, the proposed widening of state scenic Route 163 initiates a number of concerns, primarily that this historic resource has not been identified within the historic survey for this project. The impacts of the changes to this highway must be evaluated, addressed within the development plan, and mitigated.

Last, consideration must be given to San Diego's Climate Action Plan (CAP) with regard to the best use of developable land and the CAP's strategy to "promote alternative modes of travel, revising the parking standards, and managing parking," (p.23, Ch. 2, Reducing Emissions, Strategy 3). SOHO strongly urges the Authority to evaluate the goal to "accommodate parking demand" through an additional 6,000 proximate parking spaces. Not only is there a better long-term use for this land, including the retention of historical resources, but the plan should prioritize alternative modes of travel (not accommodating the parking demand), expanding the airport's own shuttle service into the community, and the strategies outlined in the CAP.

SOHO emphatically advises the Airport Authority to retain the facade of Terminal One, relocate and retain the United Air Hanger/Terminal (UAHT), identify and mitigate the runway itself as well as historic scenic Highway 163, and consider the Climate Action Plan with regard to best use of land (not parking), which then broadens the opportunity for solutions to retain the Terminal One facade and the UAHT.

Thank you for the opportunity to comment,



Bruce Coons
Executive Director
Save Our Heritage Organisation