

# **FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

**Gillespie Field 70-acre Redevelopment Project**  
**State Clearinghouse Number 2005111092**

**Lead Agency:**

**County of San Diego**  
**Department of Public Works**  
**5469 Kearny Villa Road, Suite 305**  
**San Diego, California 92123-1152**  
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**June 20, 2012**

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# **GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT**

## **FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT AND SUPPORTING DOCUMENTATION**

**STATE CLEARINGHOUSE NUMBER 2005111092**

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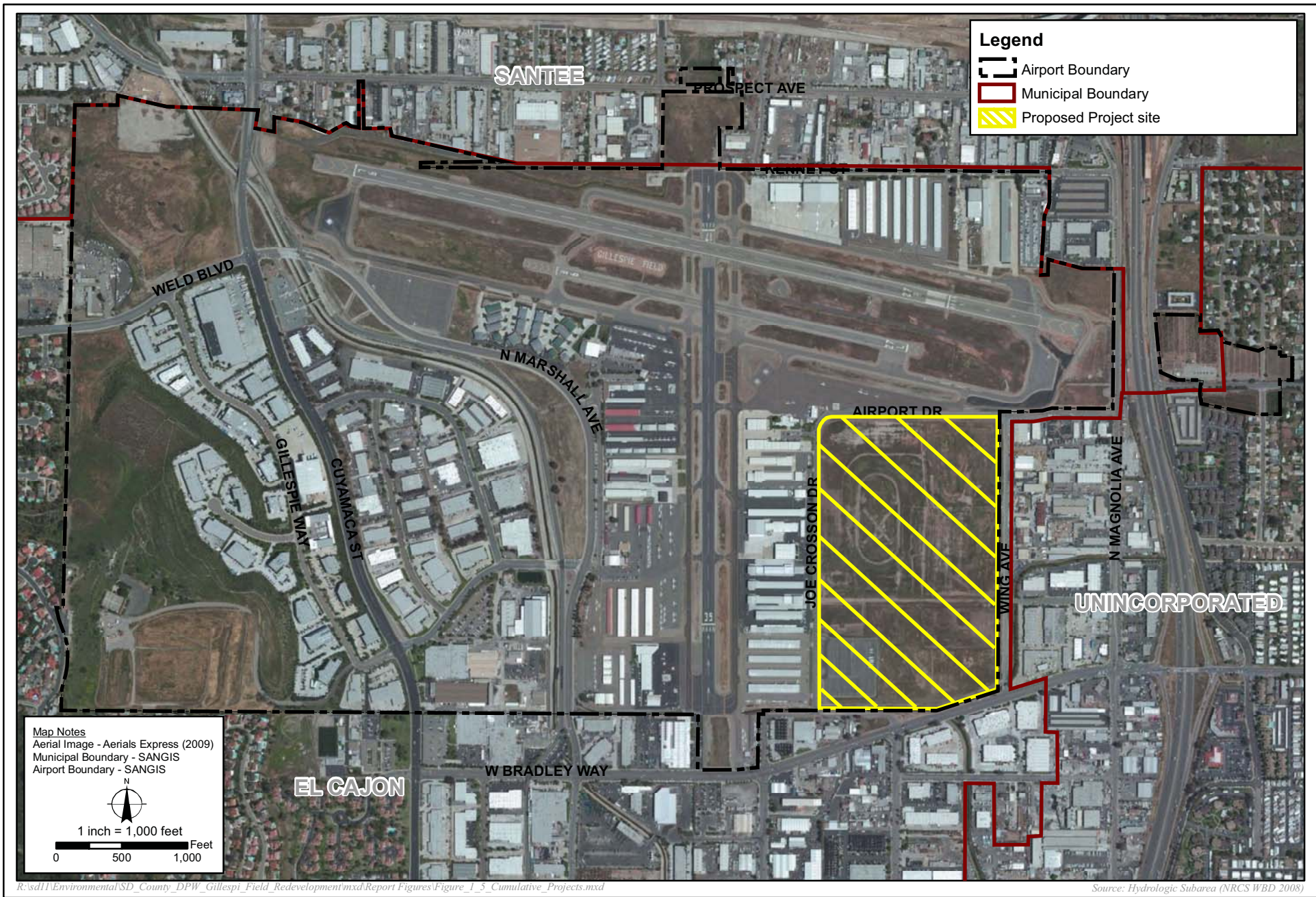
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# ATTACHMENT A



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**Gillespie Field 70-Acre Redevelopment Project**

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**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND  
TECHNICAL APPENDICES (INCLUDED AS CD)**

**ERRATA SHEET FOR THE  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**

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Attachment B

**ERRATA**

**Gillespie Field 70-acre Redevelopment Project  
Final Program Environmental Impact Report  
State Clearinghouse Number 2005111092**

**Lead Agency:**

**County of San Diego  
Department of Public Works  
5469 Kearny Villa Road, Suite 305  
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**June 2012**

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## ERRATA SHEET

### FOR THE GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT PROGRAM ENVIRONMENTAL IMPACT REPORT

This Errata Sheet identifies changes to the Draft Program Environmental Impact Report (DPEIR) for the Gillespie Field 70-acre Redevelopment Project. The text of the DPEIR has not been altered. This Errata Sheet identifies specific locations in the DPEIR where changes have been made based on comments received during the public review period and changes made for the purpose of providing more current information. Deletions to the DPEIR are shown as ~~struckthrough~~ text and revisions/additions are shown as underlined text.

The following is a list of pages and locations (section, page, and paragraph) in which the changes are to be included in this Final PEIR.

<b>FINAL PEIR Section</b>	<b>LOCATION (Section, Page, Paragraph)</b>
1. Table of Contents	Acronyms and Abbreviations
2. Summary Chapter	Section S.1.2, Page S-2, first paragraph
3. Summary Chapter	Section S.4, Page S-2, fifth paragraph
4. Summary Chapter	Section S.5, Page S-3 second paragraph
5. Summary Chapter	Table S-1
6. Chapter 1	Section 1.2.1.2, Page 1-3, second paragraph
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16. Chapter 2	Section 2.2.3, Page 2-24, third paragraph
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18. Chapter 2	Section 2.2.3.1, Page 2-26, fourth paragraph
19. Chapter 2	Section 2.2.3.1, Page 2-26, (new) fifth paragraph
20. Chapter 2	Section 2.2.3.2, Page 2-27, last paragraph
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The following changes are incorporated into the text of the Final PEIR:

**1. Table of Contents, Acronyms and Abbreviations has been revised as follows:**

SDCRAA	San Diego <u>County</u> Regional Airport Authority
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**2. Summary Chapter, Section S.1.2, Page S-2, first paragraph has been revised as follows:**

The County is the CEQA Lead Agency for the public infrastructure improvements as described above; therefore the County will review and conduct subsequent environmental review on these projects as discussed further in Section 1.5 of this PEIR.

**3. Summary Chapter, Section S.4, Page S-2, fifth paragraph has been revised as follows:**

The County Board of Supervisors (Board) would be required to ~~determine if the benefits of the proposed project outweigh the potential significant unavoidable impacts related to traffic and transportation. In making this decision, the Board will have to balance the benefits of the Proposed Project against the unavoidable significant effects. The Board will also need to decide whether significant impacts to biological resources, and hazardous materials, and traffic and transportation~~ can be reduced to less than significant with implementation of proposed mitigation measures, or whether or not to adopt a Project Alternative that would reduce the impact to less than significant.

**4. Summary Chapter, Section S.5, Page S-3, second paragraph has been revised as follows:**

Alternatives are required to be identified and evaluated to determine if they would lessen or avoid significant impacts identified in Chapter 2.0. The following ~~three~~ two alternatives are compared in this PEIR to the Proposed Project and are summarized below in order of environmental superiority based on the detailed analysis in Chapter 4.0.



5. Summary Chapter, Table S.1 has been revised as follows:

**Table S.1. Summary of Significant Effects and Mitigation Measures**

Impact Number and Description of Impact	Mitigation Measure	Significance After Mitigation
<p><b>HZ-1.</b> Grading or excavation on the site may disturb contaminated soil, presenting potential health risks to construction workers. Additionally, the presence of contaminated soil on the site may present significant health risks to future occupants of the site. Excavation on the site may encounter soil and/or groundwater contaminated with TCE and 1,4-dioxane originating from the Ketema plume, presenting potential health risks to workers on the site or during operation of the proposed on-site aviation uses. This would be considered a significant <u>indirect</u> impact.</p>	<p><b>M-HZ-1a.</b> County Airports shall prepare a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site.</p> <p>This mitigation measure shall be implemented prior to the <del>development of aviation-related uses on the Proposed Project site.</del> <u>Excavation of contaminated soil related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site.</u> <del>shall require preparation of a</del> <u>The Soil Management Plan shall be prepared</u> in accordance with the Environmental Protection Agency (EPA) and the County Department of Environmental Health (DEH) requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The County prepared a Soil Management Plan (Rincon 2011c) for the Proposed Project to comply with this measure and it is included in Appendix E of this PEIR.</p>	<p>Less than Significant</p>
	<p><b>M-HZ-1b.</b> As a condition of lease agreements for development between the County and private developers, County Airports shall require individual project developers to prepare and implement a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds and before any discharge to a public sewer system or storm drain. This mitigation measure shall be implemented prior to the</p>	

Table S.1. Summary of Significant Effects and Mitigation Measures

Impact Number and Description of Impact	Mitigation Measure	Significance After Mitigation
	<p><del>development of aviation-related uses on the Proposed Project site.</del>  <del>Excavation of contaminated soil related to the private development of aviation-related uses on the Proposed Project site. shall require</del>  <del>preparation of a</del> The Soil Management Plan shall be prepared in accordance with EPA and County DEH requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The Soil Management Plan for the private development projects shall be prepared by each individual developer and can tier off the Soil Management Plan already prepared for the public development portion, which is included in Appendix E</p>	
<p><b>TR-1.</b> Addition of the Proposed Project traffic would exceed the significance thresholds at the segment of Bradley Avenue between the SR-67 southbound and northbound ramps because it would add 218 Average Daily Trips (ADTs) under LOS E conditions, which is greater than the significance threshold of 200 ADT for a two-lane roadway operating under LOS E conditions. This results in a <i>significant direct impact</i></p>	<p><u><b>M-TR-1/2.</b> Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project.</u></p>	<p><u>Less Than Significant</u>  <u>Significant and Unmitigable</u></p>
<p><b>TR-2.</b> Addition of the Proposed Project traffic would exceed the significance threshold at the intersection of Bradley Avenue and the SR-67 northbound ramps because it increases the delay by 5.5 seconds, which is greater than the significance threshold of 2 seconds for LOS E conditions (PM peak hour). This results in a</p>	<p><u>Galtrans proposes to reconstruct the existing SR-67 interchange at</u></p>	<p><u>Less Than Significant</u>  <u>Significant and Unmitigable</u></p>

Table S.1. Summary of Significant Effects and Mitigation Measures

Impact Number and Description of Impact	Mitigation Measure	Significance After Mitigation
<i>significant direct impact.</i>	Bradley Avenue. The construction schedule for this Caltrans project is not known at this time. The Bradley Avenue/SR-67 interchange project is estimated to cost approximately \$34 million, and is included in the 2030 San Diego Regional Transportation Plan. Proposed improvements to the Bradley Avenue/SR-67 interchange would alleviate existing traffic congestion at this interchange, and could accommodate increased traffic volumes as a result of the Proposed Project. However, because the Bradley Avenue/SR-67 interchange project is not under the direct oversight or jurisdiction of the County, the County cannot anticipate that these improvements would be completed prior to implementation of the Proposed Project. Therefore, direct impacts would be <i>significant and unmitigable</i> .	

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**6. Chapter 1, Section 1.2.1.2, Page 1-3, second paragraph has been revised as follows:**

A Finding of No Significant Impact (FONSI) would be issued by FAA for the ~~With FAA final unconditional approval of the ALP, which depicts the Proposed Project improvements. Upon FAA's issuance of the FONSI,~~ would be issued with the Finding of No Significant Impact (FONSI) pursuant to the NEPA document, initial construction would commence ~~including~~ the redevelopment of the Proposed Project site with infrastructure facilities prior to the private development. Full implementation (or build-out) of the Proposed Project site is not anticipated to occur until 2019.

**7. Chapter 1, Section 1.6, Page 1-6, third paragraph has been revised as follows:**

The County, as the CEQA Lead Agency for the Proposed Project, is not subject to City of El Cajon regulations. In order to secure building permits, each private developer proposing future private development at Gillespie Field will need to comply with the City of El Cajon plans and regulations. The proposed uses for the 70-acre site include taxiways, runway access, infrastructure facilities, hangar spaces, aircraft tie-downs, apron area, automobile parking, aircraft maintenance space, and aviation office and business space. All of these uses are consistent with the City of El Cajon General Plan industrial land use designation and the manufacturing zone that applies to the site. The City of El Cajon General Plan also includes a Special Development Area Overlay to allow flexibility for uses within Gillespie Field, specifically for airport-related support facilities and office uses. Since future aviation uses on the Proposed Project site must conform to the requirements of the Special Development Overlay, it is not anticipated that any future developments under the Proposed Project would be in conflict with the intent of the Special Development Overlay.

All future private development at Gillespie Field would be subject to a lease agreement with the County, then approvals by the City of El Cajon. Accordingly, when private developers propose building and grading permit applications, the City of El Cajon shall review conformity of the proposed use with their established policies and regulations to ensure compatibility with their local land use plans and policies.

Pursuant to CEQA Section 15168, the City of El Cajon can use this PEIR during the project permitting review of future private development. In addition, compliance with the regulations and project design features listed in this PEIR will be a requirement of the lease agreement future private developers must enter into with the County.

**8. Chapter 1, Section 1.8 (starts on Page 1-7) has been revised as follows:**

The City of El Cajon is largely built out and, therefore, future development is largely constrained within this jurisdiction. The City is now focusing on business growth and redevelopment. The lack of vacant land makes residential growth limited. Housing units are projected to grow only 87 percent between 2000 and 2030, and population is projected to grow only 1444 percent.

Employment is expected to grow a moderate 28~~45~~ percent. This level of growth is much lower than what is projected for the entire County.

The City of Santee is in the process of developing a substantial residential base. SANDAG forecasts that the total population for the area will increase 36% percent during the 30-year period from 2000 to 2030. In comparison, the population of the County will grow 42%. With good economic indicators, available land for development, a skilled labor force, transit linkage to downtown San Diego by trolley and bus, and access to three regional freeways, the City of Santee offers good opportunities for economic growth and expansion.

Growth-inducing impacts refer to effects from development that possess characteristics such as being located in isolated, undeveloped or under developed areas necessitating the extension of major infrastructure (e.g., roadways, sewer and water lines and facilities, etc.), or other services that encourage unanticipated growth. Projects that induce new development in areas requiring major new infrastructure, employment centers, or residential communities may be considered to have growth-inducing impacts. The causes of growth typically involve a complex and varied relationship among several factors including economic setting, employment opportunities, natural population increase, public policies, and local environment. All of these influence the rate and extent of growth, but economic and employment opportunities (and to a lesser extent local birthrates) are considered the most important factors in the San Diego region. Regardless of the environmental amenities or favorable local attitudes toward growth in a specific area, significant sustained population growth will normally not occur without adequate employment opportunities.

The Proposed Project includes the redevelopment of a site within the City of El Cajon that is zoned for commercial/industrial uses and is completely surrounded by urban development. Gillespie Field has provided a home to aviation services and business space in its existing location for over 70 years. The redevelopment of the Proposed Project site is an extension of these existing uses and will allow the airport to accommodate the increasing need to provide aviation-related uses in the area. This would include the same types of commercial uses as the surrounding uses currently operating at Gillespie Field. This would not result in a substantial need for increased or expanded public services to the area, which may remove obstacles to growth.

The Proposed Project and continued development of Gillespie Field has been anticipated in regional and local land use planning documents such as the County of San Diego General Plan, Airport Land Use Compatibility Plan (ALUCP), FAA's Airport Improvement Program, as well as planning documents of local jurisdictions such as the Cities of El Cajon and Santee General Plans. As discussed further in this PEIR, various planning documents were evaluated for consistency with aviation development at Gillespie Field. The site is an existing 757-acre facility surrounded by urban development, and the Proposed Project would have no impact on growth in the area. The existing 757-acre facility currently supports aviation infrastructure, as well as aviation and non-aviation businesses. As such, the Proposed Project would not substantially change the economic characteristics of the surrounding area. In addition, given that Gillespie Field is connected to the transportation network by major highways (SR-52, SR-125, SR-67,

and I-8) and offers a trolley station (serving both Orange and Green lines), new major transportation infrastructure and residential development and relocations are not required because the site is easily accessible from existing homes. Accordingly, the Proposed Project would not generate a need for the construction of additional housing or major transportation infrastructure. Furthermore, the Proposed Project is a revenue generating project for the County through the lease agreements with private developers; however, it does not involve residential development and is not anticipated to substantially increase employment opportunities in the area.

The addition of 55 acres of commercial development to an existing 757-acre facility already providing similar services is a relatively small increase. The proportional increase of on-airport employment opportunities would provide an economic benefit to the surrounding areas. However, this job sector improvement would be adequately accommodated by the existing community as discussed and anticipated in local and regional planning documents. Accordingly, the Proposed Project would not create a secondary effect that would require or necessitate the need of additional housing due to population growth, or the need for additional transportation facilities. Furthermore, the Proposed Project would alleviate the existing unmet demand for based aviation support facilities, and bring the County into compliance with FAA forecasts and grant assurances as described in Sections S.1, S.1.2, 1.1 and discussed in the project objectives. Therefore, the Proposed Project will not substantially induce growth and will not result in substantial growth-inducement impacts within the local community or the region. Therefore, the Proposed Project would not result in growth-inducement as it would not cause a substantial need for increased services to the area, nor would it result in population growth requiring the need for residential development.

**9. Chapter 1, Table 1.1 has been revised as follows:**

**Table 1.1. Matrix of Approvals/Permits**

Approving Agency	Discretionary Approval/Permit
County of San Diego	Certification of the PEIR and adoption of a MMRP
	<u>Apply for and accept grant funds for construction</u>
	<u>Authorization to advertise and award a contract for construction of County infrastructure improvements</u>
	Board of Supervisors approval for lease agreements for any proposed private development at Gillespie Field
San Diego <u>County</u> Regional Airport Authority	Airport Land Use Commission findings in a Statement of Consistency with the adopted Airport Land Use Compatibility Plan (ALUCP) for Gillespie Field

10. Chapter 1, Table 1.2 has been revised as follows:

Table 1.2. Cumulative Projects

Map Indicator	Project Name and Case Number	Location	Project Description	Status	Project-Level Related Impacts
21	Pacific Scene Industrial Park (Also referred to as Forester Creek Industrial Park) Unknown Case Number	Northwestern Corner of Cuyamaca Avenue and Weld Boulevard APN 38719006	Industrial Park – 470,000 sf of industrial uses	<del>Pending approval; Final prepared 5/09</del> <u>Final EIR certified 8/11/09</u>	Significant Impacts: Air Quality (significant and unavoidable construction and operation), Biological Resources (15.6 acres of non-native grassland; M.M. = off-site acquisition of 7.8 acres) (nesting birds impact – M.M. = pre-construction surveys and maintaining a 500-foot buffer); Ambrosia impact – M.M. = compliance with Section 7 and 10a of Endangered Species Act; and preparation of habitat conservation plan) (wetlands impact at Forester Creek due to fill of jurisdictional waters – M.M. = wetland mitigation and monitoring plan) Hazards and Hazardous Materials (construction period air traffic hazard – M.M. = coordination with airport manager and submitting Notice to Airmen) Noise (operation of HVAC equipment M.M. = noise walls around the HVAC equipment) Transportation and Traffic (direct impact and cumulative impacts to features unrelated to Gillespie project).
23	Electrical Peaker Plant	222 N. Johnson Ave.	Additional power generator at an existing SDG&E substation on 2.2 acres	<del>Negative Declaration approved 7/13/09. prepared 5-09. Project construction complete</del>	Less than Significant Impacts: Land Use and Growth Inducement, Geologic Conditions, Hydrology and Water Quality, Air Quality and Odor, Transportation, Traffic, and Parking, Mineral Resources, Health and Safety, Noise, Public Services, Facilities, and Public Utilities, and Visual Effects and Neighborhood Character No Biological Resources Impact - paved site Not within Gillespie Field Land Use Plan

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**11. Chapter 2, Section 2.1.2.1, Page 2-7, fifth paragraph has been revised as follows:**

No other special-status plant species were found to occur within the Proposed Project site. The County will conduct focused special-status floral surveys prior to project construction. If additional special-status floral species are detected, impacts will be evaluated in accordance with the County guidelines and applicable regulations as overseen by a qualified biologist.

**12. Chapter 2, Section 2.1.2.4, Page 2-9, third paragraph has been revised as follows:**

Although no raptors and migratory birds have been observed on-site, full implementation or build-out of the Proposed Project site is not anticipated to occur until the entire 70-acres is fully developed in 2019. The likelihood that the Proposed Project site would support suitable nesting habitat for raptors and migratory birds is low as long as regular maintenance and mowing is conducted to prevent suitable habitat vegetation to re-grow at the site (AMEC 2011). The County would continue regular maintenance of the Proposed Project site until build-out and conduct preconstruction nesting bird surveys for all future construction activities that are within the breeding season (i.e., January 15 ~~February 1~~ to August 31 ~~30~~).

**13. Chapter 2, Section 2.1.3, Page 2-10, fourth paragraph has been revised as follows:**

The cumulative study area encompasses a 1-mile radius around the Proposed Project site. ~~This boundary was extended to accommodate for cumulative projects with impacts to biological resources, specifically San Diego ambrosia.~~ This is an appropriate cumulative boundary because the area surrounding the Proposed Project is fully developed and does not provide natural boundaries.

**14. Chapter 2, Section 2.1.3, Page 2-11, third paragraph has been revised as follows:**

Impacts to non-native grassland from the Proposed Project do not ~~make~~ constitute a cumulatively considerable contribution to a significant cumulative impact to this vegetation community due to the small proportion of non-native grassland impacts (1.1 acres) relative to the overall non-native grassland impacted (56.30) within the cumulative study area.

**15. Chapter 2, Section 2.2.2, Page 2-24, first paragraph has been revised as follows:**

County of San Diego, DEH Hazardous Materials Division-UST Program

The Hazardous Materials Division (HMD) is one of the four divisions of the Department of Environmental Health (DEH). The primary goal of the Hazardous Materials Division (HMD) is to protect public health and the environment by promoting compliance with applicable laws and regulations. HMD is the Certified Unified Program Agency (CUPA) for San Diego County responsible for regulating hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, aboveground petroleum storage and risk management plans. As such, under the California Hazardous Waste Control Act, State of California Health and Safety Code, Division 20, Chapter 6.5, and the California



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~~Code of Regulations Title 22, the County (DEH) has the authority to serve as the lead oversight regulatory agency (i.e. authorized local health officer) concerning hazardous materials. The DEH Hazardous Materials Division (HMD) UST Program administers and enforces federal and state laws and regulations and local ordinances for the construction, installation, modification, upgrade, and removal of USTs in San Diego County. If contamination is discovered or likely to be present, owners or operators of USTs are required by law to report the contamination to the DEH HMD and SAM programs and to take corrective action.~~

**16. Chapter 2, Section 2.2.3, Page 2-24, third paragraph has been revised as follows:**

The identified significance thresholds for impacts related to hazardous materials are based on criteria provided in the County's Guidelines for Determining Significance to Hazardous Materials (County 2007g), and to Emergency Response Plans (County 2007h), and Wildland Fire and Fire Protection (2010d). These Guidelines were adapted from Appendix G of the CEQA Guidelines.

**17. Chapter 2, Section 2.2.3.1, Page 2-26, third paragraph has been revised as follows:**

Design features, when incorporated into the design of future redevelopment on the Proposed Project site, would avoid a significant hazard to the public or the environment. During construction of the public infrastructure improvements, ~~the~~ County shall ensure that all contractors and subcontractor project personnel receive training regarding the appropriate work practices necessary to comply with the applicable environmental laws and regulations related to hazardous material spill prevention and response measures. The County shall prepare and implement a Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) to address routine use of hazardous materials, in conformance with title 40, CFR, Part 112; and a Storm Water Pollution Prevention Plan (SWPPP) in conformance with the State Water Resources Control Board prior to the construction of facilities improvements to reduce pollutants in storm water runoff. Additionally, as a condition of lease agreements for private development, the County shall require project developers of individual development projects to prepare a SWPPP and Business Emergency Plan (BEP) to address transport, storage, use, and disposal of hazardous materials following construction of proposed developments.

**18. Chapter 2, Section 2.2.3.1, Page 2-26, fourth paragraph has been revised as follows:**

Grading or excavation on the site which may encounter soil and/or groundwater contaminated with TCE and 1,4-dioxane originating from the Ketema plume could present potential health risks to workers on the site or during operation of the proposed on-site aviation uses. This is a *significant indirect impact* (HZ-1).

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**19. Chapter 2, Section 2.2.3.1, Page 2-26, (new) fifth paragraph has been added as follows:**

Although the Proposed Project has the potential to handle regulated substances subject to CalARP RMP requirements, no school or day care are located within 0.25 mile of the Proposed Project. Therefore, *no impact* would occur.

**20. Chapter 2, Section 2.2.3.2, Page 2-27, last paragraph has been revised as follows:**

The EDR database searches ~~did not identify~~ thirty sites located within one-quarter mile of the Proposed Project site (including eight adjacent properties that generate, store, or dispose of hazardous materials) that are listed as being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or on a hazardous release site identified by the DTSC compiled and updated pursuant to Section 25356 of the California H&SC, including landfills, burn ash, or munitions. The EDR search did, however, identify eight adjacent properties as sites that generate, store, or dispose of hazardous materials. A review of those sites indicated no evidence that a hazardous substance release occurred (Rincon 2011a). Therefore, there is *no significant impact* with respect to listings of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or on a hazardous release site identified by the DTSC compiled and updated pursuant to Section 25356 of the California H&SC. As analyzed above in Section 2.2.3.1, soil and/or groundwater contaminated with TCE and 1,4-dioxane from the Ketema plume, as well as TPH and PCB, were identified. However, the Proposed Project would not result in human or environmental exposure to soils or groundwater that exceed the identified state and federal thresholds for applicable contaminants. Furthermore, the Proposed Project site is currently vacant and graded and will require no demolition prior to construction. Therefore, there is no potential for the Proposed Project to create a public health hazard related to ACM, LBP, or other hazardous building materials.

**21. Chapter 2, Section 2.2.4, Page 2-29, third paragraph has been revised as follows:**

Potential impacts to hazardous materials and hazards associated with the Proposed Project include: ~~impacts related to the accidental spills of hazardous materials during construction or future operation of the redevelopment that could cause soil or groundwater contamination or potentially impact storm water runoff; and disturbance of contaminated soil and groundwater during construction activities or the operational phase of the project and/or excavation on the site that could encounter soil and/or groundwater contaminated with TCE and 1,4-dioxane originating from the Ketema plume, that could present potential health risks to construction workers or to future occupants of the site.~~

**22. Chapter 2, Section 2.2.4, Page 2-29, fourth paragraph has been revised as follows:**

However, as required by CEQA and applicable federal, state, and local laws (i.e., CERCLA, Uniform Fire Code, Hazardous Materials Release Response Plans and Inventory Act, etc.), each existing hazard or hazardous environmental condition must be mitigated or have a plan developed to safely protect the public from the hazard.

**23. Chapter 2, Section 2.2.6, Page 2-30, second paragraph has been revised as follows:**

This mitigation measure shall be implemented prior to the ~~development of aviation-related uses on the Proposed Project site. Excavation of contaminated soil related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site. shall require preparation of a~~ The Soil Management Plan shall be prepared in accordance with the Environmental Protection Agency (EPA) and the County Department of Environmental Health (DEH) requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development.

**24. Chapter 2, Section 2.2.6, Page 2-30, fourth paragraph has been revised as follows:**

As a condition of lease agreements for development between the County and private developers, County Airports shall require individual project developers to prepare and implement a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds and before any discharge to a public sewer system or storm drain. This mitigation measure shall be implemented prior to the ~~development of aviation-related uses on the Proposed Project site. Excavation of contaminated soil related to the private development of aviation-related uses on the Proposed Project site. shall require preparation of a~~ The Soil Management Plan shall be prepared in accordance with EPA and County DEH requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The Soil Management Plan for the private development projects shall be prepared by each individual developer and can tier off the Soil Management Plan already prepared for the public development portion, which is included in Appendix E.

**25. Chapter 2, Section 2.2.7, Page 2-31, third paragraph has been revised as follows:**

The Proposed Project has the potential to result in the use, storage, transport, or disposal of hazardous materials during construction or future operation of the Proposed Project. However, potential impacts would be avoided ~~reduced to less than significant~~ by requiring the identified design features, including appropriate training regarding work practices of construction contractors and subcontractors related to transport and handling of hazardous materials prior to construction; monitoring of construction activities to ensure compliance with required regulations; and ensuring a SWPPP is prepared and implemented.

26. Chapter 2, Section 2.2, Figure 2.2-2 has been replaced with the following:



27. Chapter 2, Section 2.3.1.3, Page 2-41, second paragraph has been revised as follows:

~~The Congestion Management Program (CMP), adopted in January 2003 by the San Diego Association of Governments (SANDAG) Board, requires a large project (greater than 2,400 ADT or more than 200 peak hour trips) to analyze its impact on the CMP transportation system. A~~

~~GMP analysis was not prepared for the project because it would generate less than 2,400 ADT and less than 200 peak hour trips (SANDAG 2003).~~

**28. Chapter 2, Section 2.3.2.1, Page 2-43, first paragraph has been revised as follows:**

Therefore, the Proposed Project would result in a *potentially significant impact* to roadway segments (TR-1). ~~The County may coordinate with Caltrans to identify suitable measures that would contribute in the reduction of impacts.~~

**29. Chapter 2, Section 2.3.2.2, Page 2-43, sixth paragraph has been revised as follows:**

Therefore, the Proposed Project would result in a *potentially significant impact* to signalized intersections (TR-2). ~~The County may coordinate with Caltrans to identify suitable measures that would contribute in the reduction of impacts.~~

**30. Chapter 2, Section 2.3.3, Page 2-45, second paragraph has been revised as follows:**

The County Guidelines for Determining Significance require the cumulative impact analysis to consider the existing conditions as compared to “existing + cumulative + Proposed Project conditions”. The guidelines state that a project, which results in contribution to a cumulative significant impact, must mitigate its share of the cumulative impacts. ~~The County may coordinate with Caltrans to identify suitable measures that would contribute in the reduction of impacts.~~

**31. Chapter 2, Section 2.3.5, Page 2-46, fifth paragraph has been revised as follows:**

The following mitigation measures would be incorporated into implementation of the Proposed Project:

***Impacts TR-1 and TR-2: Impacts to Roadway Segments and Intersections***

**M-TR-1/2**      Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project.

~~Caltrans proposes to reconstruct the existing SR-67 interchange at Bradley Avenue. The construction schedule for this Caltrans project is not known at this time. The Bradley Avenue/SR-~~

~~67 interchange project is estimated to cost approximately \$34 million, and is included in the 2030 San Diego Regional Transportation Plan. Proposed improvements to the Bradley Avenue/SR-67 interchange would alleviate existing traffic congestion at this interchange, and could accommodate increased traffic volumes as a result of the Proposed Project. However, because the Bradley Avenue/SR-67 interchange project is not under the direct oversight or jurisdiction of the County, the County cannot anticipate that these improvements would be completed prior to implementation of the Proposed Project. Therefore, direct impacts would be *significant and unmitigable*.~~

**32. Chapter 2, Section 2.3.6, Page 2-47, second and third paragraphs have been revised as follows:**

Impacts TR-1 and TR-2 are associated with direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps, and the intersection of Bradley Avenue and the SR-67 northbound ramps. The direct segment impact and direct intersection impact can both be mitigated to below a level of significance through the construction of the proposed Caltrans Bradley Avenue/SR-67 interchange project. As such, direct impacts would be avoided by limiting private aviation development to 21.5 acres. After completion of the proposed Bradley Avenue/SR-67 interchange project, the remaining 33.5 acres would be authorized to proceed. ~~However, because the Bradley Avenue/SR-67 interchange project is a Caltrans project and not under the direct oversight and jurisdiction of the County, the County cannot anticipate that these improvements would be completed prior to implementation of the Proposed Project. Therefore, these direct impacts would be *less than significant significant and unmitigable*.~~

Impacts TR-C1 and TR-C2 are associated with cumulative impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps, and the intersection of Bradley Avenue and the SR-67 northbound ramps. As stated in the Traffic Impact Study, the proposed project traffic generation and associated TIF payment are based on the size and type of private aviation development. Once the individual private aviation development uses are defined, and prior to execution of an aviation lease agreement with the County, each private developer will be required to comply with applicable plans and regulations, including payment into the TIF program in order to ~~Prior to construction of the Proposed Project, the County shall implement M-TR-C1/2. Therefore, because payment into the TIF program would fully mitigate for cumulative impacts, the Proposed Project would result in a less than significant impact to traffic and transportation.~~

**33. Chapter 3, Section 3.1.1.6, Page 3-4, third paragraph has been revised as follows:**

Two of the cumulative projects are anticipated to present impacts on visual resources; however, in order to secure the applicable development permits, all cumulative project development would be required to comply with ~~would be subject to~~ the respective regulations and requirements of the lead agency, including San Diego County General Plan, as well as the City of El Cajon and City of Santee General Plans.

**34. Chapter 3, Section 3.1.2.1, Page 3-8, (new) third paragraph has been added as follows:**

The U.S. Environmental Protection Agency (USEPA) is researching lead emissions at select airports across the United States, including Gillespie Field. According to the USEPA, various airports throughout the country were selected as candidates for the collection of ambient air quality samples, including lead, due to characteristics including runway configuration, frequency of operations, ambient air conditions, and historical lead emissions. Data continues to be collected and the USEPA has not made site-specific conclusions or developed standardized methodology regarding the levels of lead in relationship to air quality standards or effects to human health from lead emissions at Gillespie Field. Therefore, in the absence of a standardized methodology, site specific conclusions cannot be reasonably reached regarding operation of the Proposed Project. In any event, the incremental increase in air traffic operations attributable to the Proposed Project as compared to the FAA forecast of future air traffic operations at Gillespie Field is not substantial. Accordingly, the increased air traffic operations and associated lead emissions are not expected to be substantial. In addition, according to the San Diego Air Pollution Control District, the San Diego County Air Basin is within federal and state standards for levels of lead.

**35. Chapter 3, Section 3.1.2.7, Page 3-15, fourth paragraph has been revised as follows:**

The definition of T-BACT allows for the consideration of environmental, energy, and economic (i.e., cost effectiveness) considerations when determining what technologies would be required for control of TAC emissions. ~~The County recommends consideration of alternative diesel fuels and diesel particulate filters as T-BACT.~~ The project will utilize low-sulfur fuels during construction per the requirements implemented by the CARB for 15 ppm sulfur diesel.

**36. Chapter 3, Section 3.1.5.4, Page 3-51, third paragraph has been revised as follows:**

Redevelopment of the Proposed Project site will involve development of more than one acre of commercial/industrial uses; therefore, the County is required to ~~project will~~ comply with the Final Hydromodification Plan for San Diego County as outlined in the County of San Diego Watershed Protection Ordinance (Section 67.812(b)) and approved by the RWQCB on July 14, 2010. The County is required to ~~project would~~ demonstrate that post-project runoff will not cause or accelerate downstream channel erosion or other negative impacts to beneficial stream uses.

**37. Chapter 3, Section 3.1.6.3, Page 3-62, third paragraph has been revised as follows:**

In 1970, the State of California enacted a law requiring the formation of an Airport Land Use Commission (ALUC) in each county containing a public airport (California Public Utilities Code §§21670, et seq.). The purpose of the ALUC is to protect the public health, safety and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) performs responsibilities of the ALUC

for all 16 airports within the County. As part of that responsibility, the Airport Authority has prepared and adopted an ALUCP for Gillespie Field. ~~This plan is also referred to as the CLUP.~~ The purpose of the Gillespie Field ALUCP is to ensure compatibility between adjacent land uses and the operation and/or expansion of the airport and to safeguard the general welfare of the inhabitants within the vicinity of the Airport and the public in general. The ALUCP focuses on noise levels and how the surrounding land uses are impacted by noise. The ALUCP identifies an Airport Influence Area (AIA) that designates the general area in which current and future airport-related noise, over flight, safety, and/or airspace protection factors may affect land uses or necessitate restrictions on the uses. Implementation of the ALUCP is intended to reduce the adverse impacts from aircraft noise, limit the increase in the number of people exposed to airport approach hazards, and ensure that no structures are erected that are deemed by the FAA to be hazards, and that no obstructions are erected that either individually or cumulatively cause an adverse safety affect on air navigation as determined by the FAA. The current ALUCP for Gillespie Field was adopted in 2010.

**38. Chapter 3, Section 3.1.6.3, Page 3-63, first paragraph has been revised as follows:**

Due to the close coordination with the SDCRAA regarding the existing and project noise contour lines, the Proposed Project is consistent with the revisions to the ALUCP as adopted. It should be noted per state law that the County of San Diego, City of El Cajon and City of Santee, are required to comply with the policies of the SDCRAA. State law explicitly requires the County and affected cities to modify their general plans and specific plans and ordinances (including zoning designations) to be consistent with the ALUCP or to take special steps to overrule the findings of the ALUC. Additionally, private parties are subject to the provision of the ALUCP either directly or as implemented in plans and zoning of the affected city or the County.

**39. Chapter 3, Section 3.1.6.3, Page 3-64, second paragraph has been revised as follows:**

The City of Santee General Plan, most recently updated in 2003, is the main planning document for the City and provides the goals, objectives, and policies to achieve desired community needs through a coordinated implementation project. According to the Safety Element of the General Plan Section 5.6 *Aircraft Hazards* states “There are currently no areas in the City which are within designated crash hazard zones as identified in the CLUP [now referred to as ALUCP] for Gillespie Field. However, various Airport Safety Zones designated by the Caltrans Division of Aeronautics do extend into the City. While these areas are almost entirely developed, the City will ensure that future development or redevelopment in the most restrictive safety zones addresses airport safety issues through measures such as recordation of avigation easements, and should discourage the establishment of sensitive uses such as hospitals and schools in those zones.” Objective 7.0, Policy 7.1, of the Safety Element recommends that the City review all development proposed within the Gillespie Field Airport Influence Area to ensure that design features are incorporated into the site plan to address aircraft safety and noise hazards.



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**40. Chapter 3, Section 3.1.6.3, Page 3-64, fourth paragraph has been revised as follows:**

In the El Cajon General Plan, the Proposed Project site is designated as Industrial Park. The Proposed Project site is also zoned for manufacturing uses. Gillespie Field also has a Special Development Area overlay in addition to the land use designations. Special Development Areas 1, 5, and 6 provide special development possibilities on Gillespie Field. The Proposed Project site is located in Special Development Areas 5 and 6. The purpose of this overlay is to allow flexibility for uses within Gillespie Field, specifically for airport-related support facilities and process office uses as well as special development standards. Additionally, the City of El Cajon's Noise Element of the General Plan (City of El Cajon 2001) discusses working towards consistency with SDCRAA's policies and rezoning areas deemed to be inconsistent.

**41. Chapter 3, Section 3.1.6.6, Page 3-66, second paragraph has been revised as follows:**

California law (Public Utilities Code 21670.3) requires that counties which operate airports for the benefit of the general public establish ALUCs for the purposes of creating ALUCPs. The SDCRAA serves as the ALUC for all public-use and military airports located in San Diego County ~~of San Diego County's airports~~. The purpose of the ALUCP is to provide land use measures that ensure the safety and welfare of the public is protected from excessive noise and safety hazards associated with aviation by discouraging incompatible development in areas surrounding airports. For this purpose, ALUCs are charged with development of guidelines suggesting compatible land use for areas affected by aviation related noise and safety (Table 3.1.6-1).

**42. Chapter 3, Section 3.1.6.6, Page 3-66, third paragraph has been revised as follows:**

As operators of eight of the airports in the County, the County has been in coordination with SDCRAA regarding the Proposed Project and associated noise surveys. The operational forecasts, noise data, and modeling are integral components of the ALUCP for Gillespie Field. ALUCPs consider a 20-year planning period, and the forecast data in both the Gillespie Field Unconstrained Aviation Activity Forecast and the Gillespie Field Constrained Aviation Activity Forecast evaluated the operations and associated noise contours through 2027 (Ricordo & Associates, Inc. 2008a; 2008b). ALUC uses this data to develop the AIA and ALUCP which together establish the land use designations that surrounding jurisdictions are subject to adhere to. In accordance with the guidance letter received from the SDCRAA dated July 26, 2011, the ~~The SDCRAA has reviewed the project description considered the Proposed Project and noise data, and concluded that a determination of consistency with the ALUCP by the ALUC is not required. The Proposed Project includes development of aviation-use facilities, and pursuant to the Gillespie Field ALUCP Section 2.6.2(b), only proposed non-aviation development on airport property is subject to ALUC review found the Proposed Project consistent with the SDCRAA and their development of the ALUCP.~~

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**43. Chapter 3, Section 3.1.6.6, Page 3-67, first paragraph has been revised as follows:**

In 2005, the ALP Update Narrative Report was approved by the FAA, and on June 25, 2005. ~~In 2006,~~ the FAA issued a guidance letter to the County regarding the need to convert the 70-acre site from non-aviation to aviation uses upon the expiration of the lease held on the site by the Cajon Speedway.

**44. Chapter 3, Section 3.1.7.3, Page 3-76, first and second paragraphs have been revised as follows:**

~~No thresholds~~ ~~The County does not designate a threshold of significance related to changes in aircraft noise levels have been established by the County in the County Guidelines for Determining Significance; therefore the federal standard as regulated by FAA is applied. FAA guidance specifies that a detailed noise analysis may be required if there is a 1.5 dBA increase in DNL/CNEL in noise sensitive areas exposed to 65 dBA DNL/CNEL or greater. As stated in FAA Order 1050.1E, Section 14.1a, "FAA has determined that noise resulting from aviation activities must be established in terms of yearly day/night average sound level (DNL) as FAA's primary metric. The FAA recognizes CNEL (community noise equivalent level) as an alternative metric for California." In addition, Use of the 1.5 CNEL threshold is consistent with noise analyses conducted for other Airport projects by the Caltrans Division of Aeronautics throughout both San Diego County and the State of California. Therefore, the 1.5 CNEL threshold is accepted here as a CEQA threshold of significance to describe significant increases of aircraft noise exposure.~~

~~The 1.5 CNEL threshold is accepted here as a CEQA threshold of significance to describe significant increases of aircraft noise exposure.~~

**45. Chapter 3, Section 3.1.7.4, Page 3-77, third paragraph has been revised as follows:**

The nearest nonresidential off-site NSLU of concern in this analysis is Chaparral High School, which is located approximately 3,000 feet southwest of the Proposed Project site, and it would experience the greatest increase in noise generated from traffic and aircraft. Per the Traffic Impact Analysis, traffic generated from the Proposed Project would primarily utilize the roadways near the Proposed Project, which do not include residential communities. Therefore, Chaparral High School is used as the NSLU of primary concern for both traffic and aircraft noise.

**46. Chapter 3, Section 3.1.7.5, Page 3-79, second paragraph has been revised as follows:**

The City of El Cajon and the City of Santee sets sound level limits between properties zoned for industrial uses at 75 dBA  $L_{eq}$  anytime of the day. The City of El Cajon borders the project site to the west and south, and the City of Santee is located to the north outside the Proposed Project. However, as the City of El Cajon and City of Santee have ~~has~~ a less restrictive noise level limit, the County noise ordinance is used for determining impacts.

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**47. Chapter 3, Section 3.1.8.1, Page 3-103, third paragraph has been revised as follows:****Police Protection**

Police protection is provided by the City of El Cajon's Police Department as a result of an agreement between the City of El Cajon and the County. Police services have been secured through the year 2021. The El Cajon Police Department Headquarters is located at 100 Civic Center Way ~~100 Fletcher Parkway~~, approximately 1.5 miles south of Gillespie Field. The City of El Cajon Police Department provides County Airports with patrol services, speed monitoring, alarm response and other services. Arrival time for Priority 1 calls in the project area fall within an average of 5 minutes. The actual time is dependent on traffic conditions, weather conditions, and accessibility to the affected area. The overall response time for service calls is approximately 19 minutes.

**48. Chapter 3, Section 3.1.8.1, Page 3-103, fifth paragraph has been revised as follows:****Parks**

There are no existing designated Parks or other recreational facilities within the project site. The nearest existing designated Parks or other recreation facilities are Sky Ranch Park, located approximately 1 mile northeast of the project site in the City of Santee; Hillside Park, located approximately 1 mile south of the project site in the City of El Cajon, and Shadow Hill Park, located approximately 1 mile to the north in the City of Santee.

**49. Chapter 3, Section 3.1.8.1, Page 3-107, third paragraph has been revised as follows:**

~~The City of El Cajon, Helix Water District, and the Padre Dam Municipal Water District provides existing water lines at Gillespie Field. The Proposed Project site currently contains a~~ The following water lines/mains are located within the project vicinity:

- ~~• 14-inch water line that runs along Kenney Street and across the airfield to Joe Crosson Drive~~
- ~~• 14-inch and a 12-inch water line underneath Marshall Avenue~~
- 68-inch City of San Diego water main and a 48-inch Helix Water District main located in a 50-foot wide easement running diagonally through the 70-acre site
- ~~• 14-inch water line in Joe Crosson Drive from Floyd Smith Drive to Airport Drive, that continues north to Kenny Street, across taxiways and Runways 27 Left and Right~~
- ~~• 6-inch water line from Floyd Smith Drive to Airport Drive.~~

The Proposed Project site lies within the Padre Dam Municipal Water District (PDMWD) service area. The PDMWD obtains its water from the San Diego Water Authority. The Proposed Project would be serviced by the existing water lines in the project area.

**50. Chapter 4, Section 4.3.2.3, Page 4-4, sixth paragraph has been revised as follows:**

The Reduced Footprint Project Alternative is calculated to generate proportionally less traffic with 1,327 ADT, 96 AM peak hour trips, and 105 PM peak hour trips in comparison to the Proposed Project that is calculated to generate 1,407 ADT, 102 AM peak hour trips, and 111 PM peak hour trips. The Reduced Footprint Project Alternative would result in 80 less ADT than the Proposed Project due to the reduction of 3.1 acres of proposed hangar areas. Similar to the proposed mitigation and conclusions described in Section 2.3, this alternative would also result in less than significant impacts with mitigation incorporated. Therefore, although the Reduced Footprint Alternative would generate less traffic than the Proposed Project, it would provide no advantage in terms of impact avoidance or reduction. However, an existing roadway and intersection, as identified in Chapter 2.3, would continue to operate at LOS E, and the traffic added by the Reduced Footprint Project Alternative would still exceed County thresholds for significance. Therefore, the Reduced Footprint Project Alternative would provide a slight advantage in terms of impact reduction, but would not eliminate significant traffic impacts.

**51. Chapter 4, Section 4.4.2.2, Page 4-6, fourth paragraph has been revised as follows:**

Impacts to hazards and hazardous materials resulting from the Further Reduced Footprint Alternative, and associated mitigation measures, would be similar to the Proposed Project~~slightly less since less soil disturbance would be required due to the reduced footprint.~~ Therefore, although the Further Reduced Footprint Alternative would result in less soil disturbance, it would provide no advantage in terms of impact avoidance or reduction~~a slight advantage in terms of impact avoidance.~~

**52. Chapter 4, Section 4.4.2.3, Page 4-7, first paragraph has been revised as follows:**

Therefore, the Further Reduced Footprint Alternative would provide a significant advantage in terms of direct impact reduction in comparison to the Proposed Project and would eliminate significant direct traffic impacts, including the SR-67/Bradley Avenue interchange. However, cumulative traffic impacts similar to the Proposed Project would still occur and the Further Reduced Footprint Alternative would provide no advantage in terms of cumulative impact avoidance or reduction.

**53. Chapter 4, Table 4.1 has been revised as follows:**

**Table 4.1. Comparison of Project Alternatives' Impacts to Proposed Project Impacts**

Issue Area	Proposed Project	No Project Alternative	Reduced Footprint Project Alternative	Further Reduced Footprint Alternative
Transportation and Traffic	<i>Direct Impacts:</i> <u>Less than Significant with Mitigation Incorporated</u> and <u>Unmitigable</u>	<i>Direct Impacts:</i> <u>Less</u> than the Proposed Project because the project would not be developed and no construction or improvements that could increase traffic would occur.	<i>Direct Impacts:</i> <u>Similar</u> to the Proposed Project. <u>All direct impacts would be reduced to a level below significance with mitigation incorporated.</u> <del>Although fewer traffic volumes would be added as compared to the Proposed Project, the additional volumes still result in a significant impact.</del>	<i>Direct Impacts:</i> <u>Less</u> than the Proposed Project.
	<i>Cumulative Impacts:</i> Less than Significant with Mitigation Incorporated	<i>Cumulative Impacts:</i> <u>Less</u> than the Proposed Project because the project would not be developed and no construction or improvements that could increase traffic would occur.	<i>Cumulative Impacts:</i> <u>Similar</u> to the Proposed Project. All cumulative impacts would be reduced to a level below significance with mitigation incorporated.	<i>Cumulative Impacts:</i> Similar to the Proposed Project. All cumulative impacts would be reduced to a level below significance with mitigation incorporated. <u>Less than the Proposed Project.</u>

**54. Chapter 5, Section 5.2, Pages 5-4 and 5-5 has been revised as follows:**

County of San Diego (County)

2010d Guidelines for Determining Significance and Report Format and Content Requirements. Wildland Fire and Fire Protection. August 31.

LOS Engineering, Inc.

2011 Traffic Impact Study Technical Report 70-Acre Redevelopment Project Gillespie Field El Cajon, California, September 7. Revised May 10, 2012.

2012 Addendum #1 to the Gillespie Field 70-acre Redevelopment Project, El Cajon, California. Traffic Impact Study. May 11.

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**55. Chapter 7, Section 7.1.2, Page 7-3, third paragraph has been revised as follows:**

This mitigation measure shall be implemented prior to the ~~development of aviation-related uses on the Proposed Project site. Excavation of contaminated soil related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site.~~ shall require preparation of a The Soil Management Plan shall be prepared in accordance with the Environmental Protection Agency (EPA) and the County Department of Environmental Health (DEH) requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development.

**56. Chapter 7, Section 7.1.2, Page 7-3, fifth paragraph has been revised as follows:**

As a condition of lease agreements for development between the County and private developers, County Airports shall require individual project developers to prepare and implement a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds and before any discharge to a public sewer system or storm drain. This mitigation measure shall be implemented prior to the ~~development of aviation-related uses on the Proposed Project site. Excavation of contaminated soil related to the private development of aviation-related uses on the Proposed Project site.~~ shall require preparation of a The Soil Management Plan shall be prepared in accordance with EPA and County DEH requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The Soil Management Plan for the private development projects shall be prepared by each individual developer and can tier off the Soil Management Plan already prepared for the public development portion, which is included in Appendix E.

**57. Chapter 7, Section 7.1.3, Page 7-4, (new) third paragraph has been revised as follows:**

**M-TR-1/2** Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project.

**58. Chapter 7, Section 7.2.2, Page 7-5, fourth paragraph has been revised as follows:**

The County would continue regular maintenance of the Proposed Project site until build-out and conduct preconstruction nesting bird surveys for all future construction activities that are within the breeding season (i.e., ~~January 15–February 4~~ to August ~~31–30~~). Surveys should be conducted by a qualified avian biologist no longer than 72 hours prior to the commencement of construction activities. Nest surveys should be conducted within the construction site and a 500-foot buffer of the construction site to assess both direct and indirect impacts to nesting bird species.

**59. Chapter 7, Section 7.2.2, Page 7-5, sixth paragraph has been revised as follows:**

In addition, the County will conduct focused special-status floral surveys prior to project construction. If additional special-status floral species are detected, impacts will be evaluated in accordance with the County guidelines and applicable regulations as overseen by a qualified biologist.

**60. Chapter 7, Section 7.2.3, Page 7-5, seventh paragraph has been revised as follows:**

Although no mitigation is required, the following design considerations will be incorporated as ~~feasible-applicable~~ into the project design:

**61. Chapter 7, Section 7.2.5, Page 7-9, first paragraph has been revised as follows:**

Implementation of the SWPPP and the construction BMPs in accordance with the project plans and specifications, which are in compliance with federal, state, and local regulations, would reduce potential water quality construction impacts to less than significant.

## **ATTACHMENT C**

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### **FINDINGS CONCERNING MITIGATION OF SIGNIFICANT ENVIRONMENTAL EFFECTS**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**



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## ATTACHMENT C

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### FINDINGS CONCERNING MITIGATION OF SIGNIFICANT ENVIRONMENTAL EFFECTS

#### GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT

SCH # 2005111092

June 20, 2012

A. The County of San Diego Board of Supervisors makes the following findings for each significant effect identified in the Final Program Environmental Impact Report (Final PEIR) pursuant to Public Resources Code section 21081(a)(1) and finds that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect. The significant effects and mitigation measures are stated fully in the Final PEIR. These findings are explained below and are supported by substantial evidence in the record of proceedings.

#### 1. Biological Resources

**Significant Effect: Impact BI-1:** The project will permanently impact 0.18 acre of San Diego ambrosia, a federally listed endangered species. This would be considered a significant direct impact (Final PEIR pg 2-11). A total of 0.18 acre of San Diego ambrosia, a federally listed endangered plant species, is located within a fenced preserve on the project site and would be impacted during construction of the public infrastructure portion of the project. The population was previously fenced and preserved as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR, prior to becoming a federally listed species. This sensitive plant species would not be able to be avoided with construction of the project therefore this would be a significant direct impact.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg 2-12 to 2-13).

**Mitigation Measures: M-BI-1a** – The County will offset direct impacts to 0.18 acre of San Diego ambrosia through transplantation of all individuals within the Proposed Project footprint to a 2.9-acre native grassland area north of the San Diego River, within Mission Trails Regional Park (MTRP) as directed in the Biological Opinion (BO) issued by USFWS on September 1, 2009.

A survey will be conducted before project impacts occur to ensure that all San Diego ambrosia have been located and mapped within the Proposed Project footprint. The outer perimeter of each ambrosia patch will be delineated on the ground with spray paint. If any ambrosia stems are discovered outside of this pre-transplantation mapped area of ambrosia, the County will reinitiate consultation with USFWS.

**M-BI-1b** – A San Diego ambrosia transplantation plan will be approved by USFWS before any impacts to the species may occur. The plan will be implemented by a biologist or botanist with experience transplanting sensitive plant species (i.e., transplantation biologist). The

transplantation plan will serve to guide the transplantation effort and the initial five-year monitoring program.

**M-BI-1c** – The ambrosia transplantation plan as described in the BO issued by USFWS will include the following:

- Individual clusters of ambrosia will be salvaged as blocks and transplanted to the transplantation site at MTRP using similar spacing and distribution as at the Proposed Project site.
- Ten percent of ambrosia within the clusters will be removed from the Proposed Project site, following the USFWS-approved transplantation plan, and will be grown in large flats at a nursery/greenhouse and used for later out-planting at the MTRP transplantation site.
- The exact location at the transplantation site where the cut-blocks containing ambrosia propagules will be transplanted will be determined in the field by the transplantation biologist, in coordination with the USFWS, prior to transplantation.
- The methods of transplantation, monitoring, and maintenance will be developed in coordination with the USFWS. The agreed-upon methods will be described in the transplantation plan, and will include specifics such as timing of transplantation, preparation of the donor and receptor sites prior to transplantation, placement of San Diego ambrosia, predator control and protective fencing, weeding, irrigation, length and type of monitoring, maintenance, and success criteria.
- The 2.9-acre San Diego ambrosia transplantation site will be restored with native grasses.

**M-BI-1d** – The receptor site will be fenced off to delineate areas containing the transplanted San Diego ambrosia to minimize the potential effects of herbivory.

**M-BI-1e** – The County will be responsible for long-term management of the transplantation site at MTRP.

**M-BI-1f** – The transplanted ambrosia population will be monitored for a minimum of 5 years, in accordance with the requirements of the USFWS-approved translocation plan, to document success of the transplantation efforts. Success will be achieved when 80 percent of the transplanted San Diego ambrosia plugs are established and expand from the transplanted plugs as clones and/or newly established individuals.

**M-BI-1g** – All San Diego ambrosia propagules taken from the Proposed Project site for nursery/greenhouse growing will be out-planted at the restoration site to increase the probability of transplantation success. Out-planting of the nursery/greenhouse-grown San Diego ambrosia plants will occur during the five-year monitoring period as determined by the transplantation biologist in coordination with the USFWS. In the event of transplantation failure, the transplantation plan will include a contingency plan to offset impacts to San Diego ambrosia.

**M-BI-1h** – In addition to the USFWS-approved transplantation plan, a long-term management strategy will be approved by the USFWS before any impacts to San Diego ambrosia may occur. County staff will be responsible for ensuring that the transplanted ambrosia population is managed consistent with this long-term management strategy.

**M-BI-1i** – The 0.18-acre San Diego ambrosia population was previously fenced and preserved as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR. To offset these impacts, the County would conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved.

**Rationale:** Impact BI-1, which is associated with permanent impacts to San Diego ambrosia, would be reduced to a level below significance by transplanting the population to a suitable receptor site, MTRP, consistent with the BO issued by USFWS. A biological opinion is the document that states the opinion of the USFWS as to whether or not an action is likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. Compliance with the BO would ensure that no additional impacts would occur to sensitive or special status species listed in local or regional plans or by CDFG and USFWS (state and federal Endangered Species Acts). The BO issued for this Proposed Project requires the County to prepare a transplantation plan, transplant the San Diego ambrosia population, implement long-term monitoring to allow the ambrosia to survive and expand into habitat adjacent to the transplantation receptor site, and to offset impacts to the existing ambrosia conservation area through conservation of one or more known ambrosia populations. Implementation of mitigation measure M-BI-1 would ensure that the Proposed Project would be managed and monitored through a long-term management strategy and would not impact the survival of the population of this federally listed endangered species.

**Significant Effect: Impact BI-2: The project will permanently impact 1.1 acres of non-native grassland, a sensitive vegetation community. This would be a *significant direct impact* (Final PEIR pg 2-11).** The project site supports 1.1 acre of non-native grassland contained within a fenced area that also supports a preserved population of the federally listed endangered plant species, San Diego Ambrosia. This sensitive vegetation community would not be able to be avoided with construction of the project therefore this would be a significant direct impact.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-14).

**Mitigation Measure: M-BI-2** – Permanent impacts to non-native grassland would be mitigated at a 0.5:1 ratio through preservation of in-kind habitat or a vegetation community of higher biological value. This mitigation would be located within the receptor site of the transplanted or preserved San Diego ambrosia discussed in M-BI-1.

**Rationale:** Significant impacts to sensitive vegetation communities, including non-native grassland would be reduced to a level below significant through implementation of in-kind habitat (or vegetation community of higher biological value) at a 0.5:1 ratio at the MTRP located within the transplanted or preserved San Diego ambrosia site. Implementation of this mitigation measure would reduce the impact to a less than significant level because the mitigation ratio for the impact to this habitat is consistent with the ratio applied throughout the County, and the wildlife agencies have reviewed and approved this mitigation ratio. The ratio is effective because these reviewing agencies have reached consensus that retention at this ratio will result in sustainable levels of this habitat.

## **2. Hazards and Hazardous Materials**

**Significant Effect:** Impact HZ-1: Grading or excavation on the site may disturb contaminated soil, presenting potential health risks to construction workers. Additionally, the presence of contaminated soil on the site may present significant health risks to future occupants of the site. Excavation on the site may encounter soil and/or groundwater contaminated with TCE and 1,4-dioxane originating from the Ketema plume, presenting potential health risks to workers on the site or during operation of the proposed on-site aviation uses. This would be considered a significant direct impact. (Final PEIR pg 2-29 to 2-30). The former Ketema Aerospace and Engineering facility has a plume of groundwater impacted with chlorinated solvents (including PCE, TCE, 1,1,1-Trichloroethane (TCA), breakdown components of these products and the solvent stabilizing compound 1,4-dioxane) that is currently impacting the groundwater beneath the Proposed Project site. The plume is located within the shallow unconfined aquifer encountered at about 10 to 14 feet below grade. The TCE plume underlies approximately 75 percent of the project site with concentrations in some areas exceeding 1,000 micrograms per liter. Since excavation on the site has the potential to encounter this plume, this would be a significant direct impact.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-30 to 2-31).

**Mitigation Measures: M-HZ-1a** – County Airports shall prepare a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site.

This mitigation measure shall be implemented prior to the excavation of contaminated soil related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site. The Soil Management Plan shall be prepared in accordance with the Environmental Protection Agency (EPA) and the County Department of Environmental Health (DEH) requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development.

The County prepared a Soil Management Plan (Rincon 2011c) for the Proposed Project to comply with this measure and it is included in Appendix E of the PEIR.

**M-HZ-1b** – As a condition of lease agreements for development between the County and private developers, County Airports shall require individual project developers to prepare and implement a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds and before any discharge to a public sewer system or storm drain. This mitigation measure shall be implemented prior to the excavation of contaminated soil related to the private development of aviation-related uses on the Proposed Project site. The Soil Management Plan shall be prepared in accordance with EPA and County DEH requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The Soil Management Plan for the private development projects shall be prepared by each individual developer and can tier off the Soil Management Plan already prepared for the public development portion, which is included in Appendix E.

**M-HZ-1c** – As a condition of lease agreements between the County and private developers for development of aviation uses on the 70-acre site, the County shall require a qualified environmental monitor to be present during the construction phases of individual development projects. The environmental monitor shall document the presence of contaminated soil and/or groundwater and shall assist in the excavation and off-site disposal of such soil and/or groundwater or the treatment and on-site reuse of such soil and/or groundwater.

County Airports shall ensure that a qualified environmental monitor will be present during the construction phases of taxiway, apron area, drainage facilities, and utility facilities at the site to document the presence of contaminated soil and/or groundwater. The environmental monitor shall assist in the excavation and off-site disposal of such soil or the treatment and on-site reuse of such soil and/or groundwater.

**M-HZ-1d** – As a condition of lease agreements between the County and private developers for development of aviation uses on the 70-acre site, if development is planned where contaminated soils and/or groundwater are present, a human health risk assessment of these areas shall be conducted by the developer to evaluate potential health risks to future occupants of the site prior to occupation of any structures within the 70-acre site. Vapor transport and risk calculations shall be performed using the County DEH Vapor Risk 2000 spreadsheet model (October 5, 2004 revision). A Risk Based Corrective Action (RBCA) analysis shall be performed in accordance with American Society for Testing Materials ASTM PS-104 Standard Provisional Guide for Risk-Based Corrective Action using the RBCA spreadsheet system (RBCA Tool Kit for Chemical Releases). County Airports will also conduct a similar health risk assessment related to the construction of runway and taxiway improvements at the site.

**Rationale:** Implementation of mitigation measure M-HZ-1a through M-HZ-1d would ensure that impacts related to disturbance of contaminated soils and groundwater and release of hazardous materials during construction would be reduced to less than significant levels, consistent with the Hazardous Materials Technical Reports and Soil Management Plan. This would be accomplished by requiring preparation and implementation of a remediation plan for contaminated soils and a groundwater dewatering and treatment program for contaminated groundwater, and establishing protocol to be followed if hazardous waste or materials are encountered (including, but not limited to, stockpiling soil, monitoring for volatiles, and removing any contaminated soil from the site).

### 3. Traffic

**Significant Effect: Impact TR-1 – Addition of the Proposed Project traffic would exceed the significance thresholds at the segment of Bradley Avenue between the SR-67 southbound and northbound ramps because it would add 218 Average Daily Trips (ADTs) under LOS E conditions, which is greater than the significance threshold of 200 ADT for a two-lane roadway operating under LOS E conditions. This would be considered a significant direct impact. (Final PEIR pg 2-46).** The segment of Bradley Avenue between the SR-67 southbound and northbound ramps currently operates at unacceptable level of service (LOS E) under existing conditions. The project would contribute 218 ADT, which is greater than the allowed threshold of 200 ADT. Therefore, this would be a significant direct impact to this roadway segment.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-46).

**Mitigation Measure:** M-TR-1/2 – Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project.

**Rationale:** This mitigation measure shall allow installation of all public infrastructure improvements on the 70-acre Proposed Project site and up to 21.5 acres of private aviation development. As supported by the Traffic Impact Study, development of private aviation uses on 21.5 acres would generate traffic below the County threshold for a significant direct impact.

The County and Caltrans propose to reconstruct the existing SR-67 interchange at Bradley Avenue. Construction funding to complete ramp improvements has not been identified.

However, completion of this interchange project shall be required in order to proceed with lease commencement of the remaining 33.5 acres of private aviation development at the Proposed Project site. As demonstrated in the Traffic Impact Study, development of the entire 55 acres would generate 1,407 Average Daily Trips (ADT), which can be accommodated by the proposed SR-67/Bradley Avenue interchange.

**Significant Effect: Impact TR-2 – Addition of the Proposed Project traffic would exceed the significance thresholds at the intersection of Bradley Avenue and the SR-67 northbound ramps because it increases the delay by 5.5 seconds, which is greater than the significance threshold of 2 seconds for LOS E conditions (PM peak hour). This would be considered a significant direct impact. (Final PEIR pg 2-46).** The signalized intersection of Bradley Avenue and the SR-67 northbound ramps currently operate at unacceptable level of service (LOS E) in the PM peak hour under existing conditions. The project would increase the delay at this intersection by 5.5 seconds, which is greater than the allowed threshold of 2 seconds. Therefore, this would be a significant direct impact to this signalized intersection.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-46).

**Mitigation Measure:** M-TR-1/2 – Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project.

**Rationale:** This mitigation measure shall allow installation of all public infrastructure improvements on the 70-acre Proposed Project site and up to 21.5 acres of private aviation development. As supported by the Traffic Impact Study, development of private aviation uses on 21.5 acres would generate traffic below the County threshold for a significant direct impact.

The County and Caltrans propose to reconstruct the existing SR-67 interchange at Bradley Avenue. Construction funding to complete ramp improvements has not been identified. However, completion of this interchange project shall be required in order to proceed with lease commencement of the remaining 33.5 acres of private aviation development at the Proposed Project site. As demonstrated in the Traffic Impact Study, development of the entire 55 acres would generate 1,407 Average Daily Trips (ADT), which can be accommodated by the proposed SR-67/Bradley Avenue interchange.



**Significant Effect: Impact TR-C1 – Addition of the Proposed Project traffic combined with cumulative traffic to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps would worsen anticipated cumulative conditions at that location because the project would add 218 ADT to the roadway segment. This is greater than the significance threshold of 200 ADT to a roadway segment currently operating at LOS E. This would be considered a significant cumulative impact. (Final PEIR pg 2-46).** The segment of Bradley Avenue between the SR-67 southbound and northbound ramps is anticipated to operate at unacceptable level of service (LOS E) under both the existing and cumulative conditions. The project would contribute 218 ADT, which is greater than the allowed threshold of 200 ADT. Therefore, this would be a significant cumulative impact to this roadway segment.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-47).

**Mitigation Measures: M-TR-C1/2:** Cumulative impacts would be mitigated below the level of significance through payment into the County TIF program. In accordance with the TIF program, a designated financial contribution would provide adequate mitigation for cumulative impacts associated with development in the unincorporated County. According to the TIF program for calendar year 2011, the Proposed Project has a required fee of \$396 per trip. Based on this rate, the Proposed Project would result in the following TIF contribution:

Proposed Project TIF Contribution: 1,407 daily trips x \$396 per trip = \$557,172

Completion of the financial contribution described above would fully mitigate for cumulative impacts described in TR-C1 and TR-C2.

**Rationale:** Potential cumulative impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps would be reduced to a level below significance through payment into the TIF program. The TIF program is specifically designed to address cumulative issues (i.e., those impacts not great enough on a project level to require mitigation, but which, when combined with the incremental adverse effects of other area-wide projects, reach a level of impact requiring mitigation). The TIF program addresses improvements required to support adequate circulation through Year 2030. Required improvements are specified in the TIF and funds are collected from projects coming on line in order to collect fees to cover costs of those improvements when implemented. Per the 2008 TIF Program Update, the intersection of Bradley Avenue and SR-67 qualifies as TIF facility eligible to receive funding in part by the TIF Program. The required improvements under the TIF would mitigate this impact to less than significant levels. Since the TIF program was designed to address cumulative concerns and the associated appropriate payment for specified improvements, participation in the TIF program constitutes effective and adequate mitigation for this issue. Once the individual private aviation development uses are defined, and prior to execution of an aviation lease agreement with the County, each private developer will be required to comply with applicable plans and regulations, including payment into the TIF program in order to implement M-TR-C1/2. Implementation of this

measure would fully mitigate for this impact, and the Proposed Project would result in a less than significant cumulative impact to traffic and transportation.

**Significant Effect: Impact TR-C2 – Addition of the Proposed Project traffic combined with cumulative traffic to the intersection of Bradley Avenue and the SR-67 northbound ramps would increase the delay by 9.6 seconds at that location, which is greater than the significance threshold of more than 2 seconds over existing conditions for LOS E (PM peak hour). This would be considered a significant cumulative impact. (Final PEIR pg 2-46).** The signalized intersection of Bradley Avenue and the SR-67 northbound ramps are anticipated to operate at unacceptable level of service (LOS E) in the PM peak hour under both the existing and cumulative conditions. The project would increase the delay at this intersection by 5.5 seconds, which is greater than the allowed threshold of 2 seconds. Therefore, this would be a significant cumulative impact to this signalized intersection.

**Finding:** Pursuant to Public Resources Code, section 21081(a)(1), specific changes or alterations have been required in, or incorporated into, the project which avoid, mitigate, or substantially lessen this potential effect on the environment (Final PEIR pg. 2-47).

**Mitigation Measures: M-TR-C1/2:** Cumulative impacts would be mitigated below the level of significance through payment into the County TIF program. In accordance with the TIF program, a designated financial contribution would provide adequate mitigation for cumulative impacts associated with development in the unincorporated County. According to the TIF program for calendar year 2011, the Proposed Project has a required fee of \$396 per trip. Based on this rate, the Proposed Project would result in the following TIF contribution:

Proposed Project TIF Contribution: 1,407 daily trips x \$396 per trip = \$557,172

Completion of the financial contribution described above would fully mitigate for cumulative impacts described in TR-C1 and TR-C2.

**Rationale:** Potential cumulative impacts to the intersection of Bradley Avenue and the SR-67 northbound ramps would be reduced to a level below significance through payment into the TIF program. The TIF program is specifically designed to address cumulative issues (i.e., those impacts not great enough on a project level to require mitigation, but which, when combined with the incremental adverse effects of other area-wide projects, reach a level of impact requiring mitigation). The TIF program addresses improvements required to support adequate circulation through Year 2030. Required improvements are specified in the TIF and funds are collected from projects coming on line in order to collect fees to cover costs of those improvements when implemented. Per the 2008 TIF Program Update, the intersection of Bradley Avenue and SR-67 qualifies as TIF facility eligible to receive funding in part by the TIF Program. The required improvements under the TIF would mitigate this impact to less than significant levels. Since the TIF program was designed to address cumulative concerns and the associated appropriate payment for specified improvements, participation in the TIF program constitutes effective and adequate mitigation for this issue. Once the individual private aviation development uses are defined, and prior to execution of an aviation lease agreement with the

County, each private developer will be required to comply with applicable plans and regulations, including payment into the TIF program in order to implement M-TR-C1/2. Implementation of this measure would fully mitigate for this impact, and the Proposed Project would result in a less than significant cumulative impact to traffic and transportation.

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## **ATTACHMENT D**

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### **LIST OF COMMENTERS, LETTERS OF COMMENT, AND RESPONSE TO COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**

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Attachment D

**RESPONSES TO COMMENTS**  
on the  
**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT**

**Gillespie Field 70-acre Redevelopment Project  
Final Program Environmental Impact Report  
State Clearinghouse Number 2005111092**

**Lead Agency:**

**County of San Diego  
Department of Public Works  
5469 Kearny Villa Road, Suite 305  
San Diego, California 92123-1152**

**June 2012**

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### List of Commenters

Comment Letter	Date of Letter	Commenter
A	11/8/2011	California Governor's Office of Planning and Research, Scott Morgan, State Clearinghouse Director
B	9/27/2011	Native American Heritage Commission, Dave Singleton, Program Analyst
C	10/24/2011	California Department of Toxic Substances Control, Al Shami, Project Manager
D	10/24/2011	California Department of Transportation (Caltrans) Jacob M. Armstrong, Chief
E	10/28/2011	California Department of Fish and Game, Edmund Pert, Regional Manager
F	10/27/2011	City of El Cajon, Rob Turner, Acting City Manager
G	11/3/2011	City of Santee, Melanie Kush, Director of Planning
H	10/6/2011	San Diego County Archaeological Society, Inc., James W. Royle, Jr., Chairperson
I	10/31/2011	San Diego County Regional Airport Authority, Angela Jamison, Manager
J	9/20/2011	Gillespie Field Development Council, Barry Bardack, Chairman
K	10/5/2011	ABABA BOLT, Jim Law
L	10/6/2011	Financial Foundations, Van C. Elliott
M	10/6/2011	Golden State Flying Club, Thomas DAmico, Chief Flight Instructor
N	10/7/2011	SkyHarbor E16, Bob Lindsay
O	10/11/2011	Hovey & Associates, Gregg B. Hovey
P	10/11/2011	OAC Consulting, William Hall, Principal
Q	10/31/2011	Bock Company, Bob Schnieders
R	9/16/2011	Ronald W. James
S	10/1/2011	Marshall
T	10/2/2011	Kent B. Casady
U	10/3/2011	Aaron Bratten
V	10/3/2011	Rochele Bratten
W	10/3/2011	Derrick Breaux
X	10/3/2011	Jessica Breaux
Y	10/3/2011	Doreen A. Connoles
Z	10/3/2011	Tim J. Connoles
AA	10/3/2011	Joseph E. Hamilton
AB	10/3/2011	Rose M. Uranga

<b>Comment Letter</b>	<b>Date of Letter</b>	<b>Commenter</b>
AC	10/3/2011	Marie L. Woods and George Gardner
AD	10/5/2011	Margaret M. Adams
AE	10/5/2011	Steve D. Adams
AF	10/5/2011	Rick Alexander
AG	10/5/2011	Dennis Araujo
AH	10/5/2011	Barry Bardack
AI	10/5/2011	Gary Bartlow
AJ	10/5/2011	Larry Bierma
AK	10/5/2011	Todd Bohlman
AL	10/5/2011	Chuck Busch
AM	10/5/2011	Liza Butler
AN	10/5/2011	Vernon Cagan
AO	10/5/2011	Darrel Cook
AP	10/5/2011	Patrick Corrigan
AQ	10/5/2011	B.L. Craig
AR	10/5/2011	C.A. Craig
AS	10/5/2011	Robert Davison
AT	10/5/2011	Leslie Day
AU	10/5/2011	Emidlo DelConte
AV	10/5/2011	Rich Essery
AW	10/5/2011	John Flippen
AX	10/5/2011	Rick Fordem
AY	10/5/2011	J.L. Garoutte
AZ	10/5/2011	Gelles L.
BA	10/5/2011	Aaron Giannetto
BB	10/5/2011	L.F. Ginkel
BC	10/5/2011	Tim Graber
BD	10/5/2011	John Hammerstrand
BE	10/5/2011	John Hammerstrand
BF	10/5/2011	John Hammerstrand
BG	10/5/2011	George Kovacevic
BH	10/5/2011	Michael La France
BI	10/5/2011	Beverly Leary
BJ	10/5/2011	Cliff Leary
BK	10/5/2011	Howard Merritt
BL	10/5/2011	Alan Nephew
BM	10/5/2011	Karen Nephew
BN	10/5/2011	Jim Oakley
BO	10/5/2011	William Reschke
BP	10/5/2011	Jennifer Sousa
BQ	10/5/2011	Joseph Sousa

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<b>Comment Letter</b>	<b>Date of Letter</b>	<b>Commenter</b>
BR	10/5/2011	David Sterling
BS	10/5/2011	John Telles
BT	10/5/2011	Warren A. Thomas
BU	10/5/2011	Sid Tolchin
BV	10/5/2011	Robert Treadwell
BW	10/5/2011	Alain P. Vasserot
BX	10/6/2011	Maxine Elliott
BY	10/6/2011	Robin Gartman
BZ	10/6/2011	Colleen M. Grimson
CA	10/6/2011	Gerald Hansen
CB	10/7/2011	Gary Butzke
CC	10/9/2011	James B. Schaible
CD	10/13/2011	Michael W. Roth
CE	11/4/11	Robert Germann
CF	11/6/11	Jean Kaiwi
CG	11/7/11	Betty Chafetz
CH	11/7/11	Robert Germann
CI	11/7/11	Robert Moyes

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Comment Letter A



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

November 8, 2011

Jeff Kashak  
San Diego County Department of Public Works  
5469 Kearny Villa Road, #305  
San Diego, CA 92123-1152

Subject: Gillespie Field 70-Acre Redevelopment Project  
SCH#: 2005111092

Dear Jeff Kashak:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 7, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 823-3018 www.opr.ca.gov

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**Document Details Report  
State Clearinghouse Data Base**

**Comment Letter A  
Attachment**

**SCH#** 2005111092  
**Project Title** Gillespie Field 70-Acre Redevelopment Project  
**Lead Agency** San Diego County

**Type** EIR Draft EIR  
**Description** NOTE: Extended Review Per Lead

The County proposes to redevelopment of the Proposed Project site (a vacant 70-acre site) located in the southeastern corner of the 757-acre Gillespie Field property with aviation uses. This redevelopment would alleviate the existing unmet demand for based aviation support facilities: Redevelopment would include construction of facility improvements by the County (i.e., new taxiways, apron area, drainage facilities, and utility facilities), and aviation-use development by private developers (e.g., rectangular and T-hangar spaces, conventional hangar space, aircraft tie-downs, an apron area, automobile parking, aircraft maintenance space, and aviation office and business space).

**Lead Agency Contact**

**Name** Jeff Kashak  
**Agency** San Diego County Department of Public Works  
**Phone** (858) 874-4056 **Fax**  
**email**  
**Address** 5469 Kearny Villa Road, #305  
**City** San Diego **State** CA **Zip** 92123-1152

**Project Location**

**County** San Diego  
**City** El Cajon  
**Region**  
**Lat / Long** 32° 49' 17" N / 116° 58' 3" W  
**Cross Streets** Bradley Avenue and Wing Avenue  
**Parcel No.** 38719008  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** Hwy 67, SR 123  
**Airports** Gillespie Field  
**Railways** LRT - Trolley  
**Waterways** Broadway Channel, Forester Creek  
**Schools** Chaparral HS  
**Land Use** Vacant; Z: Industrial

**Project Issues** Biological Resources; Toxic/Hazardous; Traffic/Circulation; Vegetation

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** 09/14/2011 **Start of Review** 09/14/2011 **End of Review** 11/07/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

## Comment Letter A Attachment



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND GAME  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.dfg.ca.gov](http://www.dfg.ca.gov)

EDMUND G. BROWN, Jr., Governor  
CHARLTON H. BONHAM, Director



October 28, 2011

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11/7/11  
P



Mr. Jeff Kashak  
Department of Public Works  
County of San Diego  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

**Subject: Comments on the Draft Program Environmental Impact Report for the Gillespie Field 70-acre Redevelopment Project (SCH# 2005111092)**

Dear Mr. Kashak:

The California Department of Fish and Game (Department) has reviewed the draft Program Environmental Impact Report (PEIR) for the Gillespie Field Redevelopment Plan, dated September 15, 2011. The comments provided herein are based on information provided in the draft PEIR and associated documents (including the Biological Technical Report and the Biological Assessment prepared by Technology Associates International Corporation [TAIC], the U.S. Fish and Wildlife Service's [Service's] Draft Biological Opinion, pursuant to Section 7 of the Endangered Species Act [dated September 1, 2009], and the Final Conceptual Mitigation Plan for Redevelopment of the Gillespie Field Airport 70-acre Parcel and Land Acquisition/Avigation Easements Project, El Cajon, California, dated March, 2009 and prepared by EDAW, Inc.), as well as our knowledge of sensitive and declining species and vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code §2050 et seq.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). The project site is located within the City of El Cajon and outside the boundaries of the County's South County MSCP; therefore, take of any listed species is not covered under the County's MSCP. The City of El Cajon was included in the Subregional MSCP Plan (August 1998), but has not yet completed its MSCP SAP.

The proposed project site is a 70-acre vacant lot located in the southeastern corner of the 757-acre Gillespie Field property. Gillespie Field is a publicly owned facility located in the County of San Diego within the municipal limits of the City of El Cajon (City). Interstate 8, which is an east-west highway, is located approximately 1.5 miles to the south of Gillespie Field. State Route 52, also an east-west highway, lies just to the north of Gillespie Field, and the north-south State Route 67 is located nearby to the east.

*Conserving California's Wildlife Since 1870*

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Mr. Jeff Kashak  
October 28, 2011  
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The proposed project would redevelop the 70-acre site and would include construction of approximately 15 acres of facility improvements by the County, including new taxiways, apron area, drainage facilities, and utility facilities, and approximately 55 acres of aviation-use development by private developers, including hangar spaces, aircraft tie-downs, apron area, automobile parking, aircraft maintenance areas, and aviation office and business space. The draft PEIR also analyzes three project alternatives: the no project, a 66.9-acre reduced footprint, and a 36.5-acre further reduced footprint.

The vegetation communities and land types identified on the property include 62.9 acres of disturbed habitat, 6.1 acres of urban/developed land (i.e., paved lot), and 1.1 acre of non-native grassland. Approximately 0.18 acre of the non-native grassland supports San Diego ambrosia (*Ambrosia pumila*), which is an Endangered Species Act-listed endangered species and a Covered Species under the MSCP. While it is not a state-listed species, the Department is currently evaluating this species for state listing under CESA due to continued losses of populations despite the presumed protection of the MSCP and other multi-species planning efforts. The onsite population was fenced and previously preserved as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR; this occurred prior to the federal listing of the species as endangered. A second population of San Diego ambrosia is located on Gillespie Field (north of the runway) but is not included in the 70-acre project area being analyzed by this PEIR. No other special status plant or wildlife species were identified on site. Located south of the proposed project and outside the project footprint are 1.1 acres of unvegetated channel (Broadway Channel) and 0.05 acre of freshwater marsh.

The proposed project would result in permanent direct impacts to the entire 0.18-acre area of San Diego ambrosia and to all of the 1.1 acre of non-native grassland. Indirect impacts to 1.2 acre of unvegetated channel/freshwater marsh outside of the project footprint would occur as a result of construction. No direct impacts to jurisdictional waters and potential wetland areas would result from implementation of this project.

At the recommendation of the 2009 Biological Technical Report prepared by TAIC, the County proposes to mitigate for direct impacts to 0.18 acre of San Diego ambrosia through translocation of all individuals within the proposed project footprint to a 2.9-acre grassland area north of the San Diego River, within Mission Trails Regional Park (MTRP); however, the final translocation site will be approved by the Service prior to project impacts to San Diego ambrosia. The translocated population would be monitored and managed for a minimum of five years to achieve the required success criteria. The County would further be responsible for ensuring the long-term management of the translocated population by providing a non-wasting endowment held by, or in favor of, the City of San Diego Department of Parks and Recreation. Because the impacted San Diego ambrosia population was previously conserved as mitigation, the County would also conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved. The non-native grassland would be mitigated at a 0.5:1 ratio per the County's Biological Guidelines for Determining Significance. This mitigation would be located within the receptor site of the translocated ambrosia or the alternate populations of ambrosia to be preserved.

The County (County Airports) is the Lead Agency under CEQA for the infrastructure improvements described above and is not subject to City regulations. The City will be responsible for all subsequent proposed aviation development by private developers, which would require City permits and be subject to City regulations and plans. Gillespie Field does not



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fall under the County's approved MSCP regulations. The proposed project area is within the jurisdictional boundaries of the City of El Cajon and the City of Santee, neither of which has an approved MSCP subarea plan. Gillespie Field is also exempt from the County's Resource Protection Ordinance (RPO) pursuant to Article 5 (Exemptions) as it is considered an "essential public facility."

We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

1. San Diego ambrosia is considered to be a narrow endemic species (referring to its limited distribution in the United States) and it is a Covered Species under the MSCP and the Multiple Habitat Conservation Program (MHCP) in northern San Diego County. Because San Diego ambrosia is a narrow endemic species, participating jurisdictions must specify additional specific conservation measures for the species in their SAPs. For instance, San Diego ambrosia is a covered narrow endemic species in the County and City of San Diego's MSCP plans and requires impact avoidance of 80% of populations, and area specific management directives must include monitoring of transplanted populations, and specific measures to protect against detrimental edge effects. For jurisdictions that do not have a SAP, such as the cities of El Cajon and Santee, the conservation provisions for San Diego ambrosia found in the MHCP and MSCP are recommended to be followed to ensure consistency with the MSCP and other regional conservation planning.
2. The PEIR examines a 66.9-acre reduced footprint alternative to the proposed project. Under this alternative, 15 acres would be developed by the County for infrastructure improvements (as in the proposed project) while the remaining 51.9 acres would be devoted to future projects by private developers. Direct impacts to the 0.18-acre San Diego ambrosia site and the entire 1.1 acres of non-native grassland would be avoided. Additionally, the San Diego ambrosia would be surrounded by a 2-acre softscape buffer. The Department supports this reduced footprint alternative as it avoids impacts to the on-site San Diego ambrosia population. Our recommendation is based on the sensitivity of the species and the fact that it was set aside as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR. To promote population viability, we further encourage the County to explore opportunities to expand the on-site ambrosia population into more remote areas which would not conflict with current or long-term airport operations.
3. The Biological Assessment (page 34) states that the Gillespie Field San Diego ambrosia population will be transplanted to MTRP, within the City of San Diego's MHPA, and propagated to achieve a 2:1 mitigation ratio. The County would also conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved. Because the currently proposed impact site was required mitigation for the elimination of three of the four previously identified ambrosia populations, as indicated in the Gillespie Field Master Plan EIR, the Department believes a 2:1 mitigation ratio is far from sufficient. If the County proceeds with a project alternative requiring transplantation, the Department recommends that the project conditions be modified such that, at a minimum, the final transplantation success criteria require at least a 5:1 ratio of the number of ambrosia shoots to be established at the transplant site. The Department further concurs

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that the additional acquisition of 1.1 acres of occupied San Diego ambrosia occur at a location which is not presently protected either under a conservation easement or as part of land contributing to the regional preserve system (e.g., MTRP).

4. The proposed translocation area is within MTRP, within the City of San Diego's MHPA. Any proposed relocation of ambrosia within the City's MHPA should be evaluated for consistency with the City's MSCP SAP in the PEIR. In addition, the mitigation (transplantation) plan should be approved by the City, Service, and Department, and provide assurance for the long-term management of the site consistent with the City's MSCP SAP, including related financial assurances (e.g., Property Analysis Record [PAR] analysis, non-wasting endowment, qualified habitat manager, etc.). As described previously, San Diego ambrosia is a covered narrow endemic species under the City's MSCP with significant populations currently being managed under the MSCP. The City's MSCP SAP (1.2.2, Eastern Area East Elliott and MTRP) identifies a major population that occurs on public lands in MTRP. The MHPA Guidelines for the City's East Elliott Area require (as a Priority 1) to "[p]rotect the remaining populations of San Diego ambrosia in the private property area immediately to the east of the Kumeyaay Lake campground.
5. Mitigation Measure M-B1-1e (page 7-2) states that the County will be responsible for the long-term management of the translocation site. The Department requests the opportunity to review and comment on the transplantation plan including the initial 5-year monitoring program, the long-term management plan, and PAR or PAR-equivalent analysis for the translocation site. We assume that both the Service and City will already be providing approval of these documents. Although not specifically stated, the Department assumes that the County will similarly be responsible for ensuring the long-term monitoring and management of the additional 1.1 acre site. The Department requests to be consulted on the selection of the 1.1 acre site, and to review the management plan and related financial analysis for the 1.1-acre site. There are a number of ambrosia populations within the City of El Cajon and the City of Santee that are currently unmanaged and subject to development.
6. The 0.92-acre on-site Gillespie Field San Diego ambrosia population north of runway 17-35, the Kenney Street population, was transplanted in 1993 as mitigation for the Waterfall Development. In the selection of a transplant mitigation site for the proposed project (see Biological Assessment, page 37) preference was given to sites large enough to accommodate the other Gillespie field population north of the runway at the request of the County. Given this information, the Department assumes that the Kenney Street population may be translocated in the future. However, Table 1.2 in the cumulative impact analysis section (2.1.3) does not mention such a project.
7. Full implementation/build out of the 70-acre site is not anticipated to take place until year 2019. In the interim the site has the potential to develop suitable habitat for raptors and migratory birds if the site is not continually maintained. Appendix C/ Biological Report (page 8) recommends preconstruction surveys prior to future construction activities during the avian breeding season. The Department agrees and recommends the following condition be added to the Chapter 7.1, Mitigation Measures, Biological Resources 7.1.1:

Preconstruction breeding bird surveys shall be conducted by a qualified avian biologist, no longer than 72 hours prior to the initiation of project activities, if future project activities are to take place during the avian breeding season which generally runs from March 1 (January 1

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October 28, 2011  
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for some raptors) to August 31. Surveys should be conducted within the construction site and a 500-foot buffer of the construction site to assess both direct and indirect impacts to nesting birds. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Buffer distances and nest and construction activities may be reduced by a qualified biologist depending upon the species of bird nesting and other site-specific factors (ambient human activity; screening vegetation; etc.). Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Subsequent surveys shall be conducted if construction is halted for more than 72 hours at any time during the breeding season.

We appreciate the opportunity to comment on the draft PEIR and to assist the County in further minimizing and mitigating project impacts to biological resources. If you have any additional questions or comments concerning this letter, please contact Meredith Osborne, Environmental Scientist (Botany) at (858) 636-3163.

Sincerely,



Edmund Pert  
Regional Manager  
South Coast Region

cc: State Clearinghouse, Sacramento  
Doreen Stadtlander, U.S. Fish and Wildlife Service, Carlsbad

# Comment Letter A Attachment

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
da\_nahc@pacbell.net



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September 27, 2011

Mr. Jeff Kashak, Environmental Planner II

**County of San Diego Department of Public Works**

5469 Kearny Villa Road  
San Diego, CA 92123-1152

RECEIVED

SEP 29 2011

STATE CLEARING HOUSE

Re: SCH#2005111092; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Gillespie Field 70-acre Redevelopment Project;" located in the City of El Cajon; San Diego County, California.

Dear Mr. Kashak:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604). The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within one-half mile of the 'area of potential effect (APE) based on the USGS coordinates provided. Note: the absence of recorded Native American cultural resources does not preclude their existence. The area (e.g. APE) is known to the NAHC to be culturally sensitive.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

## Comment Letter A Attachment

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254( r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

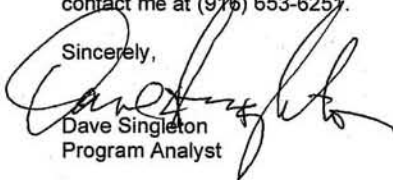
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

**Comment Letter A  
Attachment**

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

## **Response to Comment Letter A**

**Governor's Office of Planning and Research, Scott Morgan  
November 8, 2011**

- A-1 This comment letter from the California Governor's Office of Planning and Research indicates which State agencies received a copy of the Draft Program Environmental Impact Report (PEIR) for review, and it acknowledges that the County has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act (CEQA). The comment letters provided as an attachment were also received directly by the County and are addressed individually in these Responses to Comments. No changes have been made to the PEIR.

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# Comment Letter B

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
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September 27, 2011

Mr. Jeff Kashak, Environmental Planner II

**County of San Diego Department of Public Works**

5469 Kearny Villa Road  
San Diego, CA 92123-1152

Re: SCH#2005111092; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Gillespie Field 70-acre Redevelopment Project," located in the City of El Cajon; San Diego County, California.

Dear Mr. Kashak:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604). The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within one-half mile of the 'area of potential effect (APE)' based on the USGS coordinates provided. Note: the absence of recorded Native American cultural resources does not preclude their existence. The area (e.g. APE) is known to the NAHC to be culturally sensitive.

The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

B-1

B-2

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

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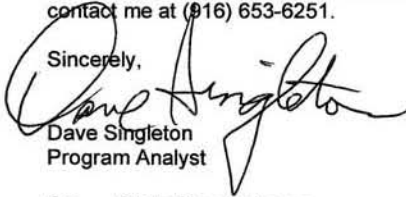
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To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

B-2  
cont'd

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

B-2  
cont'd

**Comment Letter B  
Attachment**

**Native American Contacts  
San Diego County  
September 27, 2011**

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Edwin Romero, Chairperson  
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619-443-0681

Sycuan Band of the Kumeyaay Nation  
Danny Tucker, Chairperson  
5459 Sycuan Road Diegueno/Kumeyaay  
El Cajon, CA 92021  
ssilva@sycuan-nsn.gov  
619 445-2613  
619 445-1927 Fax

La Posta Band of Mission Indians  
Gwendolyn Parada, Chairperson  
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(619) 478-2113  
619-478-2125

Viejas Band of Kumeyaay Indians  
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(619) 445-3810  
(619) 445-5337 Fax

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Allen E. Lawson, Chairperson  
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Valley Center, CA 92082  
allenl@sanpasqualband.com  
(760) 749-3200  
(760) 749-3876 Fax

Kumeyaay Cultural Historic Committee  
Ron Christman  
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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2005111092; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Gillespie Field 70-acre REdevelopment Project; located in the City of El Cajon; San Diego County, California.

**Native American Contacts**  
San Diego County  
September 27, 2011

**Comment Letter B  
Attachment**

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2005111092; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Gillespie Field 70-acre REdevelopment Project; located in the City of El Cajon; San Diego County, California.

**Native American Contacts**  
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September 27, 2011

**Comment Letter B  
Attachment**

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2005111092; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Gillespie Field 70-acre REdevelopment Project; located in the City of El Cajon; San Diego County, California.

## **Response to Comment Letter B**

**Native American Heritage Commission, Dave Singleton  
September 27, 2011**

- B-1 The County acknowledges receipt of this letter and concurs that no traditional cultural properties or Native American heritage sites are located within one-half mile of the Proposed Project site as discussed in the Draft PEIR Section 3.1.3.1. No changes have been made to the PEIR.
- B-2 The County received a previous letter from the Native American Heritage Commission (NAHC) during development of the Cultural Resources Technical Report for the Proposed Project. As described in the Cultural Resources Technical Report (Appendix D), the NAHC provided a list of Native American tribal representatives to solicit further information concerning the Proposed Project. Letters were sent to eight tribal representatives requesting further information. Only one response, a letter dated April 18, 2006, from Ms. Shasta Gaughen, Assistant Director for the Pala Band of Mission Indians, was received. The letter suggested that a “project of this size would benefit from the presence of Native American monitors.” On August 16, 2006, a letter was sent in response to Ms. Gaughen stating that, due to the extremely high level of disturbance on-site and the fact that neither the records search nor the survey resulted in the identification of cultural resources, the likelihood of identifying unknown prehistoric or historic archaeological deposits is extremely low and does not warrant Native American or archaeological monitoring. Therefore, the County finds that additional tribal consultation is not warranted. In addition, the San Diego County Archaeological Society, Inc. submitted a letter to the County dated October 6, 2011 stating that “we agree no significant impacts to cultural resources are likely to occur. We therefore also agree that no cultural resources mitigation measures are necessary.” No changes have been made to the PEIR.

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Comment Letter C



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

October 24, 2011

Mr. Jeff Kashak  
County of San Diego, Department of Public Works  
5469 Kearny Villa Road, Suite 305  
San Diego, California 92123

DRAFT ENVIRONMENTAL IMPACT STATEMENT /ENVIRONMENTAL IMPACT  
REPORT FOR GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT  
(SCH# 2005111092).

Dear Mr. Kashak:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of the Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The County proposes the redevelopment of a vacant 70-acre site located in the southeastern corner of the 757-acre Gillespie Field property with aviation uses. The Proposed Project would include construction of approximately 15 acres of facility improvements implemented by the County (i.e., new taxiways, apron area, drainage facilities, and utility facilities), and approximately 55 acres to be dedicated toward aviation-use development that would be designed and constructed by private developers (e.g., rectangular and T-hangar spaces, conventional hangar space, aircraft tie-downs, an apron area, automobile parking, aircraft maintenance space, and aviation office and business space). Private developers would be required to conduct subsequent environmental review prior to the authorization for individual project development. The City of El Cajon will be the CEQA Lead Agency for all project components related to private development requiring discretionary permits".

Based on the review of the submitted document DTSC has the following comments:

- 1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

C-1

C-2

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Mr. Jeff Kashak  
October 24, 2011  
Page 2

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
  - Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.

C-2  
cont'd

C-3

C-4

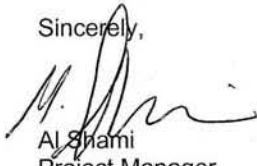
- June 2012

Mr. Jeff Kashak  
October 24, 2011  
Page 4

If you have any questions regarding this letter, please contact me at  
[ashami@dtsc.ca.gov](mailto:ashami@dtsc.ca.gov), or by phone at (714) 484-5472.

◆ C-9  
cont'd

Sincerely,



Al Shami  
Project Manager  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
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Sacramento, California 95812-3044  
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CEQA Tracking Center  
Department of Toxic Substances Control  
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CEQA # 3363

## **Response to Comment Letter C**

**California Department of Toxic Substances Control, Al Shami  
October 24, 2011**

- C-1 This comment from the Department of Toxic Substances Control (DTSC) restates information provided in the project description of the Draft PEIR, and does not raise any specific issues relative to the environmental analysis. No changes have been made to the PEIR.
- C-2 As discussed in Section 2.2 of the Draft PEIR, a Phase I and Phase II Environmental Due Diligence Audit (EDDA) Environmental Site Assessments (ESA) were completed for the Proposed Project. These reports evaluated current and historic uses of the Proposed Project site. As part of the Phase I federal, state, tribal, and local environmental database information was reviewed within the ASTM-specified distance from the project site, including the specific databases listed in this comment. Copies of these records can be found in Appendix E of the Draft PEIR.

Based on the potential for hazardous materials to be released during construction, the Draft PEIR concluded that the Proposed Project could potentially result in a significant impact. Mitigation Measures M-HZ-1a through M-HZ-1d would be implemented to reduce any potential impacts from the release of hazardous materials during construction to a level below significance. No changes have been made to the PEIR.

- C-3 As discussed in the Draft PEIR Section 2.2.6, the County identifies a mechanism to initiate required investigation and/or remediation for any site that may be contaminated. The Draft PEIR has been revised in Section 2.2.2 to cite San Diego County Department of Environmental Health (DEH) as the appropriate regulatory agency.
- C-4 Mitigation measures M-HZ-1a through M-HZ-1d describe the process for properly surveying and remediating any hazardous materials that may be released during construction. This includes ensuring compliance with all federal, state, and local regulations pertaining to hazardous materials as enforced by the County DEH. Also, in preparation of the Draft PEIR, a Soil Management Plan was prepared to describe the procedures to manage known and potentially contaminated soil (Appendix E). No closure, certification, or remediation approval reports have been prepared at this time by regulatory agencies (DEH).

Furthermore, the use, generation, storage, treatment or disposal of hazardous materials by future occupants of the site will be regulated by the County of San Diego DEH, Hazardous Materials Division (HMD). The HMD is responsible for regulating hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The goal of the HMD is to protect human health and the environment by ensuring that hazardous materials, hazardous waste and underground storage tanks are properly managed. All hazardous materials at the site would be properly stored and managed with oversight by HMD. The PEIR has been revised in Section 2.2.2 to cite County DEH as the regulatory agency.

- C-5 No buildings or other structures are located on the Proposed Project footprint. Therefore, additional investigation as outlined in this comment is not warranted. No changes have been made to the PEIR.
- C-6 The County concurs that sampling would be required of excavated soil that has the potential to be contaminated. Additionally, all contaminated soil would be disposed at an approved offsite disposal/recycling facility. As such, Mitigation Measures M-HZ-1a through M-HZ-1d as identified in the Draft PEIR shall be implemented. No changes have been made to the PEIR.
- C-7 The County concurs that a health risk assessment should be prepared to protect human health and the environment during any construction activities. As such, Mitigation Measure M-HZ-1d as identified in the Draft PEIR requires the County and private developers to prepare a human health risk assessment to evaluate potential health risks to future occupants of the site prior to occupation of any structures within the Proposed Project site. No changes have been made to the PEIR.
- C-8 The use, generation, storage, treatment or disposal of hazardous materials by future occupants of the Proposed Project site will be regulated in accordance with all federal, state and local regulations and ordinances. The quantities and types of solid waste which may be generated by future aviation-related uses of the site have not been determined at this time and will ultimately be determined by the occupants of the site. As identified in the Draft PEIR Section 2.2.3.1, depending on the quantity and nature of the hazardous materials stored and used at the site, a Spill Prevention, Control and Countermeasure (SPCC) Plan or Storm Water Pollution Prevention Plan (SWPPP) may need to be prepared by the occupant(s) of the site. The County of San Diego DEH would regulate the use, generation, storage, treatment or disposal of hazardous materials by future occupants of the site. No changes have been made to the PEIR.
- C-9 The County acknowledges that DTSC can provide cleanup oversight for government agencies that are not responsible parties. As County DEH would serve as the overseeing regulatory authority for the Proposed Project, the County finds that no guidance for cleanup oversight is required by DTSC. The County appreciates DTSC's input. No changes have been made to the PEIR.

# Comment Letter D

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN, Jr., Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

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TTY 711

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October 24, 2011

11-SD-67

PM 1.11

Mr. Jeff Kashak  
Department of Public Works  
San Diego County  
5469 Kearny Villa Road, #305  
San Diego, CA 92123-1152

RE: Gillespie Field 70-Acre Redevelopment Project

Dear Mr. Kashak:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Draft Traffic Impact Study (TIS) prepared by LOS, Engineering Inc., dated September 7, 2011, as part of Draft Environmental Impact Report (DEIR SCH #2005111092) for the Gillespie Field 70-Acre Redevelopment Project located at 10990 Woodside Avenue North in the City of El Cajon, near State Route 67 (SR-67). Caltrans has the following comment on the TIS:

On Page 11, Table 2: EXISTING (YEAR 2011) INTERSECTION LEVEL OF SERVICE, Cuyamaca Street/SR-52 ramps intersection should be included.

Appendix I year 2030 shows that 28% of traffic is expected to travel north on Marshall Avenue. This northbound traffic on Marshall Avenue would continue to Cuyamaca Street and ultimately to SR-52. However, this report shows no studies at the intersection of Cuyamaca Street and the SR-52 ramps. Please explain.

If you have any questions or require further information, please contact Roy Abboud at (619) 688-6869 or Roy\_Abboud@dot.ca.gov.

Sincerely,

JACOB M. ARMSTRONG, Chief  
Development Review Branch

*"Caltrans improves mobility across California"*

D-1

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## **Response to Comment Letter D**

**California Department of Transportation (Caltrans), Jacob M. Armstrong  
October 24, 2011**

- D-1 The County finds that analysis of the roadway intersection of Cuyamaca Street and State Route (SR)-52 was not warranted in the PEIR or Traffic Impact Study as this intersection is located outside of the determined study area as defined by the peak hour trip criteria documented in the County of San Diego *Report Format and Content Requirements for Transportation and Traffic*. As shown in the Traffic Impact Study (Figure 12; intersection #10), the number of peak hour trips on Cuyamaca Street just north of Bradley Avenue include 20 AM trips and 23 PM trips. Therefore, according to the County criteria, the roadways and intersection north of Bradley Avenue along Cuyamaca Street are not required for analysis.

As documented in the Traffic Impact Study (Figure 8), 12% of the total project traffic generated from the Proposed Project is anticipated to use SR-52 (including Marshall Avenue and Cuyamaca Street). 12% of the total project AM trips and PM trips equates to 12 AM trips and 13 PM trips, which is less than 25 peak hour trips and less than the required threshold for analyzing a roadway element. No changes have been made to the PEIR.

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## Comment Letter E



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND GAME  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.dfg.ca.gov](http://www.dfg.ca.gov)

EDMUND G. BROWN, Jr., Governor  
CHARLTON H. BONHAM, Director



October 28, 2011

Mr. Jeff Kashak  
Department of Public Works  
County of San Diego  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

**Subject: Comments on the Draft Program Environmental Impact Report for the Gillespie Field 70-acre Redevelopment Project (SCH# 2005111092)**

Dear Mr. Kashak:

The California Department of Fish and Game (Department) has reviewed the draft Program Environmental Impact Report (PEIR) for the Gillespie Field Redevelopment Plan, dated September 15, 2011. The comments provided herein are based on information provided in the draft PEIR and associated documents (including the Biological Technical Report and the Biological Assessment prepared by Technology Associates International Corporation [TAIC], the U.S. Fish and Wildlife Service's [Service's] Draft Biological Opinion, pursuant to Section 7 of the Endangered Species Act [dated September 1, 2009], and the Final Conceptual Mitigation Plan for Redevelopment of the Gillespie Field Airport 70-acre Parcel and Land Acquisition/Aviation Easements Project, El Cajon, California, dated March, 2009 and prepared by EDAW, Inc.), as well as our knowledge of sensitive and declining species and vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

E-1

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code §2050 et seq.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). The project site is located within the City of El Cajon and outside the boundaries of the County's South County MSCP; therefore, take of any listed species is not covered under the County's MSCP. The City of El Cajon was included in the Subregional MSCP Plan (August 1998), but has not yet completed its MSCP SAP.

The proposed project site is a 70-acre vacant lot located in the southeastern corner of the 757-acre Gillespie Field property. Gillespie Field is a publicly owned facility located in the County of San Diego within the municipal limits of the City of El Cajon (City). Interstate 8, which is an east-west highway, is located approximately 1.5 miles to the south of Gillespie Field. State Route 52, also an east-west highway, lies just to the north of Gillespie Field, and the north-south State Route 67 is located nearby to the east.

E-2

*Conserving California's Wildlife Since 1870*

Mr. Jeff Kashak  
October 28, 2011  
Page 2 of 5

The proposed project would redevelop the 70-acre site and would include construction of approximately 15 acres of facility improvements by the County, including new taxiways, apron area, drainage facilities, and utility facilities, and approximately 55 acres of aviation-use development by private developers, including hangar spaces, aircraft tie-downs, apron area, automobile parking, aircraft maintenance areas, and aviation office and business space. The draft PEIR also analyzes three project alternatives: the no project, a 66.9-acre reduced footprint, and a 36.5-acre further reduced footprint.

E-2  
Cont'd

The vegetation communities and land types identified on the property include 62.9 acres of disturbed habitat, 6.1 acres of urban/developed land (i.e., paved lot), and 1.1 acre of non-native grassland. Approximately 0.18 acre of the non-native grassland supports San Diego ambrosia (*Ambrosia pumila*), which is an Endangered Species Act-listed endangered species and a Covered Species under the MSCP. While it is not a state-listed species, the Department is currently evaluating this species for state listing under CESA due to continued losses of populations despite the presumed protection of the MSCP and other multi-species planning efforts. The onsite population was fenced and previously preserved as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR; this occurred prior to the federal listing of the species as endangered. A second population of San Diego ambrosia is located on Gillespie Field (north of the runway) but is not included in the 70-acre project area being analyzed by this PEIR. No other special status plant or wildlife species were identified on site. Located south of the proposed project and outside the project footprint are 1.1 acres of unvegetated channel (Broadway Channel) and 0.05 acre of freshwater marsh.

E-3

The proposed project would result in permanent direct impacts to the entire 0.18-acre area of San Diego ambrosia and to all of the 1.1 acre of non-native grassland. Indirect impacts to 1.2 acre of unvegetated channel/freshwater marsh outside of the project footprint would occur as a result of construction. No direct impacts to jurisdictional waters and potential wetland areas would result from implementation of this project.

E-4

At the recommendation of the 2009 Biological Technical Report prepared by TAIC, the County proposes to mitigate for direct impacts to 0.18 acre of San Diego ambrosia through transplantation of all individuals within the proposed project footprint to a 2.9-acre grassland area north of the San Diego River, within Mission Trails Regional Park (MTRP); however, the final transplantation site will be approved by the Service prior to project impacts to San Diego ambrosia. The translocated population would be monitored and managed for a minimum of five years to achieve the required success criteria. The County would further be responsible for ensuring the long-term management of the translocated population by providing a non-wasting endowment held by, or in favor of, the City of San Diego Department of Parks and Recreation. Because the impacted San Diego ambrosia population was previously conserved as mitigation, the County would also conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved. The non-native grassland would be mitigated at a 0.5:1 ratio per the County's Biological Guidelines for Determining Significance. This mitigation would be located within the receptor site of the translocated ambrosia or the alternate populations of ambrosia to be preserved.

E-5

The County (County Airports) is the Lead Agency under CEQA for the infrastructure improvements described above and is not subject to City regulations. The City will be responsible for all subsequent proposed aviation development by private developers, which would require City permits and be subject to City regulations and plans. Gillespie Field does not

E-6



Mr. Jeff Kashak  
October 28, 2011  
Page 3 of 5

fall under the County's approved MSCP regulations. The proposed project area is within the jurisdictional boundaries of the City of El Cajon and the City of Santee, neither of which has an approved MSCP subarea plan. Gillespie Field is also exempt from the County's Resource Protection Ordinance (RPO) pursuant to Article 5 (Exemptions) as it is considered an "essential public facility".

E-6  
Cont'd

We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

1. San Diego ambrosia is considered to be a narrow endemic species (referring to its limited distribution in the United States) and it is a Covered Species under the MSCP and the Multiple Habitat Conservation Program (MHCP) in northern San Diego County. Because San Diego ambrosia is a narrow endemic species, participating jurisdictions must specify additional specific conservation measures for the species in their SAPs. For instance, San Diego ambrosia is a covered narrow endemic species in the County and City of San Diego's MSCP plans and requires impact avoidance of 80% of populations, and area specific management directives must include monitoring of transplanted populations, and specific measures to protect against detrimental edge effects. For jurisdictions that do not have a SAP, such as the cities of El Cajon and Santee, the conservation provisions for San Diego ambrosia found in the MHCP and MSCP are recommended to be followed to ensure consistency with the MSCP and other regional conservation planning.
2. The PEIR examines a 66.9-acre reduced footprint alternative to the proposed project. Under this alternative, 15 acres would be developed by the County for infrastructure improvements (as in the proposed project) while the remaining 51.9 acres would be devoted to future projects by private developers. Direct impacts to the 0.18-acre San Diego ambrosia site and the entire 1.1 acres of non-native grassland would be avoided. Additionally, the San Diego ambrosia would be surrounded by a 2-acre softscape buffer. The Department supports this reduced footprint alternative as it avoids impacts to the on-site San Diego ambrosia population. Our recommendation is based on the sensitivity of the species and the fact that it was set aside as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR. To promote population viability, we further encourage the County to explore opportunities to expand the on-site ambrosia population into more remote areas which would not conflict with current or long-term airport operations.
3. The Biological Assessment (page 34) states that the Gillespie Field San Diego ambrosia population will be transplanted to MTRP, within the City of San Diego's MHPA, and propagated to achieve a 2:1 mitigation ratio. The County would also conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved. Because the currently proposed impact site was required mitigation for the elimination of three of the four previously identified ambrosia populations, as indicated in the Gillespie Field Master Plan EIR, the Department believes a 2:1 mitigation ratio is far from sufficient. If the County proceeds with a project alternative requiring transplantation, the Department recommends that the project conditions be modified such that, at a minimum, the final transplantation success criteria require at least a 5:1 ratio of the number of ambrosia shoots to be established at the transplant site. The Department further concurs

E-7

E-8

E-9

E-10

Mr. Jeff Kashak  
October 28, 2011  
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that the additional acquisition of 1.1 acres of occupied San Diego ambrosia occur at a location which is not presently protected either under a conservation easement or as part of land contributing to the regional preserve system (e.g., MTRP).

**E-10  
Cont'd**

4. The proposed translocation area is within MTRP, within the City of San Diego's MHPA. Any proposed relocation of ambrosia within the City's MHPA should be evaluated for consistency with the City's MSCP SAP in the PEIR. In addition, the mitigation (transplantation) plan should be approved by the City, Service, and Department, and provide assurance for the long-term management of the site consistent with the City's MSCP SAP, including related financial assurances (e.g., Property Analysis Record [PAR] analysis, non-wasting endowment, qualified habitat manager, etc.). As described previously, San Diego ambrosia is a covered narrow endemic species under the City's MSCP with significant populations currently being managed under the MSCP. The City's MSCP SAP (1.2.2, Eastern Area East Elliott and MTRP) identifies a major population that occurs on public lands in MTRP. The MHPA Guidelines for the City's East Elliott Area require (as a Priority 1) to "[p]rotect the remaining populations of San Diego ambrosia in the private property area immediately to the east of the Kumeyaay Lake campground.

**E-11**

**E-12**

**E-13**

5. Mitigation Measure M-B1-1e (page 7-2) states that the County will be responsible for the long-term management of the translocation site. The Department requests the opportunity to review and comment on the transplantation plan including the initial 5-year monitoring program, the long-term management plan, and PAR or PAR-equivalent analysis for the translocation site. We assume that both the Service and City will already be providing approval of these documents. Although not specifically stated, the Department assumes that the County will similarly be responsible for ensuring the long-term monitoring and management of the additional 1.1 acre site. The Department requests to be consulted on the selection of the 1.1 acre site, and to review the management plan and related financial analysis for the 1.1-acre site. There are a number of ambrosia populations within the City of El Cajon and the City of Santee that are currently unmanaged and subject to development.

**E-14**

6. The 0.92-acre on-site Gillespie Field San Diego ambrosia population north of runway 17-35, the Kenney Street population, was transplanted in 1993 as mitigation for the Waterfall Development. In the selection of a transplant mitigation site for the proposed project (see Biological Assessment, page 37) preference was given to sites large enough to accommodate the other Gillespie field population north of the runway at the request of the County. Given this information, the Department assumes that the Kenney Street population may be translocated in the future. However, Table 1.2 in the cumulative impact analysis section (2.1.3) does not mention such a project.

**E-15**

7. Full implementation/build out of the 70-acre site is not anticipated to take place until year 2019. In the interim the site has the potential to develop suitable habitat for raptors and migratory birds if the site is not continually maintained. Appendix C/ Biological Report (page 8) recommends preconstruction surveys prior to future construction activities during the avian breeding season. The Department agrees and recommends the following condition be added to the Chapter 7.1, Mitigation Measures, Biological Resources 7.1.1:

**E-16**

Preconstruction breeding bird surveys shall be conducted by a qualified avian biologist, no longer than 72 hours prior to the initiation of project activities, if future project activities are to take place during the avian breeding season which generally runs from March 1 (January 1

Mr. Jeff Kashak  
October 28, 2011  
Page 5 of 5

for some raptors) to August 31. Surveys should be conducted within the construction site and a 500-foot buffer of the construction site to assess both direct and indirect impacts to nesting birds. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Buffer distances and nest and construction activities may be reduced by a qualified biologist depending upon the species of bird nesting and other site-specific factors (ambient human activity; screening vegetation; etc.). Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Subsequent surveys shall be conducted if construction is halted for more than 72 hours at any time during the breeding season.

We appreciate the opportunity to comment on the draft PEIR and to assist the County in further minimizing and mitigating project impacts to biological resources. If you have any additional questions or comments concerning this letter, please contact Meredith Osborne, Environmental Scientist (Botany) at (858) 636-3163.

Sincerely,



Edmund Pert  
Regional Manager  
South Coast Region

cc: State Clearinghouse, Sacramento  
Doreen Stadtlander, U.S. Fish and Wildlife Service, Carlsbad

E-16  
Cont'd



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## Response to Comment Letter E

California Department of Fish and Game, Edmund Pert  
October 28, 2011

- E-1 The County acknowledges receipt of this comment letter, which states that the PEIR and project documents were reviewed by California Department of Fish and Game (CDFG), and CDFG is a Trustee Agency and Responsible Agency pursuant to CEQA. No changes have been made to the PEIR.
- E-2 This comment repeats the project description and project alternatives as described in the Draft PEIR. No changes have been made to the PEIR.
- E-3 This comment summarizes the existing vegetation communities identified in the Draft PEIR and the status of sensitive species found within the project footprint, including the federally-endangered San Diego ambrosia (*Ambrosia pumila*). No changes have been made to the PEIR.
- E-4 This comment summarizes the proposed impacts to vegetation communities and sensitive species identified in the Draft PEIR. However, this comment incorrectly states that 1.2 acres of unvegetated channel/freshwater marsh would be indirectly impacted during construction. As identified in Section 2.1.2.3 of the Draft PEIR and Appendix B – *Evaluation of the 2009 Biological Resources Impact Analysis*, no impacts would occur to unvegetated channel or freshwater marsh, and the identified 1.2 acres would be avoided. No changes have been made to the PEIR.
- E-5 This comment summarizes the mitigation required to offset impacts to 0.18 acre of San Diego ambrosia. In accordance with Mitigation Measure M-BI-1e, the County will be responsible for long-term management of the transplantation site. The County is continuing coordination with the City of San Diego to establish a funding mechanism in order to ensure long-term management of the transplanted population. No changes have been made to the PEIR.
- E-6 The County concurs that the County is the Lead Agency for the infrastructure improvements and is not subject to City of El Cajon regulations. The City of El Cajon will be responsible for all review of subsequent proposed aviation development by private developers. In addition, the County concurs that the Proposed Project is located outside an approved Multiple Species Conservation Program (MSCP) and is exempt from the County Resource Protection Ordinance. No changes have been made to the PEIR.
- E-7 The County acknowledges and concurs that the Cities of El Cajon and Santee do not have adopted SAPs and reiterates that the Proposed Project is located outside approved-MSCP area. As such, the County coordinated with the U.S. Fish and Wildlife Service (USFWS) to ensure proper mitigation was implemented. The USFWS issued a Biological Opinion (BO) for the species on September 1, 2009. In addition, the BO confirms that the current onsite location of San Diego ambrosia would likely not contribute to the recovery of the species as a whole because it represents a small, isolated population surrounded by development. No changes have been made to the PEIR.

- E-8 See Response E-7. As stated in the BO issued for the Proposed Project by USFWS on September 1, 2009, while the existing population would be surrounded by existing and future development at Gillespie Field if left intact, transplanting the population to Mission Trails Regional Park (MTRP) – where it will be conserved and managed in perpetuity – will better contribute to the overall recovery of the species. The impacted population, if left in place, would likely not contribute to the recovery of the species as a whole because it represents a small, isolated population surrounded by development.

The County acknowledges that CDFG's preferred footprint includes the Reduced Footprint Alternative since it would avoid impacts to San Diego ambrosia; however, as identified in Section 4.3.1 of the Draft PEIR, the Reduced Footprint Alternative would not meet the County's objective to comply with federal grant assurances. The County has been directed by the FAA to develop the 70-acre site for aviation uses in accordance with the "highest and best use" for the property. In addition, two of the three project objectives would not be met to the same extent than the Proposed Project. The commenter's support for the Reduced Footprint Project Alternative is noted and has been included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.

- E-9 To request take authorization under the Federal Endangered Species Act, the County prepared a Biological Assessment to the jurisdictional agency, the USFWS, and is obligated to perform the avoidance, minimization, and mitigation measures stated in the BO. As stated in the BA for the Proposed Project, propagation of the San Diego ambrosia population at 2:1 mitigation ratio would require 2.9 acres of native grassland. Therefore, as identified in Mitigation Measure M-BI-1a and in accordance with the BO issued by USFWS on September 1, 2009, the County will offset direct impacts to San Diego ambrosia by transplanting the population to a 2.9-acre native grassland site. The ambrosia will be salvaged, transported, and transplanted at the receptor site to ultimately attain a mitigation ratio of 2:1 at the end of a 5-year maintenance and monitoring period. The methods, size, and location of the transplantation will be conducted as required by the BO issued on September 1, 2009.

The San Diego ambrosia population proposed to be impacted by the Proposed Project is mitigation from the 1987 Gillespie Field Master Plan Revision and Development Project. According to the PEIR for that project, three of the four ambrosia populations on the airport were to be removed, with the large population to be preserved in open space at the location being impacted by the Proposed Project. However, the Proposed Project mitigation for impacts to San Diego ambrosia was negotiated and approved through consultation with the USFWS and subsequent issuance of a Biological Opinion on September 1, 2009. Mitigation measure M-BI-1a is taken directly from the Biological Opinion issued by the USFWS and fully mitigates the impact. No changes have been made to the PEIR.

- E-10 The County concurs that the additional conservation of 1.1 acres of San Diego ambrosia should occur at a location which is not currently conserved, protected, and/or managed in accordance with the BO. No changes have been made to the PEIR.
- E-11 As identified in the City of San Diego's MSCP Subarea Plan, the goal of the MSCP is to maintain and enhance biological diversity in the region and conserve viable populations

of endangered, threatened, and key sensitive species and their habitats. The transplantation of San Diego ambrosia to MTRP would not result in impacts to any existing sensitive biological resources currently located within MTRP, and it would contribute to the continued protection and overall recovery of the species by increasing the population area within MTRP. The proposed transplantation would also attain and fulfill the management objectives of the City's Multi-Habitat Planning Area (MHPA). No changes have been made to the PEIR.

- E-12 While the County agrees to include CDFG on correspondence during future consultation with USFWS and the City of San Diego regarding the management of the receptor site, the County must defer to the overseeing regulatory agency, USFWS, for final approval of a transplantation plan. Prior to implementation, the County will consult with USFWS and the City of San Diego regarding a financial agreement to ensure long-term management of the receptor site. No changes have been made to the PEIR.
- E-13 See Response E-11. Furthermore, as identified in the City of San Diego MSCP Subarea Plan (p. 71), the City shall "explore methods to protect and enhance the San Diego ambrosia population in the area such as transplanting to more remote areas" within the East Elliott subarea. The proposed transplantation to Mission Trails Regional Park by the County would not impact existing known populations of San Diego ambrosia and would contribute to the protection and overall recovery of the species by increasing the population area within Mission Trails Regional Park. No changes have been made to the PEIR.
- E-14 While the County agrees to include CDFG on future consultation with USFWS and the City of San Diego regarding the management of the receptor site, the County must defer to the overseeing regulatory agency, USFWS, for final approval of a transplantation plan and approval of the additional 1.1-acre San Diego ambrosia conservation site. The County appreciates CDFG's input into identifying suitable conservation sites. No changes have been made to the PEIR.
- E-15 At the time when search criteria were developed for a suitable receptor site to transplant the San Diego ambrosia population located on the Proposed Project site, the County proactively elected to identify larger receptor sites in the event that the existing ambrosia population located north of Runway 17/35 required transplantation in the future. However, the County does not have proposed plans to impact or transplant the existing ambrosia population located north of Runway 17/35. No changes have been made to the PEIR.
- E-16 The County concurs that preconstruction surveys should be performed for nesting birds for all future construction activities that are within the breeding season. This is currently identified in the Draft PEIR in Section 2.1.2.4 and Section 7.2.2 as a project design feature that the County will be required to implement by including this condition in the construction contract language. The County does not recommend adding the survey language as mitigation to Section 7.1 as no project impacts to nesting birds were identified. The PEIR has been revised in the above sections to correct the allowed range of habitat clearing (September 1 through December 31) to avoid the avian breeding season.

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# Comment Letter F



## CITY OF EL CAJON

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CITY MANAGER

October 27, 2011

Jeff Kashak, Environmental Planner II  
Department of Planning and Land Use  
County of San Diego  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

Subject: Draft Program Environmental Impact Report - SCH# 2005111092  
Gillespie Field 70-Acre Redevelopment Project

Dear Mr. Kashak:

The City of El Cajon (City) appreciates the opportunity to review the draft program environmental impact report (PEIR) for the Gillespie Field Redevelopment Project. As you know, we are partners in the development of properties on and around Gillespie Field. As a "Responsible Agency" under Section 15096 of the CEQA Guidelines, the City has an obligation to review and comment on the proposed Draft, including the proposed mitigation measures related to the private development component of the proposed project.

F-1

The City understands that the proposed project is to redevelop a vacant 70-acre site located in the southeastern corner of Gillespie Field with aviation uses. The project includes components that are public and private. Gillespie Field is a 757-acre publicly-owned facility located within the municipal limits of the City of El Cajon, with the exception of a small portion within the City of Santee.

The City recognizes the independent authority of the County of San Diego (County) over its properties. The City believes that since the City serves as the permitting authority for the future private development of the proposed project, and the City provides fire, police, sewer and drainage services to the project site, the private development component of this project should be evaluated against the City's General Plan, Zoning Code and other applicable regulations and policies. This would better facilitate development by allowing the City to more effectively tier off this PEIR. The use of the County General Plan, codes and policies do not serve as an appropriate measuring tool against the proposed project.

F-2

Based on the City's review of the draft program environmental impact report, the City has the following comments:










1. Analyze the proposed project, especially the private development and associated impacts portion against the City of El Cajon General Plan Goals and their supporting objectives and policies. It should also be measured against the City's Zoning Ordinance Manufacturing Zone development standards and Architectural Guidelines. Finally, the associated traffic results should be weighed against the City's LOS D threshold for City streets and intersections.

F-3

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County of San Diego  
Draft Program Environmental Comment Letter  
Dated 10-27-11

- |   |  |
|---|--|
| <p>2. On Page S-7, <i>Mitigation Measure M-HZ-1b</i>: Since the proposed mitigation is for the private development component of the project, which is subject to City approval, the City suggests that the implementation of the Soil Management Plan be submitted to the City for permits to discharge into the City sewer system or storm drain. This MM should be adjusted with the following language: "Any actions taken by a private developer to remove, treat or otherwise reduce the contaminant concentrations, and before discharge to any sanitary sewer or public storm drain system, shall be reviewed and approved by the City of El Cajon Public Works Department prior to the issuance of building permits."</p> | <br><b>F-4</b>    |
| <p>3. On Page S-7, <i>Mitigation Measure M-HZ-1c</i>: Since the proposed mitigation is for the private development component of the project, which is subject to City approval, the City suggests that a copy of any reports the environmental monitor produces be submitted to the City of El Cajon Community Development Department for entitlement record management purposes.</p>   | <br><b>F-5</b>    |
| <p>4. On Page S-8, <i>Mitigation Measure M-HZ-1d</i>: Since the proposed mitigation is for the private development component of the project, which is subject to City approval, the City suggest that that a copy of the Health Risk Assessment (HRA) and a copy of the Risk Based Corrective Action (RBCA) analysis be submitted with the Site Development Permit application to the City of El Cajon Community Development Department for application completeness purposes.</p>  | <br><b>F-6</b>    |
| <p>5. On Page 1-12, Table 1-2, <i>Cumulative Projects</i>: The status of the Pacific Scene Industrial Park project is approved and the accompanying EIR was certified on 08/11/09.</p>  | <br><b>F-7</b>    |
| <p>6. On Page 1-13, Table 1-2, <i>Cumulative Projects</i>: The status of the Electrical Peaker Plant project is complete. The project and ND were approved on 7/13/09. The status of the Public Safety Center is complete.</p>  | <br><b>F-8</b>   |
| <p>7. On Page 1-13, Table 1-2, <i>Cumulative Projects</i>: Please include the City of El Cajon's proposed Downtown Specific Plan Project. The specific plan and draft PEIR details can be obtained at <a href="http://www.ci-el-cajon.ca.us/dept/comm/planning.html">www.ci-el-cajon.ca.us/dept/comm/planning.html</a> under "Proposed Downtown Specific Plan".</p>   | <br><b>F-9</b>  |
| <p>8. On Page 2-35, Figure 2.2-2, <i>Surrounding Uses</i>: The surrounding uses in El Cajon include light industrial.</p>   | <br><b>F-10</b> |
| <p>9. On Page 2-41, <i>County Guidelines for Determining Significance: Transportation and Traffic</i>: There is a discussion on SANDAG's Congestion Management Program (CMP). In 2009, all SANDAG member agencies have officially opted out the Congestion Management Program and are no longer required to perform a CMP analysis.</p>   | <br><b>F-11</b> |
| <p>10. On Page 2-44, Section 2.3.2.3, <i>Hazards Due to a Transportation Design Feature</i>: The project includes the removal of Airport Road that will result in Joe Crosson Drive terminating at the northerly end of the project area. Since fire department services are provided by the City, the City requests that the new terminus of Joe Crosson Drive be designed and improved with a turning radius that is consistent with the standards found in the California Fire Code. Please contact the City of El Cajon Building Official/Fire Marshall at 619-441-1726 for further information.</p>  | <br><b>F-12</b> |

County of San Diego  
Draft Program Environmental Comment Letter  
Dated 10-27-11

11. On Page 3-103, Section 3.1.8.1, *Existing Conditions, Police Protection*: The Police Department is located at 100 Civic Center Way.
12. On Page 3-107, Section 3.1.9.1, *Existing Conditions, Water Supply*: Only Padre Dam provides water to the area. Helix Water District, like the City of San Diego, has a water main within an easement through the subject property.
13. On Page 3-109, Section 3.1.9.3, *Wastewater, Analysis*: Previous meetings between the City and County engineering teams discussed the option of Padre Dam providing sewer service to the northeast section of the project site because of grade differences. Is this still a matter to resolve or will the City of El Cajon provide sewer service for the entire project area?
14. The proposed 70-Acre redevelopment project is expected to generate 1,407 daily vehicle trips to the adjacent street system. Recent County approved development agreements, such as the 465,000 square-foot Forester Creek Industrial Park is expected to generate 3,900 daily vehicle trips. These combined with other County approved projects on and in the vicinity of Gillespie Field area will cumulatively impact traffic at the existing constrained Cuyamaca Street bridge over Forester Creek. The Cuyamaca Street bridge should be widened by the County from four to six-lanes to alleviate these future traffic impacts in the Gillespie Field Area.
15. Although not a mitigation measure to reduce GHG emissions, the proposed GHG Design Features are indicated to be incorporated into a lease agreement between County Airports and private developers. The private development phase is governed by the City. In order to ensure that the GHG Design Features are included in future planning entitlement and building permit applications, the City requests that a collaborative mechanism be established between County Airports and the City's permitting teams. The City believes that this will assist in ensuring that the proposed GHG Design Features are included in the finished project.

F-13

F-14

F-15

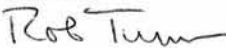
F-16

F-17

F-18

Since the annexation of Gillespie Field to the City of El Cajon, the County and the City have benefited from a cooperative relationship in developing and improving the airport proper and surrounding properties. I would like to extend an opportunity to strengthen this partnership by inviting the Director of Airports, Peter Drinkwater, to a team meeting with the City prior to implementing the first stages of the Gillespie Field 70-acre redevelopment project. I envision this meeting as a chance to understand the roles of each jurisdiction and to "iron-out" any challenges, so that the proposed project is a success for both the County and the City.

Sincerely,



Rob Turner  
Acting City Manager

cc: Peter Drinkwater, Director of Airports, County of San Diego

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## **Response to Comment Letter F**

**City of El Cajon, Rob Turner  
October 27, 2011**

- F-1 The County concurs that both the City of El Cajon and County of San Diego are partners in the development on and around Gillespie Field. This comment restates information provided in the project description of the Draft PEIR, and does not raise any specific issues relative to the environmental analysis. No changes have been made to the PEIR.
- F-2 The County concurs with this comment that the County has independent land use authority over its properties, including the County-owned and operated Gillespie Field. Because the City of El Cajon's General Plan does not apply to the public infrastructure component of the Proposed Project, the County is not required by CEQA to discuss or analyze any inconsistencies between the plan and this part of the Proposed Project (see CEQA Guidelines Section 15125(d)). As such, the Draft PEIR Section 1.6 does not include City of El Cajon regulations for consistency review of the public infrastructure component of the Proposed Project.

The County concurs that the City of El Cajon has permitting authority over future private development at Gillespie Field which should be analyzed in comparison to the approved City of El Cajon rules, regulations, and policies. At this time, specific improvements by future private developers have not been designed or developed; therefore, project-level land use analysis of the private aviation development would be speculative and cannot be completed at this time to determine consistency with the City of El Cajon's regulations. As discussed in Section 1.6 of the Final PEIR, future private developers of the 70-acre site would be required to demonstrate to the City that their project-specific improvements would comply with the City of El Cajon General Plan. All of the anticipated uses are consistent with the City of El Cajon General Plan industrial land use designation and the manufacturing zone that applies to the site. The City of El Cajon General Plan also includes a Special Development Area Overlay to allow flexibility for uses within Gillespie Field, specifically for airport-related support facilities and office uses. Since future aviation uses on the Proposed Project site must conform to the requirements of the Special Development Overlay, it is not anticipated that any future developments under the Proposed Project would be in conflict with the intent of the Special Development Overlay.

The County concurs that the City may prepare subsequent environmental documents tiering from the PEIR once project-specific improvements are proposed by future private developers. In addition, the use of the County General Plan for the PEIR does not negate the City from completing subsequent environmental analysis in accordance with City rules, regulations, and policies. No changes have been made to the PEIR.

- F-3 See Response to Comment F-2. The proposed uses for the 70-acre site include taxiways, runway access, infrastructure facilities, hangar spaces, aircraft tie-downs, apron area, automobile parking, aircraft maintenance space, and aviation office and business space. All of these uses are consistent with the City of El Cajon General Plan industrial land use designation and the manufacturing zone that applies to the site.

The City of El Cajon uses the San Diego Engineers' Council (SANTEC) significance criteria to assess potential traffic impacts. The County's methodology for determining significance is considered more stringent than SANTEC in terms of the scope of roadways required for study, and the thresholds triggering a significant traffic impact. For example, the use of the SANTEC criteria would reduce the study area in the traffic technical report, but use of the County's criteria provides a more comprehensive analysis of project impacts to the roadway network. In consideration of the City of El Cajon's LOS D threshold, and in review of the volume counts shown on PEIR Table 2.3.1 Existing + Proposed Project Segment Impacts, the LOS of traffic conditions would not change with the Proposed Project and would continue to operate at LOS C. In addition, the street segments within the study area of the Proposed Project were analyzed based on the functional classification of the roadways using the Average Daily Trip (ADT) capacities as defined by the County of San Diego Public Road Standards. Furthermore, as CEQA lead agency for the Proposed Project, the County uniformly analyzes County thresholds throughout the PEIR. Therefore, use of the El Cajon General Plan would not be consistent with the rest of the PEIR. No changes have been made to the PEIR.

- F-4 As stated in the Draft PEIR Section S.1 and 1.2.1.1, future private development will require authorization, including CEQA review, by the City of El Cajon. Therefore, private developers must demonstrate compliance with the County PEIR mitigation measures to the City of El Cajon. Prior to County approval of lease agreements with private developers, the County would ensure that subsequent CEQA review has been approved by the City of El Cajon, including preparation of a Soil Management Plan. In addition, the City of El Cajon maintains authority to review Soil Management Plans from private developers prior to issuance of land use permits (i.e. building, grading). No changes have been made to the PEIR.

Furthermore, the County has no method of enforcing and identifying whether said documents were submitted to the City of El Cajon with the Site Development Permit application. Therefore, the County could not guarantee compliance with this suggested mitigation measure. The County recommends that the City of El Cajon requests all required documents from the private developers during the application process. No changes have been made to the PEIR.

- F-5 See Response to Comment F-4.

- F-6 See Response to Comment F-4.

- F-7 The County acknowledges that the Pacific Scene Industrial Park project as listed in Table 1-2 on page 1-12 of the Draft PEIR (Map Indicator #21) has been approved by the City of El Cajon, and a Final EIR was certified on August 11, 2009. Table 1-2 has been revised to reflect certification of the Final EIR.

- F-8 The County acknowledges that the Electrical Peaker Plant project as listed in Table 1-2 on page 1-13 of the Draft PEIR (Map Indicator #23) is complete, and a Negative Declaration was approved on July 13, 2009. Table 1-2 has been revised to reflect approval of the Negative Declaration. Also, the County acknowledges that construction

of the Public Safety Center is complete. Table 1-2 has been revised to identify completion of project construction.

- F-9 As identified in the Draft PEIR Section S.3, a Notice of Preparation (NOP) was released for the Proposed Project on January 28, 2009. As such, the County commenced conducting technical analysis of environmental resources and preparing the Draft PEIR in accordance with CEQA. Subsequently, the City of El Cajon released an NOP for the Downtown Specific Plan Project on March 9, 2009. Therefore, the cumulative list of projects for the Proposed Project was established at the time of the Proposed Project NOP, and did not require the inclusion of the Downtown Specific Plan Project at that time. As discussed in Section 3.1.6.6, the proposed uses of the 70-acre site, specifically the aviation-related facilities and office space, are consistent with the City of El Cajon General Plan. The 70-acre site is located over one mile north of the City's Downtown Specific Plan project area and the proposed uses at the 70-acre site would be in conformance with the parcel's zoning designation and are not anticipated to conflict with the Specific Plan. Once individual private aviation development is proposed, each project will be reviewed during the permit application process to ensure projects are designed in accordance with City planning documents, including the Downtown Specific Plan. No changes have been made to the PEIR.
- F-10 Figure 2.2-2 of the Draft PEIR has been replaced to include light industrial land uses within the City of El Cajon.
- F-11 The County concurs with this comment. Section 2.3.1.3 of the Draft PEIR has been revised to remove reference to the CMP.
- F-12 The County concurs that the new terminus of Joe Crosson Drive would be designed and improved consistent with the standards identified by the California Fire Code. No changes have been made to the PEIR.
- F-13 In response to this comment, the Draft PEIR has been revised in Section 3.1.8.1 to update the address for the El Cajon Police Department.
- F-14 As clarified by this comment, only the Padre Dam Municipal Water District provides water service to the Proposed Project site. This has been clarified in the PEIR Section 3.1.9.1.
- F-15 The County acknowledges this comment, and the design of the sewer service system will be considered during the development of the design for the Proposed Project. The County will continue to coordinate with the City of El Cajon as the design progresses. No changes have been made to the PEIR.
- F-16 As described in the County of San Diego *Report Format and Content Requirements for Transportation and Traffic*, the scope of a focused Traffic Impact Study should include an assessment of transportation facilities that would receive 25 or more peak hour trips from the Proposed Project. As such, the project study area (shown in PEIR Figure 2.3-1) does not encompass the roadway segment of Cuyamaca Street (adjacent to the Forest Creek Industrial Park) as traffic was calculated to be less than identified threshold. Therefore, proposed project traffic at the roadway segment

of Cuyamaca Street is not anticipated to result in a significant direct or cumulative traffic impact. No changes have been made to the PEIR.

F-17 The County concurs that close coordination must occur with the City of El Cajon during review and approval of the private aviation development projects. The County is committed to facilitating this collaborative process, and will be working to ensure that applicable mitigation measures and design feature requirements of the PEIR, including GHG Design Features, are incorporated into the private projects. No changes have been made to the PEIR.

F-18 This comment is noted. No changes have been made to the PEIR.

# Comment Letter G



## CITY OF SANTEE

MAYOR  
Randy Voepel

CITY COUNCIL  
Jack E. Dale  
Rob McNelis  
John W. Minto  
John Ryan

CITY MANAGER  
Keith Till

November 3, 2011

Jeff Kashak  
County of San Diego  
Department of Public Works  
Environmental Services Unit  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123  
Email: Jeff.Kashak@sdcounty.ca.gov

**SUBJECT: City of Santee Review of the Draft Program Environmental Impact Report (PEIR) for Gillespie Field 70-acre Redevelopment Project (SCH#2005111092)**

Dear Mr. Kashak:

The City of Santee has reviewed the Draft Program Environmental Impact Report (PEIR) prepared by the County of San Diego for the Gillespie Field 70-acre Redevelopment Project ("Project"). The Notice of Availability provided a 45-day review period ending on October 31, 2011 that was extended by the County of San Diego to November 7, 2011.

The comments provided in this letter are made in accordance with the Safety and Noise Elements of the City of Santee General Plan that require the review of any future expansion of the facilities of Gillespie Field, or intensification of operation, that potentially result in greater safety and noise impacts to the City.

The Draft Program Environmental Impact Report has determined that there would be no significant environmental impacts with project implementation. Added clarification under "Project Description" as well as in the technical reports for traffic, land use/planning, noise and growth inducement would more strongly substantiate this determination of no impact. The following comments are submitted for your consideration.

### PROJECT DESCRIPTION

The County of San Diego Department of Public Works proposes to redevelop an undeveloped 70-acre site located in the southeastern corner of Gillespie Field Airport with aviation uses consistent with the Gillespie Field Airport Layout Plan Draft Final Narrative Report. As such, the Project intends to implement the Gillespie Field Airport Layout Plan Draft Final Narrative Report (ALP).

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G-1

G-2

Draft Program EIR – City of Santee Comment  
 Gillespie Field 70-Acre Redevelopment Project  
 SCH No. 2005111092  
 November 3, 2011  
 Page 2 of 4

However, the ALP describes five different concepts for development of the 70-acre site based upon growth forecasts (Low Growth to High Growth). Since the project description in the PEIR relies upon the ALP, it would be helpful to state which development concept is being implemented and provide greater detail related to building gross floor areas and land uses consistent with the ALP.

**G-2  
cont'd**

The PEIR Project Description excludes the acquisition of parcels and/or avigation easements that was identified in the January 28, 2009 Notice of Preparation for the Project and also identified in the ALP. An explanation in the PEIR for exclusion of acquisitions would be helpful.

**G-3**

#### **TRAFFIC AND TRANSPORTATION**

The PEIR states that the Project vicinity includes roadways and intersections under the jurisdictions of the Cities of El Cajon and Santee (PEIR Section 2.3.1 Existing Conditions). Analysis is needed to explain the determination that there would be no significant impact to Santee's street system. The explanation should take into account that the City of Santee Circulation Element thresholds encourage a Level of Service "C" on street segments and intersections throughout the circulation network (Circulation Element, Policy 1-8).

**G-4**

#### **LAND USE AND PLANNING**

CEQA requires analysis under Land Use and Planning to assess conflicts with applicable land use policy. The PEIR, Appendix G (Page 2) states: "Consequently, because the Proposed Action is a County project, it is exempt from the City of Santee and the City of El Cajon's General Plan." However, given the Project's potential to influence land uses beyond the airport's boundary, the PEIR should incorporate and analyze the relevant land use policies of the surrounding communities.

**G-5**

The PEIR analysis at Section 3.1.6.3 should include information from the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) to provide a wider context for the Airport Land Use Commission's land use and planning role. The PEIR should include ALUCP Section 1.1.2 information that states in part: "(1) ALUCs have no authority over 'existing land uses' regardless of whether such uses are incompatible with airport activities; (2) ALUCs have no jurisdiction over the 'operation of airports; and (3) ALUCs have no jurisdiction over federal lands."

**G-6**

Also, the PEIR at Section 3.1.6.6 should be revised to correctly reflect the San Diego Regional Airport Authority's July 26, 2011 letter (Appendix G) concluding that the Project was not subject to ALUC review and that a determination of consistency with the ALUCP by the ALUC was not required.

**G-7**

Draft Program EIR – City of Santee Comment  
 Gillespie Field 70-Acre Redevelopment Project  
 SCH No. 2005111092  
 November 3, 2011  
 Page 3 of 4

The PEIR should analyze the consistency of the ALP forecast with the Regional Aviation Strategic Plan ("RASP") accepted March 2011 by the San Diego County Regional Airport Authority. The RASP shows that Gillespie Field is assumed to accommodate greater general aviation activity from San Diego International Airport to free up SDIA capacity.

G-8

The PEIR Section 3.1.8.1 that identifies existing parks should include the Sky Ranch public park located 0.68 miles northeast of Gillespie Field that was constructed in 2007.

G-9

#### NOISE

The PEIR concludes that there would be no significant impact for Project noise within Santee. However, Appendix H analysis shows that off-airport aircraft operational noise impacts would affect residential areas within the City of Santee. Discussion needs to be provided to substantiate the determination that there would be no significant impact to Santee residents. That is, the PEIR should include analysis to explain why a residence that is within the 60 CNEL aircraft noise contour pre-Project, that would be within the 65 CNEL contour post-Project, would not experience a significance threshold greater than a 1.5 CNEL increase. The 1.5 CNEL noise level is a significance threshold established by FAR Part 150, Section 150.21 as the point where "...A change in the operation of an airport creates a substantial new noncompatible use if that change results in an increase in the yearly day-night average sound level of 1.5 dB or greater in...a land area which was formerly compatible...".

G-10

The PEIR, in Section 3.1.7.2 "Local Regulations and Standards", does not appear to include the City of Santee's noise regulations and standards in the analysis of noise impacts. The CEQA Guidelines for Noise Impacts requires the analysis to establish that there is no exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. To adequately assess if the residential uses within the City of Santee are affected by the Project's noise impacts, at a minimum, the Santee General Plan Noise and Safety Element policies must be incorporated into the PEIR noise analysis.

G-11

Gillespie Field could consider methods to manage off-airport aircraft noise by means of noise abatement procedures and City or County ordinances to enforce the procedures. The aircraft noise abatement procedures could be modeled after the City of Torrance, California airport procedures for noise abatement (Torrance Municipal Code Article 8 – Airport Noise Limits).

G-12

Draft Program EIR – City of Santee Comment  
Gillespie Field 70-Acre Redevelopment Project  
SCH No. 2005111092  
November 3, 2011  
Page 4 of 4

**GROWTH-INDUCING IMPACTS**

The PEIR discussion concerning growth-inducing impacts provides analysis concerning the City of El Cajon but does not provide analysis to address whether the Project would result in growth inducement impacts within the City of Santee. Development of the 70-acre vacant property would increase the existing aviation capacity of the airport facility that may have a growth effect within Santee given the airport facility links to the regional freeway system via the Santee street system.

G-13

The City appreciates that the Gillespie Field aviation facility provides an important economic value to the region and surrounding communities and appreciates the opportunity to submit comments on the PEIR.

G-14

I may be contacted at (619) 258-4100, extension 167 with any questions, or electronically, at [mkush@ci.santee.ca.us](mailto:mkush@ci.santee.ca.us).

Respectfully,



Melanie Kush, AICP  
Director of Planning

Attachment: Public Notice of Availability of Draft EIR

Cc: Keith Till, City Manager  
Pedro Orso-Delgado, Director of the Department of Development Services  
Peter Drinkwater, County Airports Manager  
Kevin Mallory, Principal Planner



# Comment Letter G Attachment



DDS

SEP 14 2011

City Manager's Office  
CITY OF SANTEE

## County of San Diego

### DEPARTMENT OF PUBLIC WORKS County Airports

RECEIVED

Peter Drinkwater  
DIRECTOR OF AIRPORTS1960 Joe Crosson Drive, El Cajon, CA 92020  
(619) 956-4800 FAX: (619) 956-4801  
Web Site: <http://www.sdcountry.ca.gov/dpw/airports.html>

SEP 16 2011

Dept. of Development Services  
City Of Santee

#### NOTICE OF AVAILABILITY OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 15, 2011

NOTICE IS HEREBY GIVEN that the County of San Diego Airports Division (County Airports) is circulating for public review a Draft Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA) for the project described below. The Draft PEIR can be viewed at the Department of Public Works (DPW), Environmental Services Unit, 5469 Kearny Villa Road, Suite 305, San Diego, CA, 92123; at the Gillespie Field Airport, 1960 Joe Crosson Drive, El Cajon, CA, 92020; at the El Cajon Branch Library at 201 E. Douglas Avenue, El Cajon, CA 92020-4561, and online at <http://www.sdcountry.ca.gov/dpw/environment/envrnsvcs.html>.

**Project Title: GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT, SCH No. 2005111092**

The County proposes the redevelopment of the Proposed Project site (a vacant 70-acre site) located in the southeastern corner of the 757-acre Gillespie Field property with aviation uses. This redevelopment would alleviate the existing unmet demand for based aviation support facilities. Redevelopment would include construction of facility improvements by the County (i.e., new taxiways, apron area, drainage facilities, and utility facilities), and aviation-use development by private developers (e.g., rectangular and T-hangar spaces, conventional hangar space, aircraft tie-downs, an apron area, automobile parking, aircraft maintenance space, and aviation office and business space). County Airports is the Lead Agency for the infrastructure improvements described above. County Airports is also responsible for issuing a formal Request for Proposals (RFP) to allow private developers an equal opportunity to bid for development space for aviation use. All development proposed by private developers would be subject to aviation leases between the County and the developer. The City of El Cajon will be the Lead Agency for all subsequent proposed private aviation development by private developers that would require permits from the City. Private developers will be responsible for complying with the City of El Cajon plans and regulations and completing the required environmental review necessary for the approval of their individual projects.

Redevelopment of the Proposed Project site with aviation uses is consistent with land use planning documents, and will bring the County into compliance with federal grant assurances by adhering to the FAA requirements to develop the site to aviation use in accordance with the "highest and best use" for the property.

*Kids • The Environment • Safe and Livable Communities*

**Comment Letter G  
Attachment**

**Significant Environmental Effects**

Significant environmental effects of the project may occur to: Biological Resources, Hazards and Hazardous Materials, and Traffic and Transportation. All significant environmental effects would be mitigated below the level of significance with the exception of Traffic due to existing congested roadway conditions along Bradley Avenue at the State Route-67 interchange.

**Public Review and Comments**

The public review period runs from September 15, 2011 to October 31, 2011. Written comments on the Draft PEIR must be received no later than Monday October 31, 2011 at 5:00 p.m. Comments should be addressed to Jeff Kashak, and can be sent to him by mail at 5469 Kearny Villa Road Suite 305, San Diego, CA 92123, or by e-mail at [Jeff.Kashak@sdcounty.ca.gov](mailto:Jeff.Kashak@sdcounty.ca.gov), or by fax at (858) 874-4043.

The Public Review Open House will be held on October 5, 2011, from 5:30 p.m. to 7:30 p.m. at the Gillespie Field Airport Administration Building, 1960 Joe Crosson Drive, El Cajon, CA 92020.

For additional information, please contact Jeff Kashak at (858) 874-4056.

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## Response to Comment Letter G

**City of Santee, Melanie Kush  
November 3, 2011**

- G-1 This comment iterates the City of Santee's obligation to review the Draft PEIR for the Proposed Project, and that the Draft PEIR determined that the Proposed Project would not result in significant environmental impacts. To clarify, the Draft PEIR concluded that potentially significant traffic impacts would occur; however, during preparation of the Final PEIR, mitigation measures were proposed that would reduce these impacts to less than significant. No changes have been made to the PEIR.
- G-2 As identified in the Gillespie Field ALP Update Narrative Report (pages 2-2 and 5-1), the analysis of facility requirements applies the "High Growth" forecasts for planning purposes as these forecasts will present the greatest requirement for aviation facilities. Because this determination has already been included in the ALP Update Narrative Report, no changes have been made to the PEIR. The Draft PEIR also identifies the Proposed Project (i.e. aviation uses) would be consistent with the ALP and ALP Update Narrative Report. Furthermore, as described in the Draft PEIR, 55 acres are proposed for aviation use development; however, the scope, scale, funding, and specific designs have not yet been defined as private developers would be responsible for this component of the Proposed Project. Until private developers are selected by the County for development on the 55 acres dedicated for aviation use, building floor areas to be developed on the proposed 70-acre site cannot be specifically defined. No changes have been made to the PEIR.
- G-3 Acquisition of parcels and/or aviation easements is no longer a part of the project description described in the Draft PEIR. Analysis of the acquisitions and/or easements will be prepared in a separate environmental document once that action is proposed. No changes have been made to the PEIR.
- G-4 The City of Santee uses the San Diego Engineers' Council (SANTEC) significance criteria to assess potential traffic impacts. The County's methodology for determining significance is considered more stringent than SANTEC in terms of the scope of roadways required for study, and the thresholds triggering a significant traffic impact. For example, the use of the SANTEC criteria would reduce the study area in the traffic technical report, but use of the County's criteria provides a more comprehensive analysis of project impacts to the roadway network. In consideration of the City of Santee's goal to encourage LOS C, and in review of the volume counts shown on PEIR Table 2.3.1 Existing + Proposed Project Segment Impacts, the LOS of traffic conditions would not change with the Proposed Project and would not further degrade the surrounding roadways operating at LOS D. In addition, the street segments within the study area of the Proposed Project were analyzed based on the functional classification of the roadways using the Average Daily Trip (ADT) capacities as defined by the County of San Diego Public Road Standards. The study area analyzed in the Traffic Impact Study for the Proposed Project includes an approximate 750-foot segment of Magnolia Avenue partially located within the City of Santee between Kenney Street and Airport Drive. As shown in Table 2.3-1 and Table 2.3-3 of the Draft PEIR, no impact is anticipated to this segment of Magnolia Avenue.

Furthermore, the County has independent land use authority over its properties, including the County-owned and operated Gillespie Field. Because the City of Santee's General Plan (i.e., Circulation Element) does not apply to the public infrastructure component of the Proposed Project, the County is not required by CEQA to discuss or analyze any inconsistencies between the plan and the Proposed Project (CEQA Guidelines Section 15125(d)). Furthermore, as CEQA lead agency for the Proposed Project, the County uniformly analyzes County thresholds throughout the PEIR. Therefore, use of the Santee General Plan would not be consistent with the rest of the PEIR. No changes have been made to the PEIR.

- G-5 See Response to Comment G-4. Also, as the Proposed Project is located at a public-use airport and is located within the airport influence area, the County must comply with the designated land uses identified in the adopted Airport Land Use Compatibility Plan (ALUCP). The Gillespie Field ALUCP establishes allowed land uses within the airport influence area and requires all local agencies to comply with the identified land use designations. The Draft PEIR states that the Proposed Project does not propose the introduction of new uses that are different from existing uses at Gillespie Field and will not significantly disrupt or divide an established community. Furthermore, the County is not proposing any improvements outside of Gillespie Field or within the City of Santee. Therefore, no changes in land use designations would occur. No changes have been made to the PEIR.
- G-6 Section 1.1.2 of the Gillespie Field ALUCP does not pertain to the Proposed Project since the project proposes aviation-related uses and does not propose changing existing land uses to land uses that are incompatible with airport activities. Furthermore, the intent of Section 3.1.6.3 of the Draft PEIR is to define the purpose and goal of the Gillespie Field ALUCP, which was developed to ensure compatibility between land uses adjacent to Gillespie Field and the operation and/or expansion of the airport. No changes have been made to the PEIR.
- G-7 The County concurs that Section 3.1.6.6 of the Draft PEIR should be revised to incorporate the letter received from San Diego County Regional Airport Authority (SDCRAA) on July 26, 2011 stating that "only proposed non-aviation development on airport property is subject to ALUC review. Therefore, a determination of consistency with the ALUCP by the ALUC is not required." This has been clarified and added to Section 3.1.6.6 (p. 3-66, third paragraph) of the PEIR.
- G-8 In an effort to improve the regional airport system performance, the County will continue to coordinate with SDCRAA to meet the aviation transportation needs. While the Regional Aviation Strategic Plan (RASP) considers the total County aviation-transport network, the County prepared an airport-specific study (ALP Update Narrative Report) to identify the existing and projected needs of Gillespie Field based on forecasted operations and based aircraft. The forecasted operations and based aircraft identified in the Unconstrained Aviation Activity Forecasts (prepared for the Proposed Project and cited in PEIR noise studies) are consistent with those identified in the RASP. No changes have been made to the PEIR.

- G-9 The County concurs that Section 3.1.8.1 of the Draft PEIR should be revised to identify Sky Ranch Park located northeast of Gillespie Field. Although the park is located approximately 0.68 miles from Gillespie Field, the park is located approximately 1 mile from the Proposed Project site. Section 3.1.8.1 has been revised to reflect this change.
- G-10 As stated in the Draft PEIR Section 3.1.7.4, the Proposed Project would result in a less than significant impact related to noise as the project would not result in an increase of 1.5 dBA CNEL.

As defined in FAA Order 1050.1E, Appendix A, Section 14.3 (p.A-61), the threshold of significance for noise impacts is as follows:

“A significant noise impact would occur if analysis shows that the Proposed Project will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dBA [CNEL] or more at or above DNL 65 dBA [CNEL] noise exposure when compared to the no action alternative for the same timeframe.” This does not include 60 dBA CNEL.

Also, as defined by FAA Order 1050.1E, Appendix A Section 14.4d(3), Integrated Noise Model (INM) analysis of 60-65 dBA CNEL contours (for the purpose of identifying noise sensitive areas) is only required when an increase of 1.5 dBA is documented within the 65 dBA CNEL contour.

Furthermore, FAA Order 1050.1E states that impacts of 3dB [CNEL] between 60-65 dB over residential areas would not cause significant noise impacts. In other words, because the INM calculations did not find that noise sensitive areas at or above 65 dBA CNEL will have an increase of 1.5 dBA or more within areas that are either already or newly exposed to 65 dBA CNEL, further analysis of 60-65 dBA CNEL contours is not required since the Proposed Project would not result in an increase of 1.5 dBA. No changes have been made to the PEIR.

- G-11 The County has independent land use authority over its properties, including the County-owned and operated Gillespie Field. Because the City of Santee’s General Plan (i.e., Noise and Safety Element) does not apply to the public infrastructure component of the Proposed Project, the County is not required by CEQA to discuss or analyze any inconsistencies between the plan and the Proposed Project (see CEQA Guidelines Section 15125(d)). Therefore, as CEQA lead agency for the Proposed Project, the Draft PEIR uniformly analyzes County thresholds throughout the document.

The Draft PEIR Section 3.1.7.5 has been revised to state that the City of Santee established sound level limits between properties zoned for industrial uses at 75 dBA  $L_{eq}$ , and noise level limits specified in the County of San Diego Noise Ordinance are 70 dBA  $L_{eq}$ . Therefore, as the City of Santee has a less restrictive noise level limit, the County Noise Ordinance is used for determining impacts, and the PEIR concludes that impacts would be less than significant under the County’s threshold.

- G-12 The County shall consider this comment in the continued management and operation of Gillespie Field. However, this comment does not pertain to the Proposed Project as no significant noise impacts were identified that would require mitigation. No changes have been made to the PEIR.

- G-13 Gillespie Field is located within the City of El Cajon, with the exception of a small portion on the northern end within the City of Santee. The redevelopment of the Proposed Project site is solely located within the City of El Cajon. The PEIR Section 1.8 (Growth-Inducing Impacts) has been revised to clarify that the Proposed Project includes the redevelopment of a site within the City of El Cajon that is zoned for commercial/industrial uses and is completely surrounded by urban development. Gillespie Field has provided a home to aviation services and business space in its existing location for over 70 years. The redevelopment of the Proposed Project site is an extension of these existing uses and will allow the airport to accommodate the increasing need to provide aviation-related uses in the area. This would include the same types of commercial uses as the surrounding uses currently operating at Gillespie Field. This would not result in a substantial need for increased or expanded public services to the area, which may remove obstacles to growth, including the City of El Cajon or the City of Santee.

The Proposed Project and continued development of Gillespie Field have been anticipated in regional and local land use planning documents such as the County of San Diego General Plan, Airport Land Use Compatibility Plan (ALUCP), FAA's Airport Improvement Program, as well as planning documents of local jurisdictions such as the Cities of El Cajon and Santee General Plans. As discussed further in this PEIR, various planning documents were evaluated for consistency with aviation development at Gillespie Field. Also, the Proposed Project would not substantially change the economic character of the surrounding area. Given that Gillespie Field is connected to the transportation network by major highways (SR-52, SR-125, SR-67, and I-8) and offers a trolley station (serving both Orange and Green lines), new major transportation infrastructure and residential development and relocations are not required because the site is easily accessible from existing homes. Accordingly, the Proposed Project would not generate a need for the construction of additional housing. Accordingly, the Proposed Project would not result in growth-inducement as it would not cause a substantial need for increased services to the area, nor would it result in population growth requiring the need for residential development, including within the City of El Cajon or the City of Santee.

- G-14 The County acknowledges the City's comment that Gillespie Field provides an important economic value to the region and surrounding communities. No changes have been made to the PEIR.

Comment Letter H



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

6 October 2011

To: Mr. Jeff Kashak  
Department of Public Works  
County of San Diego  
5469 Kearny Villa Road, Suite 305  
San Diego, California 92123

Subject: Draft Program Environmental Impact Report  
Gillespie Field 70-Acre Redevelopment Project

Dear Mr. Kashak:

I have reviewed the cultural resources aspects of the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DPEIR and its Appendix D, we agree that no significant impacts to cultural resources are likely to occur. We therefore also agree that no cultural resources mitigation measures are necessary.

SDCAS appreciates this opportunity to participate in the public review of this project's environmental documents.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: ASM Affiliates  
SDCAS President  
File

H-1

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

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## **Response to Comment Letter H**

**San Diego County Archaeological Society, Inc., James W. Royle, Jr.  
October 6, 2011**

- H-1 The County acknowledges receipt of this comment letter, and concurs that no significant impacts to cultural resources would occur, and no mitigation measures are required. No changes have been made to the PEIR.

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## Comment Letter I

### SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

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

October 31, 2011

Mr Jeff Kashak  
County of San Diego  
Department of Public Works  
Environmental Services Unit  
5469 Kearny Villa Road, Suite 305  
San Diego, California 92123-1292

**Re: Comments on Draft Programmatic Environmental Impact Report  
Gillespie Field Redevelopment Project; APN 387-190-08**

Dear Mr Kashak:

As the Airport Land Use Commission (ALUC) for San Diego County, the San Diego County Regional Airport Authority offers the following comments on this project's environmental document. Foremost, the SDCRAA reiterates our letter of July 26, 2011, which notes that the project is not subject to ALUC review because only aviation-related development is proposed. As such, this fact should replace the statement on page 3-66 that our agency has considered the project and found it consistent with the Gillespie Field Airport Land Use Compatibility Plan (ALUCP). Please note that the acronym "CLUP" was retired when replaced by ALUCP (page 3-62).

Also on page 3-66, it would be more accurate to say that SDCRAA functions as the ALUC for all public-use and military airports in the county, rather than all of San Diego County's airports, since our agency does not have any jurisdiction over private airports in the county.

Finally, please note that that correct acronym for our agency is SDCRAA (repeated references), corresponding to the "County" which should be included in its name (page 1-8).

Thank you for the opportunity to comment on this report. If you have any questions concerning this letter, please contact Ed Gowens at (619) 400-2244 or egowens@san.org.

Sincerely,



Angela Jamison  
Manager, Airport Planning

cc: Peter Drinkwater, Director of County Airports

I-1

I-2

I-3

I-4



SAN DIEGO  
INTERNATIONAL  
AIRPORT

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## **Response to Comment Letter I**

**San Diego County Regional Airport Authority, Angela Jamison  
October 31, 2011**

- I-1 In responses to this comment, the PEIR has been revised in Section 3.1.6.6, (p. 3-66, third paragraph), to clarify that the Proposed Project is not subject to review by the Airport Land Use Commission since the Proposed Project includes aviation-related development.
- I-2 In response to this comment, the PEIR has been revised in Section 3.1.6.3 (pp. 3-62 and 3-64) to remove the acronym “CLUP” since this term has been replaced by “ALUCP”.
- I-3 The County concurs that the San Diego County Regional Airport Authority does not have jurisdiction over private airports located within San Diego County. Therefore, the PEIR has been revised in Section 3.1.6.6 (p. 3-66, second paragraph), to clarify that the San Diego County Regional Airport Authority serves as the Airport Land Use Commission for all public-use and military airports located within San Diego County.
- I-4 As noted in this comment, page 1-8 (Table 1.1) of the Draft PEIR incorrectly cites the name and acronym of the San Diego County Regional Airport Authority. Table 1.1 and all other occurrences in the PEIR have been revised to reflect this revision (see Errata, Attachment B for all occurrences).

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Comment Letter J



## Gillespie Field Development Council



**A Joint Powers Agreement Between the City of El Cajon and County of San Diego**

Airport Administration Building ♦ 1960 Joe Crosson Drive ♦ El Cajon, California 92020-1236 ♦ (619) 956-4800

Barry Bardack  
*Chairman*

Cliff Leary  
*Vice Chairman*

Phyllis Trombi  
*Councilwoman*

Bob Davison  
*Councilman*

Jeff Swiney  
*Councilman*

September 20, 2011

Jeff Kashak, Environmental Planner  
Department of Public Works  
Environmental Services Unit  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

RE: GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT; PROGRAM EIR (SCH #2005111092)

The Gillespie Field Development Council (GFDC) considered the proposed project during the Public Review period for the Gillespie Field 70-acre Redevelopment Project Draft Program Environmental Impact Report. Accordingly, the GFDC approved a motion at its regularly scheduled meeting on September 20, 2011 to submit a letter in support of the proposed project as follows:

**MOTION: TO SUPPORT THE GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT AND TO SUBMIT THIS ENDORSEMENT FOR COUNTY RECORD.**

The Motion passed unanimously.

**Comments:**

The GFDC strongly supports the 70-acre Redevelopment Project to provide aeronautical uses consistent with FAA direction. This development is necessary to meet the demand for aircraft storage facilities and other aviation-related uses by the aviation community at Gillespie Field.

The GFDC looks forward to completion of the proposed project.

Sincerely,

BARRY BARDACK, Chairman  
Gillespie Field Development Council

J-1

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## **Response to Comment Letter J**

**Gillespie Field Development Council, Barry Bardack  
September 20, 2011**

- J-1     The County confirms receipt of this comment letter and acknowledges the Gillespie Field Development Council's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter K

**From:** N9114P@aol.com  
**Sent:** Wednesday, October 05, 2011 1:06 PM  
**To:** Kashak, Jeff  
**Subject:** Draft PEIR

Hello,

Count me in on wanting to have a hangar in the new development for our company plane.

⋮ K-1

Jim Law

ABABA BOLT  
1466-1 Pioneer Way  
El Cajon, CA 92020  
619-440-1781

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## **Response to Comment Letter K**

**ABABA BOLT, Jim Law  
October 5, 2011**

- K-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter L

**From:** Moneyvan@aol.com  
**Sent:** Thursday, October 06, 2011 12:36 PM  
**To:** Kashak, Jeff  
**Cc:** leslie.GPA@cox.net  
**Subject:** Gillespie Field 70 acres

Jeff,

I was unable to make the meeting on Oct. 5.

I am a pilot with a plane based at Gillespie. I strongly support the development of the 70 acres as described in the current plan that I have seen.

L-1

*Van*

Van C. Elliott, CFP  
Financial Foundations  
1477-A Gustavo Street  
El Cajon CA 92019  
619-334-2567 phone  
619-749-9950 fax

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## **Response to Comment Letter L**

**Financial Foundations, Van C. Elliott  
October 6, 2011**

- L-1     The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter M

**From:** Tom DAMICO [skycaptom@sbcglobal.net]  
**Sent:** Thursday, October 06, 2011 12:11 PM  
**To:** Kashak, Jeff  
**Subject:** 70 acre parcel

Sir:

I am a CFI working full time at Gillespie Field. I fully support the development of the 70 acres.  
It has been 20 years in the making, let's finish this!

Thomas DAmico  
Chief Flight Instructor  
Golden State Flying Club

↕ M-1

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## **Response to Comment Letter M**

**Golden State Flying Club, Thomas DAmico  
October 6, 2011**

- M-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter N

**From:** ROBERT LINDSAY [rlindsa2@san.rr.com]  
**Sent:** Friday, October 07, 2011 12:01 PM  
**To:** Kashak, Jeff  
**Subject:** GILLESPIE FIELD DEVELOPMENT

I support the aviation use of the vacant 70 acres at SEE. Aviation services, jobs and technology for East County are needed.

Bob Lindsay  
SkyHarbor E16

↕ N-1

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## **Response to Comment Letter N**

**SkyHarbor E16, Bob Lindsay  
October 7, 2011**

- N-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter O

**From:** Gregg Hovey [ghovey@hoveyassociates.com]  
**Sent:** Tuesday, October 11, 2011 2:34 PM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field 70 acre development

Dear Mr. Kashak;

I am a resident of San Diego and am a licensed pilot. I own an airplane and frequently fly into Gillespie Field. I totally support the project including the building of new hangars. I currently hangar my aircraft at Brown Field because **I was unable to find a hangar at Gillespie** even though I looked for two years.

Please include my support for this project.

**Gregg B. Hovey**  
**Hovey & Associates**  
877 Island Avenue, 907  
San Diego, CA 92101-6808  
Office: (619) 546-4901  
Fax: (619) 546-4904  
email: [ghovey@hoveyassociates.com](mailto:ghovey@hoveyassociates.com)

O-1

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Hovey & Associates

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## **Response to Comment Letter O**

**Hovey & Associates, Gregg B. Hovey  
October 11, 2011**

- O-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter P

**From:** William Hall [whall002@san.rr.com]  
**Sent:** Tuesday, October 11, 2011 7:56 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field: 70 Acre Parcel EIR, public comment

Mr. Kashak,

I am a 53 year San Diego resident, licensed instrument pilot, business owner who enjoys the privilege of operating in the airspace of San Diego County.

I currently house my aircraft operation at Montgomery Field (MYF), but often use the facilities at Gillespie Airport (SEE). I earned my private pilot license operating out of SEE and would consider expanding my flight operation to a larger facility there if the 70 acre parcel were approved and then improved with hangers and amenities suited to meet my needs.

I therefore write you in favor, and request your approval of the request of the applicant.

Thank you for your consideration,

William Hall



**WILLIAM HALL**  
PRINCIPAL  
 858.382.0391  
 WHALL@OACCONSULTING.NET  
 OACCONSULTING.NET

P-1

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## **Response to Comment Letter P**

**OAC Consulting, William Hall  
October 11, 2011**

- P-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter Q

**From:** Bock Company [bockcorp@pacbell.net]  
**Sent:** Monday, October 31, 2011 10:41 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field 70-acre redevelopment project, Schedule No. 2005111092

Dear Mr. Kashak,

We object to the Airport redevelopment if it expands the width of the north south flight path zone. Our business is located on the east side of the north south runway on Railroad Avenue in the City of Santee. Expansion of this flight path safety zone would close our businesses causing jobs to be lost. Relocating to another property would move us farther from our principal business location which is the center of San Diego County. This would cause greater pollution since travel distances would increase.

Since the north part of the runway and the businesses are in the City of Santee, does Santee have enough decision making responsibility for this project as opposed to the City of El Cajon?

Sincerely,

Bob Schnieders

Bock Company

132 W. Providencia Avenue

Burbank, California 91502 (323) 848-5733

◆ Q-1  
 ◆ Q-2  
 ◆ Q-3

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## **Response to Comment Letter Q**

**Bock Company, Bob Schnieders  
October 31, 2011**

- Q-1 The Proposed Project does not include altering or expanding the current flight path of Runway 17/35. No changes have been made to the PEIR.
- Q-2 The County does not propose widening or altering the FAA-required Runway Protection Zone (RPZ) or Runway Safety Area (RSA) surrounding Runway 17/35. The properties currently operated by the Bock Company are located within the identified RPZ and RSA for Runway 17/35; however, only redevelopment of the 70-acre site is proposed at this time. As identified in the Draft PEIR (page S-2, Section S.3), an environmental document pursuant to CEQA will be prepared for acquisition of parcels and/or avigation easements at the time that action is proposed. No changes have been made to the PEIR.
- Q-3 Because Gillespie Field is owned and operated by the County of San Diego, the County maintains the authority to implement public-use projects at its discretion. Therefore, the County is the lead agency for the Proposed Project, including development of the infrastructure. In addition, because Gillespie Field is located in the City of El Cajon and partially within the City of Santee, each city maintains the authority to regulate land uses and improvements proposed by private entities within its municipal jurisdiction. Therefore, the City of El Cajon would serve as the lead agency for private development associated with the Proposed Project, since the limits of the Proposed Project are wholly within the City of El Cajon. No changes have been made to the PEIR.

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## Comment Letter R

Untitled

9/16/11

TO MR. JEFF KASHAK  
5469 KEARNY VILLA ROAD  
SAN DIEGO, CA 92123

FROM; MR. RONALD JAMES

7934 WESTERN TRAILS DR  
EL CAJON, CA 92021  
619 447 8072

RE; GILLESPIE FIELD REDEVELOPMENT  
SCH NO. 2005111092

MR. KASHAK:

WE ARE LONG TIME RESIDENTS OF THE ABOVE ADDRESS IN EL CAJON. DURING THIS TIME WE HAVE NOTICED A DRAMATIC INCREASE IN THE AIR TRAFFIC AT GILLESPIE FIELD.....THIS TRAFFIC HAS NO REGARD FOR THE LOCAL RESIDENTS AND THE NOISE GENERATED FROM THESE PLANES. THIS STARTS EARLY IN THE MORNING AND CONTINUES UNTIL 8 OR 9 P.M. AND SOMETIMES LATER...ONE CANNOT EVEN USE THEIR BACK YARDS DUE TO ALL THE NOISE AS A CONVERSATION IS IMPOSSIBLE WITH GUESTS.

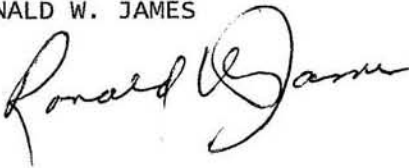
WHEN WE PURCHASED OUR HOME 30 YEARS AGO, THIS WAS NOT A PROBLEM, BEING DIRECTLY IN THE FLIGHT PATH OF THESE PLANES. TODAY IT IS A DIFFERENT STORY ENTIRELY. THE PLANES ARE MORE FREQUENT AND FLY MUCH LOWER THESE DAYS. THE EXPANSION WILL ONLY INCREASE THE NUMBER OF FLIGHTS ETC. AND SINCE THE HOURS OF THESE FLIGHTS ARE NOT CONTROLLED, AND HAPPEN EARLY AND LATE EVENINGS, WE ARE EXPECTING MORE OF THE SAME.

IT SEEMS TO US THAT THE CITY OF EL CAJON HAS NO REGARD FOR THE WISHES OF THEIR TAX PAYERS AND REGARDLESS OF THE RESIDENTS DISSENT ON VARIOUS PROJECTS, THEY APPROVE THEM ANYWAY....CASE IN QUESTION IS THE HOME DEPOT PROJECT, THAT ALL RESIDENTS OPPOSED ON EAST MAIN ST IN EL CAJON AND YET THE CITY FOUGHT TO GET APPROVED.

THIS ADDITIONAL EXPANSION WILL INCREASE THE AIR AND VEHICLE TRAFFIC ESPECIALLY ON BRADLEY AVENUE IN EL CAJON....THESE AREAS ARE HOME TO MANY RETIRED AND FAMILY RESIDENCES WHICH DO NOT ENJOY THE CONSTANT OVER HEAD NOISE POLLUTION.

THANK YOU FOR YOUR TIME....

RONALD W. JAMES



R-1

R-2

R-3

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## **Response to Comment Letter R**

**Ronald W. James  
September 16, 2011**

- R-1 The County acknowledges receipt of this comment letter, and understands that aircraft operations have increased over time as shown in FAA forecasts. However, the County does not have the regulatory authority to control the type of aircraft, frequency of operations, nor airspace surrounding the airport including flight paths of aircrafts. However, in development of the environmental analysis, the County modeled the full build-out change in noise exposure attributable to the project and found that no significant noise impacts would occur in accordance with FAA Order 1050.1E due to additional aircraft operations (PEIR Section 3.1.7.4). No changes have been made to the PEIR.
- R-2 As Gillespie Field is owned and operated by the County, the County maintains land use authority over the public airport development, including the proposed development of 15 acres of public infrastructure facilities (i.e., new taxiways, apron area, drainage facilities, and utility facilities). The City of El Cajon maintains land use authority over the private development at Gillespie Field. Accordingly, the City would be the lead agency for approximately 55 acres of aviation-use development (e.g., rectangular and T-hangar spaces, conventional hangar space, aircraft tie-downs, an apron area, automobile parking, aircraft maintenance space, and aviation office and business space). No changes have been made to the PEIR.
- R-3 See Response R-1. Additionally, the PEIR identifies that the Proposed Project has the potential to result in significant direct and cumulative traffic impacts to the roadway segment of Bradley Avenue between SR-67 northbound ramps and southbound ramps, as well as the intersection of Bradley Avenue and SR-67 northbound ramps. However, with the incorporation of the listed mitigation measures, these potential impacts would be reduced to less than significant and would be below the County's thresholds. No changes have been made to the PEIR.

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Comment Letter S

**From:** Marshall [Swift36B@cox.net]  
**Sent:** Saturday, October 01, 2011 11:55 PM  
**To:** Kashak, Jeff  
**Subject:** Development of 70 acre parcel at Gillespie Field

I already rent a hangar at Gillespie Field, and I hope to rent or own a new one on the 70-acre property when it's developed. I completely support the project.

↕ S-1

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## **Response to Comment Letter S**

**Marshall**  
**October 1, 2011**

- S-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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**Comment Letter T**

**From:** KentCasady@aol.com  
**Sent:** Sunday, October 02, 2011 11:51 PM  
**To:** Kashak, Jeff  
**Cc:** leslie.GPA@cox.net  
**Subject:** Gillespie Field 70 acres

I have been flying off of Gillespie Field since 1954 and have watched the growth around the airport for over 50 years. As a pilot and as a taxpayer, and as a registered voter in the county of San Diego, I fully support the development of the 70 acres for aviation use.

As a licensed California real estate broker, real estate developer, and real estate investor, I am acutely aware that It is economically impossible to ever again assemble the required amount of land for a general aviation airport. And any of the remaining vacant land belonging to the airport will never be regained if it is ever given up. Communities with general aviation airports attract and retain businesses which are not attracted to communities without GA airports.

As a member of the Commemorative Air Force with a small hangar at Gillespie Field, I am looking forward to the day when the CAF can get some land upon which to build a much larger hangar to house flying World War II airplanes in a World War II Flying Museum.

There is plenty of property in the county available for commercial real estate development. There is only one airport in the El Cajon Valley. It is critical to retain airport land for aviation use.

Kent B. Casady  
619 933-5368

T-1

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## **Response to Comment Letter T**

**Kent B. Casady**  
**October 2, 2011**

- T-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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October 3, 2011

## Comment Letter U

Federal Aviation Administration  
County of San Diego

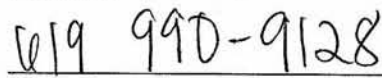
To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 20 years with my parents for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

U-1

Sincerely:

  
Name  
Address  
Phone/Email

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## **Response to Comment Letter U**

**Aaron Bratten  
October 3, 2011**

- U-1    The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter V

October 3, 2011

Federal Aviation Administration  
County of San Diego

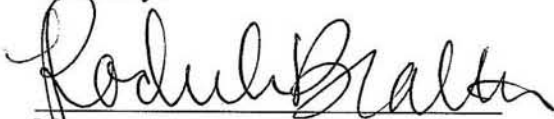
To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 20 years with my parents for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

V-1

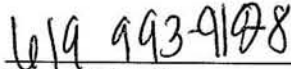
Sincerely:



Name



Address



Phone/Email

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## **Response to Comment Letter V**

**Rochele Bratten**  
**October 3, 2011**

- V-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter W

October 3, 2011

Federal Aviation Administration  
County of San Diego

To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 20 years with my parents for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

Sincerely:

DERRICK BREAU

Name

15175 Palomino Valley Place, San Diego CA 92127

Address

858-722-8232 dpreaux@susco media.com

Phone/Email

W-1

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## **Response to Comment Letter W**

**Derrick Breaux  
October 3, 2011**

- W-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter X

October 3, 2011

Federal Aviation Administration  
County of San Diego

To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 20 years with my parents for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

X-1

Sincerely:

  
JESSICA BREAU

Name

15175 PALOMEDU VALLEY PL.  
Address S.D. CA 92127

858 722-8233 JESSICABREAU@GMAIL.COM  
Phone/Email

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## **Response to Comment Letter X**

**Jessica Breaux  
October 3, 2011**

- X-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter Y

October 3, 2011

Federal Aviation Administration  
County of San Diego

To Whom It May Concern:

I *completely* support the development of the 70 acres for aviation use! We have waited for more than 20 years to have this project developed for Gillespie Field. I hope to own or rent a new hangar on the 70 acres.

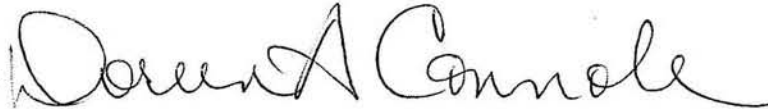
My husband and I are pilots and have flown into and out of Gillespie Field for over 25 years. We use our plane for business, pleasure and for humanitarian purposes.

The 70 acre parcel is a vital part of the airport and it should be developed for aviation use.

JOBS! Let's get going on this 70 acre parcel and its development. It will create jobs providing hangars and attracting aviation businesses.

Y-1

Sincerely:

Doreen A. Connole

Name

15138 Orchard View Dr.

Address

Poway, CA 92064858-842-1708

Phone/Email

timanddoreen@cox.net

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## **Response to Comment Letter Y**

**Doreen A. Connoles**

**October 3, 2011**

- Y-1    The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter Z

October 3, 2011

Federal Aviation Administration  
County of San Diego

To Whom It May Concern:

I *completely* support the development of the 70 acres for aviation use! We have waited for more than 20 years to have this project developed for Gillespie Field. I hope to own or rent a new hangar on the 70 acres.

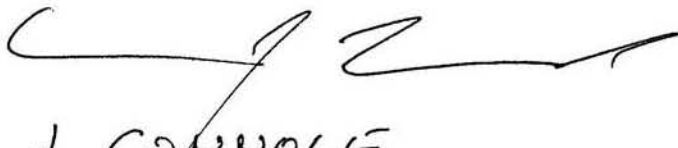
My wife and I are pilots and have flown into and out of Gillespie Field for over 25 years. We use our plane for business, pleasure and for humanitarian purposes.

The 70 acre parcel is a vital part of the airport and it should be developed for aviation use.

JOBS! Let's get going on this 70 acre parcel and its development. It will create jobs providing hangars and attracting aviation businesses.

Z-1

Sincerely:

  
TIM J. CONNOLLY

Name

15138 ORCHARD VIEW DR.

Address

TIMANDDOREEN@COX.NET

Phone/Email

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## **Response to Comment Letter Z**

**Tim J. Connole**  
**October 3, 2011**

- Z-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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October 3, 2011

## Comment Letter AA

Federal Aviation Administration  
County of San Diego

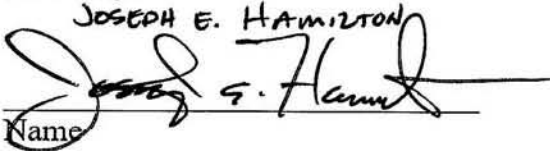
To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 15 years with the Connoles, who own an airplane and is based at Gillespie. They have flown me for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

AA-1

Sincerely:

JOSEPH E. HAMILTON  
  
Name

9417 Mandeville RD  
Address SANTEE, CA 92071

619-805-5395 Jhamilton@pacbell.net  
Phone/Email

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## **Response to Comment Letter AA**

**Joseph E. Hamilton**  
**October 3, 2011**

AA-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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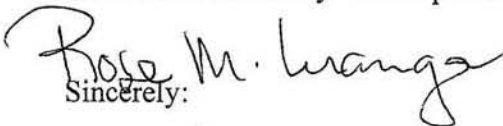
October 3, 2011

## Comment Letter AB

County of San Diego  
Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road #305  
San Diego, CA 92123

To Whom It May Concern:

I *FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs.

  
Sincerely:

ROSE M. URANGA  
Name

4879 MUIR AVE  
Address

SAN DIEGO, CA 92107

619-264-6600  
Phone/Email

IRTROSE@SBCGLOBAL.NET

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## **Response to Comment Letter AB**

**Rose M. Uranga**  
**October 3, 2011**

AB-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AC

**From:** geo2mar@nethere.com  
**Sent:** Monday, October 03, 2011 10:44 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Airport

We hope that the 70 acres is developed for aviation uses. We am hoping that we will be able to own or rent a hanger there at Gillespie soon.  
Please count us for aviation!!!!  
Marie L. Woods and George Gardner  
10427 Susie Place, Santee 92071

AC-1

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## **Response to Comment Letter AC**

**Marie L. Woods and George Gardner  
October 3, 2011**

AC-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AD

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

I THINK THIS IS AN EXCELLENT USAGE FOR THIS PROPERTY. THIS  
DEVELOPMENT WILL ENHANCE GILLESPIE FIELD, AND HAVE A POSITIVE  
IMPACT ON THE COMMUNITY.

AD-1



I am interested in receiving future project notices.

Name: MARGARET M. ADAMS

Address: 11626 CAMINITO MAGNIFICA  
SAN DIEGO, CA 92131

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AD**

**Margaret M. Adams**

**October 5, 2011**

AD-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AE

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I SUPPORT THE DEVELOPMENT OF THE EL CAMINO  
AIR CENTER 70 ACRE PROJECT. THIS HAS TAKEN 25 YEARS TOO  
LONG. THE FUTURE OF THE AIRPORT IS DEPENDENT ON THIS ENDEAVOR  
IT IS LONG OVER DUE

AE-1

☒ I am interested in receiving future project notices.

Name: Steve D. Norms

Address: 11766 CALLE ALBANA  
EL CAMINO, CA 92019

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AE**

**Steve D. Adams**  
**October 5, 2011**

AE-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AF

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I support the development of the 70 ac.  
It will promote economic development in the East County.

AF-1

☒ I am interested in receiving future project notices.

Name: RICK ALEXANDER

Address: 1200 Merritt  
EL CAJON, CA 92020

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AF**

**Rick Alexander**  
**October 5, 2011**

AF-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AG

Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011



Comments

I am in favor of the project, anything that can  
 be done to expedite development should be. Construction  
 jobs would benefit the local economy in addition to  
 generating revenue.

AG-1

☐ I am interested in receiving future project notices.

Name: Dennis Araujo

Address: 9500 Havitt Rd #64  
 Lakeside CA 92040

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter AG**

**Dennis Araujo  
October 5, 2011**

AG-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AH

Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011



**Comments**

THIS DEVELOPMENT IS VITAL TO PROVIDE  
 NECESSARY AVIATION INFRASTRUCTURE & EAST COUNTY JOBS

AH-1

☒ I am interested in receiving future project notices.

Name: BARRY BARBACK

Address: 916 LEMON AVE  
EL CAJON, CA 92020

**Thank you for your participation!**

Comments can be mailed to: County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter AH**

**Barry Bardack**  
**October 5, 2011**

AH-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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**Comment Letter AI**

**From:** Gary Bartlow [gwbartlow@cox.net]  
**Sent:** Wednesday, October 05, 2011 9:10 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field 70 acre development

Jeff:

I'm a pilot with two aircraft that fly out of/into Gillespie Field on a regular basis. I fully support the development of the 70 acres, and I want the 70-acre parcel to be developed for aviation use. I personally have waited YEARS for this project to be developed, and it is about time to proceed with no more delays. I already own a hangar at Gillespie Field, and know the need for more aviation-related businesses and spaces.

AI-1

I support this development.

Get on with it!

Gary Bartlow  
619-579-9808

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## **Response to Comment Letter AI**

**Gary Bartlow**  
**October 5, 2011**

- AI-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AJ

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

I support the development of the 70-Acres  
for Aviation use.

AJ-1

☒ I am interested in receiving future project notices.

Name: Larry Bierma

Address: 4230 Orchard Ave.  
San Diego CA 92107

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AJ**

**Larry Bierma  
October 5, 2011**

- AJ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AK

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I FAVOR AIRPORT DEVELOPMENT FOR MORE  
GENERAL AVIATION AIRCRAFT.

AK-1

☐ I am interested in receiving future project notices.

Name: Todd Bohman

Address: P.O. Box CJ  
Lemon Grove, CA  
91946

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AK**

**Todd Bohlman**  
**October 5, 2011**

AK-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AL

**Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011**



### Comments

HEREFORLY THE 70 ACRE DEVELOPMENT WILL CONTINUE AT A  
FASTER PACE THAN HAS BEEN APPROVED. GILLESPIE FIELD IS A JEWEL  
OF AN AIRPORT & PROVIDES VITAL SERVICES TO THE SAN DIEGO  
COUNTY AREA. THIS AIRPORT SHOULD CONTINUE TO BE DEVELOPED &  
IMPROVED SO THAT THE SERVICES PROVIDED TO BOTH THE FLYING COMMUNITY  
AND THE PUBLIC SERVED BY THE AIRPORT CAN BE CONTINUED AND  
EXPANDED

AL-1

☐ I am interested in receiving future project notices.

Name: Chuck Busch

Address: 743 WATERLOO AVE  
EL CAJON, CA 92019

### Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AL**

**Chuck Busch  
October 5, 2011**

- AL-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AM

RESIDENTIAL HELICOPTER Hovers instead  
 of freeway ROUTES ARE NOT  
 Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011  
 A SAFE + LIVABLE  
 community



## Comments

AM-1

Helicopters (LOW-LOUD-CROSTING TREES -  
 DOGS BARK ETC ETC) BACK + FORTH  
 FROM G3 SOUTH WEST OVER HILLSMONT -  
 BATHURST - BERENDA DISTURB + FRIGHTEN  
 FOR WE CAN'T CONVERSE, USE PHONE,  
 OR OUTSIDE. WHEN WALLS SHAKE - THE  
 FLYING IS BAD BEHAVIOR + NOT REFLECTING  
 RESPECT AND COURTESY REQUIRED OF PUBLIC  
 SERVANTS. ☒ I am interested in receiving future project notices.

Name: LIZA BUTLER

Address: 1494 BATHURST  
 ELCAJON CA

Thank you for your participation! 92020

Comments can be mailed to:

619-405-1500  
 LIZABUTLER  
 @AOL.COM

County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter AM**

**Liza Butler  
October 5, 2011**

- AM-1 This comment pertains to existing airport operations and does not provide comments on the Proposed Project or Draft PEIR. The commenter's concerns regarding existing helicopter operations are noted, and this comment will be included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.

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Comment Letter AN

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

GILLESPIE FIELD IS THE BEST THING THAT EVER  
HAPPENED TO EAST COUNTY. IT DEFINITELY  
NEEDS THE 70 ACRE EXPANSION.

AN-1

☐ I am interested in receiving future project notices.

Name: VERNON CAGAN

Address: FLYGUYVERN@COX.NET

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AN**

**Vernon Cagan  
October 5, 2011**

AN-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AO

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I am a pilot and active member of several clubs and groups at Gillespie. We need to keep this area aviation ind.

It would help the area and the airport

AO-1

☒ I am interested in receiving future project notices.

Name: DARNEE COOK

Address: 528 Goulbourn Ct.  
EL CAJON, CA 92020

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AO**

**Darrel Cook**  
**October 5, 2011**

AO-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AP

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

AVIATION HAS PROVIDED ME AN EXPERIENCE AND SKILL SET THAT HAS BEEN ENVALUABLE IN BOTH MY PROFESSIONAL AND PERSONAL LIFE. I BELIEVE THAT ANY PROJECT THAT EXPANDS AVIATION AND BRING MORE PEOPLE TO AIRPORTS, IS BOTH GOOD FOR THE COMMUNITY AND GOOD FOR THE INDIVIDUAL. I FULLY SUPPORT THE GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT!!

AP-1

☒ I am interested in receiving future project notices.

Name: PATRICK CORRIGAN

Address: 740 SAPPHIRE ST #4  
SAN DIEGO, CA 92109

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AP**

**Patrick Corrigan**  
**October 5, 2011**

AP-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AQ

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



## Comments

LOOK FORWARD TO HAVING MORE HANGARS AVAILABLE  
PLANE HOLD UP MUCH BETTER UNDER COVER. THERE  
IS A SHORTAGE OF HANGAR SPACE IN SOUTHERN CALIF.  
VERY BENEFICIAL TO EL CAJON & EAST COUNTY!

AQ-1

☐ I am interested in receiving future project notices.

Name: B.L. CRAIG

Address: 1012 GLENHILL RD  
EL CAJON, CA  
92020

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AQ**

**B.L. Craig**  
**October 5, 2011**

AQ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AR

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

THIS DEVELOPMENT IS A "MUST" FOR GILLESPIE FIELD!! IT WOULD BE AN ADDED ASSET TO THE FIELD AND COMPLIMENT THE GROWTH THAT HAS TAKEN PLACE IN EAST COUNTY.

AR-1

☐ I am interested in receiving future project notices.

Name: C. A. CRAIG

Address: 1012 GLENVIEW RD  
EL CAJON  
CA 92020

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AR**

**C.A. Craig**  
**October 5, 2011**

AR-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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# Comment Letter AS

**Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011**



## Comments

The Addition of the 70 Acre Parcel to  
increase Gillespie is a great improvement to  
the Airport. This will create many new jobs  
in East County along with increased revenue for  
the City & County.

AS-1

☒ I am interested in receiving future project notices.

Name: Robert Davison

Address: 1660 N. MAGNOLIA AVE  
EL CAJON, CA 92020

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AS**

**Robert Davison  
October 5, 2011**

AS-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AT

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011

**Comments**

I am in favor of the development of the 70 acre parcel at Gillespie Field for aviation use. I currently own a hangar at Gillespie Field (Speer Hangars) and have seen first hand that General Aviation remains strong. As past President and current V.P. of the Gillespie Pilots Association, there continues to be a need for additional hangars in the San Diego area. I support the development of this project as part of the Gillespie Airport.

AT-1

☐ I am interested in receiving future project notices.

Name: LESLIE DAY

Address: 5018 ALZEDA DRIVE  
LA MESA, CA 91941

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AT**

**Leslie Day  
October 5, 2011**

AT-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AU

Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011



### Comments

*I am eagerly awaiting the construction of hangars for us individual pilots!! Can't believe it takes this long to convert from a race track to an aviation use, but I'm looking forward to it. I fly here quite often for business & pleasure and would like to maintain my airplane here rather than at Montgomery.*

AU-1

☒ I am interested in receiving future project notices.

Name: EMILIO DELCONTE

Address: 11626 CAMINITO MAGNIFICA  
SAN DIEGO CA 92131

### Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter AU**

**Emidlo DelConte  
October 5, 2011**

AU-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AV

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

A much needed Improvement to the  
Airport. Please move Forward ASAP.

AV-1

☒ I am interested in receiving future project notices.

Name: Rich ESSERY

Address: 5008 ONSTAD  
San Diego, CA  
92110

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AV**

**Rich Essery**  
**October 5, 2011**

AV-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AW

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011

**Comments**

1. LETS KEEP MAKING IMPROVEMENTS TO THE AREA
2. THE COUNTY COULD BE MAKING MONEY BY BUILDING MORE HANGERS.
3. DEVELOPE THE EMPTY LOT
4. SDP LOSING MONEY IN THIS RECESSION BY BUILDING MORE HANGERS.

AW-1

☒ I am interested in receiving future project notices.

Name: JOHN FLIPPEN

Address: 1756 COUNTRY VISTAS  
BONITA CA  
91902

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AW**

**John Flippen  
October 5, 2011**

AW-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter AX

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



## Comments

AS A CAPTAIN FOR A MAJOR AIRLINE, I LEARNED  
TO FLY AT GILLESPIE FIELD IN 1969. IT IS BECAUSE  
OF GILLESPIE FIELD I HAD A GREAT CAREER WITH  
THE AIRLINE. I CONTINUE TO FLY OUT OF GILLESPIE  
AND HOPE THE 70 ACRES IS DEVELOPED FOR AVIATION.  
PLEASE EXPIDITE AND DEVELOP THE 70 ACRES FOR  
AVIATION. THANK YOU!

AX-1

☒ I am interested in receiving future project notices.

Name: Rick FordemAddress: 1937 HACIENDA DR  
EL CAJON, CA  
92020**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AX**

**Rick Fordem  
October 5, 2011**

AX-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AY

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I AM A LONG TIME RESIDENT OF ELCAJON AND  
FEEL THE REDEVELOPMENT OF GILLESPIE IS A  
VERY IMPORTANT PART OF THE CONTINUING  
GROWTH OF EAST COUNTY

AY-1

☐ I am interested in receiving future project notices.

Name: J. K. GAROUTTE

Address: 1086 MARY ST.  
ELCAJON  
CA 92021

Thank you for your participation!

Comments can be mailed to: County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AY**

**J.L. Garoutte**  
**October 5, 2011**

AY-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter AZ

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

70 years of Gillespie Field History indicates the value suggests the need for upgrade and expansion to better serve all of SD but especially East County.

AZ-1

☒ I am interested in receiving future project notices.

Name: Jeff Kashak, J -

Address: AG-1, CAF  
1905 N. MARSHALL Ave #6  
ELCAJON, CA 92020

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter AZ**

**Gelles L.  
October 5, 2011**

AZ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BA

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I am looking forward to the eventual development of the 70 acre  
land adjacent to airport. It has been a long time coming & will  
have a great deal of positive impact on our community.

BA-1

☐ I am interested in receiving future project notices.

Name: AARON GIANNETTO

Address: 8532 CONRAD COURT  
SANTEE, CA 92071

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BA**

**Aaron Giannetto**  
**October 5, 2011**

BA-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BB

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

MY MEDICAL PRACTICE WELCOMES MORE AVIATION ACTIVITY  
AT KSEE, HAVE BEEN DOING FAA MEDICAL CERTIFICATES  
FOR MANY YEARS AND APPRECIATE WHAT THE AVIATION  
COMMUNITY BRINGS TO EAST COUNTY.

BB-1

☐ I am interested in receiving future project notices.

Name: L.R. GUNKEL, MD

Address: 205 LEXINGTON  
EL CAJON, CA

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BB**

**L.F. Ginkel**  
**October 5, 2011**

BB-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BC

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

All in favor of additional hanger at Gillispi, THE SOONER  
THE BETTER

BC-1

☐ I am interested in receiving future project notices.

Name: Tim GRABER

Address: 10423 IRONWOOD AVE  
SANTEE, CA 92071

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BC**

**Tim Graber**  
**October 5, 2011**

BC-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter BD

Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011



### Comments

Lots 1, 2, 8, 9 to be developed with taxiway. Taxiway to end at south end of lots 2 and 8. Phase I. This limitation prevents lots 3, 4, 5, 6, 7 from development at same time as lots 1, 2, 8, 9. County Dept of P&A should allow development of taxiway to end at lot 5. This linking of taxiway in its entirety, prevent waste of taxpayer money and abuse. This complete taxiway development would create development of lots 3, 4, 5, 6, 7 at same time. There are over 9 RFP requests for development funding by P&A/County as it would be available when requested. When all lots not developed at same initial RFP, its discriminatory against other developers waiting for lots 3, 4, 5, 6, 7.  
☒ I am interested in receiving future project notices.  
 Lots be fair & impartial.

BD-1

Name: JOHN HAMMERSTICANE

Address: 1739 ROBLE GRANDE RD  
ALPINE, CA 91901-3024

### Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter BD**

**John Hammerstrand**  
**October 5, 2011**

- BD-1 This comment addresses the conceptual layout of developable lots on the Proposed Project site. The County shall consider this comment during design development as the specific lots to be developed are not defined at this time. No changes have been made to the PEIR.

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Comment Letter BE

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

- ① AMBITIOUS GRASS - WHY IN PROPOSED AIRPORT DEVELOPMENT AREA?  
this grass has no place (transplanted from other area on airport) on this to here....
- ② Minimum acreage & Max acreage allowable for lease - Max lease years.

BE-1

BE-2

☒ I am interested in receiving future project notices.

Name: JOHN HAMMERSTRAND

Address: 1739 ROBLE GRANDE  
ALPINE, CA - RD.

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BE**

**John Hammerstrand**

**October 5, 2011**

- BE-1 As identified in Mitigation Measure M-BI-1a, the Proposed Project includes transplanting the existing San Diego ambrosia population located onsite to a suitable receptor site located within Mission Trails Regional Park. As analyzed in the Draft PEIR Chapter 4, two project alternatives were developed, which include preserving the population of San Diego ambrosia in-place. This comment will be included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.
- BE-2 This comment is noted and has been included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.

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Comment Letter BF

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

Lot 5 - 1.0 Acre - Proposal Use?

BF-1

☒ I am interested in receiving future project notices.

Name:

JOHN HAMMEICER AND

Address:

1739103 LEGIONAIRE  
AVENUE CA  
91901

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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**Response to Comment Letter BF**

**John Hammerstrand  
October 5, 2011**

BF-1 See Response BD-1.

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Comment Letter BG

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I think aviation related business is great. I do worry about more business jet coming to the field and creating more problems with the residential neighbors. I currently have a hangar for my GA aircraft @ KSEE.

BG-1

☒ I am interested in receiving future project notices.

Name: GEORGE KOVACEVIC

Address: PO BOX 1005  
JAMUL CA  
91935

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BG**

**George Kovacevic**

**October 5, 2011**

- BG-1 Gillespie Field currently serves as a General Aviation airport, which does allow the use of jet aircraft. However, based on the Federal Aviation Administration's Terminal Area Forecast as well as forecasts prepared by the County associated with the Proposed Project, the fleet mix is not anticipated to substantially change as a result of the Proposed Project. The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BH

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

CAN'T WAIT FOR THIS DEVELOPMENT /

BH-1

☐ I am interested in receiving future project notices.

Name:

MICHAEL LA FAVOR

Address:

10109 Ramona Dr.  
Spring Valley  
CA 91977

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BH**

**Michael La France**  
**October 5, 2011**

BH-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BI

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

I AM FAVOR OF development OF the 40 acres!

BI-1

☐ I am interested in receiving future project notices.

Name: Beverly Leary

Address: 13450 Morning Glory  
LakeSide, Ca  
92040

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BI**

**Beverly Leary  
October 5, 2011**

- BI-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

INTENTIONALLY LEFT BLANK

## Comment Letter BJ

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



## Comments

I am fully in favor of developing the 70 acre project.  
This is long overdue and needed in support of general  
aviation.  
It will mean jobs & income for the city of El Cajon & Santee

☐ I am interested in receiving future project notices.

Name:

Cliff Leary

Address:

13450 MORNING GLORY Dr.  
LAKEVIEW, 92040

BJ-1

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BJ**

**Cliff Leary**  
**October 5, 2011**

- BJ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BK

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

DEVELOPMENT OF THE 70 ACRES WILL HELP MEET AVIATION  
DEMAND IN OUR COUNTY AND PROVIDE MORE JOBS. I  
RENT A HANGAR AT GILLESPIE AND HOPE TO OWN A NEW ONE  
ON THE DEVELOPMENT.

BK-1

☐ I am interested in receiving future project notices.

Name: HOWARD MERRITT

Address: 809 LOQUAT CT.  
EL CAJON, CA 92020

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BK**

**Howard Merritt  
October 5, 2011**

BK-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BL

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

WE NEED TO GET THIS TO AHEAD DEVELOP.  
ASAP

BL-1

☒ I am interested in receiving future project notices.

Name: ALAN NICHOLSON

Address: 11775 H. RIDGE RD.  
LAKEVIEW, CA 92040

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BL**

**Alan Nephew**  
**October 5, 2011**

BL-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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## Comment Letter BM

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



## Comments

*I support the development of the 70 acres for aviation use. There are many pilots who would like hangars - This has been a long time in the making - a lot longer than I had ever imagined. I hope it goes through to building hangars.*

BM-1

☐ I am interested in receiving future project notices.

Name: KAREN NEHEW

Address: 11775 HIRIDGE RD  
LAKEVIEW, CA  
92040

## Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BM**

**Karen Nephew  
October 5, 2011**

BM-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BN

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

Looking Forward to the start of the 70 acre  
project. A Fuel Island would be a great  
start, with the operator being a 3rd vendor.

BN-1

☐ I am interested in receiving future project notices.

Name: Jim Oakley

Address: 1900 JOE CROSSAN  
EL CAJON CA 92020

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BN**

**Jim Oakley**  
**October 5, 2011**

BN-1 See Response BD-1.

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Comment Letter BO

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

Well thought out, concept drawing on all aspects of community and aviation requirements I support the project. Economic benefits for the area are significant.

BO-1

☒ I am interested in receiving future project notices.

Name: William Reschke

Address: 4402 Promesa Circle  
San Diego, CA  
92124

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BO**

**William Reschke**  
**October 5, 2011**

BO-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BP

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

*I am in favor of the development on the 70 acres.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BP-1

☐ I am interested in receiving future project notices.

Name: Jennifer Bousa

Address: 8333 Pasadena Ave  
La Mesa, CA 91941

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BP**

**Jennifer Sousa**  
**October 5, 2011**

BP-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BQ

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

I am in favor of the development of the 70  
Acres.

BQ-1

☐ I am interested in receiving future project notices.

Name: Joseph Sousa

Address: 8333 Pasadena Ave  
La Mesa CA  
91941

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BQ**

**Joseph Sousa**  
**October 5, 2011**

BQ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BR

**Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011**



**Comments**

THIS needs to be completed asap. I  
1. It will promote aviation.  
2. create jobs  
3. bring in TAX revenue for the county

BR-1

☐ I am interested in receiving future project notices.

Name: David Sterling

Address: 4744 Norma Pl.  
San Diego CA  
92115

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BR**

**David Sterling**  
**October 5, 2011**

BR-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BS

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

I'm excited about the prospects of growth in a way that  
benefits the community impact of General Aviation.  
GA is terribly mis understood and horribly under-  
appreciated.

BS-1

☒ I am interested in receiving future project notices.

Name: JOHN TELES

Address: 1905<sup>N.</sup> MARSHALL AVE #6  
EL CAJON, CA  
92020

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BS**

**John Telles**  
**October 5, 2011**

BS-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BT

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



Comments

*I am an aviation Buff. I enjoy coming to Gillespie Airport to see the aircraft. You need to expand it as the field Hangar space is lacking. Need more Hangars. To keep the new area for Planes, Hangars and aviation Businesses*

BT-1

☐ I am interested in receiving future project notices.

Name: *Werner A. Thomas*

Address: *8629 PERSEUS Road  
SAN DIEGO, CA 92126.*

Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BT**

**Warren A. Thomas**

**October 5, 2011**

BT-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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# Comment Letter BU

Gillespie Field 70-Acre Redevelopment Project  
 Program Environmental Impact Report (PEIR)  
 Public Review Open House: October 5, 2011



## Comments

The area should be developed only for aircraft/aviation related use. Too often, currently, hangars are used for motorcycle/auto development, retail housing, and activities only marginally related to aviation. Having space is necessary to continue the remarkable aviation technology world development at Gillespie - avionics, aircraft building, maintenance, parts development, research, etc - all of these should be encouraged and assisted through this planning.

BU-1

☒ I am interested in receiving future project notices.

Name: Sid Tolchin

Address: 1810 Marquis  
1820 JOE CROSSON DRIVE  
LA CAJON CA 92020

### Thank you for your participation!

Comments can be mailed to:

County of San Diego, Department of Public Works  
 ATTN: Jeff Kashak  
 5469 Kearny Villa Road, Suite 305  
 San Diego, CA, 92123

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## **Response to Comment Letter BU**

**Sid Tolchin  
October 5, 2011**

- BU-1 As stated in the Draft PEIR Section S.1, the Proposed Project includes construction of approximately 15 acres of infrastructure improvements by the County (i.e., new taxiways, apron area, drainage facilities, and utility facilities), and approximately 55 acres of aviation-use development by private developers (e.g., rectangular and T-hangar spaces, conventional hangar space, aircraft tie-downs, an apron area, automobile parking, aircraft maintenance space, and aviation office and business space). The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BV

Gillespie Field 70-Acre Redevelopment Project  
Program Environmental Impact Report (PEIR)  
Public Review Open House: October 5, 2011



**Comments**

A balanced approach to development  
including Aviation and related  
industries are in the best interest  
of the community and General Aviation

BV-1

☐ I am interested in receiving future project notices.

Name: Robert Treadwell

Address: 8670 Almond Rd  
LAKESIDE CA 92040

**Thank you for your participation!**

Comments can be mailed to:

County of San Diego, Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road, Suite 305  
San Diego, CA, 92123

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## **Response to Comment Letter BV**

**Robert Treadwell  
October 5, 2011**

BV-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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**Comment Letter BW**

**From:** Alain Vasserot [alainvasserot@yahoo.com]  
**Sent:** Wednesday, October 05, 2011 11:26 AM  
**To:** Kashak, Jeff

Dear Mr. Kashak,

I am a pilot and a frequent user of Gillespie field. I wanted to send a short note to support the development of the 70-acre project in hopes that it will provide long-term, affordable solutions to GA needs in the county.

**BW-1**

Best regards,  
Alain P. Vasserot

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## **Response to Comment Letter BW**

**Alain P. Vasserot**  
**October 5, 2011**

BW-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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**Comment Letter BX**

**From:** Moneyvan@aol.com  
**Sent:** Thursday, October 06, 2011 12:46 PM  
**To:** Kashak, Jeff  
**Cc:** leslie.GPA@cox.net; moneyvan@aol.com  
**Subject:** Gillespie 70 acres

Mr. Kashak,

My husband is a pilot and regular user of Gillespie airport. I support the development of the 70 acres east of the field.

**BX-1**

Maxine Elliott

1477-A Gustavo Street  
El Cajon CA 92019  
619-334-2567 phone

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## **Response to Comment Letter BX**

**Maxine Elliott  
October 6, 2011**

- BX-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter BY

**From:** Gartman, Robin [RGartman@sandiego.gov]  
**Sent:** Thursday, October 06, 2011 12:51 PM  
**To:** Kashak, Jeff  
**Subject:** Draft PEIR

To whom it may concern,

I fully support the development of the 70 acres located at Gillespie Field because it will bring added income to county airport funds.

This project will meet the aviation demand in the county. It will provide hangars, aviation businesses and jobs. I support this development.

I'm a pilot that flies out of/into Gillespie Field who would love own or rent a hangar on this 70-acre parcel.

It is time to get beyond all the unworthy delays and bring jobs and money back to this area.

BY-1

**Robin Gartman**  
Marine Biologist II  
City of San Diego Marine Biology Laboratory  
2392 Kincaid Road, San Diego, CA 92101 USA  
Voice: 619-758-2327  
Email: [rgartman@sandiego.gov](mailto:rgartman@sandiego.gov)

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## **Response to Comment Letter BY**

**Robin Gartman**  
**October 6, 2011**

BY-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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**Comment Letter BZ**

**From:** Colleen (Elliott) Grimson [cme\_fly@yahoo.com]  
**Sent:** Thursday, October 06, 2011 9:45 PM  
**To:** Kashak, Jeff  
**Subject:** Development of property east of Gillespie Field

Hello,

My husband and I live in Santee, just across the 67 freeway from Gillespie Field. In followup to the public hearing last night about the property to the east of Gillespie Field that's being considered for multiple aircraft hangars, I'd like to voice our support for this project. I live across from Gillespie and work next door to Montgomery Field and have formed high opinion of the role that private aircraft can play in our society, from the young people learning to fly and, along with that, learning responsibility and common sense, to the retired military veterans who find kindred spirits in their fellow pilots, to the businesses that serve and are served by local airports like these. I try to do whatever I can to support this unsung, often overlooked section of our culture.

**BZ-1**

Thank you for your consideration,

Colleen M. Grimson  
Santee resident and Gillespie Field neighbor

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## **Response to Comment Letter BZ**

**Colleen M. Grimson**  
**October 6, 2011**

BZ-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter CA

**From:** Jerry Hansen [jerry-hansen@cox.net]  
**Sent:** Thursday, October 06, 2011 8:53 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field development project

I was unable to attend the meeting at Gillespie last evening, but would like to go on record as supporting the 70 acre development. I have based several aircraft at Gillespie over the past 35 years and look forward to seeing the facilities improved.

I would be opposed to any use that is not aviation related.

Best regards,

Gerald Hansen  
11140 Fuerte Drive  
La Mesa, CA 91941

CA-1

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## **Response to Comment Letter CA**

**Gerald Hansen**  
**October 6, 2011**

CA-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter CB

**From:** Butzke, Gary L. HS [gary.butzke@hs.utc.com]  
**Sent:** Friday, October 07, 2011 8:38 AM  
**To:** Kashak, Jeff  
**Subject:** 70 acre El Cajon Air Center

I am very much interested in renting a new hangar over at the new 70 acre development and have been patiently waiting for something to happen over there. I fully support utilizing those 70 acres of the airport and hope that the county can start making progress on the Air Center – it will not only add some jobs to a struggling economy but will make one of San Diego’s best airports even better and more up to date.

Thanks, Gary

CB-1

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## **Response to Comment Letter CB**

**Gary Butzke  
October 7, 2011**

CB-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter CC

October 9, 2011

County of San Diego  
Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road #305  
San Diego, CA 92123

To Whom It May Concern:

I have flown in and out of Gillespie field many times over the past 15 years with family and friends, who own airplanes and are based at Gillespie. They have flown me for business, pleasure and humanitarian purposes.

*I FULLY* support the development of the 70 acres located next to the current Gillespie Field in El Cajon, California. It is time that acreage goes back into meeting the aviation demand in the county. It will provide hangars, aviation businesses and jobs

CC-1

Sincerely:

James B. Schaible  
Name

1451 Glen Avon Dr.  
Address

San Marcos, CA 92069

james.schaible@dgs.ca.gov  
Phone/Email

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## **Response to Comment Letter CC**

**James B. Schaible**

**October 9, 2011**

CC-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter CD

October 13, 2011

County of San Diego  
Department of Public Works  
ATTN: Jeff Kashak  
5469 Kearny Villa Road #305  
San Diego, CA 92123

To Whom It May Concern:

JOBS! Let's get going on this 70 acre parcel and its development for aviation use. It will create jobs providing hangars and attracting aviation businesses. We have waited 20 years for this project to be developed. I completely SUPPORT this project!

CD-1

Sincerely:

  
Name

8318 YOLO CT.  
Address

SAN DIEGO, CA 92129

rockstar77750@yahoo.com  
Phone/Email

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## **Response to Comment Letter CD**

**Michael W. Roth**  
**October 13, 2011**

CD-1 The County acknowledges receipt of this comment letter and acknowledges the commenter's support for the Proposed Project. No changes have been made to the PEIR.

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Comment Letter CE

**ROBERT GERMANNSENDER'S NAME**

9111 Hillman Way  
 Lakeside Ca. 92040  
 619 654 0785  
 regermann@Hotmail.com

November 4, 2011

Jeff Kashak  
 County of San Diego  
 Department Of Public Works  
 Environmental Services Unit  
 5489 Kearney Villa Road, Suite 305  
 San Diego, Ca 92123

Subject: Public Notice of 45 Day Public Review & Comment on Pier. (SCH#2005111092)

Dear Mr. Kashak

In reviewing your process of Notifying the public regarding the planned development/expansion of Gillespie Field the County has fallen short of its goal. The goal is to inform the citizens that are to be impacted of the pending development and the impact it will have on their quality of life either directly or indirectly. The process the county used was to notify property owners within a 300 ft of proposed development. Also to publish a notice in the San Diego Union Tribune.(newspaper) These methods of notices area standard practices with normal delopments of properties. This is an airport expansion not a shopping mail or a housing development. This development (SCH#2005111092) is unique and thus should have its own notification process. This development of expanding an airport in the city of ElCajon which impacts surrounding communities such as the City of Santee, the community of lakeside even the State of California. I will start with the first requirement which I think is flawed. The public Notice procedure.

CE-1

On October 17 2011 I attended a meeting at Dian Jacobs office in ElCajon . Present at this meeting was Diane Jacobs,( County Supervisor) Amber Tarrac (Policy Advisor) Mack represented Duncan Hunters office. Peter Drinkwater (Director of County Airports) Three(3) representatives from the F.A.A. and five homeowners from the unincorporated community of Lakeside. The topic was Safety/noise regarding Gillespie Fields planes. There was direct testimony from Homeowners that the planes from Gillespie field where flying at 300ft. or lower over our neighborhood. This was supported by Mac, Duncan Hunters aide. Nobody at that meeting denied this was not accurate. In fact the Tower(F.A.A.) could not tell at what altitude the planes where flying nor where exactly the planes where in the air. Gillespie field does not have radar that could track these planes under 1400 ft.

CE-2

The flight school is owned and staffed with instructors from Sweden. The company name is Scandinavian Aviation Academy. The school has a contract with China to train Chinas pilots for its commercial airline industry and air force. The instructors are Swedish, the students are Chinese and the tower(FAA) is English speaking. So in a nut shell what you have is two foreign languages in a cockpit trying to communicate with the tower in English flying multiple engine planes, including jets over our houses at 300ft or less.

CE-3

According to the flight school's own sales brochure: Gillespie Field is one of the busiest airports in southern California. Gillespie Field is surrounded by small mountains but there is another obstacle for the pilots to consider. Helicopters are flying up/down and all around in this whole mess. The airport is flying and training Helicopter pilots. This is a accident waiting to happen . I think the citizens of east county need to know what is happening over their heads.

The county gave notices of expansion of Gillespie field which will INCREASE these planes flying overhead. The county gave notice to the property owners who live 300 ft. from the project. The county should give the homeowners under the flight path the same courtesy. We(homeowners) have that same right as the 300ft property owners do. The solution would be to mail out notices to the individual households in the flight path of Gillespie's field planes. This "flight path" map was handed out by Peter Drinkwater( Director of Operations of Airports) at the Oct. 17 2011 meeting held by Dian Jacobs in El Cajon.

CE-4

The other form the county used of notification is in the San Diego Union Tribune(newspaper ) is not applicable here. The Tribunes home office is in the city, large metropolitan dailies are struggling . I would recommend the small weekly community papers to reach the citizens. This issue is exclusive to East county. The planes fly over East county . I would recommend then a El Cajon Newspaper since Gillespie field is in El Cajon City. The El Cajon newspapers publishes bidding information on projects in its city limits. Gillespie Field is in El Cajon City limits. Any public review notice of Gillespie Field should be in the El Cajon newspapers.

CE-5

Gillespie Field has a sign already in place announcing the development of a Aviation Center since they(County) has taken this approach of notifying the public about the expansion of the "Field" then they (airport) should use this same procedure to notify the public of the right to comment on the project. The signs on all four corners of the airport would be applicable somewhat like the posting that liquor licenses are required to do.

CE-6

Sincerely,



Robert Germann  
9111 Hillman Way  
Lakeside Ca. 92040  
[regermann@hotmail.com](mailto:regermann@hotmail.com)  
619 654 0785

## **Response to Comment Letter CE**

**Robert Germann  
November 4, 2011**

- CE-1 The California Environmental Quality Act (CEQA) Guidelines §15087 outlines the requirements of providing the public notice of the availability of a draft environmental impact report (EIR). It requires a lead agency to provide public notice of the availability of a draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice. Notice shall also be given by at least one of the following procedures: publication at least one time in a newspaper of general circulation, posting of notice on and offsite, and direct mailing to the owners and occupants of property contiguous to the parcel(s) on which the project is located.

In accordance with the CEQA Guidelines §15105(a), the public review period of a draft EIR shall not be less than 45 days, but no longer than 60 days. As such, public review of the Draft PEIR for the Proposed Project commenced September 15, 2011 and was extended at the request of the general public through November 7, 2011 for a period of 52 days.

In accordance with CEQA Guidelines §15087, the County notified all organizations and individuals, who previously provided comments during the CEQA development, of the availability of the Program EIR for public review. The County also published the notice of availability one time in the San Diego Union Tribune on the first day of public review, September 15, 2011. The County mailed notices of the Program EIR's availability to (1) owners of property contiguous to the proposed action site, (2) owners of property contiguous to all aviation-use areas at Gillespie Field, and (3) owners of property located within 300 feet of aviation-use areas at Gillespie Field. Lastly, the Draft PEIR and notice of availability were made available on the internet at the County Department of Public Works Airports' website and Environmental Services Unit's website during the public review period.

In accordance with CEQA, the California Governor's Office of Planning and Research submitted a letter to the County (Comment Letter A) finding that the County has complied with the State Clearinghouse review requirements for draft environment documents pursuant to CEQA. No changes have been made to the PEIR.

- CE-2 The Proposed Project does not propose alteration of the existing, authorized flight tracks surrounding Gillespie Field. The commenter's concerns regarding low altitude flights are noted, and this comment will be included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.
- CE-3 This comment pertains to existing airport operations and does not provide comments on the Proposed Project or PEIR. This comment will be included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.
- CE-4 See Response CE-1.

CE-5 See Response CE-1.

CE-6 See Response CE-1.

Comment Letter CF

**From:** Jeankaiwi@gmail.com  
**Sent:** Sunday, November 06, 2011 10:43 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Jeff,

As an east county resident who spends all my time outside, I am not in favor of this expansion to Gillespie Field. Jobs are very important, I understand, but so is quality of life. Gillespie Field's large number of daily flights make sure the days are full of constant noise.

I wish this proposed expansion was not going to happen, and that the county found a way to offset all the noise and pollution that this airport causes in such a way as to offer jobs and a quieter and cleaner El Cajon.

Jean Kaiwi

CF-1

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## **Response to Comment Letter CF**

**Jean Kaiwi**  
**November 6, 2011**

- CF-1 The commenter's concerns and opposition to the Proposed Project are noted and have been included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.

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Comment Letter CG

**From:** Betty Chafetz [bac21@cox.net]  
**Sent:** Monday, November 07, 2011 4:25 PM  
**To:** Kashak, Jeff  
**Subject:** comments on Gillespie Field 70 acre redevelopment plan

Jeff Kashak  
 Environmental Department

Thank you for the opportunity to comment. Betty Chafetz 619 562 3356

The PEIR consists of a well researched 250 page document plus approximately 2600 pages of technical reports. It took several years for environmental experts to develop. The public had only 45 days (and an extension of 7 days for) to read, become familiar with, absorb and comment on close to 3000 pages of technical information. Therefore response time is insufficient and should be extended.

CG-1

Only people within 300 yards of the airfield were notified of the PEIR. However at least four large communities will be affected by the environmental problems and mitigation procedures the Report evaluates and describes. Therefore, communities affected by the increase in air traffic due to the change in land usage should be notified as well as those within 300 yards of the construction.

CG-2

7.1.2, M-HZ-1d

In this section, it is stated that the private developer conduct a human risk assessment where contaminated soil or groundwater are present on land he or she wishes to be developed. Having the interested party monitor him or herself does not seem like a prudent method of overseeing the project.

CG-3

7.1.3, M-TR-C1/2

Cumulative Impacts of the Project to traffic on the Hwy 67 exchange by payment to the TIF Fund would do nothing to mitigate traffic until the funds are accumulated and the state decides the project is a priority. That could take years. In addition, the city of El Cajon would not be compensated for the 1407 additional trips with no additional street/road capacity.

CG-4

CG-5

7.2.1

Watering because of dust emissions during grading, particularly where contaminated soils are concerned, should be ongoing and not just twice a day.

CG-6

2.2.1

The Katema Plume will rise and fall with groundwater level changes and it may migrate as well. Can the county guarantee the plume and the soil it has contaminated be totally eliminated before the project proceeds?

CG-7

The 70 acres seems to be full of contaminated water underneath, hazardous, cancer-causing chemicals from dumping and munitions. Cancer-causing particles dangerous to passers-by and workers on site are a distinct possibility if proper procedures are not followed. Therefore mitigation requires complicated studies, programs, training, etc. Who will oversee the entire project to ensure that all plans for the safe removal and disposal of hazardous wastes are done safely according to regulation and how will the county keep the public informed? The public should have those answers.

CG-8

The PEIR states on two occasions that the project will not create a significant number jobs and therefore not create an impact requiring extra county or city services. A recent newspaper article in the Union Tribune cites the possibility of at least 440 jobs being created. This would seem to be contradictory to the afore mentioned conclusion.

CG-9

The EPA cited avgas as having lead emissions harmful to children and pregnant women. The EPA is doing a study on Gillespie Field because its inventory of planes and number of operations was found to emit harmful levels of lead. There are no plans in the PEIR to deal with the increased level of lead that would ensue with the increased number of operations that come with the change of land usage to aviation only, particularly in touch and go patterns. This is a major health concern that should be dealt with.

CG-10

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## Response to Comment Letter CG

**Betty Chafetz**  
**November 7, 2011**

- CG-1 In accordance with the California Environmental Quality Act (CEQA) Guidelines §15105(a), the public review period of a draft EIR shall not be less than 45 days, but no longer than 60 days. As such, public review of the Draft PEIR for the Proposed Project commenced September 15, 2011 and was extended at the request of the general public through November 7, 2011 for a period of 52 days. In accordance with CEQA, the California Governor's Office of Planning and Research submitted a letter to the County (Comment Letter A) finding that the County has complied with the State Clearinghouse review requirements for draft environment documents pursuant to CEQA. No changes have been made to the PEIR.
- CG-2 See Response to Comment CE-1. Furthermore, the Proposed Project does not involve the alteration of land use designations. No changes have been made to the PEIR.
- CG-3 As discussed in Responses C-3 and C-4, the Draft PEIR has been revised in Section 2.2.2 to cite San Diego County Department of Environmental Health (DEH) as the appropriate regulatory agency. Under the California Hazardous Waste Control Act, State of California Health and Safety Code, Division 20, Chapter 6.5, and the California Code of Regulations Title 22, the County (DEH) has the authority to serve as the lead oversight regulatory agency (i.e. authorized local health officer) concerning hazardous materials. No further changes have been made to the PEIR.
- CG-4 As stated in the Draft PEIR Section 2.3.1.3, the County of San Diego Board of Supervisors adopted a Transportation Impact Fee Ordinance for the unincorporated area of San Diego County. The ordinance enables the County to implement Transportation Impact Fee (TIF) programs, which require payment of fees that constitute a project's fair share contribution towards the construction costs of the planned transportation facilities that are affected by the proposed development. CEQA Guidelines recognize that mitigation for cumulative impacts may involve the adoption of ordinances or regulations (CEQA Guidelines §15130) such as the County-adopted Transportation Impact Fee Program. No changes have been made to the PEIR.
- CG-5 As analyzed in Draft PEIR Section 2.3.2 and associated Traffic Impact Study, the traffic anticipated to be generated by the Proposed Project was evaluated against the County of San Diego *Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic*. As identified in Section 2.3.2 of the Draft PEIR and as revised in the Final PEIR (Errata), all potential traffic impacts within the City of El Cajon and unincorporated San Diego County would be less than significant and less than the County's thresholds. No changes have been made to the PEIR.
- CG-6 As stated in the Draft PEIR Section 7.2.1, active grading would be watered at a minimum frequency of twice per day to reduce dust emissions. Therefore, the County will ensure through leasing agreements and/or review of the contractor specifications that all construction activities will require additional watering as needed. No changes have been made to the PEIR.

- CG-7 Operation of the privately-owned Ketema Aerospace and Engineering facility, which was located outside County Airport property, resulted in a groundwater plume impacted with chlorinated solvents that has migrated below the Proposed Project site. Because the origin of the Ketema plume is located offsite, the County cannot ensure that future contaminants will not migrate under the Proposed Project site. In accordance with *County Guidelines for Determining Significance for Hazardous Materials and Existing Contamination* Section 5.2 and as stated in Mitigation Measure M-HZ-1a, the County proposes to excavate and remove any contaminated soil and/or groundwater that is encountered during project construction. In addition, Mitigation Measure M-HZ-1d requires the County and private developers to prepare a human health risk assessment, which will identify whether any potential health risks exist for future occupants. No changes have been made to the PEIR.
- CG-8 See Responses C-3 and C-4. As required by CEQA and applicable federal, state, and local laws (i.e., CERCLA, Uniform Fire Code, Hazardous Materials Release Response Plans and Inventory Act, etc.), each existing hazard or hazardous environmental condition must be mitigated or have a plan developed to safely protect the public from the hazard. Also, Mitigation Measures M-HZ-1a through M-HZ-1d would be implemented to reduce any potential impacts from the release of hazardous materials during construction to a level below significance. Specifically, Mitigation Measure M-HZ-1d requires a human health risk assessment to be conducted by the developer and County to evaluate potential health risks to future occupants of the site prior to occupation of any structures within the Proposed Project site. As noted in Responses C-3 and C-4, the Draft PEIR Section 2.2.2 has been revised to cite San Diego County Department of Environmental Health as the appropriate regulatory overseeing agency.
- CG-9 The discussion in PEIR Section 1.8 has been augmented to clarify that the Proposed Project includes the redevelopment of a site within the City of El Cajon that is zoned for commercial/industrial uses and is completely surrounded by urban development. Gillespie Field has provided a home to aviation services and business space in its existing location for over 70 years. The redevelopment of the Proposed Project site is an extension of these existing uses and will allow the airport to accommodate the increasing need to provide aviation-related uses in the area. This would include the same types of commercial uses as the surrounding uses currently operating at Gillespie Field. Although the commenter cites a newspaper article's estimation of the Proposed Project's job creation, the actual number is somewhat speculative, as it is directly contingent on the specific uses and staffing that would be required by the private aviation development leasees. See PEIR Section 1.8 for additional analysis of these issues.
- Further discussion on the potential impacts to public services and utilities is provided in Section 3.1.8 and 3.1.9. These sections consider the anticipated uses of the site, and conclude that the Proposed Project will not result in significant impacts to public services and utilities and service systems.
- CG-10 The U.S. Environmental Protection Agency (USEPA) is researching lead emissions at select airports across the United States, including Gillespie Field. According to the USEPA, various airports throughout the country were selected as candidates for the

collection of ambient air quality samples, including lead, due to characteristics including runway configuration, frequency of operations, ambient air conditions, and historical lead emissions. Data continues to be collected and the USEPA has not made site-specific conclusions or developed standardized methodology regarding the levels of lead in relationship to air quality standards or effects to human health from lead emissions at Gillespie Field. Therefore, in the absence of a standardized methodology, site specific conclusions cannot be reasonably reached regarding operation of the Proposed Project. In any event, the incremental increase in air traffic operations attributable to the Proposed Project as compared to the FAA forecast of future air traffic operations at Gillespie Field is not substantial. Accordingly, the increased air traffic operations and associated lead emissions are not expected to be substantial. In addition, according to the San Diego Air Pollution Control District, the San Diego County Air Basin is within federal and state standards for levels of lead.

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# Comment Letter CH

## ROBERT GERMANN

9111 Hillman Way  
Lakeside, Ca 92040  
619 654-0785  
Rgermann@hotmail.com

November 7, 2011

Jeff Kashak  
County of San Diego  
Department of Public Works  
Environmental Services Unit  
5489 Kearney Villa Road, Suite 305  
San Diego, Ca 92123

Subject: Redevelopment Project Sch #2005111092

Dear Mr. Kashak

The purpose of this letter is to comment on the environmental study and how inaccurate it is. The study uses criteria that is flawed. I have eaten breakfast several times at the restaurant at Gillespie field. The majority of the planes that I witnessed are doing touch and goes. The reason for this I am told is that nobody can afford to fly when fuel is 6.00dollars a gallon. The county, to produce revenue because of the downturn in the economy has focused on flight schools. The flight schools operated differently than your private pilot who flies on the weekend. Gillespie field is a general aviation airport but it is unique in ways from the counties other airports. General Aviation airport critera does not apply to Gillespie Field and the estimates of the impact on the community in all areas of the counties study. I have read quotes from different sources that say how many take offs and landings there are at Gillespie Field. The numbers range from 210,000 to 250,000 all from credible sources. One flight school says 250,000 flights to Steve Schmidt San Diego Union of 210,000. I would suggest the County get a accurate count by a non-partial outside source. I also witness multiple engine planes do touch and go's way more than the 9% the county has listed in its report. My estimate would be more around 50%. Gillespie Field has catered to the commercial flight school which have to train their students for multiple engine planes to receive their F.A.A. licenses. The hours they need to get their licenses are many. The report does not take this in to account.

Since the county has failed to get an account count on how many planes actually take off and land and how many engines are on those planes, I suggest the counties report is fundamentally flawed. It is very important that the simple criteria of how many planes that are used in the counties study be accurate.

I did not read of any schedule for cost mitigation that comes with Airport development. The costs for mitigation will impact the county, it should be addressed.

I also witness the old fuel truck with no vapor recovery system on more than one occasion fueling the flight school planes. I could not see a vapor recovery system installed on this truck or even at the fuel station at Gillespie field. The Counties report did not document the effects of using LEADED fuel in piston driven planes. I would like to see a study on the Green House gases that are emitted by the actual counted planes landing and taking off from the FIELD. Gillespie Field is in a valley that is not like any other county airport, any projected pollution to the Valley should have hard data to figure any mitigation costs for a polluted EL Cajon Valley in violation of the Clean Air and Water Act

This mitigation fund should also included funds available for Forester Creek. This creek runs straight into

CH-1

CH-2

CH-3

CH-4

CH-5

CH-6

the San Diego river. I saw no water treatment program for this issue in the Counties study.

In conclusion I disagree with the statement in the counties study that the expansion would fill the demand for existing unmet demand for aviation support farcicalities. I have been at the airport several times and on both sides of the airport there are for rent signs not just one sign but 4 signs for 4 different properties that is a sure sign of excess inventory. I really don't believe there is a demand for airplane hangers in today's economy. The hard economic times have changed aviation. The county is building a white Elephant. However, the Chinese like white elephants.

I disagree that the new expansion is consistent with the land use planning.

Gillespie Field is a General Aviation Airport. The flight school that Gillespie Field is building a new terminal for is a commercial enterprise owned by a foreign country(Sweden). The student pilots are sponsored by a foreign country(China) and that is not in compliance with a General Aviation Airport. I disagree the highest and best use for this property is for an expansion of Gillespie Field. In a area where there is little flat land left the county wants to build asphalt runways and tin sheds that few people want or can afford. The aviation industry/hobby is a very small percentage of the east county population. At a time when the East County Economic Development Council could have initiated a plan that East County residents would have been proud of, the council elected to sell their souls to the devil and please two foreign countries. At a time when a N.F.L. franchise team is available to move and is in the same county. The county ignores the Chargers. To have a chance to get a N.F.L. franchise is a once in a lifetime opportunity for ElCajon and East County. I have read no reports or seen any feasibility studies investigating any other industries or public projects that this property could be used for, because of this I think the county was only focused on expanding this airport and nothing else. East county is horse county, would a Del Mare East be considered. How about a convention center, a baseball park for a minor league team. A public park with a pool for the community. A concert hall.. The list is long that the people of East County could use and be proud of, and re-development would flourish in. The expansion of Gillespie Field does not benefit the community as a whole. It will only add less safe skies overhead, more smog,( leaded fuel) noise, water pollution issues(Forrester creek)

I read the Sept. 15, 2011 "THE NOTICE OF AVAILABILITY OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT" Then at the bottom of the page it states:

KIDS                      THE ENVIRONMENT                      SAFE AND LIVABLE COMMUNITIES

Did the East County Economic Development Council even read this, I don't think so.

Sincerely,



Robert Germann

CH-6  
cont'd

CH-7

CH-8

CH-9

CH-10

CH-11

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## Response to Comment Letter CH

**Robert Germann  
November 7, 2011**

CH-1 As discussed in the Aircraft Noise Analysis (Appendix H), aviation activity levels for existing conditions (2008) at Gillespie Field were based on the most recent 12-consecutive months of operations data collected by FAA Airport Traffic Control Tower (ATCT) staff. The data reflects the period between July 1, 2007 and June 30, 2008. During this time, there were 267,969 operations at Gillespie Field, 110,008 of which were itinerant operations (arrivals and departures) and 157,961 of which were local operations (touch-and-go operations). This data was utilized to calculate existing and forecasted demand for based aircraft storage facilities as well as potential noise effects.

The County disagrees that 9% of touch-and-go operations include multi-engine aircraft. As explained below, the County calculated (through the methods described above) that 13% of touch-and-go operations include multi-engine aircraft. As illustrated in Table I-2 of the Gillespie Field Aircraft Noise Analysis, existing touch-and-go operations at Gillespie Field total 216.38 Annual Average Day (AAD) operations, including 188.25 AAD by single-engine aircraft and 28.13 AAD by multi-engine aircraft. Therefore, approximately 13% of all touch-and-go operations include multi-engine aircraft. Separately, all touch-and-go operations were calculated to comprise approximately 42% of the total aircraft operations at Gillespie Field. No changes have been made to the PEIR.

CH-2 As identified in the Draft PEIR (Table S.1), mitigation is required for impacts associated with Biological Resources, Hazards and Hazardous Materials, and Traffic/Transportation. Costs to implement the identified mitigation measures will be developed and provided to the County Board of Supervisors. No changes have been made to the PEIR.

CH-3 This comment addresses the current fueling conditions of the Gillespie Field, and does not provide comments on the Draft PEIR for the Proposed Project. Should fueling stations be installed on the Proposed Project site, all fueling stations would be required to comply all federal, state, and local regulations. No changes have been made to the PEIR.

CH-4 See response to CG-10.

CH-5 In accordance with the California Environmental Quality Act (CEQA), an analysis of potential effects to air quality and greenhouse gas emissions was performed for the Proposed Project, and is included in Section 3.1.4 of the Draft PEIR. The Draft PEIR incorporates aircraft emissions as part of the impact analysis for future conditions (i.e., upon project completion). As shown in Table 3.1.4-1 of the Draft PEIR, aircraft operations are one of several components that were calculated to contribute to greenhouse gas emissions; however, impacts would be below the threshold of significance as demonstrated in the Draft PEIR and do not require mitigation. Pursuant

to the thresholds established by the County, analysis of existing greenhouse gas emissions at the airport was not required. No changes have been made to the PEIR.

CH-6 As identified in the Draft PEIR, no significant impacts are anticipated to occur to hydrology and water quality (including Forester Creek) as a result of the Proposed Project. Therefore, no mitigation is required. As identified in Section 3.1.5.4, Section 3.1.5.6, and Section 7.2.5, the County proposes to implement project design features prior to construction to reduce pollutants in storm water runoff, to ensure project storm flows do not exceed existing conditions, and to reduce potential water quality construction effects. Implementation of these design features would ensure compliance with all applicable federal, state, and local laws regulating water quality, including, but not limited to the Clean Water Act, Porter-Cologne Water Quality Control Act, State of California NPDES General Permit, and County Grading, Clearing, and Watercourse Ordinance. No changes have been made to the PEIR.

CH-7 One objective of the Proposed Project is to meet an existing unmet and forecasted demand for landside aviation support facilities as described in the 2005 Airport Layout Plan (ALP) Update Narrative Report. Gillespie Field has 144 acres dedicated to aeronautical uses and in 2007 there were a total of 978 based aircraft. When the 978 based aircraft is divided by 144 acres, the resulting density of 6.8 based aircraft per acre represents full capacity because at this level there are no additional tie downs or T-hangar spaces available for aircraft parking and it is below an acceptable level of service for airport management. To maintain or improve the ratio of 6.8 based aircraft per acre (maximum capacity), the amount of land dedicated to aeronautical uses will have to be increased by an additional 45.6 acres to accommodate the forecasted 1,269 based aircraft in 2027. If the Airport does not increase the based aircraft storage, the 2027 forecast predicts 58,935 unserved annual operational demand. The FAA Los Angeles Airports District reviewed and approved these forecast numbers in a letter to the County dated June 5, 2009.

The FAA has approved and revalidated the ALP and published a Terminal Area Forecast demonstrating the need to fulfill these facility deficiencies. In addition, the County prepared an Unconstrained Aviation Activity Forecast Report (Appendix H of Draft PEIR) for the Proposed Project which identified that increases in the demand for airport facilities and the number of aircraft utilizing Gillespie Field are anticipated to occur even if the Proposed Project site is not developed with aviation uses. In addition, according to FAA's 2007 Terminal Area Forecast, the number of total based aircraft at Gillespie Field will increase by a compounded annual growth rate of 1.6 percent from 2007 through 2025. Therefore, the anticipated increases in the demand for airport facilities and the number of aircraft utilizing Gillespie Field are anticipated to occur absent the Proposed Project. No changes have been made to the PEIR.

CH-8 As identified in the Draft PEIR Section 3.1.6, the Proposed Project will not significantly disrupt or divide an established community and does not propose the introduction of new uses that differ from existing uses in the area. The Proposed Project is consistent with the applicable goals and policies of the FAA-approved Airport Layout Plan, the Airport Land Use Compatibility Plan, and the County of San Diego General Plan. Furthermore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. No additional analysis or

justification is provided in this comment to warrant a change in determination. No changes have been made to the PEIR.

- CH-9 This comment pertains to existing airport operations and does not provide comments on the Proposed Project or PEIR. This comment will be included in the Final PEIR for review and consideration by the County Board of Supervisors. No changes have been made to the PEIR.
- CH-10 In June 2005, the FAA issued a guidance letter to the County regarding the need to develop the Proposed Project site from non-aviation to aviation uses upon the expiration of the lease held on the site by the Cajon Speedway. As stated by FAA, development of the Proposed Project site for aeronautical uses will bring the County into compliance with federal grant assurances by adhering to the FAA requirement to develop the site to aviation use. As stated in the FAA's 2005 letter, the County would not receive approval from the FAA for any non-aeronautical uses of the site. No changes have been made to the PEIR.
- CH-11 The phrase "Kids – The Environment – Safe and Livable Communities" as referenced in this comment is derived from the strategic initiatives from the County's General Management System as identified by the County General Plan. No changes have been made to the PEIR.

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Comment Letter CI

**From:** Robert "Bob" Moyes [rmoyes1@cox.net]  
**Sent:** Monday, November 07, 2011 10:46 AM  
**To:** Kashak, Jeff  
**Subject:** Gillespie Field Developmen

Dear Mr Kahak

I have been a El Cajon resident for the pass twenty-five plus years. The aircraft traffic noise around Gillespie Field is extremely bad at this time. Expanding Gillespie field can only make it worse than it already is. I wish that county would be working to improve the safety and reduce the noise problem by limiting the number of take-off and landing. Expanding Gillespie Field and adding more hangers, I believe, is going in the wrong direction. This is not a positive plan for residence in and around the Airport.

Member of Fletcher Hill HOA  
Robert Moyes

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## **Response to Comment Letter CI**

**Robert Moyes  
November 7, 2011**

- CI-1 The County acknowledges receipt of this comment letter, and understands that aircraft operations have increased over time as shown in FAA forecasts. However, the County does not have the regulatory authority to control the type of aircraft, frequency of operations, nor airspace surrounding the airport including flight paths of aircrafts. The County has worked with pilots at Gillespie Field to promote a safe environment for both the aviation community and surrounding residents. In 2011, the County developed a Pilot's Resource Guide with the goal of educating pilots on the facility requirements and best practices for airfield safety. Staff have also met with residents to address noise and safety concerns for current flight operations, and will continue to do so in the future. In addition, in development of the environmental analysis, the County modeled the full build-out change in noise exposure attributable to the project and found that no significant noise impacts would occur in accordance with FAA Order 1050.1E due to additional aircraft operations (PEIR Section 3.1.7.4). No changes have been made to the PEIR.

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## **ATTACHMENT E**

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### **STATEMENT OF LOCATION AND CUSTODIAN OF DOCUMENT**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**

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## ATTACHMENT E

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### STATEMENT OF LOCATION AND CUSTODIAN OF DOCUMENTS OR OTHER MATERIALS THAT CONSTITUTE A RECORD OF PROCEEDINGS

Public Resources Code section 21081.6(a)(2) requires the lead agency (in this case the County of San Diego) to specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based. It is the purpose of this statement to satisfy this requirement.

Location of documents and other materials which constitute the record of proceedings:

County of San Diego  
Department of Public Works  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

Clerk of the Board of Supervisors  
1600 Pacific Highway, Room 402  
San Diego, CA 92101

Custodian:

Custodian:

County of San Diego  
Department of Public Works  
5469 Kearny Villa Road, Suite 305  
San Diego, CA 92123

Clerk of the Board of Supervisors  
1600 Pacific Highway, Room 402  
San Diego, CA 92101

Project Name:

Gillespie Field 70-acre Redevelopment Project

Reference Case Number:

SCH # 2005111092

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**ATTACHMENT F**

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**DECISION AND EXPLANATION REGARDING RECIRCULATION  
OF THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**

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## ATTACHMENT F

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### DECISION AND EXPLANATION REGARDING RECIRCULATION OF THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR)

#### GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT

SCH # 2005111092

June 20, 2012

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), the County of San Diego is required to recirculate a draft EIR when significant new information is added to the draft EIR after public review of the draft EIR, but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. New information added to a draft EIR is not significant unless the draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement.

**BACKGROUND:** The County released the Gillespie Field 70-acre Redevelopment Project Draft Program EIR (PEIR) for public review from September 15 to November 7, 2011. During public review, the County received 87 comment letters. The following public agencies and local organizations submitted comment letters on the Draft PEIR: California Governor's Office of Planning and Research (State Clearinghouse), Native American Heritage Commission, California Department of Toxic Substances Control, California Department of Transportation, California Department of Fish and Game, City of El Cajon, City of Santee, San Diego County Archaeological Society, San Diego County Regional Airport Authority, and Gillespie Field Development Council. Comment letters were also submitted by various individuals and local businesses. Responses to all comments received during the public review period were prepared and are included in the Final PEIR.

**DECISION:** No "significant new information" has been added to the Draft PEIR since public notice was given of the availability of the Draft PEIR for public review, and, therefore, recirculation of the Draft PEIR is not required.

**EXPLANATION:** CEQA Guidelines Section 15088.5 states that new information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- (3) A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

### **Changes**

A number of changes have been made to the Draft PEIR for clarification or amplification purposes, but none of these changes results in a new significant impact or a substantial increase in the severity of an impact.

### **Comments on the PEIR**

No comments were received on the Draft PEIR that advised the County to recirculate the Draft PEIR.

## **ATTACHMENT G**

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### **MITIGATION MONITORING AND REPORTING PROGRAM**

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND SUPPORTING DOCUMENTATION  
SCH # 2005111092**

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**MITIGATION MONITORING AND REPORTING PROGRAM  
for the  
Gillespie Field 70-acre Redevelopment Project  
Final Program Environmental Impact Report  
State Clearinghouse Number 2005111092**

**Lead Agency:**

**County of San Diego  
Department of Public Works  
5469 Kearny Villa Road, Suite 305  
San Diego, California 92123-1152**

**June 2012**

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## MITIGATION MONITORING AND REPORTING PROGRAM

### GILLESPIE FIELD 70-ACRE REDEVELOPMENT PROJECT

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Mitigation measures have been identified in the Final Program Environmental Impact Report for the Gillespie Field 70-acre Redevelopment Project to reduce or eliminate potential environmental impacts. The County of San Diego (County) is required to implement all adopted mitigation measures as applicable. To ensure compliance, the following mitigation monitoring and reporting program has been formulated. This program consists of a matrix containing detailed descriptions of the mitigation measures and a checklist to track implementation.

A mitigation checklist has been prepared for the project. Table 1 summarizes the mitigation measures for the Gillespie Field 70-acre Redevelopment Project. Information contained within the checklist clearly identifies the mitigation measure, delineates the monitoring schedule, and defines the conditions required to verify compliance. Following is an explanation of the eight columns that constitute the checklist.

<b>Column 1</b>	<b>Impact:</b> An inventory of each impact is numbered and provided with a brief description.
<b>Column 2</b>	<b>Mitigation Measure:</b> Each measure is numbered and provided with a brief description of mitigation to reduce the impact to a below a level of significance.
<b>Column 3</b>	<b>Monitoring Activity:</b> Identifies the County department or other public agency that is responsible for determining compliance with the mitigation measure and for informing DPW about compliance.
<b>Column 4</b>	<b>Timing:</b> The monitoring schedule depends upon the progression of the overall project. Therefore, specific dates are not used within the "Timing" column. Instead, scheduling describes a logical succession of events (e.g., prior to construction, annual) and if necessary, delineates a follow-up program.
<b>Column 5</b>	<b>Responsibility:</b> Party responsible for ensuring the mitigation measure is completed within the correct timing period.
<b>Column 6</b>	<b>Initial:</b> The monitor verifies completion of the particular mitigation measure by initialing and dating in this column. Where the "Timing" column indicates annual or other ongoing mitigation measures, verification of compliance may not occur until completion of the project. Provision of all required initials within the Verification of Compliance column signifies conclusion of the monitoring program.
<b>Column 7</b>	<b>Date:</b> The monitor dates the completion of the mitigation measure, which is the same date that Column 6 is initialed.
<b>Column 8</b>	<b>Remarks:</b> The status of ongoing and cumulative mitigation measures is to be documented during each visit. The space provided for remarks is obviously too small for the inclusion of the remarks. It is intended that this space be used to indicate whether there are specific comments pertaining to the status of the mitigation measure. If there are additional comments they are to be attached to the checklist. Progress reports are required for the revegetation program. Information provided within progress reports will be helpful in the development of future mitigation programs.

This program is to be adopted by the lead and responsible agencies upon formulation of findings in order to comply with the requirements set forth by Assembly Bill 3180 (Public Resources Code Section 21081.6).

**Table 1**  
**Mitigation Checklist**

Impact	Mitigation Measures	Monitoring Activity	Timing	Verification of Compliance			Remarks
				Responsibility	Initial	Date	
Biological Resources							
<b>BI-1.</b> The project will permanently impact 0.18 acre of San Diego ambrosia, a federal-listed endangered species. This would result in a <i>significant direct impact</i> .	<p><b>M-BI-1a.</b> The County will offset direct impacts to 0.18 acre of San Diego ambrosia through transplantation of all individuals within the Proposed Project footprint to a 2.9-acre native grassland area north of the San Diego River, within Mission Trails Regional Park (MTRP) as directed in the Biological Opinion (BO) issued by the United States Fish and Wildlife Service (USFWS) on September 1, 2009.</p> <p>A survey will be conducted before project impacts occur to ensure that all San Diego ambrosia have been located and mapped within the Proposed Project footprint. The outer perimeter of each ambrosia patch will be delineated on the ground with spray paint. If any ambrosia stems are discovered outside of this pre-transplantation mapped area of ambrosia, the County will reinitiate consultation with USFWS.</p> <p><b>M-BI-1b.</b> A San Diego ambrosia transplantation plan will be approved by USFWS before any impacts to the species may occur. The plan will be implemented by a biologist or botanist with experience transplanting sensitive plant species (i.e., transplantation biologist). The transplantation plan will serve to guide the transplantation effort and the initial five-year monitoring program.</p> <p><b>M-BI-1c.</b> The ambrosia transplantation plan will include the following:</p> <ul style="list-style-type: none"><li>• Individual clusters of ambrosia will be salvaged as blocks and transplanted to the transplantation site at MTRP using similar spacing and distribution as at the Proposed Project site.</li><li>• Ten percent of ambrosia within the clusters will be removed from the Proposed Project site, following the USFWS-approved transplantation plan, and will be grown in large flats at a nursery/greenhouse and used for later out-planting at the MTRP transplantation site.</li><li>• The exact location at the transplantation site where the cut-blocks containing ambrosia propagules will be transplanted will be determined in the field by the transplantation biologist, in coordination with the USFWS,</li></ul>	The Department of Public Works (DPW) will ensure that the project biologist prepares and implements a transplantation plan including a long-term management strategy, which will be approved by USFWS.	Prior to the start of construction	DPW Project Manager and Project Biologist			



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	<p>prior to transplantation.</p> <ul style="list-style-type: none"> <li>•The methods of transplantation, monitoring, and maintenance will be developed in coordination with the USFWS. The agreed-upon methods will be described in the transplantation plan, and will include specifics such as timing of transplantation, preparation of the donor and receptor sites prior to transplantation, placement of San Diego ambrosia, predator control and protective fencing, weeding, irrigation, length and type of monitoring, maintenance, and success criteria.</li> <li>•The 2.9-acre San Diego ambrosia transplantation site will be restored with native grasses.</li> </ul> <p><b>M-BI-1d.</b> The receptor site will be fenced off to delineate areas containing the transplanted San Diego ambrosia to minimize the potential effects of herbivory.</p> <p><b>M-BI-1e.</b> The County will be responsible for long-term management of the transplantation site at MTRP.</p> <p><b>M-BI-1f.</b> The transplanted ambrosia population will be monitored for a minimum of 5 years, in accordance with the requirements of the USFWS-approved translocation plan, to document success of the transplantation efforts. Success will be achieved when 80 percent of the transplanted San Diego ambrosia plugs are established and expand from the transplanted plugs as clones and/or newly established individuals.</p> <p><b>M-BI-1g.</b> All San Diego ambrosia propagules taken from the Proposed Project site for nursery/greenhouse growing will be out-planted at the restoration site to increase the probability of transplantation success. Out-planting of the nursery/greenhouse-grown San Diego ambrosia plants will occur during the five-year monitoring period as determined by the transplantation biologist in coordination with the USFWS. In the event of transplantation failure, the transplantation plan will include a contingency plan to offset impacts to San Diego ambrosia.</p> <p><b>M-BI-1h.</b> In addition to the USFWS-approved transplantation plan, a long-term management strategy will be approved by the USFWS before any impacts to San Diego ambrosia may occur. County staff will be responsible for ensuring that the transplanted ambrosia population is managed consistent with this long-term management</p>						

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	strategy.  <b>M-BI-1i.</b> The 0.18-acre San Diego ambrosia population was previously fenced and preserved as mitigation associated with the 1985 Gillespie Field Airport Master Plan EIR. To offset these impacts, the County would conserve an additional 1.1 acres of existing San Diego ambrosia by acquiring land or securing a conservation easement over land with an existing San Diego ambrosia population that is currently not conserved.						
<b>BI-2.</b> The project will permanently impact 1.1 acres of non-native grassland, a sensitive vegetation community. This would result in a <i>significant direct impact</i> .	<b>M-BI-2.</b> Permanent impacts to non-native grassland would be mitigated at a 0.5:1 ratio through preservation of in-kind habitat or a vegetation community of higher biological value. This mitigation would be located within the receptor site of the transplanted or preserved San Diego ambrosia discussed in M-BI-1.	DPW will ensure that in-kind habitat (or a vegetation community of higher biological value) will be preserved during transplantation of San Diego ambrosia (M-BI-1a through M-BI-1h).	Prior to project construction	DPW Project Manager and Project Biologist			
<b>Hazards and Hazardous Materials</b>							
<b>HZ-1.</b> Grading or excavation on the site may disturb contaminated soil, presenting potential health risks to construction workers. Additionally, the presence of contaminated soil on the site may present significant health risks to future occupants of the site. Excavation on the site may encounter soil and/or groundwater contaminated with TCE and 1,4-dioxane originating from the Ketema plume, presenting potential health risks to workers on the site or during operation of the proposed on-site aviation uses. This would be considered a <i>significant direct impact</i> .	<p><b>M-HZ-1a.</b> County Airports shall prepare a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site.</p> <p>This mitigation measure shall be implemented prior to the excavation of contaminated soil related to the construction of the taxiway, apron area, drainage facilities, and utility facilities on the site. The Soil Management Plan shall be prepared in accordance with the Environmental Protection Agency (EPA) and the County Department of Environmental Health (DEH) requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development.</p> <p>The County prepared a Soil Management Plan (Rincon 2011c) for the Proposed Project to comply with this measure and it is included in Appendix E of this PEIR.</p> <p><b>M-HZ-1b.</b> As a condition of lease agreements for</p>	<p>DPW will ensure that a Soil Management Plan is prepared outlining procedures for removing, treating, or reducing contaminants onsite.</p> <p>DPW will ensure that a Soil Management Plan is prepared outlining</p>	<p>Prior to ground-disturbing activities by the County for public facilities (15 acres of infrastructure)</p> <p>Prior to ground-disturbing activities by</p>	<p>DPW Project Manager and Resident Engineer</p> <p>DPW Project Manager</p>			

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	<p>development between the County and private developers, County Airports shall require individual project developers to prepare and implement a Soil Management Plan and/or groundwater dewatering and treatment system to remove, treat, or otherwise reduce the contaminant concentrations to below human or ecological health risk thresholds and before any discharge to a public sewer system or storm drain. This mitigation measure shall be implemented prior to the excavation of contaminated soil related to the private development of aviation-related uses on the Proposed Project site. The Soil Management Plan shall be prepared in accordance with EPA and County DEH requirements prior to grading and construction to properly assess, handle, contain, and segregate soil excavated or graded from the site. The Soil Management Plan shall outline methods for characterizing and classifying soil for off-site disposal, as needed during site development. The Soil Management Plan for the private development projects shall be prepared by each individual developer and can tier off the Soil Management Plan already prepared for the public development portion, which is included in Appendix E.</p> <p><b>M-HZ-1c.</b> As a condition of lease agreements between the County and private developers for development of aviation uses on the 70-acre site, the County shall require a qualified environmental monitor to be present during the construction phases of individual development projects. The environmental monitor shall document the presence of contaminated soil and/or groundwater and shall assist in the excavation and off-site disposal of such soil and/or groundwater or the treatment and on-site reuse of such soil and/or groundwater.</p> <p>County Airports shall ensure that a qualified environmental monitor will be present during the construction phases of taxiway, apron area, drainage facilities, and utility facilities at the site to document the presence of contaminated soil and/or groundwater. The environmental monitor shall assist in the excavation and off-site disposal of such soil or the treatment and on-site reuse of such soil and/or groundwater.</p> <p><b>M-HZ-1d.</b> As a condition of lease agreements between the County and private developers for development of aviation uses on the 70-acre site, if development is planned where contaminated soils and/or groundwater are present, a</p>	<p>procedures for removing, treating, or reducing contaminants onsite.</p> <p>DPW will ensure that a qualified environmental monitor is retained by a private developer to be present during construction.</p> <p>DPW will retain a qualified environmental monitor to be present during construction.</p> <p>DPW will ensure that a human health risk assessment is prepared.</p>	<p>private developers for aviation facilities (55 acres)</p> <p>Prior to, and during ground-disturbing activities by private developers for aviation facilities (55 acres)</p> <p>Prior to, and during ground-disturbing activities by the County for public facilities (15 acres of infrastructure)</p> <p>Prior to ground-disturbing activities by private developers for aviation facilities</p>	<p></p> <p>DPW Project Manager</p> <p>DPW Project Manager and Resident Engineer</p> <p>DPW Project Manager</p>			

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	<p>human health risk assessment of these areas shall be conducted by the developer to evaluate potential health risks to future occupants of the site prior to occupation of any structures within the 70-acre site. Vapor transport and risk calculations shall be performed using the County DEH Vapor Risk 2000 spreadsheet model (October 5, 2004 revision). A Risk Based Corrective Action (RBCA) analysis shall be performed in accordance with American Society for Testing Materials ASTM PS-104 Standard Provisional Guide for Risk-Based Corrective Action using the RBCA spreadsheet system (RBCA Tool Kit for Chemical Releases).</p> <p>County Airports will also conduct a similar health risk assessment related to the construction of runway and taxiway improvements at the site.</p>	DPW will ensure that a human health risk assessment is prepared.	<p>(55 acres)</p> <p>Prior to ground-disturbing activities by the County for public facilities (15 acres of infrastructure)</p>	DPW Project Manager			
<p><b>TR-1.</b> Addition of the Proposed Project traffic would exceed the significance thresholds at the segment of Bradley Avenue between the SR-67 southbound and northbound ramps because it would add 218 Average Daily Trips (ADTs) under LOS E conditions, which is greater than the significance threshold of 200 ADT for a two-lane roadway operating under LOS E conditions. This results in a <i>significant direct impact</i>.</p> <p><b>TR-2.</b> Addition of the Proposed Project traffic would exceed the significance threshold at the intersection of Bradley Avenue and the SR-67 northbound ramps because it increases the delay by 5.5 seconds, which is greater than the significance threshold of 2 seconds for LOS E conditions (PM peak hour). This results in a <i>significant direct impact</i>.</p>	<p><b>M-TR-1/2.</b> Mitigation for direct impacts to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps and the intersection of Bradley Avenue and the SR-67 northbound ramp can be achieved through project phasing. The Bradley Avenue interchange project proposes capacity improvements that would improve the LOS at this location. The Traffic Impact Study for the Proposed Project (Appendix I to the PEIR) indicates that the significant traffic impacts would not occur prior to construction of County infrastructure and 21.5 acres of private aviation development (Phase I). By delaying the remaining 33.5 acres (Phase II) until completion of capacity improvements at the Bradley Avenue interchange, significant traffic impacts are avoided. Lease agreements for Phase II of the private aviation development will not commence until completion of the Bradley Avenue interchange project</p>	DPW will ensure Phase II of the Proposed Project does not commence until the Bradley Avenue interchange improvements have been completed.	<p>Construction of infrastructure and 21.5 acres of private aviation development shall be allowed to commence.</p> <p>The remaining 33.5 acres shall not commence until the Bradley Avenue interchange improvements have been completed.</p>	<p>DPW Project Manager</p> <p>DPW Project Manager</p>			
<b>TR-C1.</b> Addition of the Proposed Project traffic combined with	<b>M-TR-C1/2.</b> Cumulative impacts would be mitigated below the level of significance through payment into the County	DPW will ensure payment into TIF Program occurs.	Prior to project construction	DPW Project Manager			

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<p>cumulative traffic to the segment of Bradley Avenue between the SR-67 southbound and northbound ramps would worsen anticipated cumulative conditions at that location because the project would add 218 ADT to the roadway segment. This is greater than the significance threshold of 200 ADT to a roadway segment currently operating at LOS E, and is considered a <i>significant cumulative impact</i></p> <p><b>TR-C2.</b> Addition of the Proposed Project traffic combined with cumulative traffic to the intersection of Bradley Avenue and the SR-67 northbound ramps would increase the delay by 9.6 seconds at that location, which is greater than the significance threshold of more than 2 seconds over existing conditions for LOS E (PM peak hour), and is therefore considered a <i>significant cumulative impact</i>.</p>	<p>Transportation Impact Fee (TIF) program. In accordance with the TIF program, a designated financial contribution would provide adequate mitigation for cumulative impacts associated with development in the unincorporated County. According to the TIF program for calendar year 2011, the Proposed Project has a required fee of \$396 per trip<sup>1</sup>. Based on this rate, the Proposed Project would result in the following TIF contribution:</p> <p>Proposed Project TIF Contribution: 1,407 daily trips x \$396 per trip = \$557,172</p> <p>Completion of the financial contribution described above would fully mitigate for cumulative impacts described in TR-C1 and TR-C2.</p>						

<sup>1</sup> The current TIF Update (January 2008) includes fees based on building area (square footage). Because the area of the buildings is undetermined at this time, the TIF would be calculated based on number of vehicle trips entering and exiting the Proposed Project site, which was determined by the Traffic Impact Analysis. The TIF category of Select Industrial Uses is the only category that allows for the TIF calculation by vehicles trips. In addition, Gillespie Field is zoned as Industrial. Therefore, the TIF Area of Lakeside (in which the project site is located) has a required fee of \$396 per trip for Select Industrial Uses