

Reader's Guide to the Revised Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan Update

This Recirculation Reader's Guide is provided to explain changes between the project's Draft Program Environmental Impact Report (DPEIR) for the McClellan-Palomar Airport Master Plan Update (Master Plan) that was released for a 61-day public review period from January 18 to March 19, 2018, and the attached Revised DPEIR which updates sections of the document. All interested persons and organizations had an opportunity during the 61-day public review period to submit written comments on the DPEIR to the County of San Diego (County). In response to comments received from the circulation of the DPEIR, revisions have been made to the Biological Resources and Greenhouse Gas Emission analyses, and a new Energy Conservation section was added. In addition, clarifications have been made to figures and text regarding the placement and location of Runway Protection Zones (RPZs).

California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a) requires the County to recirculate an EIR when significant new information is added after public review, but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. Section 15088.5(a) of the CEQA Guidelines states:

"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 impacts to a level of insignificance.
- 3) A feasible project alternative or mitigation measures considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project 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. (CEQA Guidelines, Section 15088.5(a).

Pursuant to CEQA, if revisions are limited to a few chapters or portions of an EIR, the lead agency need only recirculate the chapters or portions that have been modified (CEQA Guidelines Section 15088.5(c)). It has been determined that portions of the DPEIR are required to be recirculated to ensure that the public has a meaningful opportunity to comment on the changes to the Revised DPEIR in accordance with CEQA Guidelines Section 15088.5. The following table provides a brief overview of the portions of the Revised DPEIR included in the recirculation that are available for public comment.

Section and/or Technical Report included in the Recirculation	Trigger for Recirculation under CEQA Guidelines	Rationale for Inclusion in Recirculation
<p>Revised DPEIR Section 2.2 Biological Resources</p> <p>New Biological Technical Report Addendum, Helix Environmental (May 2018) to supplement DPEIR Appendix B</p>	CEQA Guidelines Section 15088.5 (a) (1)	Although relocation of the existing Federal Aviation Administration (FAA) navigational aid lighting system, including the Medium Intensity Approach Lighting System (MALSR), was shown and described in the DPEIR released for public review, the conceptual placement and alignment of the navigational aid structures and access road were not designed or calculated for potential impacts. Shifts to the existing MALSR on the County-owned parcel just east of El Camino Real (Eastern Parcel) are being analyzed now to describe the potential impacts to biological resources on the County-owned property if, or when, the FAA funds relocation of their navigational aid lighting system. A new Biological Technical Report Addendum was prepared to supplement DPEIR Appendix B. The Biological Technical Report is available on the project's website for informational purposes, but is not included in the documents for recirculation public review.
<p>Revised DPEIR Section 3.1.5 Greenhouse Gas Emissions</p> <p>New Greenhouse Gas Emissions Analysis Memorandum (June 2018) to supplement DPEIR Appendix H</p>	CEQA Guidelines Section 15088.5 (a)	A Greenhouse Gas Emissions Analysis Memorandum was prepared to supplement DPEIR Appendix H to address new emissions regulations and supplement the C&S Climate Change Technical Report analysis with additional information using project and site-specific data and analysis. DPEIR Section 3.1.5 was also revised to include this information and discuss a revised significance threshold. While the impacts to Greenhouse Gas Emissions remain less than significant, the Memorandum and Revised DPEIR Section are being recirculated to ensure the public has a meaningful opportunity to comment on this additional information. The C&S Climate Change Technical Report contains the assumptions and calculations of data used for the analysis and is available on the project's website for informational purposes, but is not included in the documents for recirculation public review.
<p>New DPEIR Section 3.1.10 Energy Use and Conservation</p> <p>New Appendix J: Energy Modeling Calculations, RECON Environmental (June 2018)</p>	Recirculation not required under CEQA Guidelines Section 15088.5 (a); information is provided to the public to present modifications to the DPEIR.	Energy use and conservation was disclosed in various sections of the DPEIR, but analysis did not include energy conservation in the context of the regulatory framework. Pursuant to CEQA Section Appendix F, a new DPEIR Section 3.1.10 is added to the record, along with a new Appendix J which contains the Energy Modeling Calculations. No new significant impact was identified.
<p>DPEIR revisions to Figures 1-4, 1-5, and 4-1 through 4-6.</p> <p>New Figures 4-1b, 4-2b, 4-3b, 4-4b, 4-5b, 4-6b</p>	Recirculation not required under CEQA Guidelines Section 15088.5 (a); information is provided to the public to present modifications to the DPEIR.	Revisions to Runway Protection Zone exhibits in the Master Plan and DPEIR were made to provide the public more detailed information on how shifts to the runway and RPZs may affect land use by alternative. These revisions do not change the project description or impact analysis.

Pursuant to CEQA Guidelines Section 15088.5(f)(2), reviewers should **limit their comments to the revised chapters or portions of the recirculated EIR only**. As such, reviewers should provide comments on only:

- Revised DPEIR Section 2.2 (Biological Resources)
 - New Biological Technical Report Addendum, Helix Environmental (May 2018) to supplement DPEIR Appendix B
- Revised DPEIR Section 3.1.5 (Greenhouse Gas Emissions)
 - New Greenhouse Gas Emissions Analysis Memorandum (June 2018) to supplement DPEIR Appendix H
- New DPEIR Section 3.1.10 (Energy Use and Conservation)
 - New Appendix J: Energy Modeling Calculations
- Figures associated with Runway Protection Zones

Note that Section 2.2 is revised in ~~strikeout~~ or underline format; however, Sections 3.1.5 and 3.1.10 are replaced with new sections and therefore are not shown in this format. Additional technical analysis to support the Revised DPEIR is available for public comment as shown in the table above.

The comments submitted during the previous public review period (January 18 through March 19, 2018) that relate to portions of the document or technical reports that were not revised or are not recirculated here will be responded to as part of the Final PEIR (FPEIR). The County also will respond to comments submitted on the specific chapters and portions of the Revised DPEIR that are part of this recirculation. Both sets of comments and responses will be included in the FPEIR.

New comments must be submitted in writing. Written comments on the Revised DPEIR must be received or post-marked no later than **August 6, 2018**. Comments must be submitted either via email to PalomarMP@sdcounty.ca.gov or mailed to Cynthia Curtis, Environmental Planning Manager, County of San Diego, 5510 Overland Avenue, Suite 410, San Diego, CA 92123.

I. BACKGROUND AND ADDITIONAL ENVIRONMENTAL ANALYSIS

The County of San Diego (County) Department of Public Works owns and operates the McClellan-Palomar Airport (Airport) in the City of Carlsbad. The Airport is an important transportation asset in San Diego's North County, serving a variety of user groups including commercial, corporate, and general aviation. The current Airport Master Plan has reached the end of its 20-year planning period and the County is the Lead Agency in preparation of a Program Environmental Impact Report (PEIR) for the proposed new 20-year Master Plan Update in compliance with the California Environmental Quality Act (CEQA). As a public-use airport that accepts federal grant funding from the FAA, it is important to note that the County's CEQA impact analysis and mitigation measures reflect the limits of their authority as ground-facility managers.

On February 29, 2016, the County released for public review a Notice of Preparation (NOP) and Initial Study for the Master Plan PEIR. A Draft PEIR was circulated for a 61-day public review period from January 18 to March 19, 2018 and all interested persons and organizations had an opportunity during this time to submit their written comments to the County. In response to comments received from the circulation of the DPEIR, several additions or changes have been made to the proposed Master Plan Update project description and analysis. The major additions or changes include:

A. Additional Analysis in Section 2.2 – Biology:

Medium-intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR) Relocation

The FAA is the owner and responsible agency for all aspects of the Airport's navigational aid lighting system, (i.e. layout and placement of the structure according to FAA design standards, lighting system ownership, maintenance, etc.) including the existing MALSR lighting system that extends from the active airfield onto the County-owned parcel just east of El Camino Real (referred to as Eastern Parcel). The MALSR is a system of lights that provide pilots with navigational assistance at the runway end. At the Airport, the FAA has placed a MALSR only on the eastern end of the runway. It is anticipated that with the shift of the runway to the north, a corresponding shift in the location of the Airport's navigational aid lighting system would be needed, including the existing MALSR light footings and associated access road on the Eastern Parcel. If the runway is extended an additional 200 feet in its current alignment, an additional concrete pad and lighting structure would be placed 200 feet east of the existing lighting, in line with the existing access road along the MALSR's existing location.

The FAA's decision to shift or relocate the navigational aid lighting system, including the MALSR on the Eastern Parcel, would be considered a federal action. The FAA has an existing land lease with the County for the current MALSR system at the Eastern Parcel, and has the ability to manage the lighting system as they deem necessary for airport safety. Although this project element was shown and described in the DPEIR released for public review, the

conceptual placement and alignment of FAA's lighting system relocation was not designed or calculated for potential impacts. Since this is a reasonably foreseeable project that may occur as a result of the Master Plan, this Eastern Parcel component is being analyzed now based on a conceptual layout to describe the potential impacts to biological resources on the County-owned property if or when the FAA funds relocation of the structures and access road.

This change has been made to the project description, and due to earthwork that would be required for relocation and placement of the structures, an Addendum to the Biological Technical Report has been prepared by Helix Environmental (May 2018) to fully disclose potential impacts to biological resources. Accordingly, Section 2.2 (Biological Resources) of the DPEIR has been revised to include a discussion of the new significant impacts BI-7, and BI-8, and associated mitigation measures M-BI-7 and M-BI-8.

B. Additional Analysis in Section 3.1.5 – Greenhouse Gas Emissions

Since the DPEIR was released for public review, the County's Climate Action Plan (CAP) was adopted by the Board of Supervisors. Reference to the CAP's applicability to the Master Plan is discussed in a new Greenhouse Gas Emissions Analysis Memorandum prepared by the County dated June 2018. Accordingly, Section 3.1.5 Greenhouse Gas Emissions of the DPEIR was updated, and the recirculated section replaces the previous public review version. The additional analysis (1) explains current regulatory framework and emissions reduction targets including the CAP and State Scoping Plan, (2) explains the project's environmental conditions and applicability in the context of the CAP and the CAP's significance threshold, and other County plans and initiatives to reduce GHG emissions, (3) includes a new project-specific significance threshold that incorporates a revised perspective on the airport service population, and is consistent with the State and the County's CAP emissions reduction goals, and (4) provides additional information and methodologies for analyzing impacts. These approaches were suggested in public comments received during the public review period. No new significant impact was identified.

C. New Section 3.1.10 – Energy Use and Conservation

Although energy use and conservation was disclosed in sections of the DPEIR, the analysis did not include energy conservation in the context of the regulatory framework. Pursuant to State CEQA Guidelines Appendix F, a new DPEIR Section 3.1.10 is added to the document, along with Energy Modeling Calculations, which are attached to the Revised DPEIR as a new Appendix J. In accordance with State CEQA Guidelines Appendix F, potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. As discussed in DPEIR Chapter 1, the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the public-use Airport, which are under the jurisdiction of the FAA. In consideration of these federal requirements it is important to note that the County's CEQA impact analysis and mitigation measures reflect the limits of the County's authority as ground-facility managers. The scope of

analysis in the new Revised DPEIR Section 3.1.10 pertains to the conservation and consumption of energy resources for use of the airport's ground facilities. No new significant impact was identified.

D. Revisions to Runway Protection Zones (RPZs) Exhibits

The Draft Master Plan and DPEIR have been updated to provide the public with more information regarding the location of RPZs on both sides of the Airport by alternative and by phase. Revisions to the original are figures included in the Revised DPEIR and are numbered 1-4, 1-5, 4-1a, 4-2a, 4-3a, 4-4a, 4-5a, and 4-6a. New figures provide a zoom-in detail of each runway end for each alternative and are numbered after the original figure. The new figures are 4-1b, 4-2b, 4-3b, 4-4b, 4-5b, and 4-6b. The more detailed exhibits allow the public to see the RPZs of each alternative within the context of the existing land uses.

As the more detailed exhibits show, depending on which development alternative is chosen, the landing threshold for aircraft on the runway may vary, and this will make a difference as to where the RPZs will lay both on and offsite. While the DPEIR accurately identified the specific parcels that would be impacted by the full implementation of Master Plan elements, the location of the RPZs within those parcels is shown in greater detail in the revised figures.

II. RECIRCULATION DOCUMENTS

As detailed above, the following Revised DPEIR documents are included in recirculation:

- A. Revised DPEIR Section 2.2 – Biological Resources
- B. New Biological Technical Report Addendum, Helix Environmental (May 2018)
- C. Revised DPEIR Section 3.1.5 – Greenhouse Gas Emissions
- D. New Greenhouse Gas Analysis Memorandum, County of San Diego (June 2018)
- E. New DPEIR Section 3.1.10 – Energy Use and Conservation
- F. New Appendix J. Energy Modeling Calculations, RECON Environmental (June 2018)
- G. DPEIR revisions to Figures 1-4, 1-5, and 4-1a, 4-2a, 4-3a, 4-4a, 4-5a, and 4-6a. New Figures are labeled 4-1b, 4-2b, 4-3b, 4-4b, 4-5b, and 4-6b.

The Revised DPEIR is available during the 46-day public review period at the following locations:

- Website: www.PalomarAirportMP.com
- McClellan-Palomar Airport Administration – 2192 Palomar Airport Road, Carlsbad, CA 92011
- Carlsbad City Library (Dove branch) – 1775 Dove Lane, Carlsbad, CA 92011
- Carlsbad City Library (Georgina Cole branch) – 1250 Carlsbad Village Drive, Carlsbad, CA 92008
- Carlsbad City Library (Learning Center) – 3368 Eureka Place, Carlsbad, CA 92008
- San Diego County Library, San Marcos Branch – 2 Civic Center Drive, San Marcos, CA 92069
- San Diego County Library, Vista Branch – 700 Eucalyptus Avenue, Vista, CA 92084
- County Airports Administration – 1960 Joe Crosson Drive, El Cajon, CA 92020
- County Dept. of Public Works – 5510 Overland Avenue, 4th Floor, San Diego, CA, 92123

Under CEQA Guidelines Section 15088.5(c), if a revision to an EIR is limited to a few chapters or portions of the EIR, only chapters or portions that have been modified need to be recirculated. Consistent with CEQA Guidelines Section 15088.5(c), this Revised DPEIR contains only the portions of the DPEIR that have modified with significant new information. Please only comment on these revised and recirculated portions indicated in the underline format.

The County will respond to comments submitted on the Revised DPEIR sections and the original DPEIR in the Final PEIR, which may include revisions for which recirculation is not necessary under the legal standards set forth above.

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