

### **D.3.1 Recirculated Portions of Draft PEIR**

This section presents copies of comments on the Draft PEIR received in written form during the Draft PEIR's recirculated public review period (June 21 – August 6, 2018), and it provides the County of San Diego's responses to those comments. Each comment letter is assigned an alphanumeric code, and the issues within each comment letter are bracketed and numbered. Comment letters are followed by responses, which are numbered to correspond with the bracketed comment letters.



STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH

EDMUND G. BROWN JR.  
GOVERNOR

August 6, 2018

Cynthia Curtis  
San Diego County  
5510 Overland Ave., Suite 410  
San Diego, CA 92123

Subject: McClellan - Palomar Airport Master Plan Update  
SCH#: 2016021105


Dear Cynthia Curtis:

The State Clearinghouse submitted the above named Draft EIR to selected state agency review period closed on August 3, 2018, and no state agencies submitted comments by letter acknowledges that you have complied with the State Clearinghouse review require environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regard environmental review process. If you have a question about the above-named project, ten-digit State Clearinghouse number when contacting this office.

R-S1-1

Sincerely,

  
Scott Morgan  
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

**Comment Letter R-S1  
Exhibit**

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2016021105  
**Project Title** McClellan - Palomar Airport Master Plan Update  
**Lead Agency** San Diego County

**Type** EIR Draft EIR  
**Description** Note: Recirculated

McClellan-Palomar Airport is owned and operated by the county of San Diego and located in the city of Carlsbad. The current Airport Master Plan was prepared in 1997 and has reached the end of its 20-year planning period. The county of SD has prepared a new comprehensive MPU to plan for the future while enhancing operations and safety at the airport. The county is the lead agency in preparation of the MPU and its associated PEIR in compliance with CEQA. The Draft PEIR was circulated for public review January 18 - March 19, 2018. Due to revisions and clarifications, the county has decided to recirculate portions of the Draft PEIR, including Biology, GHGe, energy, and several exhibits for public review.

**Lead Agency Contact**

**Name** Cynthia Curtis  
**Agency** San Diego County  
**Phone** 858-694-3906 **Fax**  
**email**  
**Address** 5510 Overland Ave., Suite 410  
**City** San Diego **State** CA **Zip** 92123

**Project Location**

**County** San Diego  
**City** Carlsbad  
**Region**  
**Lat / Long** 33° 07' 40.4" N / 117° 16' 45" W  
**Cross Streets** Palomar Airport Rd @ Yarrow Drive  
**Parcel No.** 213-+020-18  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-5  
**Airports** McClellan-Palomar  
**Railways**  
**Waterways** Agua Hedionda Creek  
**Schools** Pacific Ridge School  
**Land Use** Z: I; LU: P

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

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

**Date Received** 06/20/2018 **Start of Review** 06/20/2018 **End of Review** 08/03/2018

**Response to Letter R-S1****State of California, Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit**

- R-S1-1** This comment letter affirms that the Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (State Clearinghouse) received the recirculated portions of the Draft PEIR, and distributed it to appropriate state agencies for review in compliance with CEQA. No comments were received from state agencies by the State Clearinghouse prior to the close of the review period. Therefore, the State Clearinghouse review requirements were met. This comment letter is for informational purposes and no response is required.



Comment Letter R-L1

**From:** Terzich, Chris <CTerzich@semprautilities.com>  
**Sent:** Thursday, June 21, 2018 9:49 AM  
**To:** LUEG, PalomarMP  
**Cc:** Zielke, Aydee; Olivo-Gomez, Edalia  
**Subject:** McClellan-Palomar Airport Master Plan Update Recirculated PEIR SCH# 2016021105

SDG&E appreciates the opportunity to comment on the above-referenced project. SDG&E provided a NOP comment letter dated March 29, 2016 identifying the need for the County to ensure that airport facility expansion did not result in any conflicts with existing overhead electric transmission and distribution lines near the runway. We note that there are 138kV and 230kV transmission lines with 2,300 feet of the western runway boundary as well as electric overhead distribution lines even closer. We could not find any discussion about potential conflicts with these facilities. We assume that this was done but we would appreciate documentation to that effect included in the Final PEIR. We apologize if there is a discussion and we have missed it if located in an unusual section of the document. Thank you for your consideration in this matter.

R-L1-1

NOP with SDG&E Comment Letter:

[https://www.sandiegocounty.gov/content/dam/sdc/dpw/AIRPORTS/palomar/documents/CRQ\\_Master\\_Plan\\_Update-Draft\\_PEIR/Appendix%20A%20-%20NOP-Initial%20Study.pdf](https://www.sandiegocounty.gov/content/dam/sdc/dpw/AIRPORTS/palomar/documents/CRQ_Master_Plan_Update-Draft_PEIR/Appendix%20A%20-%20NOP-Initial%20Study.pdf)

Christopher P. Terzich  
 SDG&E Environmental Technology and Regulatory Lead  
 8315 Century Park Ct., MS CP21E  
 San Diego, CA 92123  
 (619) 838 8772

**Response to Letter R-L1**  
**San Diego Gas & Electric (SDG&E)**

- R-L1-1** As the comment notes, SDG&E provided a comment letter on March 29, 2016 during the project's Notice of Preparation (NOP) comment period. While this comment is not related to the recirculated Draft PEIR subjects, the County would like to offer clarification. In accordance with CEQA Guidelines, this NOP comment did not require a response as it does not pertain to the environmental analysis. The comment is correct that any improvements associated with modifying the runway's location could respectively alter the runway's approach or departure obstruction surfaces. As described in the PEIR, the Master Plan Update is a long-term planning document, and the exact scope, scale, and timing for implementation of each proposed element are not yet defined because project-specific information has not been fully developed to quantify exact impacts. Therefore, environmental impacts for each element, and the Master Plan Update as a whole, are analyzed at a programmatic level for the purpose of environmental analysis. Therefore, additional analysis under CEQA and coordination with all utilities including SDG&E will occur at the time that they are designed and proposed. No changes to the PEIR have been made in response to this comment.

**Comment Letter R-L2**

**From:** Redman Ralph <rredman@san.org>  
**Sent:** Friday, July 27, 2018 11:32 AM  
**To:** LUEG, PalomarMP  
**Cc:** Reed, Brendan; Griffiths, Roger; Probst Dennis  
**Subject:** Revised Draft Program Environmental Impact Report - ALUC comments  
**Attachments:** CRQ MP Revised PEIR Comment Letter.pdf

Good afternoon –

The San Diego County Regional Airport Authority – Airport Land Use Commission staff have completed their review of the Revised Draft McClellan-Palomar Airport Master Plan and Program Environmental Impact Report. The attached letter provides the review comments. If you have any questions please let me know.

R-L2-1

Sincerely,  
Ralph



**Ralph Redman, ENV SP**  
**Manager | Airport Planning**  
 San Diego County Regional Airport Authority  
 T 619.400.2464 | M 619.380.7792 | F 619.400.2459  
[rredman@san.org](mailto:rredman@san.org)

[www.san.org](http://www.san.org) |   

San Diego County Regional Airport Authority, PO BOX 82776, San Diego, CA 92138



July 27, 2018

Ms. Cynthia Curtis  
County of San Diego - Public Works Department  
1222 First Avenue, M.S. 501  
San Diego, California 92123

**Re: Revised Draft Program Environmental Impact Report for Updated McClellan-Palomar Airport Master Plan**

Dear Ms. Curtis:

The San Diego County Regional Airport Authority (Airport Authority), which also functions as the Airport Land Use Commission (ALUC) for San Diego County, appreciates the opportunity to review and comment on the recirculated portions of the Draft Program Environmental Impact Report (PEIR) for the updated McClellan-Palomar Airport Master Plan (proposed project).

R-L2-1  
cont.

The Authority submitted an initial comment letter to the County of San Diego on March 19, 2018 after reviewing the Draft PEIR. As noted in that letter, ALUC comments were primarily focused on clarifications to text and exhibits related to the depiction of the future Runway Protection Zones (RPZs). We've reviewed the supplemental information provided in the Revised Draft PEIR, including the figures associated with RPZs, and have determined that the new information provides the necessary clarification to address our previously-submitted comments.

R-L2-2

Thank you for the opportunity to present our comments on the Revised Draft PEIR for the updated McClellan-Palomar Airport Master Plan. We look forward to working with the County on the ALUC consistency review process for the proposed project. In the meantime, if you have any questions regarding our comments or if you would like to discuss the issues addressed in this letter further, please do not hesitate to contact Ralph Redman at (619) 400-2464 at your convenience.

R-L2-3

Sincerely,

Brendan Reed  
Airport Authority, Director of Planning & Environmental Affairs

cc: Kimberly Becker, Airport Authority CEO/President  
Dennis Probst, Airport Authority VP Development  
Roger Griffiths, County of San Diego Airports

PO Box 82776  
San Diego, CA 92138-2776  
[www.san.org/aluc](http://www.san.org/aluc)

**AIRPORT  
LAND USE  
COMMISSION**

**Response to Letter R-L2****San Diego County Regional Airport Authority (SDCRAA)**

- R-L2-1** This comment includes introductory remarks. The County acknowledges this comment, and no response is required.
- R-L2-2** The comment provides a brief summary of the San Diego County Regional Airport Authority (SDCRAA) previous comment letter on the PEIR. The comment states that after the SDCRAA's review of the recirculated documents, no additional comments are needed as the recirculated documents provided the necessary clarifications. The County acknowledges this comment, and no response is required.
- R-L2-3** This comment includes concluding remarks which will be included in the record for this project. No further response is required.

**Comment Letter R-L3**

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**From:** Jason Haber <Jason.Haber@carlsbadca.gov>  
**Sent:** Monday, August 06, 2018 9:34 AM  
**To:** LUEG, PalomarMP  
**Cc:** Gade, Derek; Carmichael, Leann  
**Subject:** City of Carlsbad Comments on Recirculated Portions of McClellan-Palomar Airport Master Plan Update Draft PEIR  
**Attachments:** Carlsbad Comment Letter on Recirculated Portions of Draft EIR.pdf

Dear Ms. Curtis:

The City of Carlsbad submits the attached comments on the Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report. I will mail a hard copy today, as well.

R-L3-1

Please confirm your receipt.

Thank you,

Jason Haber  
Assistant to the City Manager



760-434-2958 | Jason.Haber@carlsbadca.gov  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-1949  
www.carlsbadca.gov

[Facebook](#) | [Twitter](#) | [YouTube](#) | [Flickr](#) | [Pinterest](#) | [Enews](#)



August 6, 2018

Cynthia Curtis, Environmental Planning Manager  
County of San Diego  
Department of Public Works  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

Re: Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report

Dear Ms. Curtis:

The City of Carlsbad submits the attached comments on the Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report.

The City looks forward to continuing discussions with San Diego County to ensure that the Master Plan Update and its various project components are undertaken in a manner that does not compromise the health and well-being of Carlsbad residents, while ensuring that requirements for safety and air navigation are met at the McClellan-Palomar Airport.

R-L3-2

Sincerely,  


Scott Chadwick  
City Manager

cc: Carlsbad City Council

**City Manager's Office**  
City Hall 1200 Carlsbad Village Drive | Carlsbad, CA 92008 | 760-434-2820 t

**CITY OF CARLSBAD COMMENTS  
ON RECIRCULATED PORTIONS OF DRAFT PEIR**

Any capitalized terms not otherwise defined below have the meanings set forth in the Draft PEIR. References to CEQA Guidelines refer to California Code of Regulations Title 14, Division 6, Chapter 3, Sections 15000 -15387.

R-L3-3

**I. Recirculated Biological Resources Section**

a) General Comments

R-L3-4

i. We reaffirm our March 13, 2018 comments on this section. Among other items, we note that this recirculated analysis still does not assess whether a relocated MALSR would impact the existing Conservation Easement area at the west end of the eastern parcel (see our Draft PEIR comment II.B.6.b, page 21).

ii. Given that this recirculated section identifies new significant impacts that were not previously analyzed, we believe that the alternatives analysis in the Draft PEIR must be updated and recirculated as well.

R-L3-5

b) Page 2-18, third paragraph. Figure 2.2-1 also shows a preserve area. This should be the area of most concern and the area which would appear to be affected by MALSR relocation. This description should be updated to include discussion of the preserve area.

R-L3-6

c) Page 2-18, third paragraph. It should be noted that any changes to the pre-negotiated preserve area must be approved by the wildlife agencies, according to the March 7, 2011 agreement letter with the wildlife agencies (see Appendix H of the Draft PEIR [Appendix B] Biological Resources Technical Report, “North County MSCP Hardline for the McClellan-Palomar Airport Runway Expansion and Eastern Parcel Development Project”). The proposed mitigation measure should be modified to acknowledge that wildlife agency approval to modify PAMA/preserve boundaries is required for the mitigation measure to be effective.

R-L3-7

d) Page 2-18, fourth paragraph. The area in question (shown in red on Figure 2.2-1) is designated preserve area, not PAMA. Also, the potentially affected area on the eastern parcel is designated preserve area.

R-L3-8

e) Page 2-19, second paragraph, last sentence. This sentence fails to acknowledge that there are 10.2 acres of designated critical habitat for the San Diego thormmint (Draft PEIR Figure 2.2-2; PEIR Appendix B, p. 23) on the Eastern Parcel. To make this description complete, please add a discussion of the critical habitat designation for the San Diego thormmint.

R-L3-9

f) Page 2-20, last paragraph. Please note that habitat impacts within the agreed-upon preserve area would require negotiation and approval of the wildlife agencies, not simply applying mitigation ratios (see March 7, 2011 letter from wildlife agencies to the County.)

R-L3-10



- g) Page 2-22, reference to Figure 2.2-3. Figure 2.2-3 does not show the Eastern Parcel habitat types/vegetation communities. The figure should be updated or a new one added (such as Figure 1 of the May 31, 2018 Biological Resources Technical Addendum) to correspond to this updated sub-section and tables. R-L3-11
- h) Page 2-26, Section 2.2.1.6 (Habitat Connectivity and Wildlife Corridors). Please expand this section to discuss habitat connectivity and wildlife corridor impacts to the Eastern Parcel. Note that the Eastern Parcel is part of Core #5 under the City’s Habitat Management Plan (see Habitat Management Plan, Section D.2.E and Figure 4). R-L3-12
- i) Page 2-28, first paragraph under Special Status Plant Species. Please strike the word “unoccupied” in the fifth line. San Diego thornmint is present within the critical habitat area, as shown in Figure 1 of the May 31, 2018 Biological Resources Technical Addendum, and the critical habitat is therefore occupied. R-L3-13
- j) Page 2-29, second to last paragraph. Given that MALSR relocation would take place concurrent with or after the long-term runway shift 13-20 years from now, and given that the MALSR's precise location within the critical habitat area is only estimated at this time, it would seem prudent to consider impact to the San Diego thornmint to be potentially significant unless mitigated. While the 2016 rare plant survey detected San Diego thornmint some 85 feet from the estimated impact area, it is conceivable that additional thornmint plants could establish themselves within the critical habitat area a decade or two from now. Therefore, a mitigation measure should be included to require that an updated rare plant survey be conducted prior to relocation of the MALSR to confirm that no impacts to the San Diego thornmint would occur. If an updated survey concludes an impact would result, then appropriate mitigation measures consistent with the NCMSCP or other applicable guidance should be implemented. R-L3-14
- k) Page 2-38, second line and M-BI-5. The referenced letter does not specify the mitigation ratio for vernal pool impacts. Instead, the letter estimates .20 acre of vernal pool impact will be mitigated through creation/restoration on 6.78 acres of fallow/ag area, which is not shown on the referenced figure. Please substantiate that the 2011 letter agreement with the wildlife agencies allows the lower 1:1 mitigation ratio for the vernal pool impacts, rather than the higher 5:1 ratio required by County Guidelines. R-L3-15
- l) Page 2-39, M-BI-7. Per the referenced letter, changes to the agreed-upon preserve area (MALSR relocation would affect the designated preserve area) would require approval by the wildlife agencies. The Draft PEIR should disclose this. R-L3-16
- m) Page 2-39, M-BI-8. The 2011 wildlife agencies letter assumes all the non-native grassland would be preserved. Given that MALSR relocation would impact some of the preserved non-native grassland, concurrence by the wildlife agencies would be required, according to the letter's terms. This should be disclosed in the Draft PEIR. Also, mitigation measure M-BI-8 should specify that the draft NCMSCP requires 1:1 mitigation for non-native grassland impacts within a PAMA, not 0.5:1 as shown in Table 2.2-4 [see Appendix A to Draft NCMSCP, R-L3-17

<https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/AppendixANCBMO.pdf>]. The table should be corrected to reflect the higher mitigation requirement of the NCMSCP.

R-L3-17  
cont.

**II. Greenhouse Gas Emissions Analysis, Revised Draft PEIR, Section 3.1.5**

We have the following comments on the revised Draft PEIR GHG emissions section:

a) Although revisions to the greenhouse gas (GHG) section address a few of Carlsbad’s comments on the original Draft PEIR section, we still have many concerns about this analysis. In summary, the revised section still uses an improper baseline, improper thresholds of significance, and improper calculation methodologies. If these errors were corrected, the GHG impacts would be significant and mitigation would be required.

R-L3-18

b) The revised GHG impact analysis does not address Carlsbad’s comments on the original Draft PEIR related to aviation emissions. The revised section continues to assert (see, e.g., p. 3-55) that since the County has no authority to regulate aircraft or their emissions, there is no applicable methodology or threshold with which to evaluate their significance. Even if the County cannot directly regulate aircraft emissions, the Draft PEIR must still disclose those emissions, include them in impact significance determinations, and address the feasibility of mitigating any significant impacts, for example, through changing those airport operations which the County does control. See *Association of Irrigated Residents v. Kern County Bd. of Supervisors* (2017) 17 Cal.App.5th 708 (County was not preempted from disclosing rail operations impacts caused by refinery expansion and identifying feasible mitigation measures, even though it was preempted from directly regulating mainline rail operations).

R-L3-19

c) In the City’s comment letter on the DEIR, we raised questions about the environmental effects of drilling hundreds of holes into the existing landfill to install piles for the runway extension. The GHG analysis does not appear to include any potential methane emissions associated with this work. Please add this analysis.

R-L3-20

(d) Although the revised Draft PEIR section addresses some of Carlsbad’s comments on the original Draft PEIR related to significance thresholds and analysis methodologies, the approach used still is inconsistent with CEQA requirements. The revised discussion of significance (pp. 3-63 and 3-64), although it purports to use Appendix G criteria as requested by Carlsbad’s comments, improperly discusses different thresholds of significance with different impact analysis methodologies for aviation-related vs. non-aviation-related emissions for determining whether the project would “generate GHG emissions, either directly indirectly, that would have a significant effect on the environment” (the Appendix G criterion). The revised Draft PEIR should present a quantitative threshold of significance that applies to *all* project emissions sources combined—amortized construction emissions plus aviation-related emissions plus non-aviation-related emissions.

R-L3-21

CEQA Guidelines section 15064.4 gives each lead agency the affirmative duty to develop its own GHG methodologies and thresholds for each regardless of project type. Carlsbad requests that the lead agency explain how the following sentence (p. 3-64) applies to the Draft PEIR analysis: “[in] the absence of state or local thresholds for GHG emissions from aviation sources, State CEQA Guidelines Appendix G criteria shall apply to determine if the proposed project would result in a significant impact.”

e) The 900 MT CO<sub>2</sub>e CAPCOA “screening level” described on Draft PEIR pages 3-64 and 3-65, although explained further in the revised Draft PEIR section, is still incorrectly described and applied. The 900 MT screening level should not be applied separately to amortized construction emissions, but instead should be applied to combined amortized construction and operational emissions. These combined emissions are presented in a new improperly-labeled “cumulative impact analysis” section; both construction and operational emissions are generated by the same proposed project, not different projects.

R-L3-22

The combined emissions in that section, even though based on a future baseline only, clearly exceed the 900 MT “screening level” and therefore should be considered significant. The Draft PEIR defends the 900 MT figure as a “screening level” for further analysis, when actually it or a similar small figure should serve as a CEQA significance threshold if a net zero threshold is not adopted (see next comment). Almost all of the air district screening levels cited to support the 900 MT figure actually use this or similarly small bright-line thresholds as a CEQA threshold of significance triggering mitigation obligations, not as a screening level that merely triggers further analysis.<sup>1</sup> The Carlsbad and Escondido CAP screening levels cited in the revised section merely identify projects too small for implementation of CAP GHG reduction measures, and are inapplicable to CEQA analysis of the Master Plan Update.

f) To achieve SB 32’s ambitious 2030 GHG reduction target of 40% below 1990 levels, the 2017 Scoping Plan (pp. 101-102) recommends a net zero threshold for project EIRs unless it is infeasible to achieve. A net zero threshold should be used to judge the significance of the proposed project’s combined construction and operational GHG emissions unless the revised Draft PEIR demonstrates it is infeasible to achieve. CEQA case law has recognized that even small amounts of GHG emissions may be cumulatively considerable and thus significant. See *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal. 5th 497.

R-L3-23

g) Instead, the revised Draft PEIR improperly applies an efficiency threshold (3.01 MT CO<sub>2</sub>e/SP/yr) to judge the significance of operational and cumulative GHG impacts. The 2017 Scoping Plan intends efficiency thresholds to apply primarily to local plans, not to projects, for which a net zero threshold is recommended (see pp. 99-102). Although the 2017 Scoping Plan does state that lead agencies may develop evidence-based numeric thresholds for project EIRs consistent with the Scoping Plan, the Draft PEIR continues to use all of San Diego County’s emissions in the numerator and the entire San Diego County service population as a denominator when calculating the proposed project’s efficiency threshold (pp. 3-65 to 3-66).

R-L3-24

To be “evidence-based” and applicable to Master Plan emissions, the Draft PEIR should have used the airport-specific emissions in the numerator and airport-specific service population in the denominator. It is not a reasonable assumption that the airport-specific service population should include all potential airport users of the catchment area, since only a small percentage of the catchment area population would use the airport in a given year, if ever. By way of contrast, the Draft PEIR traffic analysis is based on vehicle trips generated by expected airport users, rather than all potential users of a geographic region.

<sup>1</sup> BAAQMD (2017), Air Quality Guidelines, Table 2-1; San Luis Obispo County APCD (2012), Greenhouse Gas Thresholds and Supporting Evidence, Table 10; SMAQMD (2015), Guide to Air Quality Assessment in Sacramento County (2015); SMAQMD Thresholds of Significance Table.

Such a calculation would result in a much lower efficiency threshold, one that would accurately measure the 2036 airport-specific emission reductions needed to be consistent with the 2017 Scoping Plan, the State’s long-term climate goals, and current scientific knowledge.

R-L3-24  
cont.

A Countywide efficiency threshold of significance that comprehensively includes all emissions sources in the County is not applicable to a relatively small airport project with limited emissions sources.

h) Further, as stated in the City’s comments on the original Draft PEIR, the operational impact analysis is inconsistent with CEQA Guidelines section 15064.4, which states, in part, that the significance of GHG emissions should be determined by whether the project increases GHG emissions *as compared to the existing environmental setting* (emphasis added). The operational impact analysis uses only a future baseline (future conditions without project); see, e.g., Table 3.1.5-6. However, the environmental setting (existing conditions) normally constitutes the baseline by which the lead agency determines whether an impact is significant. CEQA Guidelines Section 15125(a). A future baseline, if supported by substantial evidence, may also be used in addition to the existing environmental setting, but cannot be the sole baseline unless use of the existing environmental setting would be uninformative or misleading.

R-L3-25

*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439. The Draft PEIR cites FAA Guidance recommending comparison of future no project and proposed project emissions (p. 3-62), but this guidance does not supersede CEQA’s requirements for also presenting an analysis using an existing conditions baseline.

As in the City’s comments on the original Draft PEIR, the revised Draft PEIR still does not demonstrate that using an existing conditions baseline would be uninformative or misleading. Therefore, the Draft PEIR text should be revised to include an operational GHG emissions impact analysis using existing conditions as a baseline. The revised Draft PEIR apparently attempted to provide this analysis by presenting total future GHG emissions in new Tables 3.1.5-8 and 3.1.5-9, but there is no comparison of these future total GHG emissions to existing GHG emissions to allow Draft PEIR readers to understand the magnitude of the increase over existing conditions caused by the Master Plan.

i) As mentioned in the City’s comments on the original Draft PEIR, even under a future baseline, the GHG increases from operational activities are quite large (as shown in Table 3.1.5-6. a net increase of 13,469 MTCO<sub>2</sub>e/yr under Scenario PAL 1, and 24,115 MTCO<sub>2</sub>e/yr under Scenario PAL 2). Using an existing conditions baseline<sup>2</sup> would add an additional 15,290 MTCO<sub>2</sub>e/yr to these increases (Table 3.1.5-5 total minus Table 3.1.5-1 total). These large increases should be considered significant impacts whether a net zero or a 900 MT significance is used. Further, the analysis does not appear to include existing and future emissions by all of the various FBOs/tenants, and thus does not provide a complete picture of airport related GHG emissions (see, e.g. Table 3.1.5-2).

R-L3-26

j) Regarding plan conflicts, the revised Draft PEIR still does not recognize that the Master Plan’s combined construction and operational GHG emissions are significant because they are inconsistent with the 2017 Scoping Plan. The proposed project’s large GHG

R-L3-27

<sup>2</sup> Note that the revised Draft PEIR’s quantifications of existing and future no-project GHG emissions are too low because they omit mobile source emissions. See Tables 3.1.5-1 and 3.1/5-5, where motor vehicle emissions are shown as “N/A.”

emissions increases are inconsistent with the state’s ability to achieve the steep declines in GHG emissions called for in the 2017 Scoping Plan, and the proposed project should incorporate stationary and mobile source GHG reduction strategies described in the 2017 Scoping Plan. Contrary to the revised Draft PEIR’s assertion, the Scoping Plan, which serves as the fundamental statewide GHG reduction plan, is highly applicable to the Master Plan’s emissions even if it excludes explicit goals for reducing aviation GHG emissions.

The proposed project’s combined construction and operational GHG emissions should also be considered significant because they are inconsistent with the adopted County CAP. The revised Draft PEIR does disclose that the proposed project’s emissions are not included in the County CAP emission projections, which itself is a grounds for inconsistency. The new analysis purporting to show CAP consistency should be revised for at least two reasons. First, it uses the CAP “consistency checklist” as the exclusive means for determining proposed project consistency with the CAP. However, this checklist expressly applies to “development projects,” which means private development projects, rather than to discretionary approvals of new County facilities.<sup>3</sup> CAP consistency could appropriately be showing consistency with applicable CAP measures that are applicable to County facilities and the Master Plan,<sup>4</sup> but the revised Draft PEIR contains no such analysis. This analysis should be included to show the consistency of the proposed Project with the County CAP.

Second, the one (inapplicable) CAP measure consistency finding that the revised Draft PEIR does present needs further evidentiary support. The revised Draft PEIR assumes the proposed project will meet a 15 percent reduction in commute VMT emissions (Measure 1a), compared to the CAP’s 2014 baseline year, and makes assurances that the proposed project would comply with County policies targeting VMT reduction. However, the project description does not include commitments to any specific VMT reduction measures to accomplish this target, and the Draft PEIR transportation and air quality analyses do not show that the proposed project will achieve the 15% reduction target.

k) Based on the above comments, as stated in the City’s comments on the original Draft PEIR, the proposed project’s GHG emissions impact appears to be significant. The revised Draft PEIR should therefore be further revised to reach this conclusion and then present feasible measures or alternatives to avoid or substantially lessen this impact. Potentially feasible mitigation measures can be derived from the County CAP GHG reduction measures referenced above, from the City of Carlsbad’s adopted Climate Action Plan, and from the San Diego Forward Final EIR (e.g., Mitigation Measure GHG-4H). In addition, Section 4 of the Draft

<sup>3</sup> This is demonstrated by many checklist features, including “Application Information” page that requires the applicant’s name and contact information to be provided (p. A-1), and references to County Department of Planning and Development Services review of “development applications” (p. A-2). Furthermore, the checklist questions explicitly address only residential and non-residential projects, not County facilities for which the CAP contains a distinct set of GHG reduction measures. None of the checklist questions refer to a single CAP measure that applies to County facilities and operations (pp. A-6 through A-10).

<sup>4</sup> These measures include:

- E-2.4 Increase use of on-site renewable electricity generation for County operations
- T-2.3 Reduce county employee VMT
- T-3.2 Use alternative fuels in County projects
- T-3.4 Reduce the County’s fleet emissions
- E-1.4 Reduce energy use intensity at County facilities
- W-1.3 Reduce potable water consumption at County facilities

R-L3-27  
cont.



Climate Change Technical Report offers a number of GHG reduction mitigation measures that the County could implement as part of the Master Plan. These include electric-powered Ground Power Units and Ground Support Equipment, both of which the Technical Report considers to be potentially feasible.

R-L3-27  
cont.

l) The revised Draft PEIR should be further revised to use a proper baseline, proper thresholds of significance, and proper calculation methodologies and then provide appropriate mitigation for significant impacts.

R-L3-28

**III. Energy Use and Conservation Analysis, Revised Draft PEIR, Section 3.1.10**

The revised Draft PEIR now includes an energy impact analysis, as requested by City comments on the original Draft PEIR. However, the operational energy impact analysis should be further revised, because, like the operational GHG analysis, it does not compare energy future use to an existing energy use baseline. Rather, it uses only a future baseline as the basis for determining quantitative energy impacts. An EIR must quantify a project’s energy impacts compared to existing conditions, and then determine whether a proposed project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy. See, e.g., *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912; *California Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173.

R-L3-29

**IV. Revised Draft PEIR Figures Associated with Runway Protection Zones**

The RPZ maps are very different from the maps in the original Draft PEIR. Please explain why the maps have changed. Also, it appears that the RPZs are shrinking in the new maps. Please explain if this is indeed the case, and if so, why.

R-L3-30

**Response to Letter R-L3****City of Carlsbad**

- R-L3-1** This comment contains an email message by the City of Carlsbad submitting comments to the County. No response is required.
- R-L3-2** This comment indicates City of Carlsbad comments are enclosed. The County recognizes and appreciates the long-standing working relationship with the City, and the history of coordination between our two agencies. No response is required.
- R-L3-3** This comment includes introductory remarks regarding the City of Carlsbad's letter. No response is required.
- R-L3-4** As discussed in the **Response to Comment L3-105**, the County reviewed Conservation Easement Deed #2004-1123441 to verify whether the relocated MALSR lighting system would impact the recorded conservation easement. The County confirmed that implementation of the Master Plan Update (including relocation of the MALSR) would not impact or encroach into the existing conservation easement. Also see Final PEIR Figure 2.2-5 showing a delineation of the anticipated MALSR site within the Eastern Parcel.
- R-L3-5** The Master Plan Update and Draft PEIR previously identified the shift of existing navigational lighting, and the potential significant impacts to biological resources. The Final PEIR incorporates more specific information pertaining to the shift of the existing MALSR on the Eastern Parcel. This additional information does not substantially change the evaluation of comparative merits of the Proposed Project and does not present information that would impede attainment of the project objectives as it pertains to CEQA Section 15126. Accordingly, pertinent information is included in the Final PEIR but recirculation was not required.
- R-L3-6** PEIR Figure 2.2-1 (Regional Preserve Areas) illustrates conservation designations for County-owned land pursuant to the Draft North County (NC) MSCP. However, the "Preserve Area" polygon identified on Figure 2.2-1 reflected a combination of existing preserved land (i.e., conservation easement) and future preserved land as illustrated in the 2011 Hardline letter (cited in the PEIR). At this time, the future preserved land is designated as "PAMA". Figure 2.2-1 has been revised to reflect this on the Eastern Parcel as it will be (and is currently) reflected in the Draft NC MSCP, which is under ongoing review and consultation with the County and wildlife agencies.
- R-L3-7** With the Proposed Project and other projects within the Draft NC MSCP area, it is standard protocol to coordinate with the wildlife agencies on development projects. In the case of the Proposed Project, once specific elements of the Master Plan Update are designed and proposed, they would be discussed with the wildlife agencies to finalize the project-specific mitigation strategy. As discussed in Section 2.2.5 Mitigation Measures, all biological resources under the jurisdictions of federal, state, and local regulations will be mitigated in consultation and oversight of the applicable regulatory agency. Measures in this section discuss the approach to mitigation within areas subject to the Draft NC MSCP, and if the Draft NC MSCP is not adopted at the time project impacts would occur, mitigation would occur at the ratio defined by the County Guidelines for Determining Significance for Biological Resources and as required by jurisdictional regulatory agencies. No changes have been made to the PEIR.

- R-L3-8** As noted in **Response to Comment R-L3-6**, “Preserve Area” polygon identified on Figure 2.2-1 reflects a combination of existing preserved land (i.e., conservation easement) and future preserved land as illustrated in the 2011 Hardline letter (cited in the PEIR). The intent was to illustrate that upon approval and implementation of the Draft NC MSCP, both of these land categories would simply be titled, Preserve. However, Figure 2.2-5 has been added to the PEIR to illustrate the various designations with the proposed relocation of the MALSR navigation lighting system.
- R-L3-9** Please note that PEIR Section 2.2.2.1 (Special Status Species) does include a discussion of USFWS designated critical habitat for San Diego thornmint. Specifically, it stated that 10.2 acres is located within the biological study area; however, only 0.33 acre would be impacted. Nonetheless, the 0.33-acre area has been added to Section 2.2.1.1 (Regulatory Setting).
- R-L3-10** Please see **Response to Comment R-L3-7**.
- R-L3-11** The recirculated PEIR Section 2.2 did include an additional figure, numbered 2.2-3b showing the Eastern Parcel vegetation; however, it appears this was not embedded in the electronic version on the County’s website. Nonetheless, PEIR hardcopies distributed at the local libraries, and the PEIR’s Biological Technical Report Addendum (Figure 1) contained the noted figure. Figure 2.2-3b is included in the Final PEIR.
- R-L3-12** The Biological Technical Report Addendum (page 9) provides an impact analysis of potential effects to wildlife movement and nursery sites in regards to the MALSR relocation on the Eastern Parcel. Implementation would not result in significant impacts on wildlife movement or nursery sites on the Eastern Parcel and no mitigation is required. The analysis is added to PEIR Section 2.2.1.6 as requested by the commenter.
- R-L3-13** PEIR Section 2.2.2.1 has been clarified that while critical habitat for San Diego thornmint is located within the Proposed Project site (i.e., MALSR relocation), significant impacts would not occur to known locations of San Diego thornmint.
- R-L3-14** As discussed on page 4 of the Biological Technical Report Addendum, most of the area associated with the MALSR relocation “is within scrub oak-dominated mature chaparral, most of which does not have suitable soil types (i.e., heavy clay soil) or a sufficiently open canopy to support thornmint.” It would be overly speculative to conclude significance due to potential impacts for an area that is not conducive to suitability for the species. The MALSR relocation and all other project elements will be reviewed pursuant to CEQA Section 15162 at the time they are proposed, as discussed in **Master Response 10 (Program-level vs. Project-level Review)**. If site conditions have changed at the time the project-specific elements are proposed, updated biological surveys in conjunction with applicable jurisdictional agencies would be conducted.
- R-L3-15** The recirculated PEIR Section 2.2 (page 2-38) cites vernal pool mitigation in accordance with the strategy stated in the 2011 USFWS and CDFW Hardline letter. The letter states that creation/restoration would occur within fallow agricultural land, and as shown in the Eastern Parcel there are several polygons designated as PAMA under the Draft NC MSCP. Those areas were identified by the wildlife agencies for vernal pool mitigation due to historic mima mound topography, which are ideal for recreating the clay lenses associated with vernal pool habitat. The PEIR, which cites the 2011 Hardline letter and Draft NC MSCP, states that unavoidable vernal pool habitat mitigation at a “minimum 1:1 ratio” is consistent with the Draft NC MSCP’s Biological



Mitigation Ordinance (BMO) Section 86.518. The BMO also states “at least one part vernal pool creation/restoration” as minimum County requirements. However, as discussed in PEIR Mitigation Measure M-BI-3, if the Draft NC MSCP is not adopted at the time project impacts would occur, mitigation would occur at the ratio defined by the County Guidelines for Determining Significance for Biological Resources and as required by jurisdictional regulatory agencies.

**R-L3-16** Please refer to **Response to Comment R-L3-7**. Nevertheless, the 2011 Hardline letter does state that changes to the Hardline or Preserve areas would require written approval from the wildlife agencies, and as that statement is already included in the record for the Proposed Project, no further changes to the PEIR were made.

**R-L3-17** Please refer to **Responses to Comments R-L3-7 and R-L3-16**. Also, as stated in PEIR mitigation measure M-BI-8, the 2011 letter does not indicate a mitigation ratio for impacts to non-native grassland, but if the Draft NC MSCP is adopted at the time project impacts would occur, mitigation would occur at the applicable ratio defined in the plan. The mitigation ratios listed in PEIR Table 2.2-4 and Table 2 of the Biological Technical Report Addendum are considered estimates until the Draft NC MSCP is adopted. Relocation of the MALSR would impact both PAMA and Take Authorized areas defined by the Draft NC MSCP. If the mitigation ratios in the 2009 public review version of the Draft NC MSCP carry forward when the plan is approved, the County agrees the 0.5:1 mitigation would apply for this habitat type in the Take Authorized area and 1:1 mitigation ratio would apply within areas designated as PAMA. As stated in M-BI-8, if the NC MSCP is not adopted at the time project impacts would occur, mitigation for impacts to non-native grassland shall occur at a 0.5:1 ratio pursuant to habitat mitigation ratios applied for areas outside of approved MSCP as defined by the County Guidelines for Determining Significance for Biological Resources dated September 15, 2010. This has been clarified in the PEIR.

**R-L3-18** This comment includes general remarks regarding the recirculated PEIR Section 3.1.5 Greenhouse Gas Emissions. Specific responses are provided below for each respective comment. No changes have been made to the PEIR.

**R-L3-19** Although the previously published Climate Change Technical Report disclosed all aircraft-related emissions (see **Response to Comment L3-93**), the County acknowledges the initial Draft PEIR based its significance conclusions on the difference (or delta) in emissions that would occur in the future with and without the Proposed Project. After considering public comments, the recirculated PEIR Section 3.1.5 (Greenhouse Gas Emissions) was published, which included all aircraft emissions that would occur as a result of the two forecast planning scenarios (PAL 1 and PAL 2). As such, the County disagrees with the comment that aircraft emissions were not disclosed. Further, a subsequent comment from the City of Carlsbad (L3-25 second paragraph) acknowledges that total GHG emissions were provided.

The County also disagrees that aircraft emissions outside of the County’s control should be included in the impact determination. As discussed in the Master Plan Update, the aircraft operations forecast indicated that operations will increase over the next 20 years at a modest level regardless of airport facilities or infrastructure. In other words, the Master Plan Update would not cause aircraft operations to increase; rather, the Master Plan Update was prepared to anticipate the natural increase in aircraft that would occur regardless of the Proposed Project and design facility improvements to accommodate that foreseeable demand. The incremental increase in aircraft operations projected in the Master Plan Update is expected to occur naturally, in response to market

conditions, throughout the 20-year planning period whether or not the Master Plan Update is implemented.

As a result, comparing the Master Plan Update's full implementation timeframe (i.e., 2036) to existing conditions (i.e., 2016) would be misleading and uninformative as conditions would naturally evolve over the 20-year planning period regardless of the implementation of the Proposed Project. Therefore, for the purposes of the PEIR analysis, emissions associated with the Proposed Project in 2036 were compared to environmental conditions projected to occur in 2036 without the Proposed Project. This methodology is consistent with the FAA Office of Environment and Energy, which requires the study of an implementation year with and without a proposed action to account for incremental changes that may occur in environmental conditions.

As explained above, facility improvements associated with the Master Plan Update would not change the Airport's uses. Additionally, the County's adopted Guidelines for Determining Significance for Climate Change uses consistency with the County's CAP for determining significance, which is not a quantitative threshold of significance as the City's letter indicates. The County's CAP is based on California's statewide Scoping Plan and is intended to help the County meet its share of statewide emissions reductions goals. As discussed in PEIR Section 3.1.5.1 Existing Conditions, the CARB Scoping Plan does not include aircraft emissions nor measures for reducing emissions from aviation sources. The County's Climate Change and Greenhouse Gas Emissions Analysis and other airport EIRs therefore exclude aircraft emissions from GHG significance conclusions (*note in the Burbank/Bob Hope Airport Terminal Replacement EIR dated June 2016, the EIR states "It is noted that GHG emissions associated with aircraft are under the jurisdiction of the FAA. The Authority [Burbank-Glendale-Pasadena Airport Authority] has no ability to regulate aircraft landing and take-off emissions." In addition, the AB32 Climate Change Scoping Plan states that "the State does not have regulatory authority over aviation" and "ARB has not identified aviation-specific measures."*)

- R-L3-20** Although the Master Plan Update does identify potential construction methods that could be used to construct a runway extension, this conceptual construction strategy is preliminary since engineering design plans have not been developed. As described in the PEIR, the exact scope, scale, and timing for construction of the Master Plan Update elements will be determined once funding is identified for project design engineering and construction. Therefore, the associated environmental impact for each element, and the Master Plan Update as a whole, is analyzed at a programmatic level for the purpose of environmental analysis. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. As project elements of the Master Plan Update are designed, potential construction methods would be identified at that time, including whether portions of the gas collection control system would need to be temporarily or permanently relocated. Also, please refer to **Master Response 10 (Program-level vs. Project-level Review)**, regarding program-level and project-level environmental review. No changes to the PEIR were made in response to this comment.
- R-L3-21** The comment requests the PEIR to include a quantitative threshold that applies to all project emissions, including construction, aviation, and non-aviation sources. The County disagrees that this information was not provided, see **Response to Comment L3-93**. Specifically, Table 3.1.5-10 identifies GHG emissions associated with all operation uses, including aircraft and non-aircraft (including ground support equipment, motor vehicles, stationary sources, and electrical consumption). Furthermore, those emissions from Table 3.1.5-10 were combined with all construction-related GHG

emissions and were presented in Table 3.1.5-11. Those emissions were then compared to the same quantitative service population threshold for analysis as shown in Table 3.1.5-11.

The comment also includes an excerpt from the PEIR and asks the County to clarify the statement. While this comment does not provide input or remarks concerning the PEIR's environmental analysis, the excerpt was intended to clarify that state and local emissions reductions plans do not have thresholds relevant to aircraft emissions. No changes to the PEIR were made in response to this comment.

- R-L3-22** The comment requests the PEIR to be revised to combine construction and operation emissions and compare it to the 900 MT CO<sub>2</sub>e CAPCOA screening level. As explained in the supplemental GHG Emissions Memo and recirculated PEIR Section 3.1.5, the 900 MT CO<sub>2</sub>e CAPCOA screening level was applied separately for construction and operational emissions. Because the amortized construction emissions would not exceed the screening level, no further analysis was warranted. However, because the operational emissions would exceed the screening level, the Proposed Project was then evaluated under the service population metric (i.e., efficiency metric), which not only evaluated operational emissions but also in combination with total construction emissions. Please see PEIR Table 3.1.5-11.

Furthermore, the City of Carlsbad's Comment L3-21 states that CEQA Guidelines Section 15064.4 gives each lead agency the affirmative duty to develop its own GHG methodologies and thresholds for each regardless of project type. Accordingly, in its independent evaluation and as explained in the published supplemental GHG Emissions Memo, the County determined the revised thresholds in the recirculated PEIR Section 3.1.5 meet the state's reduction requirements, and is supported by substantial evidence. Specifically, please refer to the supplemental GHG Emissions Memo Section 3.A.i for further discussion and justification of the 900 MT CO<sub>2</sub>e CAPCOA screen level. See **Response to Comment R-L3-21** outlining the full disclosure of project emissions. In PEIR Section 3.1.5.3 Cumulative Impact Analysis, the construction and operations emissions were combined and compared to the 2036 Service Population significance threshold as reflected in Table 3.1.5-11. No changes to the PEIR were made in response to this comment.

- R-L3-23** The County implements the statewide emissions reduction goals through the adopted CAP, which includes a net zero threshold for General Plan Amendments. However, the Proposed Project is not a General Plan Amendment, and therefore the PEIR uses a project-specific threshold that demonstrates the Proposed Project would not interfere with County's GHG reduction goals. Furthermore, the 2017 Scoping Plan recommends, but does not require, a net zero emission threshold. While it may be appropriate in some cases, it is not applicable for all projects, and particularly those with aviation emission sources. As stated in the 2017 Scoping Plan, "[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA." As noted throughout these responses to comments, the County has no regulatory authority or control over aviation or air travel emissions, and there are no measures that could ensure the Proposed Project could feasibly achieve net zero emissions.

The County implements statewide emissions reductions goals discussed in the CARB's Scoping Plan via the County CAP. As discussed in PEIR Section 3.1.5.1 Existing Conditions, the County CAP includes a net zero threshold for General Plan

Amendments, and the Master Plan Update does not require such an action. The project therefore uses a project-specific threshold, meets applicable CAP measures, and will not interfere with the County's GHG emissions goals. County CAP measures related to airport facility operations will be implemented programmatically on this and other County facilities regardless of the Master Plan Update also discussed in PEIR Section 3.1.5.1 Existing Conditions. No changes to the PEIR were made in response to this comment.

- R-L3-24** The use of an efficiency threshold and service population metric is appropriate for the Master Plan Update as it applies to program-level environmental analysis similar to a long-range planning document (i.e., local plan), as the 2017 Scoping Plan intended. The County disagrees that the PEIR uses an incorrect service population threshold. The County acknowledges that the 3.01 MT service population threshold is a conservative estimate because it incorporates SANDAG's countywide population estimations. As explained in the PEIR Section 3.1.5, using the countywide population is appropriate because the 2017 Scoping Plan recommended a community-wide goal for local agencies; therefore, SANDAG's documented 2030 population estimations were the most appropriate to generate a revised threshold.

Now that a revised threshold has been established, the PEIR Section 3.1.5 uses a more-focused, Airport-specific service population to calculate and evaluate the Proposed Project's GHG emissions. A more-focused service population was utilized in order to capture potential users surrounding the Airport. This was also recommended by the City of Carlsbad's comment letter on the original Draft PEIR. Specifically, the City stated, "...the DEIR improperly uses the entire San Diego County service population as a denominator when calculating the proposed project's efficiency metric; to be accurate, it should have used the project-specific Master Plan's service population." The County agreed with this approach, and the recirculated PEIR Section 3.1.5, page 3-66, subheading "Project-specific Service Population" explains how the analysis was revised to consider a more Airport-specific service area. No further changes have been made to the PEIR.

- R-L3-25** Please refer to **Response to Comment L3-74** (related to Noise), which has been repeated here in the context of GHG emissions. Pursuant to CEQA Guidelines Section 15125(a), each section of the PEIR includes a discussion of the environmental baseline, and for GHG emissions that discussion is located in Section 3.1.5.1 (Existing Conditions) and calculated in Table 3.1.5-1.

As discussed in the Master Plan Update, changes in operational levels are expected to increase annually at a modest level as compared to the previous planning period regardless of whether any of the Master Plan Update improvements are made. In other words, the project does not cause the increased aircraft activity. Also see **Response to Comment R-L3-19**. The forecast scenarios reflect assumptions about the increase in aircraft operations over time (referred to planning activity levels, or PALs) and are not dependent on airfield capacity improvements or other infrastructure improvements. Rather, the forecasts were developed to anticipate foreseeable demand for Airport facilities and infrastructure. As a result, this would help identify which facilities should be improved to meet the projected forecast.

However, because the County must issue ground leases to allow for commercial air service at the Airport, this would be considered a discretionary action. As such, for the purposes of CEQA, the PEIR includes both facility improvements and commercial air service operations as part of the Proposed Project. Furthermore, it would be misleading and uninformative to presume the County has discretion or control over non-commercial

aircraft operations, such as general aviation, charter, military, etc. Also, potential changes in environmental conditions (i.e., greenhouse gas emissions) were calculated to naturally change regardless of the County's proposed facility improvements or approval of commercial air service operations (i.e., Proposed Project). Comparing the Master Plan Update's full implementation timeframe (i.e., 2036) to existing conditions (i.e., 2016) would also be misleading and uninformative as conditions would naturally evolve over the 20-year planning period regardless of the Proposed Project. Therefore, for the purposes of the PEIR, emissions associated with the Proposed Project in 2036 were compared to environmental conditions projected to occur in 2036 without the Proposed Project in order to show impacts associated with the project. This methodology is consistent with the FAA Office of Environment and Energy, which requires the study of an implementation year with and without a proposed action to account for incremental changes that may occur in environmental conditions.

Nonetheless, existing environmental conditions have been disclosed for greenhouse gas emissions (Table 3.1.5-1). However, for the purposes of CEQA impact analysis, only the discretionary actions attributable to the Proposed Project are considered, including project-related emissions shown in Tables 3.1.5-8 and 3.1.5-9, and how the project-related emissions compare to the identified threshold (Table 3.1.5-10).

**R-L3-26** Please refer to **Response to Comment L3-25** (regarding analysis of existing conditions) and **Response to Comment L3-99** (regarding FBOs/tenants). No further response is required.

**R-L3-27** CARB's Scoping Plan is a statewide policy document implemented by local jurisdictions to reduce their local share of emissions. The County implements statewide emissions reductions goals discussed in the CARB's Scoping Plan via the County CAP. Consistency with the CAP is discussed in the County's Guidelines for Significance under CEQA. The County disagrees with this comment that the Proposed Project is inconsistent with the 2017 Scoping Plan. The comment does not provide supporting evidence for its claim that a significant impact would occur or justification why mitigation is necessary. No changes have been made to the PEIR.

The County also disagrees that the PEIR relied on the County CAP Consistency Checklist solely as a means for determining consistency. As the comment itself explains, the PEIR disclosed that the Proposed Project emissions were not included in the CAP; therefore, a consistency determination cannot be made. To clarify, the published PEIR Section 3.1.5 states, "*because the CAP and the County GHG Guidelines are based upon the land use assumptions of the 2011 General Plan, the fact that the Airport Master Plan improvements were not included in the 2011 General Plan means that the CAP cannot be used to streamline the review of GHG emission from the Proposed Project... As such, although the CAP cannot be used to streamline the review of GHG emissions from the Proposed Project, a Project-specific climate change analysis was completed in compliance with the CAP to analyze potential Project-related impacts and to show consistency with the CAP.*" In other words, although the Proposed Project cannot rely on the CAP Consistency Checklist, the PEIR Section 3.1.5 discusses the applicable methodology for evaluating project-specific emissions, and elements of the County's CAP and how the airport, and the project comply with CAP's measures. PEIR Section 3.1.5.2.2 Conflict with Plans, Policies or Regulations discusses the applicability of GHG reduction plans and specific CAP measures and strategies implemented at Palomar Airport and system-wide for public projects including other airports. While the reduction of aircraft-related emissions are not within the County's jurisdiction to regulate and are not in the CARB Scoping Plan or County's CAP, the Proposed Project is consistent with applicable measure for County-owned facilities and

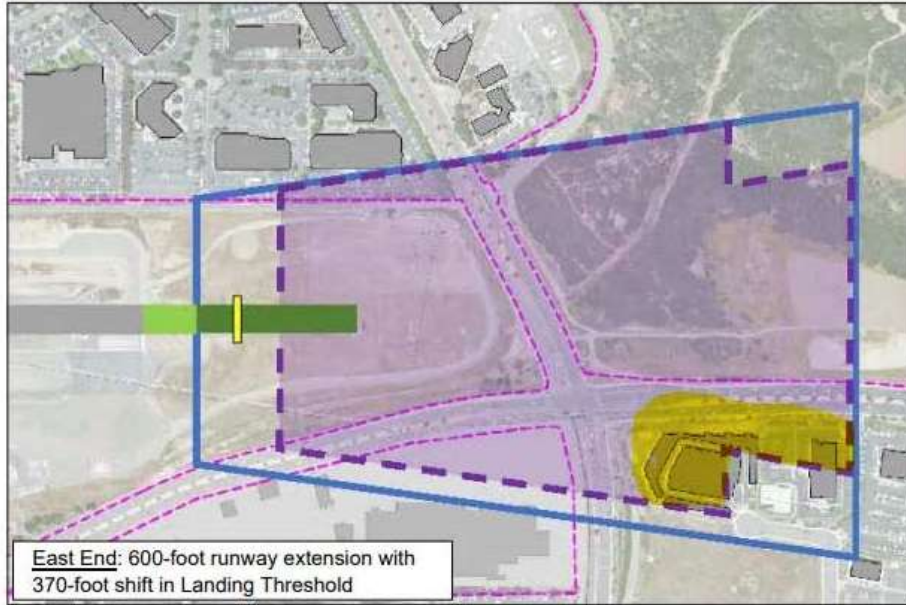
would not impact or impede implementation of the CAP. No changes have been made to the PEIR.

The County would also like to clarify that because the roadways surrounding the Airport are owned and maintained by the City of Carlsbad, the County has no authority to regulate the vehicle trips on the City's roadway network. The City of Carlsbad adopted its own Climate Action Plan to account for facilities within its jurisdiction. Rather, Measure 1a referenced in this comment is associated with County-owned facilities applicable to County policies, and the County can only manage components under its regulatory oversight. As explained in the PEIR, impacts associated with GHG emissions would be less than significant, and no mitigation is required. Therefore, while the County is committed to complying the reduction measures identified in Table 3.1.5-12, they are not deemed mitigation. No changes have been made to the PEIR.

- R-L3-28** Please see **Responses to Comments R-L3-19 through R-L3-27**.
- R-L3-29** Please refer to **Response to Comment L3-74**, which states that potential changes in environmental conditions were calculated to naturally change regardless of the County's proposed facility improvements or approval of commercial air service operations (i.e., Proposed Project). While **Response to Comment L3-74** is associated with Noise, its overall context applies to this comment. As a result, comparing the Master Plan Update's full implementation timeframe (i.e., 2036) to existing conditions (i.e., 2016) would be misleading and uninformative as conditions would naturally evolve over the 20-year planning period regardless of the Proposed Project.
- R-L3-30** Please refer to **Master Response 11 (Runway Protection Zones)** regarding changes to the RPZs.

**From:** Dorris, Gary <gary.dorris@viasat.com>  
**Sent:** Thursday, July 12, 2018 10:46 AM  
**To:** LUEG, PalomarMP  
**Cc:** Rota, Bob; Tom van Betten/USA; Rands, Spencer  
**Subject:** COMMENT - McClellan-Palomar Airport Master Plan Update

Several of the runway expansion options appear to shift the *Runway Protection Zones* so that they would overlay existing commercial buildings. See below, where the existing Bressi Self-Storage and an adjacent Viasat office building would potentially / partially be within the purple shaded RPZ (lower right corner and highlighted in yellow). What does this mean to the owner and occupants? Are there safety, occupancy, & development implications, or other?



**D-III On-Property Alternative Runway Protection Zones**

**Figure 4-4b**

R-01-1

**Gary Dorris**  
 Director, Real Estate



T. 760.795.6245  
 6155 El Camino Real  
 Carlsbad, CA 92009  
[www.viasat.com](http://www.viasat.com)



**Response to Letter R-01****ViaSat**

- R-01-1** As illustrated by the blue line in Figure 4-4b, under current conditions there is an existing Runway Protection Zone (RPZ) over the highlighted area in this comment (at the southeast corner of Palomar Airport Road / El Camino Real). As shown in the figures recirculated with the Draft PEIR, none of the project alternatives would result in the existing RPZ extending beyond its current limits. Therefore, compared to current conditions, there would be no change to safety, occupancy, or development implications. No changes have been made to the PEIR in response to this comment.





770 Sycamore Avenue / Suite 122, Box 208 / Vista CA 92083 / [southvistacommunities@cox.net](mailto:southvistacommunities@cox.net) / [www.southvistacommunities.org](http://www.southvistacommunities.org)

July 30, 2018

**RECEIVED**

**AUG 07 2018**

**County of San Diego  
ENVIRONMENTAL SERVICES**

Cynthia Curtis, Environmental Planning Manager  
County of San Diego  
Department of Public Works  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

Re: Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report

Dear Ms. Curtis:

I am submitting these comments about the Recirculated Portions of the McClellan-Palomar Master Plan Update Draft Program Environmental Impact Report on behalf of residents of Vista who, over the last four years, have been increasingly assaulted by airplane overflights – noise, vibration, particulate emissions.

The portions of the Draft PEIR which you have recirculated include Biological Resources, Greenhouse Gas Emissions, Energy Use and Conservation, and several exhibits.

These portions obviously do not include the environmental impacts from noise and airplane fuel particulates that are adversely impacting the neighborhoods of Vista. [see my letter of February 8, 2018]

Rather than repeat all my points about omissions of the first PEIR, I will refer you to that letter and hope that the final EIR will address these invasive and deleterious impacts completely and substantively:

Vista neighborhoods are being severely impacted by airplane overflights approaching McC-P airport.

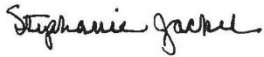
For determination of the impacts of particulate emissions affecting Air Quality, it is essential that the emissions must be measured on the ground in the pathways of the overhead airplane approaches to the airport over the surrounding residential neighborhoods in Vista.

R-O2-1

For determination of the impacts of Noise, the use of CNEL as the impact metric will not begin to give you the true picture of the noise experiences of Vista residents. And it is essential that measurements be taken on-the-ground over a number of days in various Vista neighborhoods.

And then the question is, once you understand the high level and frequency of the noise created by the airplane overflights, with accompanying particulate emissions, what will you recommend as a solution in order to mitigate these extremely negative impacts?

Sincerely,



Stephanie Jackel  
President

cc: Honorable Darrell Issa, U.S. Congress  
Members of Vista City Council  
Aly Zimmerman, Assistant City Manager, Vista

↑  
R-O2-1  
cont.

**Response to Letter R-02****South Vista Communities**

- R-02-1** The comment identifies that the recirculated portions of the Draft PEIR do not include noise or air quality, and the commenter refers to their previous letter (Comment Letter O3). The comment requests air quality measurements in the aircraft flight paths, which is addressed in **Response to Comment O3-13**. Regarding noise and CNEL, please refer to **Master Response 7 (FAA Involvement and Oversight)** and **Response to Comment O3-7**. Furthermore, the comment does not provide input related to the recirculated PEIR subjects (i.e., Biology, Greenhouse Gas Emissions, Energy Use and Consumption, RPZs). Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 38.62dB, and its future condition without the Proposed Project is estimated to be 40.19dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 43.03dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-I1**

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**From:** djb83@netzero.net  
**Sent:** Wednesday, June 20, 2018 4:29 PM  
**To:** LUEG, PalomarMP  
**Subject:** Opposed to Expansion

To Whom It May Concern:

As residents of both Carlsbad and San Diego County my family and I are vehemently opposed to any expansion of the current McClellan airport.

} R-I1-1

The Burtons  
7450 Esfera St  
Carlsbad CA 92009  
760-753-7715

**Response to Letter R-11**

**The Burtons**

- R-11-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-I2**

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**From:** leon juskalian <drbig@me.com>  
**Sent:** Wednesday, June 20, 2018 6:25 PM  
**To:** LUEG, PalomarMP  
**Subject:** COMMENT

please extend the runway soon and bring commercial service to l.a., las vegas, phoenix., burbank and santa barbara, please!

R-I2-1

sincerely,  
lee juskalian  
encinitas  
drbig@me.com

**Response to Letter R-12****Lee Juskalian**

- R-12-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment pertains to commercial airline activity. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-13**

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**From:** Janis Murphy <deck55@aol.com>  
**Sent:** Wednesday, June 20, 2018 4:24 PM  
**To:** LUEG, PalomarMP  
**Subject:** Palomar Airport

Sending my support of the proposed runway expansion!  
Sent from my iPhone Janis Murphy

} R-I3-1



**Response to Letter R-13****Janis Murphy**

- R-13-1** This comment states the commenter's general support for the Proposed Project. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-14**

**From:** Jessica Price <jessicalangprice@gmail.com>  
**Sent:** Thursday, June 21, 2018 10:24 PM  
**To:** LUEG, PalomarMP  
**Cc:** Council@carlsbadca.gov; scott.chadwick@carlsbadca.gov  
**Subject:** NO BUILD Palomar Airport NO BUILD

Thank you for asking for feedback from residents. I personally hear airport/aircraft noise quite often as it is at my home next to Poinsettia Park. I am usually up late and have heard it well after midnight. This isn't a problem when my windows are shut but living in the perfect coastal weather we often sleep with our windows open. On a few occasions the noise from an aircraft has woken me up early! Not to mention napping in the day. Once, the kids and I were in the backyard playing and the aircraft noise was so loud it sounded like it was going to land in our yard. The kids ran into the house screaming like it was Armageddon. We were quite shaken from that experience.

I tell you this not to complain but to illustrate how expanding the airport will only increase traffic allowing more off schedule noise, unwanted noise, opportunity for accidents and air pollution. Not to mention the fact that living in the path of airport traffic we will surely see a decrease in our home values when future buyers hear/see/know about the increase of flights and noise.

It is hard to force pilots to abide by the rules even with fines, it's hard to go back and undo once it's been done.

I already think the rules should be stricter at Palomar in regards to noise to make the rules more like John Wayne but even homeowners there experience problems I discussed above.

Please help us grow Carlsbad in the RIGHT ways, ones that are best for residents in the long run.

Thank you,

Jessica Price

R-14-1

**Response to Letter R-14****Jessica Price**

- R-14-1** The County acknowledges this comment; it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 49.24dB, and its future condition without the Proposed Project is estimated to be 50.39dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 51.59dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-15**

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**From:** Shirley-Ann Grubbe <grubbe.shirleyann@gmail.com>  
**Sent:** Saturday, June 23, 2018 10:33 AM  
**To:** LUEG, PalomarMP  
**Subject:** Palomar Airport

Please don't see expand this airport it will cause much harm to the surrounding neighborhoods.  
Thank you  
Shirley-Ann Grubbe

] R-I5-1

**Response to Letter R-15****Shirley-Ann Grubbe**

- R-15-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-16**

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**From:** Jenene McGonigal <jenenemcg@gmail.com>  
**Sent:** Sunday, June 24, 2018 6:41 AM  
**To:** LUEG, PalomarMP  
**Subject:** Airport expansion

To Whom It May Concern,

My family’s single most important concern is mandating and ENFORCING a flight path that mitigates noise to the surrounding communities for all planes. Without a true penalty that likely needs to hit the wallets of the owner of planes, there is no need for any rules at all to keep pilots from diverting from a flight path. Hearing an airplane from a distance is fine, having an airplane buzz our house is not. Conversations cease, tv programs need to be stopped, our pets get scared, and quite frankly, it is disturbing to any person inside or outside our house to have a plane fly so low over our home. Planes should be required to fly west out over the ocean first, and reach and maintain a certain altitude before being able to return to flying over homes. It’s a very reasonable request and a rule that should be enforced with a hefty penalty for those pilots that choose to disregard it.

R-16-1

Thank you,  
 Jenene McGonigal and Family  
 1569 Martingale Ct.  
 Carlsbad, CA 92011  
 --  
 Jenene McGonigal

(858) 229-2610

**Response to Letter R-16****Jenene McGonigal**

**R-16-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topics raised in this comment were analyzed under the PEIR. Also, please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 50.02dB, and its future condition without the Proposed Project is estimated to be 50.66dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 51.69dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-17**

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**From:** sandi blake <sandra.blake@gmail.com>  
**Sent:** Wednesday, June 27, 2018 2:55 PM  
**To:** LUEG, PalomarMP  
**Cc:** council@carlsbadca.gov  
**Subject:** Palomar Airport...  
**Categories:** CRQ Saved

To whom it may concern,

Please choose the "No Build" option and do not expand the Palomar Airport.

Thank you,

Paul and Sandra Blake  
4783 Flying Cloud Way  
Carlsbad, California

} R-17-1



**Response to Letter R-17****Paul and Sandra Blake****R-17-1** The comment does not provide input related to the recirculated Draft PEIR subjects.

However, because the commenter previously expressed concerns of aircraft-related noise during the Notice of Preparation review period (February 29, 2016 for 30 days), the commenter's provided location was included for staff to further study or analyze the noted noise concerns. As such, County staff researched the location provided and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 41.04dB, and its future condition without the Proposed Project is estimated to be 41.45dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 43.25dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter R-18

**From:** Robt Carter <bobcarter43@yahoo.com>  
**Sent:** Friday, June 29, 2018 9:50 AM  
**To:** Robt Carter; council@carlsbadca.gov; scott.chadwick@carlsbadca.gov; LUEG, PalomarMP  
**Subject:** Re: CRQ Airport Meeting on June 19

On Wednesday, June 27, 2018, 10:38:38 PM PDT, Robt Carter <bobcarter43@yahoo.com> wrote:

Hi, my name is Bob Carter and I have a few concerns about the proposed CRQ master plan. I am not an expert in environmental issues but did live next to (three blocks away) the LA airport for 20 years so have some first hand experience with noise pollution, air pollution and traffic congestion around airports. I am a licensed pilot and have also spent over 40 years working in the airline industry.

During the questions and answer session, Mr. Paul Hook said that his company's (Cal Pacific Airlines ) aircraft omit "zero smoke" and "zero emissions". He said that the planned aircraft , the Embraer 170 and 145 fell into this category. Being somewhat skeptical I looked up the engines specifications for the Embraer 170 and it does emit both smoke and emissions. The GE engine most Embraer 170's use is the GE CF34-8-E. While this engine meets ICAO CAEP stage 6 emission standards and ICAO chop 4 noise standards, that does not mean that their are "no emissions and zero smoke". I used the original Cal Pacific Airlines aircraft number N760CP for my research.

It does not make sense that large jet engines emit no smoke, or emissions nor noise. There is obviously combustion and thus exhaust and noise. Mr. Hook's comment is obviously a inaccurate.

Given that noise and air pollution were two top issues during the meeting I think the record should show the actual incremental smokc and emissions which can be found on linc via GOOGLE search by engine type (see above). In addition, one must wonder how an accurate an upfront Environmental Impact Report (EIR) is if aircraft types, flight schedules, number of aircraft are not known. When I asked the panel during the Q @ A, they agreed that this is indeed a problem.

During the meeting, the presenters (Kaplan, Kirsch, Rockwell) showed a number of examples where they claimed that citizens and airport authorities found mutually acceptable solutions to noise and emission problems. One of the examples of such a "success" was the move from the old Denver Stapleton Airport to the new DIA airport, which is approximately 17 miles due East or 19 minutes of driving with no traffic and 45 minutes with heavy rush hour traffic. What was **not mentioned** was the **prime reason** for the move and that was the fact that the Stapleton runways were too close together to operate parallel simultaneous take off and or ILS landings because the runways were too close together. During bad weather, this limitation caused significant flight delays with aircraft circling for extended periods of time waiting for their time to make the final ILS approach to only one active runway. . This was the primary reason for the new airport construction, not noise or air pollution. Stapleton did not have enough land to expand the runways to meet safety requirements. I say this was a misleading example of stake holders finding a mutually acceptable solution.

Mr. Kirsch also did not mention the fact that the Santa Monica Airport has plans to close as a result of citizens concerns over safety, noise pollution, and air quality. He also did not mention that LAX has had to buy out at great expense hundreds of homes around the airport property because of noise, pollution and safety concerns. Also not mentioned were the constant complaints of citizens of Newport Beach over noise at the John Wayne airport. Not mentioned were actual air crashes at LAX and night time operational constraints (landing from the west). In addition, many regional airports have closed in the past two years as airlines have pulled out of them due to a lack of traffic volume.

R-18-1

It was also stated that moving from a "D2 Airport" classification to a "D3 airport" represent "no new uses to the current airport plan". This is a stretch given the fact that the CUP defined CRQ as a "General Aviation Airport" which traditionally meant small private aircraft. The Embraer 170's are not small private aircraft. In fact, the current runway needs an extension for safe operations with a full load of 70 passengers. This is a "New Use" and is a violation of the original CUP terms. This reclassification is a major change to the agreed to historic use of the airport. The historic context of CRQ was that it was to remain a small "General Aviation Airport". The proposed 500 ft eastern extension is being sold as a "safety" issue. Ironically, this proposed 500 feet extension is just enough additional runway for an Embraer 170 to get off the ground with 70 passengers - a full load. This appears to be an expensive move to allow a specific airline to operate their older and larger 70 passenger jets. If an airline airlines was to buy newer more expensive jet aircraft with more power, this extension would not be necessary.

R-I8-1  
cont.

In closing, I want to say that I just returned from a 5 day trip out of the San Diego airport. When I got into my car that was parked at an airport parking lot, I turned on my windshield wipers, sprayed them with the soap, and looked at the black grim that was produced on either side of the windshield. This black dust was all over my car. Yes, this is the impact of having high performance jet operations. While much cleaner than older jet engines, air pollution is still an unfortunate reality. Do the citizens of Carlsbad really want this dirty gritty air covering their city? I suspect the answer is no. I say, let them vote on it.

R-I8-2

The question I ask is what is the compelling need to expand airline operations at CRQ when we already have a fine airport less than 45 minutes away that serves hundreds of destinations. This is like Torrance wanting their own airport to compete with LAX. For those saying that they will save time commuting to the San Diego Airport, that is not really true as CRQ will only serve 4 original destinations and we know that those four destinations will not meet the needs of the general flying public. Lindbergh Field will still be used for the majority of the traveling public. Cal Jet Elite trimmed their flights from two a day to 9 weekly flights prior to stopping operations.

R-I8-3

Here are several suggestions: 1. Offer the citizens a "No airport Expansion" vote in a special election. 2. Since the Coaster already operates from Carlsbad to the San Diego Santa Fe station with every 15 minute bus connections to the San Diego airport, promote its usage. 3. Promote UBER which charges only \$45.00 one way to Lindbergh Field. It is door to door, operates 24 hours a day, and eliminates the daily parking fees.

R-I8-4

The prime promoter, County Supervisor Bill Horn is termed out later this year. Promote a vote for a new Supervisor that lives in Carlsbad that is against this unnecessary and costly airport expansion. Carlsbad leadership has to decide if it wants to be sensitive to its citizens needs for a quiet high quality bedroom community or cater to a small group of business interests that want expansion, congestion, noise pollution, and air pollution all in the name of progress.

Thanks for listening,

Robert Carter  
bobcarter43@yahoo.com

**Response to Letter R-18****Robert Carter**

**R-18-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**R-18-2** This comment discusses that soot could be presumably generated by aircraft, and the comment does not provide specific input related to the recirculated Draft PEIR subjects. While soot is a byproduct of fuel combustion, it is considered a form of fine particulate matter, which was studied and analyzed as part of the PEIR and Air Quality Impact Technical Report. The PEIR concludes that the Master Plan Update would not result in a significant air quality impact. No changes to the PEIR have been made in response to this comment.

**R-18-3** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment pertains to commercial airline activity. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the project.

**R-18-4** The comment does not provide input related to the recirculated Draft PEIR subjects. Please refer to **Master Response 5 (Airport Expansion / Public Vote)**, for a discussion of the term airport "expansion." Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-19**

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**From:** Joyce Hassell <chassell@roadrunner.com>  
**Sent:** Saturday, June 30, 2018 10:53 AM  
**To:** LUEG, PalomarMP  
**Subject:** Flights

To Whom It May Concern,

I would love to see the airport to have flights to Phoenix, it is so much more user friendly than Sa Diego Airport. I had a family issue and left from Carlsbad, and was able to connect in Phoenix to Chicago. It was stress free, please allow usage of our airport!



R-19-1

Sincerely,

Joyce Hassell

**Response to Letter R-19****Joyce Hassell**

- R-19-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-I10**

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**From:** John Harelson <jharelson@bankendeavor.com>  
**Sent:** Tuesday, July 03, 2018 4:26 PM  
**To:** LUEG, PalomarMP  
**Subject:** please include me as a strong support of the Palomar Airport Master Plan

Cynthia – I am a Carlsbad resident and my office is located here. I am a strong supporter of the airport and its development.

Please keep me in mind if you ever need pro-attendees at a public forum. Please let me know of any public events that I can attend.

R-I10-1

Thanks!  
JH

Respectfully,

John C Harelson  
SVP, Endeavor Bank  
6183 Paseo Del Norte, Suite 260  
Carlsbad, CA 92011  
619-227-2939  
[www.bankendeavor.com](http://www.bankendeavor.com)

*"Energy & persistence conquer all things"*  
*~Benjamin Franklin*

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**Response to Letter R-I10****John Harelson**

- R-I10-1** This comment states the commenter's general support for the Proposed Project. The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.



**Comment Letter R-111**

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**From:** P Gray <pgsustainable@gmail.com>  
**Sent:** Thursday, July 05, 2018 2:09 PM  
**To:** LUEG, PalomarMP  
**Subject:** Low, dangerous, and noisy flights

Hi,

I am a long time homeowner living in the hills East of Palomar Airport. Overflights have recently increased in number and create dangerously low flights and generate noise directly over my home.

This hill is at 800' and pilots often take a shortcut directly overhead at maybe 100-200' above my roof and *not* on the established flight path. Most are landing.

Controllers should enforce the 1000' ILS glide path which goes over commercial neighborhoods. Planes (Especially Jets) should not impact residential areas with noise pollution and a possible safety hazard.

R-111-1

Thank you for extending the PEIR.

Paul Gray

--  
Paul Gray  
T.P.W.  
760 809 7534

**Response to Letter R-I11****Paul Gray**

- R-I11-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topics raised in this comment were analyzed under the PEIR. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 41.56dB, and its future condition without the Proposed Project is estimated to be 43.39dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 43.61dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-112**

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**From:** Lorraine Bell <ljb@bell.com>  
**Sent:** Monday, July 09, 2018 12:15 PM  
**To:** LUEG, PalomarMP  
**Cc:** jaquilar@denverpost.com  
**Subject:** Wondering about the facility in CA that's handling the software certification? San Diego or Sacramento?

NEWS  
 COLORADO NEWS  
 COLORADO WILDFIRES

## SuperTanker 747 required to fly through more hoops before joining the fight against Colorado's wildfires

Company signed a contract with Colorado but needs fed approval to take to skies



Joe Amon, The Denver Post

Global SuperTanker Services LLC's Boeing 747-400 firefighting Supertanker, the world's largest firefighting plane, sitting on the tarmac in Colorado Springs June 13, 2018.

R-112-1

By JOHN AGUILAR | jaguilard@denverpost.com | The Denver Post  
July 8, 2018 at 6:00 am

Perhaps the biggest obstacles between Colorado’s wildfires and a plane that can drop nearly 20,000 gallons of water at a time?

A software install and Uncle Sam’s seal of approval.

Despite state fire officials recently signing a contract with Global SuperTanker ServicesLLC to use its Colorado Springs-based Boeing 747 — a former passenger jet retrofitted to carry 19,200 gallons of water or retardant and dispense it in a matter of seconds — the company needs the federal government’s blessing before it can fly fires in the state.

That’s because most wildfires are fought on an interagency basis by multiple entities — state, federal and local — and the landscape itself is a mosaic of property held privately or overseen by the state or federal government.

“We need the carding process to be completed before we can be called on by the state of Colorado, or other entities that would need our services,” Global SuperTanker CEO Jim Wheeler said Friday.

Carding — industry nomenclature for the federal government’s approval process — is currently held up by an onboard software upgrade that the U.S. Forest Service requires the giant plane to have. Wheeler said the necessary software is a “data collection system” that reports on the “parameters of operations of the aircraft.”

“While we believe our system is up to standards and in no way impacts the successful operation or safety of the aircraft, we are working diligently with (the forest service) and the vendor to resolve any issues they have,” he said.

**RELATED ARTICLES**

- **JULY 6, 2018**Colorado could soon add 747 SuperTanker to wildfire-fighting arsenal
- **JUNE 14, 2018**Wildfires are burning across Colorado. So why is one of the world’s largest air tankers grounded in Colorado Springs?
- **JULY 6, 2018**Colorado’s worsening drought could make 200,000-acre wildfire seasons more commonplace
- **JULY 6, 2018**Colorado wildfire update: Heavy rains tame Spring Creek fire; the latest on Colorado blazes
- **JULY 5, 2018**Spring Creek fire “tsunami” sweeps over subdivision, raising home toll to 251  
And as to when the Global SuperTanker, which is by far the world’s largest-capacity firefighting aircraft, might start flying in Colorado is not known. Wheeler said he hopes the carding process is completed “very soon, but (we) do not have a specific timetable.”

He did say he thought it likely that the plane, dubbed the Spirit of John Muir, would be in use in the state before the end of the summer. It is currently going through its software certification at McClellan-Palomar Airport in Sacramento.

R-I12-1  
cont.

**Comment Letter R-112  
Exhibit**

**From:** John Aguilar <jaguilar@denverpost.com>  
**Sent:** Monday, July 09, 2018 12:55 PM  
**To:** Lorraine Bell  
**Cc:** LUEG, PalomarMP  
**Subject:** Re: Wondering about the facility in CA that's handling the software certification? San Diego or Sacramento?

Fixed. Thanks.

On Mon, Jul 9, 2018 at 1:35 PM, John Aguilar <jaguilar@denverpost.com> wrote:

My apologies. It's Sacramento McClellan Airport. I am getting it corrected now. I fell victim to the highly unlikely scenario that Calif has two airports named McClellan.

On Mon, Jul 9, 2018 at 1:15 PM, Lorraine Bell <ljb@bell.com> wrote:

**NEWS**  
**COLORADO NEWS**  
**COLORADO WILDFIRES**

## **SuperTanker 747 required to fly through more hoops before joining the fight against Colorado's wildfires**

Company signed a contract with Colorado but needs fed approval to take to skies



Joe Aron, The Denver Post

Global SuperTanker Services LLC's Boeing 747-400 firefighting Supertanker, the world's largest firefighting plane, sitting on the tarmac in Colorado Springs June 13, 2018.

**Comment Letter R-112  
Exhibit**

By JOHN AGUILAR | jaguilard@denverpost.com | The Denver Post  
July 8, 2018 at 6:00 am

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**RELATED ARTICLES**

- **JULY 6, 2018**Colorado could soon add 747 SuperTanker to wildfire-fighting arsenal
- **JUNE 14, 2018**Wildfires are burning across Colorado. So why is one of the world’s largest air tankers grounded in Colorado Springs?
- **JULY 6, 2018**Colorado’s worsening drought could make 200,000-acre wildfire seasons more commonplace
- **JULY 6, 2018**Colorado wildfire update: Heavy rains tame Spring Creek fire; the latest on Colorado blazes



**Comment Letter R-112  
Exhibit****JULY 5, 2018 Spring Creek fire “tsunami” sweeps over subdivision, raising home toll to 251**

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He did say he thought it likely that the plane, dubbed the Spirit of John Muir, would be in use in the state before the end of the summer. It is currently going through its software certification at McClellan-Palomar Airport in Sacramento.

--

John Aguilar

*Reporter***The Denver Post**5990 Washington St.  
Denver, CO 80216

O: 303-954-1695

M: 720-273-6486

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John Aguilar

*Reporter***The Denver Post**5990 Washington St.  
Denver, CO 80216

O: 303-954-1695

M: 720-273-6486

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**Response to Letter R-I12**

**Lorraine Bell**

- R-I12-1**      The comment provides an article related to McClellan Airport located in Sacramento, California. The article mistakenly referenced McClellan-Palomar Airport. The Denver Post’s response and republication is included in this comment. No changes to the PEIR have been made, and no further response is required.



**Comment Letter R-113**

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**From:** SAMUEL HERSHEY <samuelshe@me.com>  
**Sent:** Tuesday, July 10, 2018 9:51 AM  
**To:** LUEG, PalomarMP  
**Subject:** Palomar Airport expansion and updates

Hello,

I am a local resident and I have two concerns:

1. Can planes approaching the airport runways please take the route of Escondido aligned with Palomar Airport Rd to reach the Palomar Airport. Sometimes planes fly overhead of our house (So. Melrose and Sycamore) and we are afraid that some time there could be a crash, also some are very low and very noise, if flights are over Palomar Airport Rd. at least there is an emergency option if a flight should have to land earlier than planned at the airport.
2. Please proceed with all updates to Palomar airport, we desperately need a larger carrier like United to access air transportation from this location rather than driving to LA or San Diego!

} R-113-1  
 } R-113-2

Thank you,

Sam Hershey  
 760-802-5242  
 1572 Pearl Heights Rd.  
 Vista, CA 92081

**Response to Letter R-I13****Sam Hershey**

- R-I13-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Aircraft in flight are strictly under the jurisdiction of the FAA. Also, please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 44.79dB, and its future condition without the Proposed Project is estimated to be 45.68dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 45.97dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- R-I13-2** This comment states support for the proposed project and stresses that proximity to air transportation is important. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PEIR, the County appreciates the commenters' support and will include this comment in the public record to be considered by the County Board of Supervisors prior to final decision.

**Comment Letter R-114**

**From:** Donna Holloway <donnaholloway@yahoo.com>  
**Sent:** Tuesday, July 10, 2018 4:44 PM  
**To:** LUEG, PalomarMP  
**Subject:** Airport Noise

Dear Ms. Cynthia Curtis,

When my family and I moved to Carlsbad eight years ago, off of Aviara, we were told the Palomar Airport planes and helicopters were suppose to follow a flight path, over the retail portion out to the ocean and not go over the residential areas, however, I have noticed increased air traffic, which has led to increased noise. I am unsure if those paths are no longer enforced, as there are many planes going over the residential areas in the past few months. We have to pause television programs, conversations, etc., while inside our home, until the plane or helicopter passes. We love our home, but it's becoming increasingly difficult to enjoy living here. Would you be able to offer any insight? Thank you.

R-114-1

Sincerely,  
Donna Holloway  
donnaholloway@yahoo.com  
Shorepoint Subdivision Homeowner

**Response to Letter R-I14****Donna Holloway**

- R-I14-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Aircraft noise was studied and discussed in PEIR Section 2.4 Noise, but please note that aircraft in flight are strictly under the jurisdiction of the FAA. Also refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. No changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-I15**

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**From:** Carla levy <carla@carlalevy.org>  
**Sent:** Wednesday, July 11, 2018 7:37 AM  
**To:** LUEG, PalomarMP  
**Subject:** airport expansion

How many more planes per day are expected with the expansion? Living within a mile of the airport, what percentage do you expect the values of our property to go down?  
Thank you,  
Carla Levy

R-I15-1

**Response to Letter R-I15**

**Carla Levy**

- R-I15-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-116**

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**From:** Dave Urban <urban@pestgon.com>  
**Sent:** Tuesday, July 17, 2018 5:58 PM  
**To:** LUEG, PalomarMP

What are they going to do to enforce the flight approach and departure lines. Many planes are deviating from it. They should be somehow controlled or penalized for violating the airspace. Also is there going to be a provision for increased noise impact on neighborhoods. Will they develop a plan to improve the sound protection in the homes that are in the flight plan.

R-116-1

Dave Urban  
Pestgon Termite  
Cell: 760-801-7196  
Urban@pestgon.com  
www.pestgontermite.com

**Response to Letter R-I16****Dave Urban**

- R-I16-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Also, please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.



**Comment Letter R-117**

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**From:** Bill Arsenault <billarsenault1@gmail.com>  
**Sent:** Tuesday, July 24, 2018 8:32 AM  
**To:** LUEG, PalomarMP; Clerk@carlsbadca.gov  
**Subject:** Palomar Airport Expansion

Dear Sirs:

I live at 6412 Merlin Dr. Carlsbad in the Seabright division. I cannot stress to you strong enough that we need enforcement rules for the airport. We have jet's taking off at 0600 waking us up, many especially the flight schools do NOT follow the "suggested" flight paths. I have filed numerous noise complaints spoken with Council members, Airport meetings and management. I even called the flight schools and asked them politely to not do touch and goes to the South over our homes, especially at 2200 hours!

R-117-1

Please move to place restrictions on take offs times, and make the noise filing complaint system have some teeth.  
Thank you for your time.  
William Arsenault

**Response to Letter R-117****William Arsenault**

- R-117-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Also, please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 54.85dB, and its future condition without the Proposed Project is estimated to be 56.03dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 56.69dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-118**

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**From:** Joyce Hassell <chassell@roadrunner.com>  
**Sent:** Friday, July 27, 2018 6:16 PM  
**To:** LUEG, PalomarMP  
**Subject:** Want to fly out of Carlsbad

I truly hope that North County will be able to fly out of Carlsbad, more convenient and a lot of less stress, Orange County does it with the rules not to upset residents and it works! Thank you 😊🙏

R-118-1

Sent from my iPhone

**Response to Letter R-I18****Joyce Hassell**

- R-I18-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment pertains to commercial airline activity. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-119**

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**From:** Ray Pili <rpili2001@yahoo.com>  
**Sent:** Saturday, July 28, 2018 12:26 PM  
**To:** LUEG, PalomarMP; Carlsbad City Council  
**Subject:** Palomar airport expansion

Hello.

I want to provide you my opinion that there should be no additional airport expansion at Palomar airport.

There is no demand for a regional airline at Palomar. Every small airline that attempts fails.

Thank you

Ray Pili  
760-889-3644

} R-119-1

Sent from my iPhone

**Response to Letter R-I19****Ray Pili**

- R-I19-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-I20**

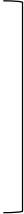
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**From:** Sterling C. Johnson <sterling@exalen.com>  
**Sent:** Monday, July 30, 2018 4:43 PM  
**To:** LUEG, PalomarMP  
**Cc:** Council@carlsbadca.gov  
**Subject:** Airport Noise - The Complainers Are TOO NOISY

To Whom It May Concern,

I am a little tired of the "noise" and false statements circulated by those who are concerned about the Carlsbad Airport noise and potential expansion. I have lived in the Aviara neighborhood of Carlsbad for 17 years and love it. The noise caused by airplanes is minimal. Noise was far worse than Carlsbad on my family farm in Northern California during the 1950's. So what if we have a few planes making some noise from time to time. Personally, I miss taking flights to LAX to connect to the rest of the world. The I 5 traffic makes getting to San Diego and other airports a health and safety hazard for us all.  
 Bottom line: Let's expand and grow and use our brains and figure out how to accommodate some air traffic.

Respectfully,  
 Sterling C. Johnson  
 Carlsbad, CA 92011  
 760-804-0110 Home



R-I20-1

**Response to Letter R-I20****Sterling Johnson**

- R-I20-1** The comment does not provide input related to the recirculated Draft PEIR subjects. The topic raised in this comment pertains to ongoing aircraft activity and the availability of commercial air service at Palomar Airport. Therefore, no changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.



**Comment Letter R-I21**

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**From:** Doris Meehan <dndinsd@icloud.com>  
**Sent:** Tuesday, July 31, 2018 9:20 PM  
**To:** LUEG, PalomarMP  
**Subject:** Palomar Airport traffic

Hello,

I live in the Shadowridge area of Vista and the amount of air traffic has increased significantly and fly very low over our homes.  
Is this being monitored?

} R-I21-1

Doris Meehan

**Response to Letter R-I21****Doris Meehan**

**R-I21-1** The comment does not provide input related to the recirculated Draft PEIR subjects. Please refer to **Master Responses 3 (Voluntary Noise Abatement Procedures) and 4 (Noise Monitors and PEIR Calculations)**. No changes to the PEIR have been made, and no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

**Comment Letter R-I22**

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**From:** Kim Kipnis <browneyedgirlkak@yahoo.com>  
**Sent:** Wednesday, August 01, 2018 9:20 PM  
**To:** LUEG, PalomarMP  
**Subject:** Why do we need a longer runway?

Hello,

I have been a resident of Carlsbad since 2006. When I travel by plane, it makes sense for me to use the Palomar Airport. and not have to drive to Lindberg Field.

When Palomar Airport was open, it briefly served the public with one airline. I would prefer to travel by airplane to see my daughter in San Jose from my local airport. I would like to see the extension of the runway to only serve commercial planes.

It doesn't make sense that North County San Diego does not have an airport which serves it's residents. I now use the train to travel to visit friends in Los Angeles and to use LAX.

Let's make Carlsbad a more renown top vacation destination We already have spectacular weather, pristine beaches, a variety of fine and casual dining restaurants, Legoland, the Flower Fields and of course the friendliest residents.

R-I22-1

Thank you for your consideration.

Kim A. Kipnis

[Sent from Yahoo Mail on Android](#)

**Response to Letter R-I22****Kim Kipnis**

- R-I22-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

**Comment Letter R-I23**

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**From:** Hope Nelson <hopen51@att.net>  
**Sent:** Thursday, August 02, 2018 8:01 AM  
**To:** LUEG, PalomarMP  
**Cc:** Council@carlsbadca.gov; clerk@carlsbadca.gov; scott.chadwick@carlsadca.gov; celia.brewer@carlsbadca.gov; jason.haber@carlsbadca.gov  
**Subject:** Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report  
**Attachments:** 2018-08-2 comments Redraft PEIR.docx

Please see attached document.

↓ R-I23-1

Cynthia Curtis, Environmental Planning Manager  
County of San Diego  
Department of Public Works  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

Re: Comments on Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report

Dear Ms. Curtis:

I respectfully submit comments on the Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report.

In the County’s Reader’s Guide to the Revised Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan Update, Page 1 of 8, you discuss CEQA reasons for recirculation of an EIR as follows:

“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 of 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).

I submit that the current document produced by the County continues to be riddled with inconsistencies, inaccuracies and simply, missed information. It clearly does not meet CEQA requirements.

Reviewing the Recirculated Portions of Draft PEIR, I request the entire document be redrafted with accurate, clear and concise information. As well, it must be recirculated with yet another



R-23-1  
cont.

R-I23-2

public comment period of a minimum of 45 days, equal to what was specified for the most recent Redraft.

For easy reference regarding specifics, please refer to comments found in the City of Carlsbad Comments on Recirculated Portions of Draft PEIR. The items the City of Carlsbad has listed are numerous and should not need to be restated again here.

To be absolutely clear, the public deserves a well thought out document that is complete in nature and not a piecemealed document which makes full analysis and public review more challenging.

Submitted to you most sincerely,  
Hope Nelson  
Carlsbad Resident  
760-804-1945



R-I23-2  
cont.

**Response to Letter R-I23****Hope Nelson**

**R-I23-1** This comment includes introductory remarks and excerpts from the County's Recirculation Reader's Guide. No response is required.

**R-I23-2** This comment states that the recirculated portions of the Draft PEIR contains inconsistencies, inaccuracies, and incorrect information. However, the comment does not identify specific items for consideration.

The comment also requests for the recirculated portions of the Draft PEIR to be recirculated for another 45-day comment period. However, the comment does not provide specific information demonstrating a need to conduct another public review period.

Lastly, the comment requests for the County to consider the City of Carlsbad's comment letter regarding the recirculated portions of the Draft PEIR. Please refer to **Response to Comment Letter R-L3**.

No changes to the PEIR have been made in response to this comment.