

Comment Letter I76

From: rich breyer <rpbreyer@gmail.com>
Sent: Monday, March 19, 2018 4:51 PM
To: LUEG, PalomarMP
Cc: Celia Brewer; Manager; clerk@carlsbadca.gov; council@carlsbadca.gov
Subject: My First Email sent earlier may have been missing exhibits.
Attachments: Airport Study - DPEIR Comments 2018.docx

I76-1

Dear Cynthia Curtis, I sent you my comments earlier today but the file may not have included the exhibits. I will try to send this version. I also sent it by mail too.

Thanks for your time.

Rich Breyer
5213 Milton Rd.
Carlsbad CA 92008

McClellan-Palomar Airport PEIR & Master Plan Feedback

Dear Cynthia Curtis et al,

I would like to share my comments and questions on the Draft Programmatic Environmental Impact Report (DPEIR). I feel that the use of the Programmatic EIR method allows the County to not have to fully develop the impacts to our community. The use of the PEIR enables the County to push this project through, without properly addressing the full environmental impacts. Also, given that the document is so voluminous (3500 pages), the review time of 45 days was too brief, again not allowing the public have enough time to fully vet the problems in the document.

Please find my comments and questions below.

I76-1
cont.

DEIR Traffic Study Comments

This is a preliminary review the traffic analysis for the Palomar Airport General Plan update proposed by the County of San Diego.

General Background

Based on SB 743, traffic impacts studies under CEQA should include analysis of transportation impacts that promote the reduction of greenhouse gas (GHG) emissions. Typically, this means that a traffic impact analysis needs to evaluate the generation of automobile trips and the vehicle miles of travel or VMT, created by a project (in this case the expansion of the airport), and the associated GHG emissions. To off-set these impacts, the creation of multimodal networks, modification of the land use or other associated mitigation strategies must be included in the CEQA analysis. The traffic study and DEIR fail to consider methods to off-set the VMT creation and GHG reduction.

Although the traffic study does include the estimated VMT created by the project, the trip length value of 6.25 miles is well below a reasonable value that would support any of the expansion scenarios. A detailed analysis should be completed on actual/current travel distances. In order to support the PAL-2 expansion, trips to the airport would need to come from much further away and the trip lengths would be much greater, thus a higher VMT and GHG creation.

Intuitively, the traffic study is fundamental flawed, as evidenced by a typical Carlsbad resident's personal experience driving in the area during the AM or PM peak timeframes.

I76-2

Traffic Impact Analysis Comments

- | | |
|---|-------|
| 1. Traffic counts were done for a single day only, on June 21, 2017. June 21, 2017 is also when peak traffic volumes are lower do to summer and schools not in session. This is an inaccurate method for traffic counting and due to the date used, likely substantially understates the true traffic volumes. Other sources such as the SANDAG model or City of Carlsbad traffic counts should be used for the traffic study in all areas or at a minimum, conduct a weekly count to determine the existing traffic volumes. Lastly road construction in the area was under way and this disturbs traffic patterns in the study areas. | I76-3 |
| 2. In general, mid-block roadway level of service (LOS) values will be at a high, typically A, B or C, since the traffic volumes for each of the roadways is controlled by a traffic signal. For the traffic analysis mid-blocks are used to evaluate existing LOS and every roadway segment in the traffic study have been listed as LOS A. Providing this information does not add any value to the traffic study. | I76-4 |
| 3. In the project vicinity all the local roads are managed through traffic control signals and the appropriate method of analysis for all intersections and detailed signal analysis is required. The traffic study utilized the ICU method to determine the existing LOS. The intersection capacity utilization (ICU) is an antiquated analysis method. Since, the ICU was used the existing LOS is understated and thus the overall traffic impact associated with the airport is understated as well. That in turn, explains why there is only two project impacts and the proposed mitigation measures are to pay a "Fair Share" contribution for signal improvements on Palomar Airport Road. The 2010 HCM should be used for both the analysis of the existing and future traffic at each of the intersections included in the study. | I76-5 |
| 4. Traffic accessing the Airport will be concentrated at the signalized intersection of Palomar Airport Road and Yarrow Drive. A detailed analysis is needed at this location that includes the engineering features of the intersection. Mitigation in the form of traffic improvements will be needed at this intersection. At a minimum extensions of the existing turn pockets will be likely along with other needed improvements not detailed in the DPEIR. This has been overlooked and not included in the traffic study. | I76-6 |
| 5. The traffic distribution included in the study shows traffic utilizing I-5 to access the local street interchanges in Carlsbad. As I-5 is currently operating at LOS E and F during peak hours, analysis of I-5 is needed as part of the traffic study. | I76-7 |

6. During the Study Scenarios Traffic conditions shown below. Large portions of El Camino Real and Cannon Road and Faraday Rd were under construction. This would change existing traffic patterns therefore making the numbers used in the study not valid. 176-8
7. The County has not addressed the major developments and the added traffic that will directly affect the roadways near and around the Airport. These projects include but not limited to, Uptown Bressi Ranch, Via Sat Campus, Marja Acres Development and various new buildings on Innovation Way and Palomar Airport Rd. There is also a newly approved 400 apartments slated for just south of Palomar Airport Rd. and Aviara Pkwy. There is also various 3 story apartment complexes scheduled for construction in the upcoming years. 176-9
8. Why is there no traffic data on rental cars, Uber/Lyft and taxi service that use and will increase if this expansion is allowed to move forward? 176-10
9. I have included below 2 attachments that need to be corrected. Both have errors that need to be corrected and that data needs to be included in your revised DPEIR for circulation and further review. 176-11
10. Why are the future impacts to I-5 Freeway that this Airport expansion will have not addressed in this DPEIR? 176-12

Chapter 2 Significant Environmental Effects

Table 2.5-1. Trip Generation

Land Use	Size	Daily Trip Ends (ADT)		AM Peak Hour				PM Peak Hour			
		Rate ^a	Volume	% of ADT ^b	In:Out Split	Volume In	Volume Out	% of ADT ^b	In:Out Split	Volume In	Volume Out
Near-Term Conditions (2020)											
PAL 1	168 ENP	2.67 /ENP	449	5.0%	6:4	14	9	6.0%	5:5	14	13
PAL 2	316 ENP	2.67 /ENP	844	5.0%	6:4	26	17	6.0%	5:5	26	25
Long-Term Conditions (2036)											
PAL 1	835 ENP	2.67 /ENP	2,230	5.0%	6:4	67	45	6.0%	5:5	67	67
PAL 2	1,575 ENP	2.67 /ENP	2,403	5.0%	6:4	127	84	6.0%	5:5	127	126

Note: ENP = enplanements

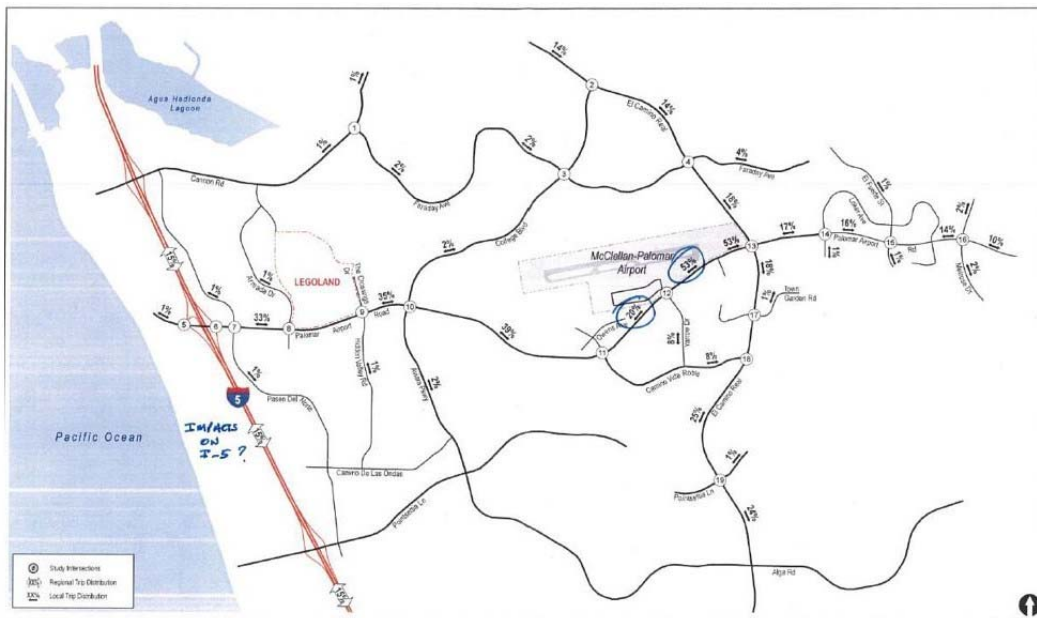
Source: Transportation Impact Analysis Technical Report (LLG 2017), Appendix E

a. Trip generation rates obtained from "Airport Trip Generation" (ITE Journal, 1998) and San Luis Obispo County Regional Airport Master Plan Update, Final EA/EIR, July 2006.

b. Peak hour percentages obtained from SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

ERROR

11.



Source: LLG 2017
McClellan-Palomar Airport Master Plan
Program EIR

Project Traffic Distribution
Figure 2.5-2

12.

I76-14

13. 10 2.2.5 Study Scenarios Traffic conditions are analyzed in this section for the following study scenarios. In addition, all scenarios “plus project” include two project alternatives with different enplanement projections (i.e., departing passengers).

- Existing Conditions: 2016
- Existing Conditions Plus Project
- Near-Term Conditions (i.e., existing + cumulative): 20206
- Near-Term Conditions Plus Project
- Long-Term Conditions: 20367
- Long-Term Conditions Plus Project

I76-15

14. In conclusion, the traffic study underestimates the existing traffic volumes and does not provide a proper analysis of the traffic impacts associated with the proposed airport expansion project. The traffic study should be re-done to be more accurate and comprehensive.

I76-16

15. What is the Purpose and Need of this airport expansion?
16. The true Purpose and Need and not clearly defined in this DPEIR.
17. The DPEIR is very general and does little to evaluate the proposed airport expansion. More work to define the Purpose and Need for this Airport expansion is needed.
18. Why doesn't the County take the time to analyze the project's environmental impacts to its entirety?
19. What benefit to the citizens of San Diego County get from a Programmatic EIR document?
20. What benefits to the citizens of SD County if this DPEIR is only a broad overlook of possible environmental impacts?
21. Why doesn't the County take closer looks at the problems that could potentially affect this project from being built?
22. This DPEIR should clearly define the projects **Purpose and Need**. CEQA makes it clear that the **purpose and need** must be clearly defined. By making this DPEIR document it allows the County to not be transparent and avoid the tough questions that need to be answered. Why did the County make the decision to draft a Programmatic EIR instead of normal EIR Document?
23. Why can't the County provide and analyze the exact scope, scale, and timing for implementation of each proposed element?
24. Why is the County not defining the project-specific information at this time?
25. Why hasn't the County not fully developed the General Plan and DEIR to quantify exact impacts?
26. Why didn't the County setup noise monitors around the airport to properly monitor the existing aircraft noise?
27. Nearby Sensitive Receptors Figure 2.4-1 map is not accurately displaying the effected sensitive receptors. It is missing existing schools, daycare centers, churches and long-term healthcare centers and needs to be updated with all sensitive receptors included.

I76-17

I76-18

- | | | |
|--|--|-----------------|
| <p>28. The expansion of the airport will allow larger jets with larger loads to take off and land. These larger jets will need to use more thrust creating more significant noise levels. This will have significant impacts to sensitive receptors in a larger radius around the airport. The DPEIR does not properly address this issue. The County must be transparent and do proper noise testing to accurately profile the noise impacts that this airport expansion will cause. When will these noise studies going to be performed?</p> | | 176-18
cont. |
| <p>29. Soil testing? Why wasn't there any soil testing done for Aerially Deposited Lead Soil (ADL Soil)?</p> | | 176-19 |
| <p>30. For 70 years airplanes that use leaded fuel have and continue to use leaded fuel into and out of the airport. There should be testing and a report of the levels and type of ADL Soil onsite. Why wasn't this testing done?</p> | | |
| <p>31. To haul off ADL Soil it can run as much as \$500.00 / cubic Yard.</p> | | |
| <p>32. Concerns that the piles being placed through the existing landfill (dump) will allow a path for ground water to easily pass deeper into the soil and possibly contaminating the aquifers below. Drilling or driving piles through the existing landfill is not an expectable method, due to the possibility of hazardous materials found in the landfill soil to migrate deeper into the ground. Without proper soil tests, the County's proposed plan, could have serious environmental impacts to water quality. How does the County expect to get clearance to drive or drill pile through an existing landfill that most likely contains hazardous waste?</p> | | 176-20 |
| <p>33. How will the County's proposed piles be placed to ensure that this easy pathway for water to travel is sealed off properly?</p> | | 176-21 |
| <p>34. How long will the Counties airport service be shutdown during the pile driving stage?</p> | | 176-22 |
| <p>35. How much potential revenue will be lost during the building phase of the Airport expansion?</p> | | |
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| <p>37. Why didn't the County provide a Risk Register for this project?</p> | | 176-23 |
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| <p>39. Viable Vernal Pools require being in an active drainage path. How will the Vernal Pools be mitigated? This DPEIR does not show where they would be located it only speaks in generalities. No clear guidance is given.</p> | | |
| <p>40. There is no mention of soil testing under the existing fuel storage tanks. Over the years I am sure that there have been accidents and spills that could have contaminated the surrounding soil.</p> | | 176-24 |
| <p>41. If there are buried fuel tanks there is no mention in the DPEIR that any tests were done to see if the existing tanks have been leaking. The County should have this information and it needs to be put in the DPEIR.</p> | | 176-25 |

42. Piles through existing landfill. As noted there was an underground fire that burned for over 6 months in the area that is proposed to have piles driven through it. Why wasn't soil cores done to identify what the property of the soil is?

176-25
cont.

43. How will the methane gases present in the existing landfill be captured and kept from escaping?


44. Why is there no geotechnical report included in the DPEIR?

176-26

Thank you for your time and I expect with all the comments, that it will take some time to properly address them all. After reading the comments provided by the City of Carlsbad legal team, I assume that you will also be recirculating the amended DPEIR to the public for an additional review.

176-27

Sincerely,



Richard Breyer
5213 Milton Rd.
Carlsbad, CA 92008

**Comment Letter I76
Exhibit**

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Subject: McClellan-Palomar Airport PEIR & Master Plan Comments
Attachments: Fig 2.5-2 and Table 2,5-1.pdf

McClellan-Palomar Airport PEIR & Master Plan Feedback

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11. See Table 2.5-1 Trip Generation attached
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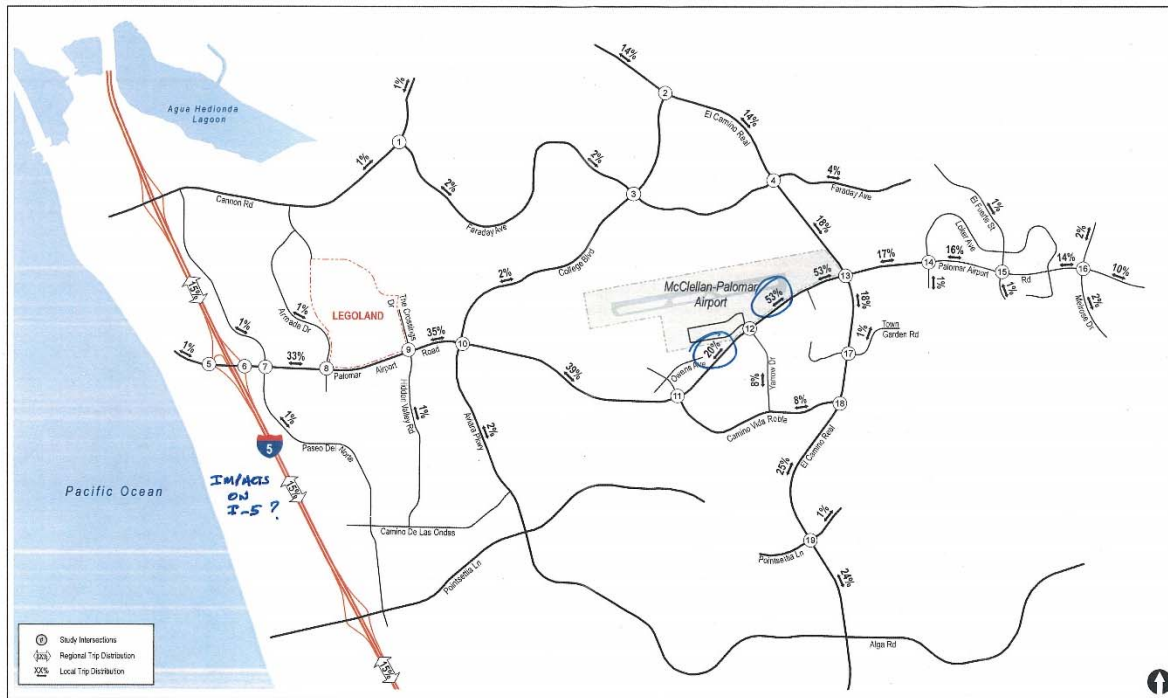
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Sincerely,

Richard Breyer
5213 Milton Rd.
Carlsbad, CA 92008

**Comment Letter I76
Exhibit**



Source: LLG 2017

McClellan-Palomar Airport Master Plan
Program EIR

**Project Traffic Distribution
Figure 2.5-2**

**Comment Letter I76
Exhibit**

Chapter 2 Significant Environmental Effects

Table 2.5-1. Trip Generation

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Note: ENP = enplanements

Source: Transportation Impact Analysis Technical Report (LLG 2017), Appendix E

a. Trip generation rates obtained from "Airport Trip Generation" (ITE Journal, 1998) and San Luis Obispo County Regional Airport Master Plan Update, Final EA/EIR, July 2006.

b. Peak hour percentages obtained from SANDAG's (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002).

ERROR

Response to Letter I76**Richard Breyer**

On March 19, 2018 2:51 p.m., the County received an email from this commenter, Mr. Richard Breyer, with comments embedded in the email and containing two map attachments. Two hours later at 4:51 p.m., Mr. Breyer resubmitted his comments attaching them as a Microsoft Word file. Both submittals are included in the record, but because the latter submittal was intended to serve as a corrected replacement version, these County responses are in reference to the March 19, 2018 4:51p.m. submittal.

I76-1 The County acknowledges these introductory comments; however, they do 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.

I76-2 This comment states that 6.25 VMT is below a reasonable value that would support any of the Master Plan Update alternatives. The commenter believes a detailed analysis should be completed on actual/current travel distances, and trips to the airport would need to come from much further away and the trip lengths would be much greater, thus a higher VMT and GHG creation.

While this comment discuss the traffic conditions, the intent of this comment to ensure greenhouse gas emissions are being accurately quantified and calculated for the project. As of this writing, neither the State CEQA Guidelines nor County Guidelines require VMT analysis. While the PEIR includes an estimated VMT that would potentially be generated by the Proposed Project, the traffic analysis relied on the currently adopted methods as outlined the PEIR. Furthermore, the potential increase in vehicle trips associated with the Master Plan Update was included and analyzed in the PEIR GHG analysis. As noted in the recirculated PEIR Section 3.1.5, GHG emissions resulting from the Proposed Project would result in less than significant impacts. No changes have been made to the PEIR.

I76-3 The comment requests that SANDAG's or City of Carlsbad's traffic counts should be used for the traffic analysis, or counts should be conducted for a week rather than one day. Please see **Response to Comment S3-2**. As noted in the PEIR Section 2.5.4.1 and **Response to Comment S3-2**, existing traffic conditions were obtained from the City of Carlsbad's 2016 Traffic Monitoring Program. At locations where the City has not collected data, traffic counts were conducted on June 21, 2017 consistent with City of Carlsbad, San Diego Traffic Engineers' Council (SANTEC) methodology, and with the "common rules" as set forth in Caltrans' December 2002 published guidance: Caltrans Guide for the Preparation of Traffic Impact Studies. This guidance does not require a weekly traffic count. Therefore, no changes to the PEIR have been made in response to this comment.

The comment also states that road construction was in progress that disturbed the traffic patterns in the study area. The County verified with the traffic technical expert who prepared the Transportation Impact Analysis that the level of construction in June 2017 was not significant enough to affect traffic volumes within the project's study area.

I76-4 This comment states that providing "mid-block" (i.e., roadway segment) analysis of traffic volumes does not add value to the traffic study. The Transportation Impact Analysis was conducted consistent with City of Carlsbad, San Diego Traffic Engineers' Council (SANTEC) methodology, and with the "common rules" as set forth in Caltrans' December

2002 published guidance: Caltrans Guide for the Preparation of Traffic Impact Studies. Specifically, the City of Carlsbad's Traffic Monitoring Program states that "Traffic Monitoring Programs include the collection of data for average daily traffic volumes recorded at mid-block locations...[and] the analysis of intersections and mid-block roadway segment locations allows the city to identify potential capacity problem areas where deficient operations exist or may become problematic in the future." Therefore, the use of mid-block analysis is appropriate. Therefore, no changes to the PEIR have been made in response to this comment.

- I76-5** The comment states that the 2010 Highway Capacity Manual (HCM) methodology should be used for both existing and future conditions at each of the intersections included in the Transportation Impact Analysis study. Because the roadways surrounding the airport are owned and maintained by the City of Carlsbad, the City's guidelines were followed for the traffic impact analysis. Therefore, in accordance with City guidelines, the intersection capacity utilization (ICU) method was used for the Existing and Existing + project scenarios, and the 2010 Highway Capacity Manual Methodology was used for future conditions. No changes to the PEIR have been made in response to this comment.
- I76-6** The comment states there is an oversight in the Transportation Impact Analysis study because it concluded there would no significant impacts or capacity improvements required at the intersection of Yarrow Drive/Palomar Airport Road (entrance to the airport). As shown in the data tables provided in the PEIR Section 2.5 and Transportation Impact Analysis appendices, this intersection was studied, and it was determined the intersection would result in satisfactory conditions in accordance with City of Carlsbad guidelines. Therefore, no significant impacts would occur and no mitigation is required. While this comment disagrees with the PEIR's determination, the comment does not provide evidence to refute the County's analysis. No changes to the PEIR have been made in response to this comment.
- I76-7** This comment requests analysis of Interstate 5 (I-5) as part of the PEIR traffic impact analysis. As noted in the Transportation Impact Analysis study, the City of Carlsbad uses San Diego Traffic Engineers' Council (SANTEC) criteria to determine the traffic report study area. This criteria establishes that intersections and segments should be included in the traffic study area where a project would add 50 or more peak hour trips. The proposed Master Plan Update would add less than 50 peak hour trips to I-5. Therefore, based on City guidelines and SANTEC criteria, an analysis of I-5 is not warranted. No changes to the PEIR have been made in response to this comment.
- I76-8** Please refer to **Response to Comment I76-3**. No changes to the PEIR have been made in response to this comment.
- I76-9** This comment states that development projects surrounding the Airport were not considered in the Draft PEIR's traffic analysis. To the contrary, the County did coordinate with the City of Carlsbad Planning Department to obtain a current list of nearby development projects. Table 9-1 of the PEIR's Transportation Impact Analysis lists multiple development projects that were considered and analyzed as part of the PEIR, including Robertson Ranch, ViaSat, and Bressi Ranch to name a few. These projects' traffic volumes were added to existing conditions and combined with near-term traffic volumes anticipated by the Master Plan Update. In addition, the long-term cumulative analysis conducted for the project includes SANDAG growth forecasts for the entire City of Carlsbad. Therefore, the PEIR adequately addressed surrounding development projects, and no changes to the PEIR have been made in response to this comment.

- I76-10** This comment asks why there is no traffic data specifically related to rental cars, ridesharing, or taxi service that currently use or are projected to use the Airport under the proposed Master Plan Update. The trip generation rate described in the project's Transportation Impact Analysis accounts for traffic generated by passengers, employees, and Airport operations associated with the increase in commercial enplanements. Therefore, this trip generation includes traffic generated by all types of vehicle use, including rental cars, ridesharing, and taxi service. As such, no changes to the PEIR have been made in response to this comment.
- I76-11** This comment references two attachments that are presented later in the commenter's letter. Please see **Response to Comments I76-13 and I76-14** for a discussion of these attachments, which have been included in the record as "exhibits".
- I76-12** The comment asks why impacts to the I-5 freeway are not addressed in the Draft PEIR. Please see **Response to Comment I76-7**. In addition, the on-ramps and off-ramps from Palomar Airport Road/I-5 were considered as described in Draft PEIR's Transportation Impact Analysis. As discussed in the PEIR Section 2.5, the project was found to result in less than significant impacts to the I-5 facilities. As such, no changes to the PEIR have been made in response to this comment.
- I76-13** This comment includes an image of the Draft PEIR Table 2.5-1 Trip Generation in which the PAL 2 ADT Volume is circled and marked with "error." The County agrees this is a typographical error as it was copied incorrectly from the Appendix E Transportation Impact Analysis. This corresponding table from the Transportation Impact Analysis identifies the correct ADT Volume of 4,206. The PEIR Table 2.5-1 has been corrected. As this was a typographical error, it does not change the PEIR's findings or conclusions.
- I76-14** This comment includes an image of the Draft PEIR Figure 2.5-2 Project Traffic Distribution in which the commenter circled the project's percent distributions along Palomar Airport Road on either side of Yarrow Drive. After another review of these percentages, the traffic technical expert verified the percentages are correct, and the County is unclear what error the commenter is referring to since no narrative description was provided. However, upon further review of Figure 2.5-2, additional information was added to clarify the project's percent distribution from the main entrance at Yarrow Drive (81%) and the project's percent distribution from the secondary entrance at Owens Avenue (19%). No other changes to the PEIR have been made in response to this comment.

On Figure 2.5-2, the commenter also wrote, "impacts on I-5?" Please see **Response to Comments I76-7 and I76-12**.

- I76-15** This comment identifies the various scenarios that are studied in the Draft PEIR and Transportation Impact Analysis. No question or request was provided; however, in reviewing this section the County noticed a typographical error in the section number (should be 2.5.2.5). This has been corrected in the PEIR.
- I76-16** This comment provides concluding remarks stating the PEIR does not provide a proper analysis of the traffic impacts associated with the Master Plan Update, and it states the Transportation Impact Analysis should be revised. As substantiated in the above responses to Comment Letter I76, the County finds the PEIR and Transportation Impact Analysis are correct and valid.
- I76-17** 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.

- I76-18** The commenter asks why noise monitors were not set up around the Airport to measure aircraft noise. Noise measurements were taken at points in the community around the Airport for purposes of completing the construction noise analysis; however, these measurements were not used to complete the aircraft noise analysis. The Airport does monitor aircraft noise as part of its Airport Noise Abatement Program, but this activity is unrelated to the Master Plan Update or PEIR.

The commenter states that Figure 2.4-1 does not accurately display noise sensitive receptors in areas around the Airport. The intent of Figure 2.4-1 is to identify the locations of those sensitive noise receptors closest to the Airport. The figure may not account for every sensitive noise receptor in the community beyond the Airport environs.

The commenter states that the Master Plan Update projects will allow larger jets to operate at the Airport, creating significant noise impacts. As discussed in Section 2.4.2.2, the noise analysis completed for the PEIR indicates that the noise impacts associated with future aircraft operations and operation of the Airport would be less than significant.

- I76-19** This comment asks why the County did not perform soil testing for Aerially Deposited Lead at the Airport. The PEIR states that a potential impact (HZ-2) may result from grading or excavation on the site due to disturbance of contaminated soil and/or groundwater. Please refer to Mitigation Measure M-HZ-1, which states that a Soil Management Plan (or equivalent remediation plan) shall be prepared in accordance with applicable federal, state, and local requirements for the purpose of removing, treating, or otherwise reducing potential contaminant concentrations to below human or ecological health risk thresholds. The Soil Management Plan (or equivalent remediation plan) shall outline methods for characterizing and classifying soil for off-site disposal, as needed, during site development. The timing of this mitigation measure's implementation will vary depending on the timing, funding, and priorities of individual project elements under the Airport Master Plan Update; however, this mitigation measure would be implemented prior to or at the time of impact. Therefore, prior to construction, the County would identify any soil that could be potentially contaminated that may pose a health risk during earthwork activities.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

- I76-20** This comment expresses concern that the conceptual drilled displacement column piles may result in impacts to groundwater. While the design is conceptual until such time that engineering design plans are prepared, it is anticipated that the columns would provide structural support for runway/taxiway surfaces, and as impervious cover it would preclude movement of rainwater underneath the paved surfaces and through the landfill profile. As described in the PEIR, the exact scope, scale, and timing for construction of the Master Plan Update elements will be determined once elements are proposed that may encounter inactive landfill materials during construction. Also, as noted in **Response to Comment S4-7** (San Diego Regional Water Quality Control Board), the County agrees that as individual project elements are proposed that may encounter inactive landfill materials during construction, engineering design plans would be needed to analyze potential impacts to the integrity of any portion(s) of the landfill cover, existing sub-drain system, or water quality

monitoring system. In addition, the project will be required to comply with federal, state, and local regulations and policies related to any existing hazardous materials and associated contamination. No changes to the PEIR have been made in response to this comment.

I76-21 As stated in Section 3.1.6, Hydrology and Water Quality, as individual improvements are proposed under the Master Plan Update and the PEIR, the engineering design process will include an evaluation of anticipated storm flows and design features to ensure increased velocities and peak flow rates exiting the project site would not result in flooding downstream or exceed the storm water drainage system. No revisions to the PEIR have been made in response to this comment.

I76-22 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. 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. The County would like to note that a Feasibility Study, dated August 13, 2013, was completed and made available to the public on the County's website.

I76-23 This comment states that the PEIR does not identify where mitigation would occur for vernal pool impacts. As described in the PEIR Mitigation Measure M-BI-3, mitigation for impacts to vernal pools will occur on County-owned lands on or adjacent to the Eastern Parcel (APN 209-050-25), or at another location deemed acceptable by the County and other regulating agencies. The exact location and implementation details of vernal pool mitigation will be determined at the project level and in consultation with the regulating agencies. Implementation of Mitigation Measure M-BI-3 would mitigate impacts on a programmatic level by establishing a compensatory mitigation requirement and stipulating mitigation ratios that ensure consistency with either the NC MSCP or County guidelines. No changes to the PEIR have been made in response to this comment.

I76-24 This comment suggests that existing fuel storage tanks may have spilled thereby contaminating the surrounding soil. Analysis of the location and current status of underground storage tanks (USTs) and other hazards and hazardous materials located on the Airport are fully discussed in the Phase I Environmental Site Assessment prepared for the project in Appendix C to the PEIR. Please refer to **Response to Comment I76-20**. In addition, the PEIR disclosed that Mitigation Measure M-HZ-1 would be implemented prior to grading or excavation over the inactive landfill. This mitigation measure identifies that a Soil Management Plan (or equivalent remediation plan) shall be prepared in accordance with applicable federal, state, and local requirements for the purpose of removing, treating, or otherwise reducing potential contaminant concentrations to below human or ecological health risk thresholds. The Soil Management Plan (or equivalent remediation plan) shall outline methods for characterizing and classifying soil for off-site disposal, as needed, during site development.

The comment also references an "underground fire" that occurred in the inactive landfill Unit 3. Please refer to **Response to Comment I75-40** for a discussion of this event, which the County refers to as subsurface oxidation.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I76-25 Please refer to **Response to Comment I76-24**. Regarding the capture of methane gases (presumably during construction), PEIR Chapter 3.1.2 included an analysis of potential air

quality emissions resulting from construction of the Master Plan Update. The PEIR concluded that the Master Plan Update would not result in a significant air quality impact. Furthermore, as noted in the PEIR, the exact scope, scale, and timing for construction of certain elements will be determined once funding is identified for project design engineering and construction. Areas of impact are estimated for project elements (such as the runway extension), as they have not been fully developed to quantify exact impacts in most cases, and therefore, are analyzed at a programmatic level. Once funding is identified for the design engineering and construction of individual Master Plan Update projects, the exact impact area will be further analyzed. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. No changes to the PEIR have been made in response to this comment.

I76-26 As stated in Section 3.1.4, Geology and Soils, the PEIR analysis of geologic conditions and hazards were based on the following geotechnical reports:

- Ninyo & Moore, Geotechnical Evaluation County Stairs Project, McClellan-Palomar Airport, Carlsbad, California, May 1, 2009.
- Ninyo & Moore, Geotechnical Evaluation, Taxiways A3, A4, and A5 Rehabilitation Project, McClellan-Palomar Airport, Carlsbad, California, April 5, 2012.
- Kimley-Horn and Associates, Inc., Feasibility Study for Potential Improvements to McClellan-Palomar Airport Runway, Final Report.

In addition, please refer to **Master Response 10**, which discusses program-level and project-level environmental review. No revisions to the PEIR were made in response to this comment.

I76-27 These are conclusion comments. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the County Board of Supervisors prior to a final decision on the Proposed Project.