

ATTACHMENT D

LETTERS OF COMMENT AND RESPONSES

This chapter contains all comments received on the Draft Program Environmental Impact Report (PEIR) and responses thereto and is organized as follows:

- D.1 List of Agencies and Individuals that Commented on the Draft PEIR2
- D.2 Master Responses6
 - D.2.1 Master Response 1 – Recirculation of the EIR 6
 - D.2.2 Master Response 2 – Public Review Period Extension 6
 - D.2.3 Master Response 3 – Voluntary Noise Abatement Procedures..... 7
 - D.2.4 Master Response 4 – Noise Monitors and PEIR Calculations 8
 - D.2.5 Master Response 5 – Airport Expansion / Public Vote 9
 - D.2.6 Master Response 6 – Existing Airport Activity 10
 - D.2.7 Master Response 7 – FAA Involvement and Oversight 10
 - D.2.8 Master Response 8 – Commercial Airline Service..... 11
 - D.2.9 Master Response 9 – Increase in Aircraft Operations 11
 - D.2.10 Master Response 10 – Program-level vs. Project-level Review 11
 - D.2.11 Master Response 11 – Runway Protection Zones (RPZ) 12
- D.3 Comment Letters Received and Responses to Comments.....12
 - D.3.1 Original Draft PEIR 12
 - D.3.2 Recirculated Portions of Draft PEIR..... 801

The focus of the responses to comments in this chapter is on the disposition of significant environmental issues raised in the comments, as specified by Section 15088(c) of the California Environmental Quality Act (CEQA) Guidelines. When a comment is not directed to significant environmental issues, the responses indicate that the comment has been acknowledged and no further response is necessary.

This section of the Final PEIR presents copies of comments on the Draft PEIR received in written form during the public review periods, 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.

The County’s responses to comments on the Draft PEIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the CEQA Guidelines, the County is not required to respond to all comments on the Draft PEIR, but only those comments that raise environmental issues. In accordance with CEQA Guidelines 15088 and 15204, the County has independently evaluated the comments and prepared the attached written responses describing the disposition of any significant environmental issues raised. CEQA does not require the County to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

Rather, CEQA requires the County to provide a good faith, reasoned analysis supported by factual information. To fulfill these requirements, the County’s experts in planning and environmental sciences consulted with and independently reviewed analysis responding to the Draft PEIR comments.

Accordingly, the County staff's final analysis provided in this response to comments are backed by substantial evidence. Likewise, the County Counsel's Office prepared and/or independently reviewed legal analysis supplementing the responses to the Draft PEIR public comments.

In the case of specific comments, the County has responded with specific analysis; in the case of a general comment, the reader is referred to a related response to a specific comment, if applicable. The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses.

D.1 List of Agencies and Individuals that Commented on the Draft PEIR

This section identifies all written comments received during the public comment periods of the Draft PEIR (including portions recirculated). Table E-1 provides an index to commenters and comment letters.

Table D-1: Commenters and Comment Letters

Comment Number	Commenter
Draft PEIR Public Review (January 18 – March 19, 2018)	
S1	State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit Scott Morgan, Director
S2	State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit Scott Morgan, Director
S3	California Department of Transportation (Caltrans), Local Development and Intergovernmental Review Branch Damon Davis, Acting Branch Chief
S4	California Regional Water Quality Control Board, San Diego John Odermatt, Senior Engineering Geologist
L1	Kaplan Kirsch & Rockwell (attorney representing City of Carlsbad) Sara Rockwell
L2	San Diego Association of Governments Seth Litchney, Senior Regional Planner
L3	City of Carlsbad Scott Chadwick, Chief Operations Officer
L4	San Diego County Regional Airport Authority Brendan Reed, Director of Planning & Environmental Affairs
O1	Rancho Vallecitos Mobile Estates Renee Brophy, Park Manager
O2	San Diego County Archaeological Society, Inc. Environmental Review Committee James W Royle, Jr., Chairperson
O3	South Vista Communities Stephanie Jackel, President
O4	Distinctive Projects Company, Inc. Richard Lee Sax, President
I1	Don Burton
Legend: S = State Agency; L = Local Agency; O = Organization; I = Individual	

Comment Number	Commenter
I2	Doug Fiske
I3	Matt Turner
I4	Tanja Freeman
I5	Karen Johnson
I6	Lynda Barrett
I7	Debi Carpenter
I8	Delinda Forsberg
I9	Hope Nelson
I10	Fred Foulks
I11	Alan Rock
I12	Rob Riordan
I13	Diane Hemelstrand
I14	Stephanie Jackel
I15	Marie Marcinko
I16	Chris Fitzherald
I17	Christine Franz
I18	Stephanie North
I19	Gary Polster
I20	Tim Stripe
I21	Lynell Ciranna
I22	Hope Nelson
I23	Kristine Wright
I24	Donald Moore
I25	Bob and Gail Carroll
I26	David Ohlson
I27	Alice Reysbergen
I28	Barry Hacker
I29	Nancy Hacker
I30	Stuart Hepburn
I31	Stephanie Jackel
I32	Alice Reysbergen
I33	Alice Reysbergen
I34	Al Cuevas
I35	Stacy Schopinsky
I36	Brennan Rupp
I37	John Harelson
I38	Dan Frazee
I39	P. Gray
I40	John Harelson
I41	Rory Kendall
I42	Frank Silva
I43	Debra Treinen
I44	Laura Dolloff
I45	Mari Siegel
Legend: S = State Agency; L = Local Agency; O = Organization; I = Individual	

Comment Number	Commenter
I46	Paul Gray
I47	Nancy Hacker
I48	Rowells Family
I49	Jenny Barger
I50	Janelle Dodkin
I51	Lonnie and Anne Smith
I52	Tom Clark
I53	Barbara Lichman
I54	Alice Reysbergen
I55	Barbara Swearingen
I56	Shirley Anderson
I57	Brian Roth
I58	Carol Smith
I59	Dieter Schulz
I60	Delinda Forsberg
I61	Giovanni and Anne Bertussi
I62	Mary and Joe Hull
I63	Valencia Porter
I64	Alice Reysbergen
I65	Louise Stiles
I66	Christopher Carroll
I67	John Roberts
I68	R.J. Ceyba
I69	Michael Goldbeck
I70	Stacy King
I71	Alice Reysbergen
I72	Sigrid Tehrani
I73	Graham Thorley
I74	Kari Banigo
I75	Ray and Ellen Bender
I76	Richard Breyer
I77	Val Brown
I78	Pamela Chana
I79	Theresa Gibson
I80	Mary and Joe Hull
I81	Amanda Mascia
I82	Ryan McKinley, Freeland McKinley & McKinley
I83	Hope Nelson
I84	Sue Nestoff
I85	Pia Romano
I86	Vickey Syage
I87	Kris Wright
I88	Derek Dozier
Legend: S = State Agency; L = Local Agency; O = Organization; I = Individual	

Comment Number	Commenter
Draft PEIR Recirculated Portions (June 21 – August 6, 2018)	
R-S1	State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit Scott Morgan, Director
R-L1	San Diego Gas & Electric Christopher P. Terzich, Environmental Technology and Regulatory Lead
R-L2	San Diego County Regional Airport Authority Brendan Reed, Director of Planning & Environmental Affairs
R-L3	City of Carlsbad Scott Chadwick, City Manager
R-O1	Viasat Gary Dorris, Director, Real Estate
R-O2	South Vista Communities Stephanie Jackel, President
R-I1	The Burtons
R-I2	Lee Juskalian
R-I3	Janis Murphy
R-I4	Jessica Price
R-I5	Shirley-Ann Grubbe
R-I6	Jenene McGonigal
R-I7	Paul and Sandra Blake
R-I8	Robert Carter
R-I9	Joyce Hassell
R-I10	John Harelson
R-I11	Paul Gray
R-I12	Lorraine Bell
R-I13	Sam Hershey
R-I14	Donna Holloway
R-I15	Carla Levy
R-I16	Dave Urban
R-I17	William Arsenault
R-I18	Joyce Hassell
R-I19	Ray Pili
R-I20	Sterling Johnson
R-I21	Doris Meehan
R-I22	Kim Kipnis
R-I23	Hope Nelson
R-I24	Ray and Ellen Bender
R-I25	Tony Kurlovich
R-I26	Bob Carter
R-I27	Graham Thorley
R-I28	Ryan McKinley, Freeland McKinley & McKinley
R-I29	Chris and Janis Murphy
Legend: R = Recirculation; S = State Agency; L = Local Agency; O = Organization; I = Individual	

Comment Number	Commenter
R-I30	Pia Romano
R-I31	Suzanne Thorley
R-I32	May Anne Viney
R-I33	Raymond Bender [submitted after comment period closed. No response included.]
R-I34	Raymond Bender [submitted after comment period closed. No response included.]
Legend: R = Recirculation; S = State Agency; L = Local Agency; O = Organization; I = Individual	

D.2 Master Responses

A number of the comments received on the Draft PEIR addressed the same or similar issues and environmental concerns. Rather than repeat responses to recurring comments in each letter, the master responses outlined in this section were prepared. Each response to comment references these master responses where applicable.

D.2.1 Master Response 1 – Recirculation of the EIR

In accordance with CEQA Section 15088 and 15088.5, on January 18, 2018, the McClellan-Palomar Airport Master Plan Update and Draft Program Environmental Impact Report (PEIR) were circulated for public review for 61 days concluding on March 19, 2018. Several comments were received that generally state that portions of the Draft PEIR were insufficient and should be revised and recirculated for an additional round of public review and comment. After reviewing public comments, staff recirculated portions of the Master Plan Update and Draft PEIR, including Biology, Greenhouse Gas Emissions, Energy, and several exhibits pertaining to the runway protection zones. The recirculation included a Reader's Guide, which is provided to explain changes between the project's Draft PEIR the Revised Draft PEIR, which was the topic of recirculation.

There are no significant changes to the Master Plan Update alternatives. The objectives of the project remain the same: to maximize safety and efficiency of McClellan-Palomar Airport (Airport) and accommodate forecasted demand in the next 20-year planning period. As with any high profile project with extensive community outreach, the County received a large number of public comments with recommendations on how to address potential environmental impacts. The County decided in the interest of collaboration and building a stronger project to incorporate those suggestions into the CEQA administrative record. Some of those changes warranted notifying the public of the opportunity to provide feedback, which is why the County recirculated portions of the documents.

D.2.2 Master Response 2 – Public Review Period Extension

During the Draft PEIR public review period (January 18 – March 19, 2018), several commenters requested an extension of the initial 45-day review period. State CEQA Guidelines define the process and durations for public review. CEQA Section 15105(a) states that public review for a draft EIR shall be no less than 30 days and no greater than 60 days, except under unusual circumstances. In response to public request, the original public review period for the Master Plan Update was extended to 61 days.

Regarding the recirculated portions of the Draft PEIR, only a few sections were revised and published for another public review period. As such, the scope of the review was narrowed and more defined for public comment. Therefore, the standard public review period of 45 days was adhered to following State CEQA Guidelines.

The County previously provided notice of the opportunity to review and comment on the Draft PEIR (include recirculated portions) in accordance with CEQA Guidelines Section 15087. This includes written notice to persons or organizations who requested written notice and posting notices of preparation. In addition, notice has been provided on the County's website, in press releases, and at Palomar Airport Advisory Committee meetings.

D.2.3 Master Response 3 – Voluntary Noise Abatement Procedures

Multiple comments requested the Voluntary Noise Abatement Procedures (VNAP) and associated flight paths be made mandatory with enforcement. In 1990, the Airport Noise and Capacity Act was enacted which prohibits airport owners/operators from implementing curfews or otherwise restricting hours of operation without FAA approval. Airports that had curfews prior to 1990 were allowed to keep them in place. However, a curfew was not in place at McClellan-Palomar Airport. After 1990, curfews may only be granted by FAA if a Part 150 noise study demonstrates that residential land uses are located within an airport's 65 CNEL noise contour. Following completion of a Part 150 noise study in 2006, the County submitted a request to implement a curfew for McClellan-Palomar Airport. The FAA denied the request because the study showed there are no residences inside the 65 CNEL noise contour. There have been no significant operations changes at their airport since 2006. Even if all project elements in the proposed Master Plan Update are implemented, there would be no residential uses inside the 65 CNEL; and as such, there would be no justification for the FAA to approve a mandatory curfew or restricted hours of operation.

For comparison, John Wayne Airport and San Diego International Airport both have curfews that were in place before the Airport Noise and Capacity Act was adopted in 1990. John Wayne Airport established a curfew in 1985, prohibiting departures between 10 p.m. to 7 a.m. and arrivals between 11 p.m. and 7 a.m. San Diego International Airport adopted regulation in 1989 restricting overnight flights from leaving (there are no time restrictions for arriving flights). Airlines that take off from San Diego International Airport between 11:30 p.m. and 6:30 a.m are fined depending on how frequently they have broken the curfew.

The proposed Master Plan Update anticipates that over time the types of aircraft using the airport will continue to trend from smaller, slower, lower propeller planes to quieter corporate business jets. In terms of noise impacts, corporate jets are quieter. Not only do they have quieter, more efficient engines, but they also descend into and ascend out of the airport area faster. Faster and steeper take offs and landings mean less ground-level noise, both in volume and duration. The Master Plan Update proposes a runway extension for departing aircraft, which allows them to get airborne sooner. There is a modest amount of growth forecast in aircraft take offs and landings, but operations are still expected to be nearly 30% less than the peak number of aircraft operations experienced at the airport in 1999.

Only the FAA can control aircraft in flight, but the County takes noise in the community seriously and has a dedicated full-time noise officer to assist with community noise concerns. When the Draft PEIR was circulated for public review in January 2018, two noise monitoring microphones were already stationed within the community (south and east of the Airport). The noise monitoring microphones record noise events qualified as above 65dB for more than five seconds. County staff use this data to assist community members with noise complaints. As of October 2018, the County is working to install two additional monitors on the north and west sides thereby covering all four sides of the Airport. The information from these noise monitors will be used by County staff to review noise concerns and share details with the public about specific noise events.

The County continues to improve its VNAP program and will continue to work with and educate pilots on how best to minimize aircraft noise impacts. Improvements include expanding VNAP education and outreach with flight schools and pilot groups throughout the region. Specifically, the County has started working with other local airports such as Gillespie Field and Montgomery Field

to share McClellan-Palomar Airport's VNAP with pilots and to encourage pilots to be courteous visitors to the Airport.

The County will also continue working with our aviation businesses to ensure their pilot briefing rooms are always stocked with the latest VNAP publications, and existing VNAP signage has been improved at both ends of the runway to encourage and remind pilots to follow the VNAP.

The Palomar Airport Advisory Committee (PAAC) routinely reviews the most current noise reports at each committee meeting. In November 2017, the PAAC approved the formation a sub-committee, including various members of the community, to discuss methods of reporting and reviewing VNAP information, such as providing the statistics about flights that occur outside of the "quiet hours."

D.2.4 Master Response 4 – Noise Monitors and PEIR Calculations

Several commenters expressed concern there were not enough noise monitors in the community claiming the Draft PEIR noise analysis is flawed because only two monitoring stations were deployed at the time when environmental studies were completed. This Master Response has been prepared to describe how aircraft noise was calculated for the Draft PEIR, and addresses the misconception that noise monitors are required for conducting environmental review.

There are three main criteria when analyzing aircraft noise. First, flight tracks (or flight paths) are analyzed to see where aircraft are flying. Second, the analysis includes which types of aircraft are using those flight tracks. And third, the frequency and time of day for the number of aircraft operations is included to identify how many are occurring. This information is gathered and entered along with runway dimensions and topography. Utilizing all of these factors, a noise contour is generated.

The Draft PEIR evaluated noise conditions in the vicinity of the airport using actual data collected from the calendar year 2016 to determine noise level exposures. The 2016 data is used as a baseline condition in the Draft PEIR. The report also looks at noise levels for 2036, based on the FAA model, using data from the Master Plan's long-term aviation forecast. When noise was modeled with the forecast for 2036, the noise contours shrunk from those anticipated in the 1997 Master Plan. Noise contours are used for planning various land uses surrounding the airport by the City of Carlsbad and the San Diego County Regional Airport Authority.

In regards to single noise events, as discussed in Section 2.4.2 of the Draft PEIR, potential noise impacts associated with the Proposed Project were studied using standard tools, methodologies, and significance criteria for aircraft noise as established by the FAA. Specifically, FAA Order 1050.1F Desk Reference (Section 11.4) explains that Day-Night Average Sound Level DNL is the recommended metric for analyzing aircraft noise exposure, and should continue to be used as the primary metric. When measuring noise for airports in California, the standard metric is to use the federal requirement for Community Noise Equivalent Level (CNEL). The CNEL standard also uses a 24-hour average measurement for the model. FAA Order 1050.1F also states there are no new metrics of sufficient scientific standing to substitute for DNL/CNEL. The noise from aircraft operations is measured for the whole day and night; not just single events of a take-off or landing. Noise that occurs during the evening or night hours is weighted or penalized and counts more against the measurement. The 65 CNEL is the level in which noise impacts and land use compatibility are analyzed. If residential or other noise sensitive areas are at or above 65 CNEL, additional analysis is needed. For McClellan-Palomar Airport, no residential areas are located within the airport's 65 CNEL noise level boundary for both current and long-term conditions.

FAA criteria require that the determination of significance must be analyzed through the use of noise contours along with local land use information and general guidance contained in Appendix

A of 14 CFR Part 150. Preparation of noise contours associated with airport and aviation projects is the standard means of assessing potential noise impacts associated with airport and aviation projects under both state and federal guidance. Accordingly, preparation of noise contours for purposes of identifying potential noise impacts associated with the Proposed Project is sufficient to identify potential noise impacts associated with the Proposed Project.

As noted in FAA Order 1050.1F Desk Reference, supplemental noise measurements, such as single events, may be conducted to assist in the public's understanding of the Airport's noise conditions. Therefore, although single noise events are not used as the County's threshold of significance, the County continues to consider single noise events through the existing V NAP measures in consultation with the community and local residents. The noise monitors deployed in the community are used by the County solely as additional information source to assist in community concerns and investigations. ANOMS flight track data is also used to determine aircraft information. Therefore, while the noise monitors are not used for the environmental analysis, they continue to be an important function and tool to monitor noise events throughout the community. See Master Response 3 for additional information on noise monitors.

D.2.5 Master Response 5 – Airport Expansion / Public Vote

Several comments expressed concern that the proposed Master Plan Update would result in an “expansion” of the airport; and as such, these commenters believe the Master Plan Update should require a vote by Carlsbad citizens according to City of Carlsbad Municipal Code Section 21.53.015.

City of Carlsbad Municipal Code Section 21.53.015 was adopted by the City of Carlsbad in 1980 to prevent “expansion of the airport”. Expansion refers to enlargement of the airport's physical boundaries; not an extension of the runway or other changes within the airport's existing footprint. All of the project elements identified in the Master Plan, including the runway extension, remain on the existing airport property and will be accomplished within the existing footprint. Multiple commenters refer to the “airport expansion” project in their comments, which the County presumes is in reference to the proposed Master Plan. The County disagrees with this terminology. However, to avoid redundancy in the County's responses, the County will not correct this terminology in every instance. Rather, it shall be stated here that the County does not agree with this description but understands this terminology is how various commenters refer to the Master Plan.

Furthermore, Carlsbad Municipal Code Section 21.53.015 requires both a legislative enactment or action in preparation for a legislative enactment by the City Council and an “expansion” (as that term is used in the code section) to require a vote. None of the project elements in the proposed Master Plan Update would require a legislative enactment from the City Council (e.g., general plan amendment, zone change); and as noted above, would not result in an expansion of the airport. The City of Carlsbad website also confirms, *“Since all of the proposed changes will occur within current airport property, the city's legal team has concluded that the plan does not call for an expansion...The city has not identified any aspect of the master plan or its implementation that would require this kind of legislative action.”*¹

In 1980, the City also issued Conditional Use Permit (CUP) 172 to grant the County the right to make alterations to facilities that are necessary to the operation of the airport. The proposed Master Plan Update is consistent with the CUP because it proposes changes to existing facilities that are necessary to provide for the safe and efficient operation of the airport. Moreover as explained in the Draft PEIR, given the scope of uses allowed by right pursuant to CUP-172 as amended, the County has voluntarily remained in compliance with the use permit, but reserves the right to assert immunities from City zoning ordinances and other building and land use regulations

¹ City of Carlsbad website accessed 7/6/18: <http://www.carlsbadca.gov/residents/airportmasterplan.asp>

under state law to operate the Airport in a manner consistent with federal obligations or County objectives.

D.2.6 Master Response 6 – Existing Airport Activity

Several comments expressed concern about the current conditions associated with existing Airport noise, traffic, air pollution, and safety hazards. As noted in the Master Plan Update and Draft PEIR, the Master Plan Update was prepared to plan for the Airport's future while enhancing operations and safety. Therefore, most of the PEIR issue areas analyze the changes proposed in the future with a starting point or baseline of existing conditions. The Master Plan Update is intended to create a new blueprint for development of the Airport over the next 20-year planning cycle. As such, the Draft PEIR was prepared to analyze potential environmental effects associated with the proposed activities identified in the Master Plan Update through 2036.

The existing environmental conditions at and around the Airport were documented as required by the CEQA Guidelines, and were used as baseline conditions to determine the potential environmental impacts of the Project. Furthermore, CEQA Guidelines Section 15126.2 requires the assessment of a project on the environment, including potential changes in the existing physical conditions. This does not require an agency to analyze impacts of existing conditions, nor is that within the scope of the project.

Also see Master Response 4 for discussion of noise and what the County is currently doing to support and enhance the Airport's voluntary noise abatement procedures. The following Master Response 7 also provides insight on FAA's involvement and oversight of aircraft activity.

D.2.7 Master Response 7 – FAA Involvement and Oversight

The FAA oversees aviation facilities by providing regulations and standards for operating aircraft, licensing pilots, and certifying commercial airports like McClellan-Palomar Airport. The FAA is responsible for air traffic control which includes flight paths, and controlling aircraft while flying and while moving on the ground, such as the runway and taxiways. The FAA also has a lesser-known regulatory role. In exchange for providing federal grant funding for making airport improvements, airport owners, like the County, must make binding commitments to the FAA on how the airport operator must operate the airport. This requires the County to make the airport available to "all types, kinds and classes of aeronautical uses." Simply put, the County cannot limit the types of aircraft that use McClellan-Palomar Airport or when those aircraft can operate.

A pilot's responsibility depends on whether or not the aircraft is general aviation, such as private corporate aircraft, or a commercial airline. For private aircraft, the pilot is responsible for determining whether or not they can safely land their plane at an airport. For commercial pilots, the FAA, as part of their certification for commercial airlines, identifies the airports where the commercial planes can land.

The County operates and maintains the airport to ensure safety for the users of the airport. The County manages the facilities, including constructing airport improvements and planning for the airport's future; provides airport security and firefighting response services; manages leases for the businesses who operate at the airport; and coordinates with the FAA to ensure the airport is properly managed, maintained, and complying with FAA regulations. The County does not have the authority to limit how many aircraft use the airport or to limit the size of the aircraft landing at the airport.

D.2.8 Master Response 8 – Commercial Airline Service

Several commenters expressed a desire to see increased commercial airline service at the airport, including a variety of destinations and increased flights. Other commenters expressed the opposite desiring fewer commercial airline flights or possibly relocating commercial activity to another airport in the region.

While the County does issue leases to commercial airlines allowing them to use the airport ground facilities, the County does not dictate the location, frequency, or companies that choose to utilize the airport for commercial airline service. Nonetheless, the proposed Master Plan Update does anticipate that commercial airline service would increase over the next 20 years as San Diego International Airport reaches its capacity. As such, an increase of future aircraft operations and commercial passengers would occur at the airport regardless of whether or not the Master Plan Update is implemented, or whether the existing airport layout remains the same or if the proposed safety improvements or runway extension occur in the future.

By the Year 2036, enhanced commercial service at the airport may provide convenience to 800 to nearly 1,600 daily North County residents by reducing drive times of traveling to Lindbergh, John Wayne, or LAX; and will add value to the region's vibrant business community. Commercial service is a relatively small percentage of the overall activity at the airport even at the highest level analyzed in the Master Plan Update (575,000 annual enplanements) commercial service accounts for less than 13% of the total aircraft operations forecasted in Year 2036.

D.2.9 Master Response 9 – Increase in Aircraft Operations

Several commenters expressed concern that aircraft operations may increase as a result of the Master Plan. As explained in the Master Plan Update and Draft PEIR, modest growth of aircraft use at the airport is expected over the next 20 years, whether or not the County enhances the Airport's facilities, as described in the Master Plan. McClellan-Palomar Airport is a Public Use Airport, so any member of the public can use the airport if they choose. The County's main function is to ensure the airport remains safe and efficient for all airport users. The Master Plan Update improvements will not cause an increase in aircraft operations.

D.2.10 Master Response 10 – Program-level vs. Project-level Review

Several comments requested detailed environmental review of specific project elements identified in the proposed Master Plan. As noted in the Draft PEIR, areas of potential impact are estimated for the project elements, as they have not been developed sufficiently 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 project elements, additional analysis under CEQA will be required for projects at the time that they are designed and proposed.

Furthermore, the proposed Master Plan Update meets the CEQA definition of a project for a program of activities. Specifically, as described in CEQA Guidelines 15168(a), the Master Plan Update consists of “one large project” that covers “a series of actions” that are linked “geographically, as logical parts in a chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

Accordingly, the County prepared a Program EIR consistent with the requirements of CEQA Guidelines Section 15168. The Draft PEIR is programmatic in nature, as it analyzes the potential environmental effects of the Master Plan, but it does not specifically analyze individual projects or actions because the design details are not yet available. This is consistent with the requirements of

CEQA. The County will implement specific activities proposed under the Master Plan, determining whether they are consistent with the activities identified in the Final PEIR, and determining whether sufficient evaluation of the potential environmental impacts associated with these later activities has been provided in the Final PEIR for the Master Plan. These later activities would be examined in light of the information in the Draft PEIR to determine whether an additional environmental document must be prepared. During this examination, if the County finds pursuant to CEQA Guidelines section 15162 that no new significant effects are identified or no new mitigation measures would be required on a subsequent project, the activity can be approved as being within the scope of the project covered by the Final PEIR.

Therefore, the proposed Master Plan Update and the Final PEIR are based on substantial evidence and work together to provide the programmatic environmental review and streamlining mechanism for the evaluation of environmental impacts for future anticipated development projects.

D.2.11 Master Response 11 – Runway Protection Zones (RPZ)

The County made revisions to the Runway Protection Zone figures in the PEIR to give the public clear information on the FAA-designated safety areas around the runway approach and departure zones. The Master Plan Update Table 2.2 identifies the RPZ dimensions required for the runway under existing conditions. However, it should be clarified that the current FAA-approved Airport Layout Plan (ALP) dated July 2010 reflects a larger RPZ than what is required for Runway 24's approach. In other words, Runway 24's approach RPZ (i.e., east end of the runway) was drawn larger than FAA requirements. Therefore, the additional RPZ figures were included in the Master Plan Update and recirculated portions of the PEIR to illustrate how the RPZs dimensions surrounding the Airport would be redrawn to maintain the FAA-designated visibility approach minimums. The Master Plan Update Table 4.11 further identifies the RPZ dimensions under the Airport's current conditions, the dimensions for a B-II classified Airport, and the dimensions for a D-III classified Airport.

D.3 Comment Letters Received and Responses to Comments

D.3.1 Original Draft PEIR

This section presents copies of comments on the Draft PEIR received in written form during the Draft PEIR's original public review period (January 18 – March 19, 2018), and it provides the County of San Diego's responses to those comments. Each comment letter is assigned an alphanumeric code, and the topics within each comment letter are bracketed and numbered. Comment letters are followed by County responses, which are numbered to correspond with the bracketed comment letters.