

Comment Letter R-I23

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



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cont.

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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.