

**Comment Letter R-I31**

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**From:** Suzie Thorley <suzie.thorley@sbcglobal.net>  
**Sent:** Monday, August 06, 2018 11:26 AM  
**To:** LUEG, PalomarMP  
**Subject:** Comment on recirculated portions of the McClellan Palomar Airport Master Plan Update Draft Environmental Impact Report  
**Attachments:** Suzie Comment Letter to County Recirculated.docx

Dear Ms. Curtis:

Attached are my comments on the Recirculated Portions of the McClellan-Palomar Airport Master Plan Update Draft Program Environmental Impact Report.

R-I31-1

Respectfully,

Suzanne Thorley

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

August 5, 2018

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

Dear Ms. Curtis:

I have owned my home in Carlsbad since 1978 when the airport hangared recreational and crop duster aircraft. Yes, I knew there was an airport nearby; however, I never imagined it to grow into a large Regional Airport for business and private jets whose pilots have little regard for citizens living near the airport. I admit I also enjoyed and used both United Express and American Eagle flights to LAX for connections elsewhere. Those commercial flights were never over my neighborhood and they were friendly neighbors by not flying during normal sleeping hours.

R-I31-2

I am still trying to figure out why the county is planning to expand CRQ.

- Currently, CRQ is safe enough for the aircraft utilizing the airport without extending the runway.
- There seems not to have a big outcry from pilots using CRQ for these improvements. Again, what is the motivation for this expansion? Please explain.
- As has been said at many meetings and workshops one aircraft that flies to China once a week needs the longer runway so it does not have to stop for fuel. In checking with the manufacturer website for that aircraft, the runway with the extensions STILL would not be long enough for that aircraft to fly nonstop to China taking off from CRQ without stopping for fuel. That seems like a huge cost to taxpayers for one aircraft when the extended runway still does not meet that requirement. I am truly having a difficult time wrapping my head around doing all this work and expense for **ONE** business jet with the loss of quality of life of at least one hundred thousand (100,000) citizens who would be affected.
- Understand that I am all for safety and improvements. Please explain how these "safety" improvements will really improve safety.
- Attracting a small carrier has not worked. These carriers usually do not have interline agreements with major carriers for ticketing and baggage. From CRQ a passenger has to fly to a connection city, deplane, claim baggage, usually change terminals, recheck baggage and go through TSA security again. This does not work for the majority of the flying public, not when they could drive to San Diego International Airport (SAN), Orange County Airport (SNA) or Los Angeles International Airport (LAX) in the same or less time with a lot less inconvenience of claiming baggage, changing terminals, checking bag, second security screening before boarding their second flight. Also, with no interline agreements and ticketing, if something happens with the first leg (misconnect, arrive late or cancellation) they are not usually protected on the second (connecting) leg as it is not considered a connection because it is a different ticket.
- It appears that the majority of users of CRQ are now business jets, many of whom fly frequently during normal sleeping hours and often do not follow the Voluntary Noise Abatement Procedures which makes for very bad neighbors. It would be helpful if there were some sort of penalty for pilots who violate these procedures.

R-I31-3

R-I31-4

R-I31-5

#	Revised PEIR Section/ Page #	RPEIR Position	Suzanne Thorley Comments																																																																																																																																																		
1	Table 1.2.10-3 and Table 3.1.10-4 Page 3-126	Aircraft Fuel Consumption (PAL 1 and PAL 2) in Gallons	<p style="text-align: center;"><b>Table 3.1.10-3. Fuel Consumption Comparison (PAL 1)</b> (gallons)</p> <table border="1"> <thead> <tr> <th>Scenarios</th> <th>Aircraft</th> <th>APU/GSE</th> <th>Gasoline</th> <th>Diesel</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>No Project</td> <td>535,471</td> <td>70,100</td> <td>298,355</td> <td>16,589</td> <td>920,515</td> </tr> <tr> <td>PAL 1</td> <td>677,513</td> <td>83,273</td> <td>301,910</td> <td>16,786</td> <td>1,079,482</td> </tr> <tr> <td>Difference</td> <td>142,042</td> <td>13,173</td> <td>3,555</td> <td>197</td> <td>158,967</td> </tr> </tbody> </table> <p style="text-align: center;"><b>Table 3.1.10-4. Fuel Consumption Comparison (PAL 2)</b> (gallons)</p> <table border="1"> <thead> <tr> <th>Scenarios</th> <th>Aircraft</th> <th>APU/GSE</th> <th>Gasoline</th> <th>Diesel</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>No Project</td> <td>535,471</td> <td>70,100</td> <td>298,355</td> <td>16,589</td> <td>920,515</td> </tr> <tr> <td>PAL 2</td> <td>704,300</td> <td>95,291</td> <td>569,432</td> <td>31,660</td> <td>1,400,683</td> </tr> <tr> <td>Difference</td> <td>168,829</td> <td>25,191</td> <td>271,077</td> <td>15,071</td> <td>480,168</td> </tr> </tbody> </table> <p>The Tables on Page 3-126 show fuel consumption by aircraft. To focus on <b>No Project</b> on both tables, fuel consumption by aircraft on both tables is 535,471.</p> <p>On McClellan-Palomar Airport website, Fuel Flowage link sends me to the county site which has the table below for Jet A fuel in 1000s of gallons delivered for the first quarter. Notice that the total for the quarter is 1,146 (1000s of gallons or 1,146,000 gallons) delivered. If the next three quarters follow, there will be 4,584,000 gallons of jet fuel delivered to CRQ. Please explain how those numbers are so drastically different, a difference of 4,048,529 gallons.</p> <p>Sales by Supplier/FBO @ CRQ  <b>Jet A 1000s of gallons delivered</b>  <b>2018 1st Quarter</b></p> <table border="1"> <thead> <tr> <th>Fuel Supplier FBO</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> <th>Jul</th> <th>Aug</th> <th>Sep</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>AvFuel</td> <td>166</td> <td>286</td> <td>240</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>692</td> </tr> <tr> <td>Atlantic Avia / PAC</td> <td></td> </tr> <tr> <td>Epic Jet Source</td> <td>145</td> <td>15</td> <td>0</td> <td>160</td> </tr> <tr> <td>Ascent SCIF / Magellan</td> <td>67</td> <td>75</td> <td>61</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>203</td> </tr> <tr> <td>Western Western Flight</td> <td>29</td> <td>32</td> <td>30</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>91</td> </tr> <tr> <td><b>Total</b></td> <td><b>407</b></td> <td><b>408</b></td> <td><b>331</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>0</b></td> <td><b>1146</b></td> </tr> </tbody> </table> <p>Since these numbers are so dramatically different, also affect the GHG calculations, the Draft EIR should disclose those emissions. Explain how much more GHG would be from this increase in fuel usage. <b>This should be done in another revised and recirculated Draft PEIR.</b></p>	Scenarios	Aircraft	APU/GSE	Gasoline	Diesel	TOTAL	No Project	535,471	70,100	298,355	16,589	920,515	PAL 1	677,513	83,273	301,910	16,786	1,079,482	Difference	142,042	13,173	3,555	197	158,967	Scenarios	Aircraft	APU/GSE	Gasoline	Diesel	TOTAL	No Project	535,471	70,100	298,355	16,589	920,515	PAL 2	704,300	95,291	569,432	31,660	1,400,683	Difference	168,829	25,191	271,077	15,071	480,168	Fuel Supplier FBO	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	AvFuel	166	286	240	0	0	0	0	0	0	0	0	0	692	Atlantic Avia / PAC														Epic Jet Source	145	15	0	0	0	0	0	0	0	0	0	0	160	Ascent SCIF / Magellan	67	75	61	0	0	0	0	0	0	0	0	0	203	Western Western Flight	29	32	30	0	0	0	0	0	0	0	0	0	91	<b>Total</b>	<b>407</b>	<b>408</b>	<b>331</b>	<b>0</b>	<b>1146</b>								
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2	Revised Figure 1-4	Parcels with RPZs	<p>Explain why the RPZs</p> <ol style="list-style-type: none"> <li>(1) Future RPZ appears to be smaller on the west end of runway</li> <li>(2) Future RPZ on east end appears to be shorter</li> <li>(3) Revised Figure shows only existing and future, previous figure showed Runway 06 Future, and Runway 24 RPZ future</li> </ol>																																																																																																																																																		
3	3.1.5.1 Page 3-55	County cannot	<p><b>“FAA Order 5190.6B</b>  <b>The County, as the owner of the Airport, currently accepts federal grant funding from the AIP. The County is therefore</b></p>																																																																																																																																																		

R-I31-6

R-I31-7

R-I31-8

		discriminate	<p><b>required to comply with a list of Airport Sponsor Assurances provided by the FAA. FAA Order 5190.6B: FAA Airport Compliance Manual, Grant Assurance 22a states that the County:</b></p> <p><b>“Will make [the] airport available as an airport for public use on reasonable terms, and without unjust discrimination, to all types, kinds, and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport.”</b></p> <p><b>Therefore, the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the airport, which are under the jurisdiction of the FAA.”</b></p> <p>Why can the county NOT lease space to aircraft that are not within the airport classification? If size of aircraft is a safety issue for extending the runway, why encourage larger aircraft by allowing them to be hangared on the property?</p>
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R-I31-8  
cont.

Thankfully, the city of Carlsbad has hired a law firm that has expertise in this field. I urge you to pay close attention to the City’s comments and request that the recirculated draft PEIR once again be updated and circulated with another 45 day comment period.

⌋  
R-I31-9

Respectfully,  
Suzanne Thorley  
760-930-1966

**Response to Letter R-I31****Suzanne Thorley**

- R-I31-1** This comment contains an email message by Ms. Thorley submitting comments to the County. No response is required.
- R-I31-2** This comment includes introductory remarks regarding the Airport's existing and historical activity and does not contain substantive issues. No response is required.
- R-I31-3** This comment states that the Airport is safe enough under current conditions without extending the runway. The comment includes additional remarks asking for an explanation or justification of the proposed improvements identified in the Master Plan Update. The topics raised in this comment were considered in the Draft PEIR that was previously published. The comment does not provide input related to the recirculated Draft 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.
- R-I31-4** 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 Proposed Project 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.
- R-I31-5** The comment does not provide input related to the recirculated Draft PEIR subjects. The topics raised in this comment (i.e., existing noise conditions) were analyzed under the Draft PEIR. Please refer to **Master Responses 3 and 4**. Therefore, no changes to the Proposed Project 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.
- R-I31-6** The comment asks the County to explain why the PEIR Section 3.1.10 (Energy) cites that 535,471 gallons of aviation fuel are consumed annually when the County's published Fuel Flowage report for 2018 first quarter shows a different quantity.

First, the 2018 data published on the County website identifies the quantity of aviation fuel that was *delivered* to the Airport, but it does not identify how or when that fuel would be used. In contrast, the PEIR specifically identifies the quantity of fuel used by aircraft. Second, for the purposes of calculating air quality and GHG emissions produced by aircraft, the FAA-approved Aviation Environmental Design Tool (AEDT) was used, which calculated fuel usage based on the Proposed Project's aircraft operations forecast and fleet mix. In other words, as a function of the AEDT model, the County quantified the estimated fuel usage by identifying the number of aircraft operations and fleet mix projected through 2036. Therefore, the data is based on substantial evidence and is sufficient for the PEIR analysis. Third, the aircraft fleet mix using the Airport in 2018 is projected to change overtime through 2036 as documented in the Master Plan Update. As discussed in the recirculated Draft PEIR GHG chapter, the FAA is continuously working to improve aviation energy efficiency, including its Continuous Lower Energy, Emissions, and Noise (CLEEN) Program. Therefore, it is anticipated that aircraft fuel efficiency would continue to improve, and it is reasonable that aircraft

utilizing the Airport in 2036 at the Master Plan's full implementation may consume less fuel than aircraft today in 2018.

Therefore, the County finds that the PEIR analysis is correct and does not require revision. The recirculated Draft PEIR Energy chapter contains sufficient quantifications of energy usage, and no changes to the PEIR have been made in response to this comment.

- R-I31-7** Please refer to **Master Response 11 (Runway Protection Zones)**.
- R-I31-8** The comment includes an excerpt from the PEIR regarding the County's requirement to comply with the FAA grant obligations. The comment asks the County whether it can restrict leasing space at the Airport for aircraft sizes that are not within the airport classification. Keeping with the FAA grant assurances, the County does not have the authority to limit how many aircraft use the Airport or to limit the size of the aircraft that use the Airport. Please refer to **Master Response 7**. Furthermore, the comment does not provide input related to the recirculated Draft 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.
- R-I31-9** The comment requests the County to review the City of Carlsbad's comment letter and to recirculate the Draft PEIR again. For responses to the City's letter, please refer to **Response to Comment Letter R-L3**. Furthermore, the comment does not identify specific or detailed issues concerning the PEIR's environmental analysis requiring recirculation. No changes to the PEIR have been made.