

**Comment Letter R-134**

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**From:** Raymond Bender <benderbocan@aol.com>  
**Sent:** Monday, August 20, 2018 4:18 PM  
**To:** LUEG, PalomarMP  
**Cc:** Raymond Bender  
**Subject:** Bender Supplemental August 20, 2018 PEIR Recirculation Biological Comment: AC 150/5200-38 Published Today August 20, 2018  
**Attachments:** 2018 Cynthia Curtis Ltr County PEIR Recirculation Biological.doc

**This email transmits our supplemental comments on the Cou McClellan-Palomar PEIR Recirculation. Comments are timely the FAA only today August 20, 2018 issued the AC noted above our letter. Please confirm receipt and inclusion of this letter in PEIR public comment section.**

**Note: County website PEIR Recirculation requires comments to be sent to**

Submit Comments

**E-MAIL:** [PalomarMP@sdcounty.ca.gov](mailto:PalomarMP@sdcounty.ca.gov)

**MAIL:** County of San Diego, Department of Public Works  
Attn: Cynthia Curtis  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

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

From: Ray & Ellen Bender [2018 Cynthia Curtis Ltr County PEIR Recirculation Biological]

Re: Bender Comments on County June 2018 Re-circulated Portions of McClellan-Palomar Airport Master Plan Programmatic EIR Due August 6, 2018

Date: Monday, August 20, 2018 Sent by Email to Cynthia Curtis at County Environmental Division

Ms. Curtis:

On August 3, 2018, we commented on the county’s June 2018 recirculation of portions of the county’s McClellan-Palomar Master Plan Programmatic EIR. [Comments were due by August 6.]

Today we submit new comments, which were not possible before today, because the FAA only today (August 20, 2018) released its Advisory Circular No. 150/5200-38 entitled *“Protocol for the Conduct and Review of Wildlife Hazard Site Visits, Wildlife Hazard Assessments, and Wildlife Hazard Management Plans.”*

**Bender Request:** Please assure that the county’s Final McClellan-Palomar Programmatic EIR Biological Analysis Section meets the FAA AC 150/5200-38 requirements. Our review of this AC suggests that the county environmental documents do not provide certain information including but not limited to the number of bird strikes encountered by aircraft operating at Palomar. Also missing is the impact of birds diverted from off-airport sites under construction. For instance, we understand that in the last 12 months contractors have begun erecting buildings covering an area in excess of 1 million square feet including but not limited to (i) the ViaSat new office headquarters off El Camino Real, (ii) multiple hotels along Palomar Airport road just to the southeast of Palomar Airport, and (iii) the expanded Bressi Ranch commercial structures and housing just southeast of Palomar Airport Road. These structures lie within 1 to 3 miles of the airport. Logic suggests that many of the wildlife displaced from these long vacant sites would travel to the northeast corner of ECR and PAR. Since one of the 8 county project self identified evaluation criteria is the county’s eligibility for FAA funding for Palomar’s estimated \$110 million of runway improvements, please assure the Final PEIR analyzes county’s compliance with FAA AC 150/5200-38

Thank you for your further review of the issues and please assure this request is included as part of the public comments in the county’s Final PEIR.

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