

# **Appendix A**

## **Notice of Preparation / Initial Study**

**(with Public Comments)**

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MAR 01 2016  
BY KBOYER1  
DEPUTY

# County of San Diego

**RICHARD E. CROMPTON**  
DIRECTOR

DEPARTMENT OF PUBLIC WORKS  
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## **NOTICE OF PREPARATION DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE MCCLELLAN-PALOMAR AIRPORT MASTER PLAN CARLSBAD, SAN DIEGO COUNTY, CALIFORNIA**

**FEBRUARY 29, 2016**

The County of San Diego Department of Public Works (County) owns and operates McClellan-Palomar (Palomar) Airport in the City of Carlsbad. The airport is an important transportation asset in San Diego's North County, serving a variety of uses including commercial, corporate, and general aviation. The current Master Plan was prepared in 1997 and is reaching the end of its 20-year planning period. The County will be the Lead Agency in preparation of a Program Environmental Impact Report (EIR) for the proposed new 20-year Master Plan in compliance with the California Environmental Quality Act (CEQA). As the CEQA Lead Agency, the County is requesting input as to the scope and content of the environmental information that should be contained in the Program EIR for the purpose of conducting an environmental review of the new McClellan-Palomar Airport Master Plan.

The Airport Master Plan objective is to develop a road map of airside and landside facility improvements for the next 20-year planning period in a manner that maximizes safety and operational efficiency, considers aviation forecasts, market trends, land use opportunities and constraints, phasing, financial feasibility, stakeholder and public input, as well as environmental review.

This notice is issued pursuant to Section 15082 of the State CEQA Guidelines. It is intended to inform those persons and organizations that may be concerned with the environmental effects of the project. Those public agencies with specific statutory responsibilities are requested to indicate their specific role in the project approval process. The Initial Study for this project is available for review and download on the Airport Master Plan's website:

<http://www.sandiegocounty.gov/content/sdc/dpw/airports/palomar/masterplan.html> Hard copies are also available for in-office review at the Airport's office located at: 2192 Palomar Airport Rd, Carlsbad, CA 92011, at the Carlsbad City Library, 1775 Dove Ln, Carlsbad, CA 92011, the San Marcos Branch Library at 2 Civic Center Drive, San Marcos, CA 92069, or the Vista Branch Library at 700 Eucalyptus Avenue, Vista, CA 92084.

The County will hold a public scoping meeting to outline elements of the Master Plan, provide an opportunity to view exhibits, and discuss the Airport's future with engineering and environmental staff. Written comments regarding the scope of analysis in the Program EIR will be accepted at the meeting. The meeting will be held on Monday, February 29, 2016, from 6 to 8pm at 1635 Faraday Ave, Carlsbad, CA 92008.

RECEIVED

If you wish to submit written comments focusing on your area of expertise, your agency's area of jurisdiction, or other issues related to the scope of the environmental analysis, written responses may be mailed, faxed, or emailed to the address below. Due to the time limits mandated by State law, responses should be sent at the earliest possible date, but no later than March 29, 2016, 5:00 p.m. Please send your comments to:

County of San Diego, Department of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123  
Fax: (858) 694-3925  
e-mail: Cynthia.Curtis@sdcounty.ca.gov



**Figure 1: McClellan-Palomar Airport Regional Map & Master Plan Components**

DEVELOPMENT PHASES/FEATURES:		
NEAR-TERM (0-7 YEARS)	INTERMEDIATE-TERM (8-12 YEARS)	PHASE 3: LONG-TERM (13-20 YEARS)
<ol style="list-style-type: none"> <li>1 Relocation of the Glideslope Building</li> <li>2 Relocation of the Segmented Circles and Windsock Equipment</li> <li>3 Relocation of ARFF Facility</li> <li>4 Construction of EMAS System on RWY West End</li> <li>5 Relocation of the Vehicle Service Road</li> <li>6 200' Extension of Existing Runway</li> <li>7 200' Extension of Existing Taxiway A</li> <li>8 Relocation of Lighting Vault</li> </ol>	<ol style="list-style-type: none"> <li>9 Removal of Fuel Farm on North Apron</li> <li>10 Removal of the North Apron</li> <li>11 Future Airside Development</li> </ol>	<ol style="list-style-type: none"> <li>12 Relocation of RWY 06-24 (Includes REILs, PAPIs, Localizer Antennae and MALSRS)</li> <li>13 Removal/Reconstruction of Existing Connector Taxiways</li> <li>14 Removal/Reconstruction of Existing TWY A (Includes Lighting)</li> <li>15 Construction of EMAS System on East End</li> <li>16 Relocation of EMAS System on West End</li> <li>17 200' RWY Extension</li> <li>18 600' RWY Extension</li> <li>19 Future Passenger/Admin Facilities Improvements</li> </ol>





## ENVIRONMENTAL DOCUMENT

The environmental document will be a program-level EIR as defined in Section 15168 of the CEQA Guidelines and is intended to allow the County to examine the environmental effects of the proposed Master Plan improvements and to take steps to avoid environmental impacts.

**PROJECT LOCATION:** The proposed project is located within existing County-owned property at McClellan-Palomar Airport within the municipal boundary of the City of Carlsbad (Figure 1). Although the County's property in the vicinity totals 487 acres, including non-aviation land, the approximately 250-acre Master Plan project study area encompasses the active airfield, tenant leaseholds, aircraft and auto parking, passenger terminal building, and administrative facilities located north of Palomar Airport Road at Yarrow Drive. Included in the project study area is a 17-acre area that is currently vacant at the northeast corner of Palomar Airport Road at El Camino Real.

**PROJECT DESCRIPTION:** The McClellan-Palomar Airport Master Plan is a flexible, phased 20-year strategy to prioritize projects at the Airport that provide safety and operational enhancements. The Master Plan uses technical studies, forecast data, Federal Aviation Administration (FAA) design engineering standards, and public involvement to support the modernization of the airport while maximizing use of existing airport property.

Due to the long-range and phased implementation schedule of the Master Plan, design and construction details, project funding, FAA review and approval for each proposed element are not yet available. Many of the proposed improvements are necessary precedents for action on larger projects. Accordingly, the County intends to conduct an analysis of potential environmental impacts at the program level to consider the scope of the action as a whole, and as a series of interrelated projects.

The Master Plan process itself was initiated after the County of San Diego Board of Supervisors received the completed *Feasibility Study for Potential Improvements to McClellan-Palomar Airport Runway* on September 25, 2013 (Item #3). The multi-year process to develop the draft Master Plan required coordination with Airport engineers, the FAA, leaseholders, regional and municipal stakeholders, as well as the public via three public workshops that occurred at milestones during the Master Plan process. The study's data and findings were incorporated into the framework of the new Master Plan, and on December 16, 2016 (Item #3), the Board of Supervisors directed staff to approach the CEQA review focused on the "Modified C/D-III classification as the preferred option, subject to the preparation of a Program-Level EIR."

The major objectives of the Modified C/D-III design for the airport include:

- Meeting FAA-required safety areas around the runway and taxiways (requires shifting aircraft movement areas)
- Maintaining a 150-foot wide runway
- Installation of Engineered Materials Arresting System (EMAS) as a safety enhancement to stop aircraft in overrun situations
- Improvements to the capacity and efficiency of landside (i.e. emergency services and passenger/visitor/administration) facilities.

The Master Plan evaluated rehabilitation, development, and new construction projects that would be required to meet the Modified C/D-III design, and the following projects are proposed to occur over flexible phases in the next 20-year planning period as demand or capacity is realized. A conceptual phasing plan is shown below, but is subject to funding:

Near-Term Projects (0-7 years):

- Elements to meet FAA's safety and design standards for the C/D-III airport classification, including the Runway Safety Area (RSA) of the existing runway/taxiway alignment
  - Relocation of the glideslope building, segmented circle, windsock equipment
  - Relocation of the vehicle service road
- New EMAS on the western end of runway 06-24
- Aircraft Rescue & Fire Fighting (ARFF) facility relocation
- 200-foot extension of the current runway and taxiway "A"
- Landside improvements to meet near-term aviation forecasts

Intermediate Term Projects (8-12 years):

- Elements to clear the RSA and the Runway Object Free Area (ROFA) of the ultimate runway/taxiway alignment
  - Removal of aircraft fueling tank and parking on north ramp
- Landside improvements to meet intermediate aviation forecasts

Long-Term Projects (13-20 years):

- Movement of runway 06-24 123-feet to the north, and all associated actions
  - Reconstruction/removal of connector taxiways
  - Relocation of EMAS on western end of new runway alignment
  - Relocation of navigational aids
  - Additional 600-foot extension on the ultimate runway and taxiway "A"
  - New EMAS on the eastern end of new runway alignment
- Landside improvements to meet long-term aviation forecasts

## **POTENTIAL ENVIRONMENTAL IMPACTS**

An analysis of the environmental impacts is currently being conducted and will be discussed in the environmental document. The following resources will be analyzed for potentially significant impacts: agriculture, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation/traffic, and utilities and service systems. Additional issues may be identified during the scoping process. These issues, along with an analysis of project alternatives, cumulative effects, and potential for growth inducement, will be analyzed and discussed in the Program EIR.

**FILED IN THE OFFICE OF THE COUNTY CLERK**

San Diego County on MAR 01 2016  
Posted MAR 01 2016 Removed APR 01 2016  
Returned to agency on APR 01 2016  
Deputy KBOYER1



# County of San Diego

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February 29, 2016

## **CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)**

1. Title:  
McClellan-Palomar Airport Master Plan
2. Lead agency and project sponsor name and address:  
County of San Diego, Department of Public Works Airport Division  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123
3. Contact: Cynthia Curtis, Environmental Planning Manager  
Phone number: (858) 694-3906  
E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)
4. Project location:  
The proposed project is located within existing County-owned property at McClellan-Palomar Airport (Airport) within the municipal boundary of the City of Carlsbad (Figure 1). Although the County's property in the vicinity totals 487 acres, including non-aviation land, the approximately 250-acre Master Plan project study area encompasses the active airfield, tenant leaseholds, aircraft and auto parking, passenger terminal building, and administrative facilities located north of Palomar Airport Road at Yarrow Drive. Included in the project study area is a 17-acre area that is currently vacant at the northeast corner of Palomar Airport Road at El Camino Real.
5. General Plan Designation: Public (City of Carlsbad General Plan)
6. Zoning: Industrial
7. Description of project:  
The McClellan-Airport Master Plan is a flexible, phased 20-year strategy to prioritize projects at the Airport that provide safety and operational enhancements. The Master Plan uses technical studies, forecast data, Federal Aviation Administration (FAA) design

engineering standards, and public involvement to support the modernization of the airport while maximizing use of existing airport property.

Due to the long-range and phased implementation schedule of the Master Plan, design and construction details, project funding, FAA review and approval for each proposed element are not yet available. Many of the proposed improvements are necessary precedents for action on larger projects. Accordingly, the County intends to conduct an analysis of potential environmental impacts at the program level to consider the scope of the action as a whole, and as a series of interrelated projects.

The Master Plan process itself was initiated after the County of San Diego Board of Supervisors received the completed *Feasibility Study for Potential Improvements to McClellan-Palomar Airport Runway* on September 25, 2013 (Item #2). The multi-year process to develop the draft Master Plan required coordination with Airport engineers, the FAA, leaseholders, regional and municipal stakeholders, as well as the public via three public workshops that occurred at milestones during the Master Plan process. The study's data and findings were incorporated into the framework of the new Master Plan, and on December 16, 2016 (Item #3), the Board of Supervisors directed staff to approach the CEQA review focused on the "Modified C/D-III classification as the preferred option, subject to the preparation of a Program-Level EIR."

The major objectives of the Modified C/D-III design for the airport include:

- Meeting FAA-required safety areas around the runway and taxiways (requires shifting aircraft movement areas),
- Maintaining a 150-foot wide runway,
- Installation of Engineered Materials Arresting System (EMAS) as a safety enhancement to stop aircraft in overrun situations,
- Improvements to the capacity and efficiency of landside (i.e. emergency services and passenger/visitor/administration) facilities.

The Master Plan evaluated rehabilitation, development, and new construction projects that would be required to meet the Modified C/D-III design, and the following projects are proposed to occur over flexible phases in the next 20-year planning period as demand or capacity is realized. A conceptual phasing plan is shown below, but is subject to funding:

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  - Relocation of the glideslope building, segmented circle, windsock equipment
  - Relocation of the vehicle service road
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  - Relocation of EMAS on western end of new runway alignment
  - Relocation of navigational aids
  - Additional 600-foot extension on the ultimate runway and taxiway "A"
  - New EMAS on the eastern end of new runway alignment
- Landside improvements to meet long-term aviation forecasts

## 8. Surrounding land uses and setting:

The County owns 487 acres in and around McClellan-Palomar Airport within the municipal limits of the City of Carlsbad. Although the County's property in the vicinity totals 487 acres, including non-aviation land, the approximately 250-acre Master Plan project study area encompasses the active airfield, tenant leaseholds, aircraft and auto parking, passenger terminal building, and administrative facilities located north of Palomar Airport Road at Yarrow Drive. The airport is an important transportation asset in San Diego's North County, serving a variety of uses including commercial, corporate, and general aviation. Operations of the airport began in 1959, and the single runway public-use facility sits atop a mesa surrounded primarily by industrial/commercial land uses. Portions of the airfield and tenant leasehold areas are underlain by closed landfill. A municipal golf course lies to the west under the primarily departure end of runway 06-24, with a long tract of open space/vacant land to immediate east under the primarily arrival end of runway 06-24. The Pacific Ocean lies a little over two miles to the west.



9. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

<b><u>Permit Type/Action</u></b>	<b><u>Agency</u></b>
Approval of the Airport Layout Plan	Federal Aviation Administration (FAA)
401 Permit - Water Quality Certification, General Construction Storm water Permit	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (ACOE)
1602 – Streambed Alteration Agreement, Consistency Determination	CA Department of Fish and Wildlife (CDFW)
Consultation under Section 7 of the federal Endangered Species Act (ESA)	U.S. Fish & Wildlife Service
General Industrial Storm Water Permit	State Water Quality Control Board

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> <u>Aesthetics</u>                          | <input checked="" type="checkbox"/> <u>Agriculture and Forest Resources</u> | <input checked="" type="checkbox"/> <u>Air Quality</u>                        |
| <input checked="" type="checkbox"/> <u>Biological Resources</u>     | <input checked="" type="checkbox"/> <u>Cultural Resources</u>               | <input checked="" type="checkbox"/> <u>Geology &amp; Soils</u>                |
| <input checked="" type="checkbox"/> <u>Greenhouse Gas Emissions</u> | <input checked="" type="checkbox"/> <u>Hazards &amp; Haz. Materials</u>     | <input checked="" type="checkbox"/> <u>Hydrology &amp; Water Quality</u>      |
| <input checked="" type="checkbox"/> <u>Land Use &amp; Planning</u>  | <input type="checkbox"/> <u>Mineral Resources</u>                           | <input checked="" type="checkbox"/> <u>Noise</u>                              |
| <input type="checkbox"/> <u>Population &amp; Housing</u>            | <input type="checkbox"/> <u>Public Services</u>                             | <input type="checkbox"/> <u>Recreation</u>                                    |
| <input checked="" type="checkbox"/> <u>Transportation/Traffic</u>   | <input checked="" type="checkbox"/> <u>Utilities &amp; Service Systems</u>  | <input checked="" type="checkbox"/> <u>Mandatory Findings of Significance</u> |

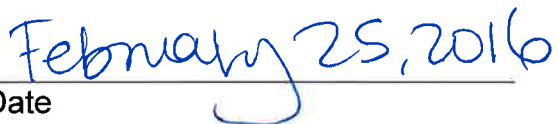
**DETERMINATION:** (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, Department of Public Works finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, Department of Public Works finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, Department of Public Works finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

  
\_\_\_\_\_  
Signature

Cynthia Curtis

\_\_\_\_\_  
Printed Name  
\_\_\_\_\_  
DateLand Use/Environmental Planning  
Manager  
\_\_\_\_\_  
Title

**INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance

**I. AESTHETICS** -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

**Less than Significant Impact:** Scenic vistas are singular vantage points that offer obstructed views of valued viewsheds, including areas designated as official scenic vistas along major highways or designated visual resources. The proposed project is not located near or within, or visible from, a scenic vista and will not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view. The project proposes improvements to Palomar Airport that would be consistent with the existing facilities and structures, and is not visible from a designated scenic vista. Therefore, the proposed project will not have an adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

**No Impact:** The proposed project is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. All Master Plan improvements are proposed within airport property, and would be consistent with the existing visual landscape. Neither a State nor County scenic highway is located in the vicinity of the project site. Therefore, the proposed project will not have any substantial adverse effect on a scenic resource within a State scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the project site and surroundings can be characterized by the surrounding industrial and commercial uses along Palomar Airport Road and El Camino Real. The primary viewers of the airport property are motorists along Palomar Airport Road, and the entrance to the airport's facilities is above road grade, so changes to the flat aircraft surfaces on the airport's mesa, or improvements to structures would not be immediately visible within the viewshed.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** FAA standards specify the location, type, and height of navigational aviation lighting required for operation of the airport. The Master Plan proposes shifts of existing aircraft movement areas that will necessitate relocation of the navigational aids. The lighting would be located adjacent to runways and taxiways. Lighting sources at parking lots, access gates, and associated with building improvements or new construction would be low intensity, downward casting and shielded. The airport is located adjacent to industrial areas where no residences occur. The project does not propose new sources of substantial light or glare that would affect views in the area.



**II. AGRICULTURE AND FORESTRY RESOURCES** -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** The active airfield and all existing airport facilities located on the parcel west of El Camino Real at Palomar Airport Road do not have a farmland designation. There are portions of the aircraft movement areas and leaseholds that are on top of closed landfill. To the east of El Camino Real, the County may develop a 17-acre portion of an airport-owned parcel to install landside improvements (See Figure 3). The potential development area does not currently support agricultural operations, but is designated as Unique Farmland and Prime Farmland. If the mapped farmland is converted to a paved or gravel surface, the project could cause a potentially significant impact to farmland, and will be further evaluated in the Program EIR.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The proposed project study area includes County-owned property currently operating at the airport, and 17 acres to the east of the airport across El Camino Real. The potential development areas allow for aviation and industrial uses, and the proposed Master Plan elements are consistent with existing the land use designation and zoning. The proposed improvements will not create a conflict with existing zoning as none of the lands are zoned for agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The proposed project study area does not contain forest lands or timberland. There are no Timberland Production Zones in the County of San Diego. In addition, the project is consistent with existing zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

- d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The project site does not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Although the active airfield and current airport facilities are not underlain by lands designated as farmland, a 17-acre portion of land atop a mesa just east of El Camino Real is proposed for development. The potential development area does not currently support agricultural operations, but is designated as Unique Farmland and Prime Farmland. If the mapped farmland is converted to a paved or gravel surface, the project could cause a potentially significant impact to farmland, and will be further evaluated in the Program EIR.

**III. AIR QUALITY** -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

**Potentially Significant Impact:** Air emissions at airports are most commonly associated with: aircraft, ground support equipment, fuel storage and transfer, stationary power sources, aircraft and ground facilities maintenance activities, periodic construction activities for improvements to existing facilities, and mobile air emissions associated with vehicular traffic coming to and leaving the airport. Over the course of the proposed 20-year Master Plan period, an increase in services and operations are expected, and will likely result in an increase in emissions. Although the project will incorporate many of the minimization measures in the RAQs, SIP, and other regional air plans, a detailed analysis of the proposed 20-year Master Plan's potential impacts has not been conducted. If the proposed project were to be in conflict with the RAQs or the SIP, it could result in a Potentially Significant Impact. An evaluation of potential impacts to air quality will be conducted in the EIR.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

**Potentially Significant Impact:** State and Federal standards have been established for "criteria pollutants" including ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, and particulates (PM<sub>10</sub> and PM<sub>2.5</sub>). The Master Plan improvements would result in an increase in criteria pollutants, primarily mobile source emissions, from motor vehicles and aircraft. An increase in particulates would be associated with exhaust pipe and tire wear emissions, suspended dust, and construction activities. A detailed analysis of potential emission impacts associated with the proposed has not been conducted, but could result in a Potentially Significant Impact. An evaluation of potential impacts to air quality will be conducted in the EIR.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O<sub>3</sub>). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM<sub>10</sub>) under the CAAQS. O<sub>3</sub> is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood,

oil); solvents; petroleum processing and storage; and pesticides. Sources of PM<sub>10</sub> in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

**Potentially Significant Impact:** As discussed above in 3(b), the proposed Master Plan improvements could result in a Potentially Significant level of criteria pollutants. An evaluation of potential impacts to air quality will be conducted in the EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12<sup>th</sup> Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

**Potentially Significant Impact:** In general, the proximity of sensitive receptors are limited to the immediate vicinity of the airport, which is predominantly industrial and commercial uses with open space/vacant land and a golf course. The nearest residential zoning is approximately ½ mile to the southwest of the airport. Pacific Ridge School is the nearest school at 1.75 miles away from the airport. The concentration of pollutants at sensitive receptors has not been quantified for either construction or operational emissions associated with the proposed Master Plan improvements, and could result in a Potentially Significant impact. Air quality impacts to sensitive receptors will be addressed in the EIR.

e) Create objectionable odors affecting a substantial number of people?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Construction equipment may generate odors during project construction. Generation of construction odors would be a short-term impact that ceases upon completion of construction projects. The Airport also generates operational odors, primarily jet engine fumes. However, such odors would not affect a substantial number of people since aircraft operate primarily in infield areas, away from portions of the Airport which are open to the public (i.e., the terminal, parking lots). Therefore, generation of odors would be a Less Than Significant impact.

**IV. BIOLOGICAL RESOURCES** -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW), or U.S. Fish and Wildlife Service?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Airport property is primarily dominated by paved or frequently maintained (mowed/graded) surfaces which would not provide adequate habitat for sensitive species. Portions of the active airfield are underlain by a closed landfill, and the aircraft movement areas and tenant leaseholds were cleared and graded when the airport was constructed in the 1950's. However, there are small pockets of native vegetation at the western end of the runway, and on the area proposed for development just east of El Camino Real on airport-owned property. These areas may provide suitable habitat for sensitive plant and/or animal species. The proposed Master Plan improvements could result in Potentially Significant impact if sensitive species are found to be present within development areas. The County has initiated baseline biological surveys within the project study area to characterize the presence of species, and will analyze potential impacts in the EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** The proposed Master Plan improvements could include alterations to airfield/landside drainages that may support riparian or other sensitive natural communities. Impacts to riparian habitat are Potentially Significant. Appropriate permits will be required from the USACE, RWQCB, CDFW and/or USFWS prior to construction of individual improvements, as applicable. Potential impacts to riparian habitat will be quantified and appropriate compensatory mitigation will be discussed in the EIR.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact



## Discussion/Explanation:

**Potentially Significant Impact:** The presence, location and size of vernal pools and seasonal wetlands will be evaluated at the airport for potential impacts where construction is proposed. A comprehensive wetland delineation has not been conducted on the airport, and would be subject to verification by the USACE as jurisdictional under Section 404 of the Clean Water Act. Wetlands not under federal Section 404 jurisdiction may still be jurisdictional under the state Porter-Cologne Water Quality Control Act. Impacts to jurisdictional wetlands would be Potentially Significant. Appropriate permits will be required from the USACE, and/or RWQCB prior to construction. Potential impacts to wetlands will be quantified and appropriate compensatory mitigation will be developed in the EIR.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

**Less than Significant Impact:** The airport is primarily surrounded by industrial and commercial uses that do not provide connectivity for migration of wildlife. The airport perimeter is currently fenced to preclude the movement of large terrestrial wildlife onto the property to the extent feasible. Wildlife moving through the property can be a safety hazard when they cross runways and taxiways, and the Airport operates a wildlife hazard management program to minimize populations of animals which pose a threat to aviation safety.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

## Discussion/Explanation:

**No Impact:** The project falls within the planning area of the proposed North County Multiple Species Conservation (MSCP) program. The North County MSCP has not been officially adopted; however the proposed project is consistent with the program's objectives and the proposed development/redevelopment projects are not within areas designated for conservation in the Plan.

**V. CULTURAL RESOURCES** -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** Cultural resource surveys have been conducted on portions, but not all of the areas proposed for improvement in the Master Plan. Studies conducted to date have not included a detailed evaluation of the potential impacts to historical resources associated with the project, and could result in a Potentially Significant impact. A comprehensive cultural resource study will be conducted and potential impacts to cultural/archaeological resources will be addressed in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** As discussed above in V.(a), potential impacts to archaeological resources have not yet been defined for the proposed project, and could be Potentially Significant. A comprehensive cultural resource study will be conducted and potential impacts to cultural/archaeological resources will be addressed in the EIR.

c) Directly or indirectly destroy a unique geologic feature?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

**No Impact:** The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

d) Directly or indirectly destroy a unique paleontological resource or site?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** A review of the County's Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock and has no potential for producing fossil remains.

e) Disturb any human remains, including those interred outside of formal cemeteries?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** No burial sites are known to occur in the vicinity of the Airport, and most of the Airport has already been disturbed by past construction. In the event that human remains are unearthed during construction, work would cease until the County Coroner and a qualified archaeologist are consulted in accordance with State law and County CEQA Guidelines.

**VI. GEOLOGY AND SOILS** -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

## ii. Strong seismic ground shaking?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** The Master Plan improvements do include construction/redevelopment of new structures which would be occupied by people on a daily basis. Construction of the buildings would meet the standards of the Uniform Building Code for seismic resistance, site stability, grading, and geologic studies. Because the building would be designed to withstand seismic-related damage, and because of the proximity of the airport to fault lines, it is not expected that the proposed terminal building (or other structures) would be affected by fault rupture. Therefore, this would be a Less Than Significant impact.

## iii. Seismic-related ground failure, including liquefaction?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not located within a floodplain. Therefore, there will be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to seismic-related ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be Less Than Significant.

## iv. Landslides?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** The project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade

because these soils are slide prone. The project is not located within an identified Landslide Susceptibility Area, and the airport and vicinity does not have a history of landslides or earth flows. The project would have a Less Than Significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** According to the Soil Survey of San Diego County, the soils on-site are identified as Huerhuero loams, urban land complex, Diablo clay, Altamont clay, Las Flores loamy fine sand, and Loamy alluvial land. These soil types have moderate to high erodibility ratings as indicated by the Soil Survey for the San Diego Area. Construction of Master Plan improvements may affect soils that have high erodibility ratings, and those considerations will be included when design engineering plans are prepared for each element. A project-specific analysis of how the proposed project may affect soils has not yet been undertaken, and the impact is Potentially Significant and will be discussed in the EIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** Airport property includes areas underlain by a closed landfill, and construction of proposed improvements may extend into closed landfill cells. The location and extent of the construction impacts will be determined once design engineering plans are prepared for each element. A project-specific analysis of how the proposed project may affect geologic or soil stability has not yet been undertaken, and the impact is Potentially Significant and will be discussed further in the EIR.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** Elements of the proposed project may be constructed on soils defined as expansive, or require special design engineering considerations based on current

conditions. Elements of the proposed project that extend into portions of the closed landfill will be evaluated for constructability during the design phase. A project-specific analysis of the expansive characteristics of the soil and how the proposed project may affect soil stability has not yet been undertaken, and the impact is Potentially Significant and will be discussed further in the EIR.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** All Master Plan improvements that require wastewater disposal would be continue to be serviced by the public sewer system, therefore there would not be impacts to soils associated with septic or wastewater disposal.

## **VII. GREENHOUSE GAS EMISSIONS – Would the project:**

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region<sup>1</sup> identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

<sup>1</sup> San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center (EPIC), September 2008.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. The County of San Diego has also adopted various GHG related goals and policies in the General Plan.

As discussed in Section III. Air Quality, a detailed analysis of potential emission impacts associated with the proposed project has not been conducted, but could result in a Potentially Significant Impact. Elements of the proposed project include construction that may extend into cells of the closed landfill. Where construction impacts the existing methane gas extraction system, the project would need to include reconstruction of those elements, which may include the gas extraction wells, header piping, and condensate pipes. An inventory of ground and mobile emissions sources will be compiled for the proposed project and an evaluation of potential impacts to air quality will be conducted in the EIR.

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130 states that an EIR shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

## Discussion/Explanation:

**Potentially Significant Impact:** In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

As discussed above in Sections III. Air Quality and VII. (a), a detailed analysis of potential emission impacts associated with the proposed project has not been conducted, but could result in a Potentially Significant Impact. An inventory of ground and mobile emissions sources will be compiled for the proposed project and an evaluation of potential impacts to air quality will be conducted in the EIR. A project-specific analysis in the EIR will determine consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of greenhouse gases.

**VIII. HAZARDS AND HAZARDOUS MATERIALS** -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** A variety of common petrochemical and chemical products are routinely used at the Airport, including avgas, Jet A, solvents, cleaning products, and various lubricants. The Airport is a licensed hazardous waste generator, and follows all State and Federal laws applicable to the transport and storage of these materials. In addition, the Airport has an existing General Industrial Storm Water Permit with the Regional Water Quality Control Board. This permit requires inspections and monitoring of Airport facilities. Portions of the airport property are underlain by cells of a closed landfill. Elements of the proposed project include construction that may extend into those areas. Where construction impacts the existing methane gas extraction system, the project would need to include reconstruction of those elements, which may include the gas extraction wells, header piping, and condensate pipes. All construction activities that would require earthwork in the vicinity of those areas are required to be reviewed by the County Department of Environmental Health prior to construction. The proposed Master Plan improvements do not propose any modification to existing Airport operations related to transport, use, or storage of hazardous materials, and therefore, would result in a Less Than Significant impact.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |



## Discussion/Explanation:

**No Impact:** The airport's nearest school is Pacific Heights Academy, located approximately 1.75 miles away at 5611 Palmer Way, Suite B, Carlsbad CA 92010.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

## Discussion/Explanation:

**Potentially Significant Impact:** The locations of proposed Master Plan improvements on airport property will be reviewed in conjunction with the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). An evaluation of the proposed project's possibility of encountering hazardous materials and exposure of these materials to the public or the environment would be a Potentially Significant Impact, which will be addressed in the EIR.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

**No Impact:** The purpose of the new 20-year Master Plan is to provide a planning document to guide future development of a safe and efficient airport. All proposed changes to the airfield facilities or operations are designed for consistency with FAA design standards, and therefore would not result in a new or increased safety hazard to people in the project area. The San Diego Regional Airport Authority, as the Airport Land Use Commission for San Diego airports, approved an airport land use compatibility plan for the airport on December 1, 2011. The plan provides guidance on compatible land uses surrounding the airport, and requires the local land use jurisdiction to amend their planning documents to conform.

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

- i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

**Less Than Significant Impact:** The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

**No Impact:** The San Onofre Nuclear Generating Station is in the process of being decommissioned. The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

## iii. OIL SPILL CONTINGENCY ELEMENT

**No Impact:** The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

## iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

**No Impact:** The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

## v. DAM EVACUATION PLAN

**No Impact:** The Dam Evacuation Plan will not be interfered with because the project is not located within a dam inundation zone.

- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The Airport has a vegetation maintenance program, which includes regular mowing of grassed infield areas, thereby reducing the fuel load of grassed areas and decreasing the likelihood of fire. In addition, the Airport has aircraft rescue and fire fighting staff on the Airport to contain any aviation-related fires. The Project would not construct buildings adjacent to wildlands or expose people to a significant risk of wildland fire, and therefore, would have No Impact.

- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or

other similar uses. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

**IX. HYDROLOGY AND WATER QUALITY** -- Would the project:

a) Violate any waste discharge requirements?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

Discussion/Explanation:

**Potentially Significant Impact:** The airport is required to comply with the operational waste discharge requirements of the National Pollutant Discharge Elimination System (NPDES) permit program, and proposed Master Plan improvements would be designed to incorporate NPDES permit program requirements for construction and operational discharges. In addition, any impacts to jurisdictional waters or wetlands that would occur during construction would require permits from the USACE or RWQCB to ensure that federal and state water quality standards are met. Applicable permits will be identified in the EIR.

The project would result in construction of new impervious surfaces for the runway, taxiways, service road, etc. An increase in impervious surface area would result in an increase in storm water runoff which may contain pollutants. Earthwork could also result in soil erosion and discharges of pollutants into waterways if not properly mitigated, and these activities could present a Potentially Significant Impact. A project-specific analysis of potential construction and operation-related waste discharge impacts will be conducted and discussed in the EIR.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant:** The project lies in the (404.31) hydrologic subareas, within the Carlsbad hydrologic unit. According to the Clean Water Act Section 303(d) list, portions of this watershed, along the coast of the Pacific Ocean at Buena Vista Lagoon, Escondido Creek, Loma Alta Slough, and San Marcos are impaired for coliform bacteria; Agua Hedionda Lagoon is impaired for coliform bacteria and sedimentation; Buena Vista Lagoon is impaired for coliform bacteria, nutrients, and sedimentation; Loma Alta Slough is impaired for eutrophication and coliform bacteria; San Elijo Lagoon is impaired for eutrophication, coliform bacteria and sedimentation. Constituents of concern in the Carlsbad watershed include coliform bacteria, nutrients, sediment, trace metals, and toxics. However, the project would not contribute any new sources or land use activities that would generate these pollutants.

The project will likely include construction activities (i.e. grading) that could cause sediment and soils to be released off site and carried downstream from the project. However, the site

design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced in any runoff to the maximum extent practicable so as not to increase the level of these pollutants in receiving waters. These BMPs include the installation of vegetated swales; installation of fiber rolls; use of silt fences; and gravel bags.

The proposed BMPs are consistent with regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result the project will not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and storm water permitting regulation for County of San Diego includes the following: San Diego Region, Order No. R9-2013-0001, (NPDES No. CAS 0109266); County Watershed Protection Ordinance; Stormwater Management, and Discharge Control Ordinance (WPO); County Stormwater Standards Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Each project subject to WPO is required to prepare a Stormwater Management Plan that details a project's pollutant discharge contribution to a given watershed and propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Less Than Significant Impact:** The Regional Water Quality Control Board has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the Lower San Luis Rey hydrologic subarea, within the San Luis Rey hydrologic unit that has the following existing and potential beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground water: municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; freshwater replenishment; hydropower generation; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; marine habitat; migration of aquatic organisms; and, rare, threatened, or endangered species habitat.

The project proposes the following potential sources of polluted runoff: construction activities including grading that could cause sediment and soils to be released off site and carried downstream from the project. The proposed project will result in a minor increase of impervious surface area. However, the project design will include drainage improvements to address this increase in impervious surfaces. The following site design measures, source control BMPs, and treatment control BMPs will be employed to reduce potential pollutants in

runoff to the maximum extent practicable, such that the proposed project will not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses: installation of vegetated swales; installation of fiber rolls; use of silt fences and gravel bags.

Dewatering of groundwater may be necessary if groundwater is encountered during construction of the drainage improvements at Keys Creek. A dewatering plan will be developed to ensure that impacts to surface waters would not result.

In addition, the proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project will not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section VIII., Hydrology and Water Quality, Question b, for more information on regional surface water and storm water planning and permitting process.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The airport does not currently, and does not propose the use of groundwater for any purpose, as the site is connected to the public water system. Certain elements of airport landscaping are fed by reclaimed water lines. The Master Plan improvements would include additional pavement, but would not interfere substantially with groundwater recharge and would have No Impact on the local groundwater supply.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** The Master Plan improvements include new areas of pavement that must adhere to specific FAA design standards for slope and drainage. A comprehensive analysis will be conducted to assess how these new surfaces will affect the existing drainage pattern of the site and address any on- or off-site impacts. The impacts could be Potentially Significant, and will be discussed in the EIR.

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** The Master Plan proposes construction of additional impervious surfaces. This would result in an increase in the amount of runoff over existing conditions. In addition, drainage improvements will be included in the project design to process on-site runoff (i.e., detention basins) and minimize post-project peak discharge rates. This could be a Potentially Significant impact, and will be addressed in the EIR.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Due to the increase in impervious surfaces, project design will include operational BMPs such as storm water detention basins to process additional runoff generated by new impervious surfaces. These structures would be designed to not generate runoff in excess of planned drainage system capacity. The EIR will include a review of the airport drainage plan and will address any identified potentially significant impacts.

- h) Provide substantial additional sources of polluted runoff?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Less Than Significant Impact:** Construction and operation of the airport improvements could cause sediment and soils or pollutants to be released off site and carried downstream from the project. However, site design measures and/or source control BMPs and/or treatment control BMPs will be employed such that potential pollutants will be reduced in runoff to the maximum extent practicable and in conformance with applicable water quality regulations.

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The proposed project does not involve the construction of housing. Therefore it will not place housing within a 100-year flood hazard area.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** No 100-year flood hazard areas were identified within the project study area. Therefore, no impact would occur.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The project site lies outside any identified special flood hazard area. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.



## m) Inundation by seiche, tsunami, or mudflow?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

## i. SEICHE

**No Impact:** The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

## ii. TSUNAMI

**No Impact:** The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

## iii. MUDFLOW

**No Impact:** Mudflow is a type of landslide. The site is not located within a landslide susceptibility zone. In addition, though the project does propose land disturbance that will expose unprotected soils, the project is not located downstream from unprotected, exposed soils within a landslide susceptibility zone. Therefore, it is not anticipated that the project will expose people or property to inundation due to a mudflow.

**X. LAND USE AND PLANNING** -- Would the project:

## a) Physically divide an established community?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

**No Impact:** The proposed project would not physically divide a community, as it is proposed entirely on airport land. Therefore, the proposed project will not significantly disrupt or divide the established community.

## b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

## Discussion/Explanation:

**Potentially Significant Impact:** All proposed airport improvements would be located entirely on existing airport property. Accordingly, the San Diego Regional Airport Authority's Airport Land Use Commission (ALUC) does not have jurisdiction over the project itself. However, alterations to runway 06-24 and other applicable facilities, would require an update to the airport's comprehensive Land Use Plan for changes in noise contours, safety zones, and/or land use type or density policies within the ALUC jurisdiction for the airport. Potential impacts to species associated with biological conservation plans are discussed in Section IV (e) and will be further evaluated in the EIR. The proposed Master Plan improvements would be reviewed for consistency with the County of San Diego General Plan, City of Carlsbad General Plan, and other applicable land use plans, policies and regulations of agencies that have jurisdiction. Some of the improvements could be Potentially Significant, and will be fully addressed in the EIR.

**XI. MINERAL RESOURCES** -- Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance" (MRZ-3).

However, the project is located within an existing airport that has been in use since 1959 and is surrounded by densely developed land uses (including commercial and industrial uses) which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

**No Impact:** The project site is not on designated mineral recovery site lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

**XII. NOISE** -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact          | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

## Discussion/Explanation:

**Potentially Significant Impact:** Noise levels are typically measured in one of two ways, as the Community Noise Equivalent Level (CNEL) or the Day-Night Average Level (Ldn). Both methods provide a measurement of total noise exposure at a given location for an average day. The most common unit of sound measurement is the decibel (dB). Because the human ear is more sensitive to some sound wave frequencies than others, different sound weighting scales have been developed. The "A" weighting scale is the most commonly used for environmental noise assessment, as it correlates well with the human response to noise sources such as aircraft and traffic (A-weighted decibels is abbreviated as dBA).

A new noise analysis will be conducted for the proposed Master Plan improvements using CNEL as the impact metric, and will incorporate the forecasted aviation operations over the 20-year planning period. The projected number of annual operations, aircraft fleet mix, and traffic pattern will be modeled using the existing and proposed runway/taxiway alignments. Ground noise will also be analyzed. Noise impacts are Potentially Significant, and will be analyzed in the EIR.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

## Discussion/Explanation:

**Less Than Significant Impact:** The project would not generate excessive ground borne vibration. Construction activities may result in minor generation of ground borne vibrations from heavy construction equipment. No high vibration producing activities are proposed as part of construction. Ground borne vibrations generated by construction activities would be of low magnitude, would be temporary, and would result in a Less Than Significant groundborne noise impact.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** The new Master Plan forecasts an increase in the number of flight operations over its 20-year planning period when compared to baseline levels, which could result in an increase in the ambient noise level in the Airport vicinity. This impact could be Potentially Significant. A new noise analysis will be conducted as part of the EIR environmental review process to determine if the changes would result in a substantial permanent increase over existing noise levels.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Construction activities will temporarily generate noise, however all of these construction activities would occur on airport property and sensitive receptors such as residences and schools are generally too far away from the Airport to be affected by construction noise. However, a project-specific noise analysis will be conducted for the proposed Master Plan improvements to assess temporary noise impacts associated with the use of heavy machinery, which may be Potentially Significant. Further CEQA review of construction noise will be included in the EIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** McClellan-Palomar Airport is a public airport and an airport land use plan (CLUP) applies to the surrounding area. As discussed above in Section XII, noise contours will be modeled and impacts analyzed for the proposed facilities and potential runway extensions as part of the EIR noise study. In addition, updated maps will be prepared for the use of the ALUC.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project is not located within the vicinity of a private airstrip, the project is located on a public airport.

**XIII. POPULATION AND HOUSING** -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The proposed Master Plan improvements are designed to accommodate existing and long-term demand for the public-use airport. The proposed project will not induce substantial population growth in an area because the project does not propose new homes or businesses, nor does it require any physical or regulatory change that would remove a restriction to or encourage population growth in an area. Therefore the project would have a Less Than Significant impact on population growth.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project proposes facility improvements within existing airport property. No acquisition of additional right of way is required, nor will the project displace any existing housing. Therefore, the Master Plan improvements would have No Impact to existing housing.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

## Discussion/Explanation:

**No Impact:** No property is proposed for acquisition, therefore no displacement of residents would occur in association with the Master Plan improvements.

**XIV. PUBLIC SERVICES**

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

**Less Than Significant Impact:**

Fire protection: Due to the airport's location within the City of Carlsbad, its landside fire response is provided by the City's Fire Department. The Department's Fire Station #5 is located east of the airport on Orion Way, just east of El Camino Real. The County has provided a fire apparatus staging area along the north side of the airport boundary. The Master Plan proposes moving and upgrading the onsite Aircraft Rescue and Fire Fighting (ARFF) facility to a vacant site adjacent to the air traffic control tower. (See Figure 4.) Specific emergency response facilities and equipment are dictated by the FAA in response to aircraft use of the airport. Any changes to the operations of emergency response would be arranged with the appropriate agencies prior to implementation.

Police Protection: The police response will continue to be from the City of Carlsbad, and County Sheriff as needed. There is not anticipated to be an increase in need for police protection in association with the proposed Master Plan activities as the project does not include development of new residences or businesses. Airport security within the passenger terminal would be provided by the federal Transportation Security Administration (TSA) and contracted security personnel, and would impact local police forces only in the event of an emergency.

Schools, Parks, or other Facilities: The proposed Master Plan improvements would not result in the need for new schools, parks, or public facilities or utilities.

Accordingly, there would be no impact to police, schools, park, or other facilities, and the upgrade/movement of the ARFF facility to a new location with improved access to the runway on a vacant site is Less Than Significant.

#### **XV. RECREATION**

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The project does not propose any residential use including, but not limited to, a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

#### **XVI. TRANSPORTATION AND TRAFFIC** -- Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Although the airport is owned and operated by the County of San Diego, airport users must use the local City of Carlsbad traffic network to access the site. The City of Carlsbad's General Plan includes assumptions regarding the long-term use

forecast for the airport, and associated increases in ground and air transportation. The impact to the City of Carlsbad and Caltrans' road network is Potentially Significant. A project-specific traffic analysis for the proposed Master Plan improvements will be conducted and discussed in the EIR.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation: The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the Regional Transportation Plan (RTP) of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System (MTS) and the North County Transit District (NCTD) is required to ensure that the impacts of new development on CMP transit performance measures are identified.

**Potentially Significant Impact:** As discussed above in Section XVI(a), potential traffic/transportation impacts associated with the proposed Master Plan are Potentially Significant and will be discussed in the EIR.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Potentially Significant Impact:** Based on Master Plan aviation forecasts, there is expected to be an increase in commercial air service and overall aircraft operations over the 20-year planning period. The potential runway extensions and a slight northward shift in the runway and taxiways may slightly shift how aircraft operate on the ground, but air traffic patterns would not substantially differ from existing conditions. The forecasted increase in air traffic will be assessed in terms of safety risks, could be Potentially Significant, and will be discussed further in the EIR.



- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** The proposed project will not alter vehicular traffic patterns, roadway design, place incompatible uses on existing roadways, or create or place curves, slopes or walls which would impede adequate site distance on a road. Any potential improvements to the ground network would be in accordance with the City of Carlsbad General Plan and Road Standards.

- e) Result in inadequate emergency access?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

**No Impact:** Emergency access is an engineering design consideration during development of the proposed Master Plan improvements. The project does not propose changes that would impede emergency access.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Less Than Significant Impact:** The design and layout of parking lots, vehicular circulation, pedestrian access, etc. are elements that will be studied in the Master Plan. The project will reviewed and designed to conform with the City of Carlsbad General Plan for local and regional alternative transportation connectivity. The project will not conflict with policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

**XVII. UTILITIES AND SERVICE SYSTEMS** -- Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

**Less Than Significant Impact:** The project proposes to continue to discharge domestic waste through facilities operated by the Encina Wastewater Authority, a community sewer system that is permitted to operate by the RWQCB. Therefore, because the project will be discharging wastewater to a RWQCB permitted community sewer system, the project is consistent with the wastewater treatment requirements of the RWQCB, including the Regional Basin Plan and would have a Less Than Significant impact.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	Potentially Significant Impact	<input type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/>	No Impact

## Discussion/Explanation:

**No Impact:** The project does not propose or require new or expanded water or wastewater treatment facilities, nor significant associated environmental effects.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input checked="" type="checkbox"/>	Potentially Significant Impact	<input type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

## Discussion/Explanation:

**Potentially Significant Impact:** The proposed Master Plan improvements include areas of new impervious surfaces that would require adherence to aircraft movement area drainage requirements established by FAA design standards. Storm water drainage improvements would be constructed in association with these projects, including surface and subsurface drain system components and stormwater detention basins. The installation of these elements may constitute a Potentially Significant Impact and will be addressed in the EIR.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input type="checkbox"/>	Potentially Significant Impact	<input checked="" type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

## Discussion/Explanation:

**Less Than Significant Impact:** Proposed Master Plan improvements would require additional potable water, and generate greater amounts of wastewater than existing conditions,

due primarily to redevelopment to the passenger terminal, administrative building, and support facilities. Where applicable, reclaimed water will be used for landscaping. Once the actual landside improvements are sized and calculated for usage, the increased demand will be compared against the airport's existing entitlements, but due to the use of water-efficient fixtures and reclaimed water, it is expected to be a less than significant impact to the entitlements and wastewater treatment capacity.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Less Than Significant Impact:** As discussed in Section XVII. (a,b,c,d), the increase in wastewater associated with the proposed landside improvements will be fully analyzed in the EIR. The increase in wastewater generation is not expected to exceed the facilities operated by the Encina Wastewater Authority.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

**Less Than Significant Impact:** The new Master Plan proposes improvement projects which would result in greater generation of solid waste over its 20-year planning period than under current conditions, primarily due to expansion of visitor-serving facilities (e.g., restrooms, restaurants) and the projected increase in the number of airline passengers anticipated to use these facilities. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- g) Comply with federal, state, and local statutes and regulations related to solid waste?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

## Discussion/Explanation:

**No Impact:** The proposed project would comply with applicable federal, state, and local statutes and regulations related to solid waste during operation and construction, and therefore, would have No Impact.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:**

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

Implementation of the proposed Master Plan improvements could result in potentially significant impacts on: agriculture, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation/traffic, and utilities and service systems. County Airports will be conducting project-specific analyses for each of these subject areas for evaluation in the Program EIR.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

## Discussion/Explanation:

The new 20-year Master Plan will guide long-range planning and development on Airport property. The construction and operation of the facility improvements may generate project-level impacts which could contribute to a cumulatively considerable impact. These impacts will be evaluated in the Program EIR in the context of applicable cumulative study areas. Due to the long-range and phased implementation schedule of the Master Plan, design and construction details, project funding, FAA review and approval for each proposed element are not yet available. Each component of the Master Plan will be evaluated at the program-level in the EIR for environmental impacts. Over the 20-year planning period as implementing projects are initiated/preceding the securement of funding and approvals, the individual project will be reevaluated as being within or outside of the scope of the Program EIR and additional environmental review will be conducted, as applicable.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

<input checked="" type="checkbox"/>	Potentially Significant Impact	<input type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

#### Discussion/Explanation:

The new 20-year Master Plan proposes improvements that could result in direct and/or indirect adverse effects to humans due to potential impacts associated with air quality, hazards and hazardous materials, noise, transportation and traffic, and those impacts will be evaluated in the Program EIR.

### XIX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to [www.leginfo.ca.gov](http://www.leginfo.ca.gov). For County regulation refer to [www.amlegal.com](http://www.amlegal.com). All other references are available upon request.

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**Figure 1**

## **Airport Property & Vicinity**

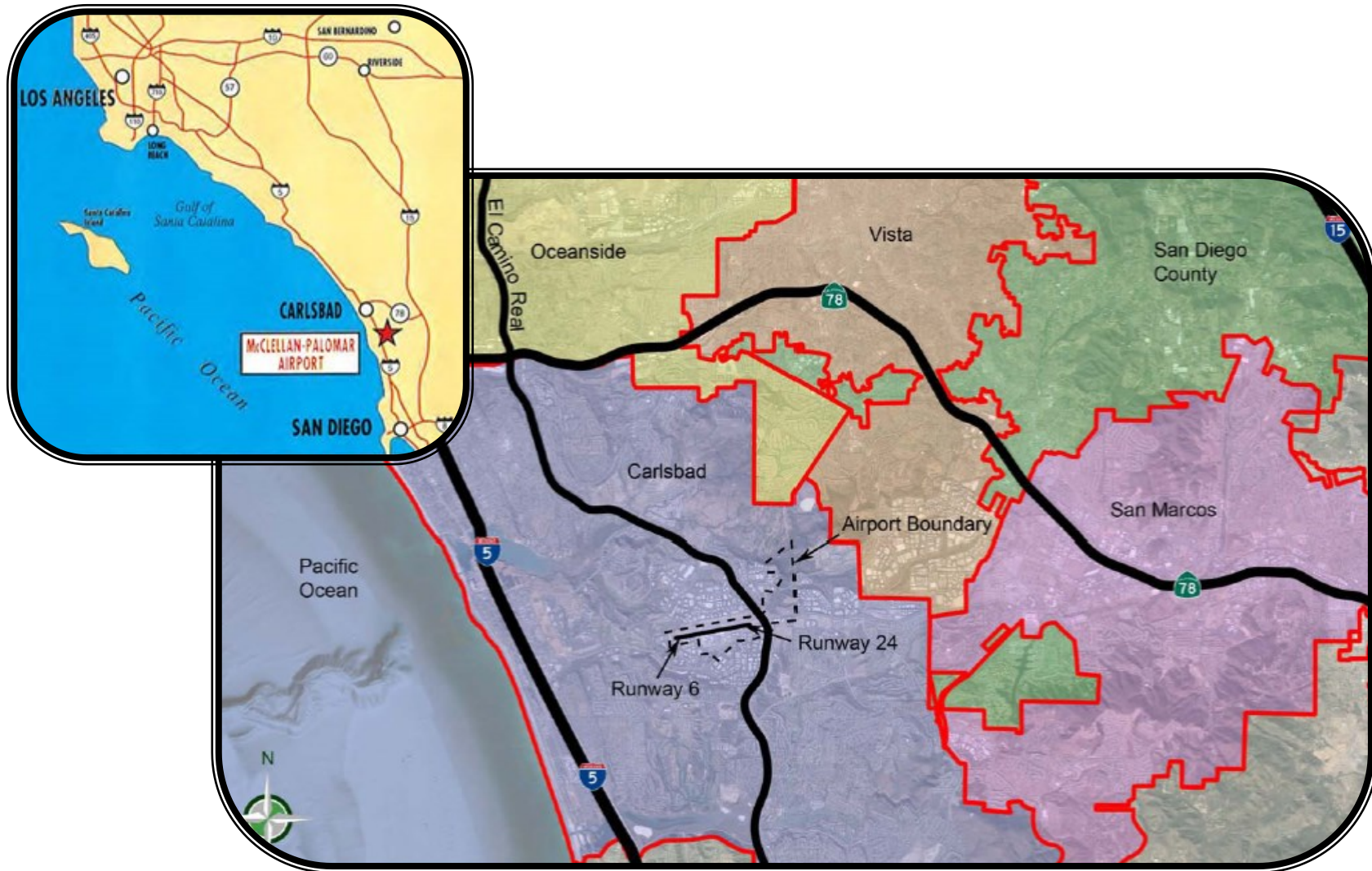


Figure 2

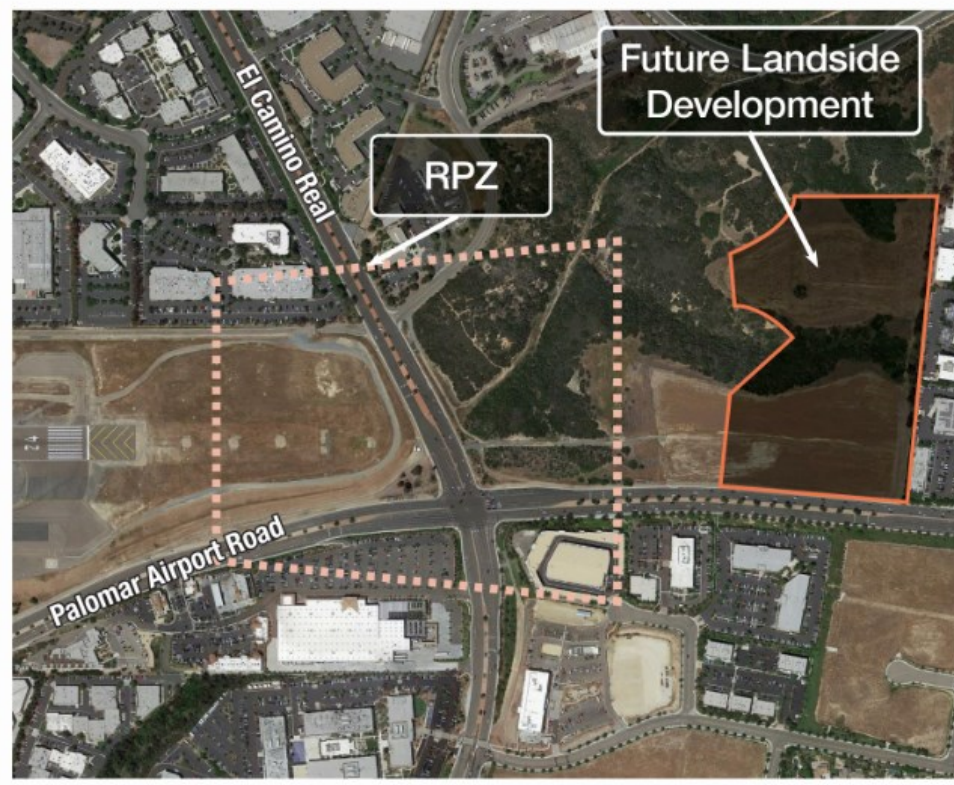
## Modified C/D-III: Airside Components





**Figure 3**

## **Modified C/D-III: Landside Improvement Areas**





**Figure 4**

# Modified C/D-III: Airside & Landside Phasing Plan

## DEVELOPMENT PHASES/FEATURES:

### NEAR-TERM (0-7 YEARS)

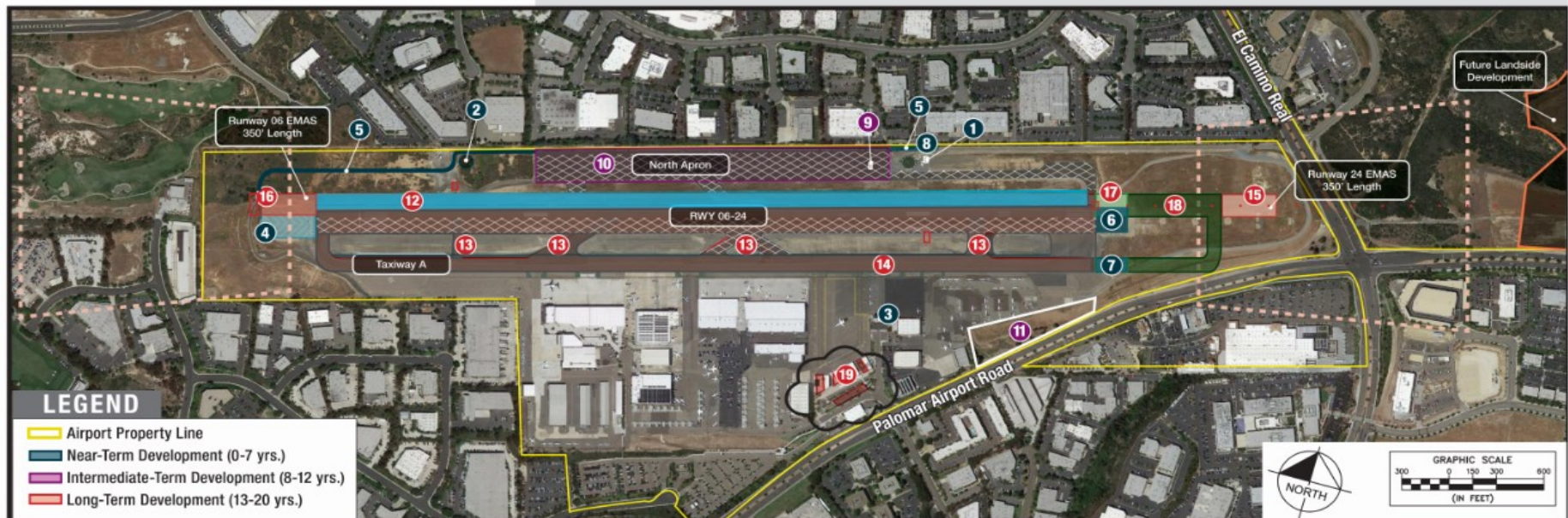
- 1 Relocation of the Glideslope Building
- 2 Relocation of the Segmented Circles and Windsock Equipment
- 3 Relocation of ARFF Facility
- 4 Construction of EMAS System on RWY West End
- 5 Relocation of the Vehicle Service Road
- 6 200' Extension of Existing Runway
- 7 200' Extension of Existing Taxiway A
- 8 Relocation of Lighting Vault

### INTERMEDIATE-TERM (8-12 YEARS)

- 9 Removal of Fuel Farm on North Apron
- 10 Removal of the North Apron
- 11 Future Airside Development

### PHASE 3: LONG-TERM (13-20 YEARS)

- 12 Relocation of RWY 06-24 (Includes REILs, PAPIs, Localizer Antennae and MALSRs)
- 13 Removal/Reconstruction of Existing Connector Taxiways
- 14 Removal/Reconstruction of Existing TWY A (Includes Lighting)
- 15 Construction of EMAS System on East End
- 16 Relocation of EMAS System on West End
- 17 200' RWY Extension
- 18 600' RWY Extension
- 19 Future Passenger/Admin Facilities Improvements





EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Notice of Preparation

**RECEIVED**

MAR 03 2016

February 29, 2016

**County of San Diego  
ENVIRONMENTAL SERVICES**

To: Reviewing Agencies

Re: McClellan - Palomar Airport Master Plan  
SCH# 2016021105

Attached for your review and comment is the Notice of Preparation (NOP) for the McClellan - Palomar Airport Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Cynthia Curtis  
San Diego County  
5510 Overland Ave., Suite 410  
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2016021105  
**Project Title** McClellan - Palomar Airport Master Plan  
**Lead Agency** San Diego County

---

**Type** NOP Notice of Preparation  
**Description** Project is a flexible, phased 20 year strategy to prioritize projects at the Airport that provide safety and operational enhancements. The Master Plan uses technical studies, forecast data, Federal Aviation Administration (FAA) design engineering standards, and public involvement to support the modernization of the airport while maximizing use of existing airport property.

---

**Lead Agency Contact**

**Name** Cynthia Curtis  
**Agency** San Diego County  
**Phone** 858-694-3906 **Fax**  
**email**  
**Address** 5510 Overland Ave., Suite 410  
**City** San Diego **State** CA **Zip** 92123

---

**Project Location**

**County** San Diego  
**City** Carlsbad  
**Region**  
**Cross Streets** Palomar Airport Rd @ Yarrow Drive  
**Lat / Long**  
**Parcel No.**  
**Township** **Range** **Section** **Base**

---

**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools** Pacific Heights Sch.  
**Land Use** Public (City of Carlsbad), Zoning: Industrial

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**Project Issues** Agricultural Land; Air Quality; Biological Resources; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse; Cumulative Effects; Other Issues

---

**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Department of Water Resources; Native American Heritage Commission; Caltrans, Division of Aeronautics; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Fish and Wildlife, Region 5; Caltrans, District 11

---

**Date Received** 02/29/2016 **Start of Review** 02/29/2016 **End of Review** 03/29/2016

# NOP Distribution List

## Resources Agency

- ☒ Resources Agency  
Nadell Gayou
- ☐ Dept. of Boating & Waterways  
Denise Peterson
- ☐ California Coastal Commission  
Elizabeth A. Fuchs
- ☐ Colorado River Board  
Lisa Johansen
- ☐ Dept. of Conservation  
Elizabeth Carpenter
- ☐ California Energy Commission  
Eric Knight
- ☐ Cal Fire  
Dan Foster
- ☐ Central Valley Flood Protection Board  
James Herota
- ☐ Office of Historic Preservation  
Ron Parsons

## Dept of Parks & Recreation Environmental Stewardship Section

- ☐ California Department of Resources, Recycling & Recovery  
Sue O'Leary
- ☐ S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam

## Dept. of Water Resources Resources Agency Nadell Gayou

## Fish and Game

- ☐ Dept. of Fish & Wildlife  
Scott Flint  
Environmental Services Division
- ☐ Fish & Wildlife Region 1  
Curt Babcock

- ☐ Fish & Wildlife Region 1E  
Laurie Harnsberger
- ☐ Fish & Wildlife Region 2  
Jeff Drongesen
- ☐ Fish & Wildlife Region 3  
Charles Armor
- ☐ Fish & Wildlife Region 4  
Julie Vance
- ☒ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M  
George Isaac  
Marine Region

## Other Departments

- ☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- ☐ Dept. of General Services  
Public School Construction
- ☐ Dept. of General Services  
Anna Garbelf  
Environmental Services Section
- ☐ Delta Stewardship Council  
Kevan Samsam
- ☐ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division
- ☐ Independent Commissions, Boards  
Delta Protection Commission  
Michael Machado

County: San Diego

- ☐ OES (Office of Emergency Services)  
Marcia Scully

## Native American Heritage Comm.

- ☐ Debbie Treadway

## Public Utilities Commission Supervisor

- ☐ Santa Monica Bay Restoration  
Guangyu Wang

## State Lands Commission Jennifer Deleong

- ☐ Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

## Cal State Transportation Agency CalSTA

- ☒ Caltrans - Division of Aeronautics  
Philip Crimmins

- ☐ Caltrans - Planning  
HQ LD-IGR  
Terri Pencovic

- ☐ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

- ☐ Caltrans, District 1  
Rex Jackman
- ☐ Caltrans, District 2  
Marcelino Gonzalez
- ☐ Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North
- ☐ Caltrans, District 4  
Patricia Maurice
- ☐ Caltrans, District 5  
Larry Newland
- ☐ Caltrans, District 6  
Michael Navarro
- ☐ Caltrans, District 7  
Dianna Watson

- ☐ Caltrans, District 8  
Mark Roberts

- ☐ Caltrans, District 9  
Gayle Rosander

- ☐ Caltrans, District 10  
Tom Dumas

- ☒ Caltrans, District 11  
Jacob Armstrong

- ☐ Caltrans, District 12  
Maureen El Harake

## Cal EPA

- ☒ Air Resources Board  
All Other Projects  
Cathi Slaminski

- ☐ Transportation Projects  
Nesamani Kalandiyur

- ☐ Industrial/Energy Projects  
Mike Tollstrup

- ☐ State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

- ☐ State Water Resources Control Board  
Karen Larsen  
Division of Drinking Water

- ☐ State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

- ☐ State Water Resources Control Board  
Phil Crader  
Division of Water Rights

- ☐ Dept. of Toxic Substances Control  
CEQA Tracking Center

- ☐ Department of Pesticide Regulation  
CEQA Coordinator

## Regional Water Quality Control Board (RWQCB)

- ☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- ☐ RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)
- ☐ RWQCB 3  
Central Coast Region (3)
- ☐ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)
- ☐ RWQCB 5S  
Central Valley Region (5)

- ☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

- ☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

- ☐ RWQCB 6  
Lahontan Region (6)

- ☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

- ☐ RWQCB 7  
Colorado River Basin Region (7)

- ☐ RWQCB 8  
Santa Ana Region (8)

- ☒ RWQCB 9  
San Diego Region (9)

- ☐ Other \_\_\_\_\_

- ☐ \_\_\_\_\_  
Conservancy



# Comment Form

McClellan-Palomar Master Plan: Notice of Preparation of a Draft  
Program Environmental Impact Report Public Scoping Comments



## Master Plan Public Meeting #4 – February 29, 2016

If you wish to submit written comments focusing on your area of expertise, your agency's area of jurisdiction, or other issues related to the scope of the environmental analysis, written responses may be mailed, faxed or emailed to the address to the right. Due to the time limits mandated by State law, comments may be submitted in writing during the 30-day public review period between February 29, 2016 and March 29, 2016.

**Please submit your comments during Public Meeting #4, or send them to:**

County of San Diego, Department of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123  
Fax: (858) 694-3925  
E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	RICHARD MARTINDALL
Title/Organization:	SELF AVIATION SAFETY CONSULTANT PILOT
Email:	RICH.MARTINDALL@EARTHLINK.NET
Phone Number:	619-253-7649
Home Address:	1434 MARSHALL ROAD #4 ALPINE CA 91901
Project Comments:	<p>THE PLAN STATES THERE WILL BE NO IMPACT TO EXISTING TENANTS YET THERE DOESN'T SEEM TO BE ANY DISCUSSION OR INDICATION ON THE MPIS HOW THE AIRCRAFT DISPLACED FROM THE NORTH PARKIAL APRON WILL BE ACCOMMODATED.</p> <p>I AM ALSO CONCERNED BY SUPERVISOR HORNE'S COMMENTS TO KIDS IN HIS INTERVIEW WITH THEM <del>THAT</del> THAT WITH THE EXPANSION TO ACCOMMODATE LARGER AIRCRAFT SMALL AIRCRAFT LIKE CESSNA'S WILL GO AWAY. PALOMAR IS A JOINT <del>USE</del> USE <u>PUBLIC</u> AIRPORT AVAILABLE TO ALL GENERAL AVIATION AIRCRAFT AND IT SEEMS TO ME THAT THE BOARD OF SUPERVISORS AND KIMLEY-HORN NEED TO BE REMINDED OF THIS</p>
<input type="radio"/> Yes, please send me project notifications	

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Fax: (858) 694-3925  
E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	Cathy Overley
Title/Organization:	Homeowner
Email:	raindroppp@aol.com
Phone Number:	206-949-8609
Home Address:	1841 Timber Trail, Vista, CA
Project Comments:	<p>NOISE! The plane fly directly overhead and have increased considerably. My home sets at 500+'. Planes are tracked at 1800' to 900' over my house. Do the math. With proposed increase in traffic, they will be joining me for dinner frequently! Please consider the noise impact on a normally or former, I should say, neighborhood.</p>
<input type="checkbox"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	VINCENT NELSON
Title/Organization:	CITIZEN OF CARLSBAD
Email:	35VPOOH@ATT.NET
Phone Number:	760-804-1945
Home Address:	1416 SAPPHIRE DR
Project Comments:	<p>There Has Been No Addressing the VNAP process that now exists. With increased size AND TRAFFIC envisioned in the future we need to see the VNAP or voluntary adherence to REGULATIONS, REMOVED AND FAA RULES FOR FLIGHT PATTERNS AND SAFETY REGS. MADE MANDATORY AND ENFORCEABLE. This would also include TAKEOFF AND LANDING TIMES ADJUSTED TO AS MUCH AS POSSIBLE. THANKS IN ADVANCE FOR A TIMELY RESPONSE</p>
<input type="radio"/> Yes, please send me project notifications	



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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	RICH MARTINDELL
Title/Organization:	SELF AVIATION SAFETY CONSULTANT, PILOT, AIRCRAFT ACCIDENT INVESTIGATOR
Email:	RICH.MARTINDELL@EARTHLINK.NET
Phone Number:	619-253-7649
Home Address:	1434 MARSHALL ROAD #4 ALPINE, CA 92109
Project Comments:	SUPPORT MASTER PLAN. ADOPTION OF THE PLAN DOES <u>NOT</u> EXCLUDE USR OR THE AIRPORT BY SMALL, PRIVATE AVIATION AIRCRAFT
<input type="radio"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	Luke Miracco
Title/Organization:	
Email:	lpmiracco@hotmail.com
Phone Number:	760-331-3436
Home Address:	Crystalline Drive.
Project Comments:	<p>Help me understand how...</p> <p>1) you will keep larger D,E class planes/jets from using the airport when today we have 6,000 C,D class aircraft on a BII runway?</p> <p>2) How larger jets with larger fuel loads will in anyway change the noise levels on the surrounding community. A. larger jets + B. larger fuel loads + C. More take offs/landings = more noise and 200-800ft. of runway is immaterial to shifting noise east and the frequency of noise in the surrounding community.</p>
<input type="radio"/> Yes, please send me project notifications	

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Fax: (858) 694-3925  
E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	Jerry Miller
Title/Organization:	
Email:	SMILLER HSG@ATT.NET
Phone Number:	
Home Address:	6093 Paseo Carretera, Carlsbad 92009
Project Comments:	<p>Why is this needed? What are deficiencies <u>now</u>? Why do we need to upgrade the classification? Why can't the airport stay as it is?</p> <p>I <u>read</u> everything he is saying. Having him read this out loud doesn't offer me any new information!!</p>
<input type="radio"/> Yes, please send me project notifications	

# Comment Form

McClellan-Palomar Master Plan: Notice of Preparation of a Draft  
Program Environmental Impact Report Public Scoping Comments



## Master Plan Public Meeting #4 – February 29, 2016

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**Please submit your comments during Public Meeting #4, or send them to:**

County of San Diego, Department of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123  
Fax: (858) 694-3925  
E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	Jerry Miller
Title/Organization:	
Email:	JMILLER HSG @ ATT.NET
Phone Number:	
Home Address:	6093 Paseo Carneta. Carlsbad 92009.
Project Comments:	<p>Planes currently fly over <u>homes</u> on a <u>regular basis</u>. If I call the airport, they say there is <u>nothing</u> they can do. If air port expands, there will be larger planes and more flights.</p> <p>I want to see the ALP superimposed on a map that shows where planes are and are not allowed to fly, as per the last update in 2013.</p> <p>And I need specific information on who to contact when planes are flying outside of this space.</p>
<input type="radio"/> Yes, please send me project notifications	



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E-mail: Cynthia.Curtis@sdcounty.ca.gov

Name:	Maud E. Schaefer
Title/Organization:	
Email:	betsyscha@shcglobal.net
Phone Number:	760-727-5948
Home Address:	1660 Dawson Dr.
Project Comments:	<p>I am concerned about any change in the flight paths. I live directly east of the airport at the mouth of Los Monos Canyon. If the runway is lengthened, then the flight plan is likely to be changed. At the present time the planes turn short over Mt. Marmon. If they go farther east they will come over my house which I won't like. My family has lived in this spot since 1897 - about 100 years.</p> <p>The EIR should include the impacts of noise, safety and wildlife disturbance. This flight path would also impact the Univ. of California Dawson Los Monos Reserve. It includes Los Monos Canyon, Mt Marmon &amp; Mt. Hinton. It is one of the few places left for wildlife of all sorts.</p> <p>If my home is impacted who will reimburse me for the loss of value of my property?</p> <p><input type="checkbox"/> Yes, please send me project notifications</p>



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E-mail: Cynthia.Curtis@sdcounty.ca.gov

Name:	Paul Glenon
Title/Organization:	
Email:	rcglenon@roadrunner.com
Phone Number:	760-473-3181
Home Address:	4543 PICADILLY Ct Carlsbad, CA 92010
Project Comments:	<p>① Once again the County is trying to force small GA aircraft off the airport. There will be insufficient parking for small aircraft as soon as the North Ramp closes.</p> <p>② It was a tremendous waste of money to build the North Ramp knowing that it would have to be removed (at great cost, by the way) to meet C/D III specifications.</p> <p>③ Has the county ceased maintaining the North Ramp. Unsealed pavement cracks have arisen over the past few months and weeds have penetrated the pavement in many areas.</p> <p><i>Probably too late to mention all this at this point.</i></p>
<input checked="" type="checkbox"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	ROCK SWANSON, PRESIDENT
Title/Organization:	PALOMAR AIRPORT ASSOC
Email:	ROCKSWANSON@COX.NET
Phone Number:	(760) 213-1323
Home Address:	4346 MANCHESTER AVE.
Project Comments:	PLEASE CONSIDER THE SMALL AIRPLANE COMMUNITY INCLUDING THE TRUE NORTH TIE-DOWNS. SEE ATTACHED LETTER.
<input type="radio"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	JOHN O'REILLY
Title/Organization:	P.A.A.C.
Email:	john@oreillyua.com
Phone Number:	760 504 6040
Home Address:	Carlsbad, CA.
Project Comments:	What is the <u>ONE</u> most common misperception about the preferred option and <del>what is the truth</del> why is it wrong? Help us understand the real truth about their option.
<input type="radio"/> Yes, please send me project notifications	

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Name:	
Title/Organization:	
Email:	
Phone Number:	
Home Address:	
Project Comments:	<p>Planes currently taking off/landing are supposed to follow designated paths within certain times. These rules are not always enforced. If they are not enforced now, why should I believe they will with bigger aircraft? Please start enforcing!!</p>
<input type="radio"/> Yes, please send me project notifications	



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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	EDWARD MCKISSICK
Title/Organization:	
Email:	edmakissick@yahoo.com
Phone Number:	
Home Address:	3610 PONTIAC DR CARLSBAD 92010
Project Comments:	WILL FLIGHTS BE REQUIRED TO STAY IN LANES THAT ARE LESS INVASIVE TO RESIDENTIAL AREAS OF HIGH CONCENTRATION. WE CURRENTLY EXPERIENCE MANY LOW FLIGHTS AND COMPLAINTS GO UNANSWERED AND UNRESOLVED
<input checked="" type="checkbox"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	MARK JURECKI
Title/Organization:	CARLSBAD NEIGHBOR OF PALOMAR AIRPORT
Email:	markjurecki@gmail.com
Phone Number:	(760) 476-9311
Home Address:	2719 LLAMA CT., CARLSBAD CA. 92009-6518
Project Comments:	<p>THE MASTER PLAN ANTICIPATES MORE AIR TRAFFIC WITH LARGER AIRCRAFT LANDING AT HIGHER SPEEDS. ALL THESE FIXED-WING A/C WILL BE FOLLOWING A SET APPROACH (FLYING THE BOX).</p> <p>IN CONTRAST, ROTORCRAFT WILL BE FLYING AS THEY WISH, NOT FOLLOWING ANY SET PATTERN. WHAT, IF ANYTHING, IS THE MASTER PLAN DOING TO LESSEN THE CHANCES THAT ROTORCRAFT WILL COLLIDE WITH FIXED-WING AIRCRAFT?</p>
<input type="radio"/> Yes, please send me project notifications	

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E-mail: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Name:	Helle Pearson, David Pearson
Title/Organization:	
Email:	dcpear@gmail.com
Phone Number:	310-415-4701
Home Address:	6443 Amethyst Way, Carlsbad, CA 92011
Project Comments:	<p>We suggest the following considerations in the environmental review:</p> <ol style="list-style-type: none"><li>1) noise pollution and dangerously close flight patterns from small aircraft which turn shortly after take-off</li><li>2) particulate matter and fuel smells (black soot in garden daily)</li><li>3) disruption of cellular phone/internet connections</li><li>4) stress/health from &gt;30 close (&lt; 2500 ft) overflights of our house daily</li></ol> <p>Suggestion: Mandate arrival/departure corridors and ban Mar Brista/Aviana overflights by CAA and other traffic</p>
<input checked="" type="checkbox"/> Yes, please send me project notifications	

## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710  
Fax (916) 373-5471  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



March 2, 2016

Cynthia Curtis  
San Diego County  
5510 Overland Ave., Suite 410  
San Diego, CA 92123

Sent via e-mail:  
[Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)  
Number of pages: 4

RE: SCH# 2016021105, McClellan-Palomar Airport Master Plan Project, City of Carlsbad, San Diego County, California

Dear Ms. Curtis:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

**CEQA was amended significantly in 2014.** Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

#### AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. **Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).



4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).  
*This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5,

subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

Gayle Totton  
Associate Government Planning Analyst

cc: State Clearinghouse

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**From:** Lanikai Management [mailto:lmc@lanikaimanagement.com]  
**Sent:** Monday, February 29, 2016 4:50 PM  
**To:** Curtis, Cynthia  
**Subject:** McClellan-Palomar Airport Master Plan, Carlsbad CA

Ms. Curtis,

My name is Greg Scaduto, and I am writing to you in regards to the recent notice we received about the McClellan-Palomar Airport Master Plan. As one of the owners of a commercial office park that abuts the airport on the north western property line, (specifically located at 1910, 1920, & 1930 Palomar Point Way, Carlsbad, CA, and commonly known as "Palomar Point Office Park"), I'm interested in knowing if the EIR will address future noise related issues. I assume the purpose of extending runway an additional 800 feet is to accommodate larger commercial passenger jets. If correct, I would like to know what, if any, mitigation requirements will be imposed to offset the increase in noise from larger jet airliners. To be clear, I am not concerned about the noise related to the construction activities for the airport improvements, only the noise related to future jet traffic. Any information you can share with me would be greatly appreciated.

Cordially,

***Greg Scaduto***

*Lanikai Management Corp.*

*P.O. Box 216*

*2928 San Marcos Ave., Ste. 201*

*Los Olivos, CA 93441*

*P. (805) 693-1314 / F. (805) 693-1317 / C. (805) 680-0354*

[gjs@lanikaimanagement.com](mailto:gjs@lanikaimanagement.com) / [lmc@lanikaimanagement.com](mailto:lmc@lanikaimanagement.com)



# San Diego County Archaeological Society, Inc.

Environmental Review Committee

3 March 2016

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

Subject: Notice of Preparation of a Draft Program Environmental Impact Report  
McClellan-Palomar Airport Master Plan

Dear Ms. Curtis:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File

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**From:** alice Cooney <alcooney28@msn.com>  
**Sent:** Sunday, March 06, 2016 8:01 AM  
**To:** Curtis, Cynthia  
**Subject:** Opposition to Palomar Airport Expansion

I am a 30 year resident of south Carlsbad. I adamantly oppose any expansion of Palomar Airport. Although I do not currently live under designated flight paths, private jets routinely buzz our rooftops practicing take offs and landings, at great disruption and potential dangers.

Any assurances the county will provide as to mitigation efforts to minimize impact to residents will not be deemed credible. Once planes are in the air, they go where they want to go.

Carlsbad residents just organized a grassroots effort to defeat Measure A allowing a new mall to be built in Carlsbad. Expect a groundswell of organic, organized, local opposition if the county tries to subvert the will of residents and go forward with this expansion.

Alice Cooney  
7042 Snapdragon Dr  
Carlsbad, CA

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**From:** rich breyer <rpbreyer@gmail.com>  
**Sent:** Monday, March 07, 2016 11:01 AM  
**To:** Curtis, Cynthia; rich breyer  
**Subject:** Palomar Airport Expansion

Hi Cynthia, This morning at 4:54 am I was awoken to a jet taking off from the airport. This is not the first time this has happen. The corporate jets use this airport whenever they want and don't follow the established rules. I have tried in the past to complain but County's own process to report planes is very difficult to follow. There isn't a number to call or email address to send a simply lodge a complaint.

It is my opinion that the airport expansion is not good for the average citizen of north county. This expansion seems to be a push from large corporations like Via Sat and Qualcomm along with other wealthy Jet owners, so they can take off and land using more fuel capacities than is allowed today.

I would like to go on record to state that I am against the expansion for the following reasons:

1. Increased Air and Noise Pollution. The amount of pollution that will result from expanding the runway needs to be studied and quantified. With the expansion allowing fully fueled aircraft to takeoff they will need to burn more fuel at takeoff compounding the matter. The airport expansion will undoubtedly increase the amount of flights adding more to this huge environmental problem. How will these concerns be addressed in the environmental document?
2. Traffic increases: The areas roads near the airport are already that at capacity. This would definitely increase Vehicle Miles Traveled (VMT). The VMT is a large and important component in the CEQA process that was put in place with the passing of SB 743. Is the County trying to avoid this new law by having this environmental document finalized before SB 743 grace period is up? I believe that a new parking area just east of the airport was mentioned at the meeting. Has this new parking lot been studied in how it would effect traffic circulation? If more parking is going to be needed then the VMT will definitely need to be addressed, along with air quality issues.
3. Air safety: The County at this time is unable to control the airspace at this airport. Planes come and go whenever it is convenient to them with little regards to the current guidelines or flight paths. This observation was further reinforced this morning on my wake up call at 4:54am from a jet taking off!

Will our comments be formally addressed? How will they become part of the record? That was not really explained well at the meeting.

Thanks again for your time..

Regards,

Ricard Breyer

5213 Milton Rd.  
Carlsbad, Ca 92008  
760 473 2489

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**From:** Dee Forsberg, Global Hire <Dee@globalhire.org>  
**Sent:** Monday, March 07, 2016 8:32 AM  
**To:** Curtis, Cynthia  
**Subject:** Has the City of Carlsbad Lost Their Mind

Hi Cynthia,

My name is Delinda Forsberg and I am a resident of Carlsbad and live not too far from the airport. As it is, the noise has gotten worse over the years. One day, it actually sounded like the plane was coming into my neighborhood to land. It isn't uncommon for windows to shake. I thought the airport is surrounded by landfill. Why would we want the airport to be expanded? I am completely against this issue and I think our City Representatives are once again falling short in their responsibilities. Why hasn't there been more of an outreach to our community letting people know what is happening? I am strongly opposed to this project.

Delinda Forsberg



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Licensed and Insured



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**From:** zensurfing@hotmail.com on behalf of Greg Gutierrez <greg@greggutierrez.com>  
**Sent:** Monday, March 07, 2016 8:58 AM  
**To:** Curtis, Cynthia  
**Subject:** No airport expansion!

Please DO NOT MAKE THE AIRPORT ANY BIGGER.

We do not want this. Big money wants it.

Don't listen to big money. Listen to Carlsbad residents!

Thanks,  
g.

**Greg Gutierrez**  
(619) 405-9496  
[www.greggutierrez.com](http://www.greggutierrez.com)

*The Evening Doorman* is now available on **Amazon.com**

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**From:** Hank Jones <hjones@wfmkt.com>  
**Sent:** Monday, March 07, 2016 4:52 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport

I am writing to comment on the flight path I have observed over my house near Encinitas Ranch. I live on Swallowtail Rd. which is 300 ft. above sea level. I have observed both fixed and rotary wing aircraft at very low altitudes going directly over my neighborhood. I estimate their altitude above ground to be about 700 ft. I understand the minimums in the flight pattern to be 1500 ft. This is a concern regarding the excess noise as well as the apparent danger of flying low. I suggest the flight pattern for Palomar be examined and rerouted to occur over non-populated areas. My experience in aviation comes from being an Army helicopter pilot with over 1200 hours of flying time. Thank you for your consideration.

Hank Jones  
Western Flow Marketing  
Office (760) 634-1133  
Cell (760) 644-2362



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

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**From:** Lawrence Posner <lhposner@hotmail.com>  
**Sent:** Monday, March 07, 2016 8:48 AM  
**To:** Curtis, Cynthia  
**Subject:** Stop this madness please

Cynthia

Asking the citizens of San Diego county to foot the bill, \$150,000,00, for the expansion of Palomar Airport so ViaSat, **Qualcomm**, etc can fly non-stop to China, fully loaded from without have to stop of at San Diego International and refuel is ridiculous...

What's the counties return on this massive investment???

And why is the county paying for it in the first place? We keep on hearing "private enterprise" and get "the Government of our backs" from our elected officials but then all of you turn around and give big business our tax dollars...

This is go to stop...

You can't make Palomar Airport's runways almost, literally, as long as La Guardia's...

I urge you to not expand the airport....

— Larry Posner  
6024 Paseo Airoso  
Carlsbad, CA. 92009

LHPosner@hotmail.com  
646-247-7742  
No Land Line :)

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**From:** Jeffrey Tontini <jstontini@me.com>  
**Sent:** Monday, March 07, 2016 5:20 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport expansion comments  
**Attachments:** Palomar Airport Concerns - Tontini.pdf

Dear Ms. Curtis,

I have attached a PDF my concerns regarding the expansion of Palomar airport.

I sincerely appreciate the opportunity to express my thoughts regarding this project and look forward to your reply.

Thank you,

Jeff Tontini

Date: 6 March 2016

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

Dear Ms. Curtis,

I am writing you to voice my opinion that I am vehemently opposed to the possible Palomar airport expansion project. I understand that aviation commerce is essential to businesses in North County; however, I do not believe lengthening the runway at Palomar airport is the correct course of action for numerous reasons listed below.

1) Increasing the runway length will negatively affect my neighborhood tranquility as well as significantly decreasing my property value.

When I purchased my home in 2009, I signed a “waiver” that I understood I was purchasing a home near an airport at the potential impacts. I personally did not have a problem purchasing a home near Palomar airport, as I knew Palomar was used primarily for light civil and limited commercial aircraft due to the fact that it had a small runway. The current runway is only 4,897 feet long and because of the smaller runway length and the lack of room to expand, I decided to purchase a home in the Sea Bright neighborhood. As a former military and professional pilot myself, I knew the short runway length, as well as the lack of room for expansion, would prohibit larger aircraft from using the airfield. Hence I purchased my current home knowing I would not be living next to the “John Wayne Airport of North County”. (I had no knowledge that local airport authorities would look at re-claiming a former “dump” in which to lengthen the runway). However, with the possible expansion of Palomar airport, I will own a home that will be under a departure path of much larger aircraft such as Boeing 737 and Gulf Stream 650s and not Cessna 172’s and Robinson helicopters as I envisioned.

In addition, a host of other problems will simultaneously occur with the possible runway expansion to allow larger and heavier aircraft to use Palomar airport. A longer runway will entice more commercial operators to increase their use of the airport as well as both business and private aircraft. Needless to say, this will bring a significant noise increase to the Carlsbad community due to both the number of aircraft and the size of the aircraft being used. In addition, increased vehicle traffic will be created on Palomar airport road, which is already becoming very congested due to the population increase of Carlsbad as well as the large amount of commuters from both Temecula and East County who commute daily to Carlsbad to work. These changes would negatively affect not only my neighbors, and the local community, but myself as well.

2) The explanation of the Palomar Airport Advisory committee that a longer runway is needed is that *“larger wing aircraft are currently being built and we need to accommodate these aircraft”*.

Though this “fact” is partially true, these larger wingspan aircraft that the Advisory committee are describing is a very small portion of the total number of aircraft being sold and operated within the United States and the rest of the world. The “larger wing” aircraft are the extremely expensive business and personal jets, which are only used for the world’s wealthiest individuals and often the largest corporations due to their enormous price tag. In fact, most aircraft still being used in both the business and light civil aviation world have very little problem operating from Palomar airport. For example such aircraft include; Cessna Citation series aircraft, Learjet 45XR, Embraer Phenom 300, Hawker 900 XP, and the Beechcraft King Air-350. The story not being revealed to the public is the primary reason for the longer runway would allow some of the businesses in San Diego County that do own larger wing aircraft to fly non-stop to Asia vice having to make a fuel stop enroute. I understand that numerous businesses are located in San Diego County such as Qualcomm, Illumina, and Hewlett Packard, to name just a few. I also understand these businesses bring a significant amount of revenue to our community in both jobs and tax revenue. That being said, I personally don’t believe that spending approximately \$80 million plus tax dollars to lengthen a runway to allow a few select companies the luxury to not have to stop to re-fuel on their trips to the Orient is ludicrous at best.

3) No limitations on number of flights or time of flights with airport runway expansion.

I don’t know if you are aware but Lindberg Field, John Wayne airport and Santa Monica airports do not allow flights early in the early morning or late at night. They also restrict “touch and go”, practice approaches, as well as certain flight times they are not allowed to operate. These flight time restrictions include both holidays as well as weekends, which positively affects the community. However, since the Federal Aviation Administration (FAA) will no longer allow public airports to create these “noise abatement” rules, and hence Palomar airport will remain “open” 24 hours a day, 7 days a week with no restrictions on operating hours! Furthermore, Palomar airport cannot dictate the number of flight operations per day, week, month or year. Long story short, as long as Palomar airport is a “public” airport, air traffic will continue to increase expeditionally and the citizens of Carlsbad will not have a voice in the process.

If Palomar airport however became a private airport, the airport could in fact create and enforce “Operating Hours”, which would be extremely advantageous to the City of Carlsbad and North County residents as we could dictate the time of operations. However, if the airport became private, it would not be eligible for funding and grants from the FAA, which I believe is a fairly substantial sum of their expansion project as well as their operating budget. Consequently, I find it difficult to believe that anyone from either the San Diego Airport Advisory committee nor Palomar airport administration itself is looking at the option of re-designating Palomar airport as “private” airport as the funding for the runway expansion itself would then be up to private donors. Needless to say, I believe it would very difficult to find individuals/corporations who would want to invest \$80 million plus dollars to fund a longer runway just so they didn’t have the inconvenience to stop for fuel enroute to Asia for 45 minutes.

#### 4) Lack of enforcement of aircraft Departure Procedures

Palomar Airport has “voluntary” aircraft Departure procedures to help alleviate noise concerns over populated areas. However, Palomar Airport Air Traffic Controllers currently due a very poor job of ensuring pilots actually fly the published departure procedure. For example, here is a portion of the “voluntary” procedures.

- *Jets fly 250 degrees ground track, north of Palomar Airport Road best rate of climb until 1 mile offshore. NBAA standard noise abatement departure procedures recommended.*
- *Piston aircraft north and southbound depart on 250 degrees track north of Palomar Airport Road until joining the \*\* Coastal VFR Flyway offshore.*

I highly suggest a study is undertaken regarding past departures using the radar departure history via Web Tracker site. (<http://webtrak5.bksv.com/crq>). I believe that the flight data will confirm that numerous aircraft disregard these published “voluntary” departure procedures. In fact, aircraft are routinely allowed to “turn early” and “go direct” to their next waypoint or use a “left hand pattern” vice the “right hand pattern” as outlined in the Palomar airport Course Rules. Consequently, Palomar airports lack of enforcing the departure route, allows many aircraft to fly over the Carlsbad community which needlessly creates both noise as well as safety concerns.

Equally as important, because the Departure procedures as well as the Operating Hours are “voluntary”, Palomar airport has very little recourse in reprimanding pilots who do not conform to either. Hence, similar to a child who knows they cannot be punished if they break a rule, the individuals violating these “voluntary” procedures will continue to break the rules. Wouldn’t it be interesting if everyone had “voluntary” rules in life with no consequences for not abiding them? For example we could speed on the highway, cheat on tests or not pay taxes, as the rules are only “voluntary” in nature.

In addition, it is quite ironic that the City of Carlsbad can fine a individual home owner for using water on the wrong day or longer than allotted time limits, but yet the airport itself is not able to reprimand (monetary fine or banish) a pilot/corporation from operating at 0400 on Christmas morning while not flying the standard Departure procedures. Seems odd doesn’t it???

#### 5) Southern California airport alternative options

San Diego larger wing aircraft have much better and potentially much cheaper options then to create a larger runway at Palomar airport. I suggest Brown Field as one prime example. The runway is 7,972 feet long, which is much approximately 2,300 feet longer than the proposed expansion of Carlsbad Airport. In addition, Brown airfield is also close to some of the businesses located in downtown San Diego and East County, which own these aircraft. Furthermore, the FAA has classified Brown Field as a "reliever airport for San Diego International, Lindbergh Field. A reliever airport is an airport that serves

*general aviation aircraft that might otherwise use a congested air carrier airport. Airline passengers benefit by experiencing fewer delays due to air traffic congestion.”*

In addition, Ramona Airport in Ramona would be other strong candidate to relieve air traffic from both San Diego’s Lindberg Field and Palomar airport as it has room to expand. In fact, as I am sure you know, Ramona airport would like a longer runway to assist the California Fire Fighting aircraft. Why not increase Ramona’s runway and kill two birds with one stone?

Long story short, do we really want “South John Wayne Airport: being built in Carlsbad??? The resident’s of Carlsbad recently voted “No” on Measure A regarding the building of a upscale retail shopping center as they did not want to be similar to Los Angeles. I can’t see how creating a larger airport with more business aircraft and commercial flights, more vehicle traffic, and more noise and pollution would not be in fact be doing just that.

If you would like to deliberate these topics further, I can be reached at: [jstontini@me.com](mailto:jstontini@me.com) or (760) 994-9348.

I look forward to the discussion

Sincerely,

Jeff Tontini



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**From:** Karen Keusseyan <kdkyan@gmail.com>  
**Sent:** Wednesday, March 09, 2016 6:07 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Master Plan

Our home is very close to the airport. We are extremely concerned about the noise that will impact our home and enjoyment of being outside. Friends from China told us, when they visited last year, that they could not believe fresh clean air, such as we are gifted with, existed anywhere on earth. Being outside in the early morning is one of our many blessings, living where we do in Carlsbad.

We both were fervent supporters of the No on A Campaign, and the traffic impacts of the airport expansion have not been explained at all.

This is a TERRIBLE IDEA that has not been thoroughly explained to the citizenry.

Regards,

Karen Keusseyan  
Dr. Roupen Keusseyan, Ph.D

Sent from my iPad  
KdK

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**From:** Karen Keusseyan <kdkyan@gmail.com>  
**Sent:** Thursday, March 10, 2016 5:46 PM  
**To:** Curtis, Cynthia  
**Subject:** Airport

Hello Cynthia,

My name is Karen Keusseyan, and I live in Carlsbad, quite near to the airport.

I am very worried that the folks who are making the plans for the expansion are not stakeholders in the outcome. People who are the most affected are not being taken seriously, and our concerns are not being addressed.

The noise pollution will worsen substantially, only to increase over time. Living outdoors, which drew so many of here, will become untenable.

Traffic on our local roads, already overburdened, will certainly increase exponentially. As it is now, most people who live in this area already plan their road trips around traffic. Are we destined to become just like LA? How much earlier will we have to leave our homes to get and from work and errands to avoid being stuck in a parking lot on the roadways??

Having been a fervent supporter of No on A, please remember that the people matter. And their voices need to be heeded.

I respectfully implore you to look deep within and decide that this expansion is a BAD IDEA!

Karen Keusseyan  
919-847-2786

Sent from my iPad  
KdK

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**From:** areysbergen@juno.com  
**Sent:** Thursday, March 10, 2016 7:32 AM  
**To:** Curtis, Cynthia  
**Subject:** Expansion of the Palomar Airport....

Air safety:

With the intended expansion of the Palomar Airport - corporate jets will be filling our air space!  
the convenience for some -- reduces safety for others -- LEGOLAND.

Families with young children will be placed in additional peril.

Years ago in the Sacramento area - a plane went down as it was landing at an airport and crashed into a  
McDonalds fast food eatery -- while a children's birthday celebration was being enjoyed.

I thought we had learned our lesson!! perhaps NOT!

I volunteer at the Carlsbad Animal Facility (across from the airport) - helicopters already fill the airspace above  
us - flying LOW over the Animal Shelter on their descent into the airport. it is sooooo NOISY! the dogs and  
the volunteers look up - just waiting for a copter to CRASH on us.

The County at this time is unable to control the airspace at this airport. Planes come and go whenever it is  
convenient to them with little regards to the current guidelines or flight paths.

the expansion of the airport would be a BIG MISTAKE !!!!!!!!!!!!!!!

we're becoming another Orange County ... that's a MAJOR MISTAKE !!!!!!!!!!!!!!!

Alice Reysbergen  
Registered Voter  
Property Owner

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**From:** Cheryl Alexander <cheralex56@aol.com>  
**Sent:** Monday, March 14, 2016 9:39 AM  
**To:** Curtis, Cynthia  
**Subject:** Paolmar Airport Opposition concerns

Ms. Curtis:

I would like to oppose the expansion of the Palomar Airport runway and future planned expansion plans based on the following concerns:

1. AIR POLLUTION

Increased and larger airplanes will bring more air pollution to the Carlsbad area.

All you have to do is visit the Lowes Hardware store across the street from the airport and while your outside in the garden dept., the overwhelming fumes from airplane exhaust is sickening. I have been in the garden dept. on many occasions, and I get nauseated every time from the fumes.

I don't know how the employees can stand it.

Also, there are other stores in that complex, including many outdoor eateries. I find this very unhealthy to eat while inhaling airplane exhaust fumes.

This will only increase with more and bigger airplanes.

2. NOISE POLLUTION

I live in the Rancho Carrillo neighborhood, and I hear airplanes taking off all the time, especially in the early morning hours of the weekend.

More and larger airplanes will be much louder of course!

Please consider my opposing points, this airport expansion will ruin the beautiful community of Carlsbad even more that it already has.

Thank you,  
Cheryl Alexander  
Rancho Carrillo resident

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**From:** Marcel Verdugo <mverdugo@windowscenes.com>  
**Sent:** Monday, March 14, 2016 8:26 AM  
**To:** Curtis, Cynthia  
**Subject:** No to Airport Expansion

My name is Marcel Verdugo and I live at 889 Piovana Ct, Carlsbad, 92011 and I am firmly against Airport Expansion in Carlsbad.

I fly to Las Vegas 4-6 times a year on business and recently there was a company (I forgot the name) that was offering limited flights to Las Vegas—Out on Thursday, Back on Sunday. Max Capacity on the plane was 30 and neither flight was even half full when I used this service last August. I tried to book a flight through the same carrier a month later and was informed that they were discontinuing their service Carlsbad to Las Vegas.

I don't see there being enough demand for the general public to warrant increased services by this airport. It is the diminishing quality of life that local residents must suffer and the demand is not high enough for the general public. Please say no to expansion. Thank you.

Marcel Verdugo  
Window Scenes Inc.  
858-518-2931 mobile  
760-687-7429 fax

March 17, 2016

Kimley-Horn and Associates, Inc.

Attn: Project Mgr., Vince Hourigan

401 B Street, Suite 600

San Diego, CA 92101

Mr. Hourigan:

We, the citizens have been given 30 days to speak against changing the McClellan Airport in any way.

I live in Ocean Hills Country Club, a retirement community of over 1600 homes. My home is in the direct flight plan of the airport. The airport has a so-called time friendly flight schedule, but is not followed according to records. We have been awakened at all time of the night by corporate jets and previous Airliners. According to McClellan records, one Corporate jet was 200 ft. above my roof. I have talked to the airport noise abatement person and my calls are on record. When United Airlines was using the airport, they flew over at 6:15 a.m.

The airport and Carlsbad Mayor now want to bring in more jets, Airlines and traffic to an area that is residential. It is so wrong. If this was your home, would you approve it? NO!

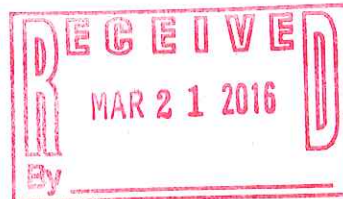
Please do not let this happen.

Sincerely,

*Gage W. Vincent*  
Gage W. Vincent

4987 Delos Way

Oceanside, CA 92056





770 Sycamore Avenue / Suite 122, Box 208 / Vista CA 92083 / [southvistacommunities@cox.net](mailto:southvistacommunities@cox.net) / [www.southvistacommunities.org](http://www.southvistacommunities.org)

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March 18, 2016

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

RE: Draft Program Environmental Impact Report  
McClellan-Palomar Master Plan

Dear Ms. Curtis:

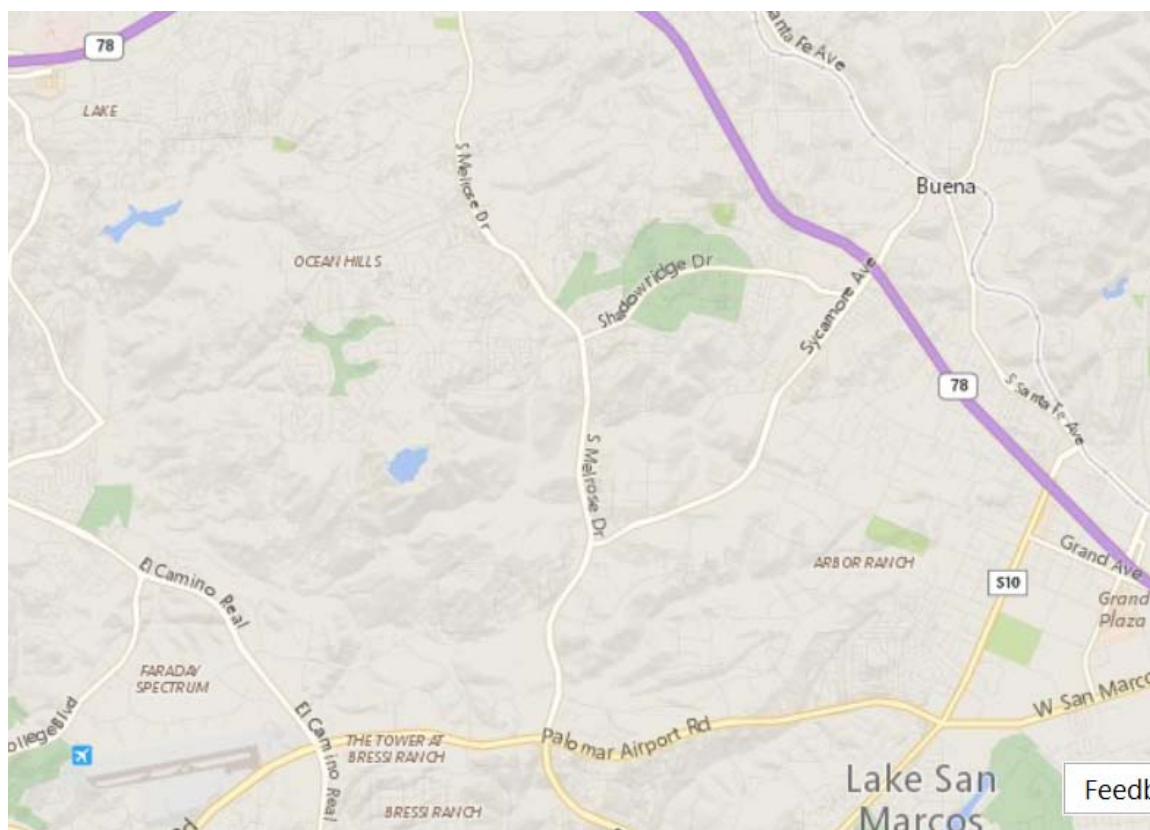
I am submitting these comments about the McC-P Master Plan on behalf of residents of Vista who, over the last two-three years, have been increasingly assaulted by airplane overflights – noise, vibration, particulate emissions. As we have met with McC-P airport staff, FAA representatives, and members of the Palomar Airport Advisory Committee regarding these issues, we have learned that much of the problem comes from the change in flight paths approaching the airport due to (a) pilots' ignoring the designated flight paths or (b) increasing use of the new NextGen technology. Or both.

According to the current McC-P master plan, the goal is to modify the airport to meet a "Modified C/D-III classification."

In the CEQA Initial Study – Environmental Checklist Form distributed at the February 29, 2016, meeting, in the instructions on evaluation of environmental impacts (p. 6), #2 says: [All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.](#) My comments are regarding the off-site impacts residents are experiencing now and which will undoubtedly increase with the increased air traffic expected if the new master plan is approved as submitted.

**III. Air Quality** (p. 10) – Discussion for this item states, [Over the course of the proposed 20-year Master Plan period, an increase in services and operations are expected, and will likely result in an increase in emissions.](#) This is marked as having a potentially significant impact. The emissions must be measured on the ground in the pathways of the airplane approaches to the airport over the surrounding residential neighborhoods in Vista.

On p. 12, the document notes that, [The nearest residential zoning is approximately ½ mile to the southwest of the airport.](#)



That may be the nearest residential area, but this assumption of the area of impact on air quality from emissions entirely ignores the large residential areas of Vista to the northeast of the airport. On-the-ground measurement of emissions must be made in these neighborhoods, as well.

**XII. Noise** (p. 32) – This discussion is all marked as having a potentially significant impact.

Noise analysis: The document says that, [A new noise analysis will be conducted for the proposed Master Plan improvements using CNEL as the impact metric, and will incorporate the forecasted aviation operations over the 20-year planning period.](#)

CNEL (Community Noise Equivalent Level) is a single number result that is calculated for a complete 24-hour period and usually made up of results taken at shorter intervals such as 5 minutes or 1 hour and then averaged over the whole 24 hours.

This averaging over 24 hours is an inadequate and incomplete measurement. Including the hours when no planes are flying overhead in the calculations dilutes the impact of the very busy hours when many planes are approaching McC-P airport. Thus, the averaged noise level number is low and within allowable levels, but does not tell the true story. Our ears hear each individual flight, not a daily average of flights.



This CNEL average will not begin to give you the true picture of the noise levels harrowing the lives of Vista residents. The burning question is, how will these noise levels be measured? To date, we understand, the noise levels are extrapolated from the airplane manufacturers' information. That tells you only what the airplane manufacturers believe or think they know.

These noise levels need to be measured on the ground, over time, in various Vista neighborhoods now adversely affected by airplane overflights. We will be happy to provide you with addresses of residents who are suffering from noise right now.

Ambient noise level (p. 33): The document states, The new Master Plan forecasts an increase in the number of flight operations over its 20-year planning period when compared to baseline levels, which could result in an increase in the ambient noise level in the airport vicinity. The new noise analysis of ambient noise must include the Vista neighborhoods which may be impacted, and the analysis must be based on ground-level measurements at these locations.

Noise contours: The document states, ... noise contours will be modeled and impacts analyzed for the proposed facilities and potential runway extensions as part of the EIR noise study ... updated maps will be prepared for the use of the Airport Land Use Commission. This effort must include the Vista neighborhoods northeast of the McC-P airport.

Additional noise mitigation needed: As stated in the beginning of my letter, these negative impacts began two-three years ago when airplane approach paths changed dramatically. Planes used to fly high above us, east to the I-15, and then turn to approach McC-P airport. This approach path protected residential neighborhoods from the terrible impacts of noise which we are now experiencing.

To give voice to what we are experiencing, I am including a few of numerous comments from Vista residents:

My home is not near the airport but rather behind the [Vista] courthouse near the 78. As you know, since about 2012, I, too, have been experiencing an increased number of flights overhead. Not only are there more planes above than in previous years, but these planes are lower and much louder. Prior to 2012, the number of flights overhead would have equated to what I would consider to be rogue or lost pilots. There weren't that many and they weren't that low.

To give you an idea of what we experience nowadays, let's look at one day as an example of the increase in flights and noise levels over my home.

On October 29th of this year, in a one-hour period from approximately 1:20-2:20 p.m., I counted 27 planes overhead. Sometimes two or three at a time.

I took decibel readings the entire hour. One reading was 59, one was at 65. ALL of the other readings during that hour were above 65, coming in at 70, 79, 82, 84, 95, etc., and as high as 103. This is just one day's accounting, but it happens every day.

Sometimes the noise is such that it does stop conversations, and living here for 23 years, that's a new and unpleasant phenomenon for us. It certainly disrupts the quiet enjoyment of our home and patio garden.

This increase in flights isn't just on Thursday afternoons; flights are overhead all hours of the day and night. There are regular flights between 10 p.m. and 2:00 a.m. We have been awakened between 1:30-2:00 a.m. so many times that when I'm awakened by a plane, I can, sadly, guess the time with uncanny accuracy. (2015)

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This is in response to the planes and noise from Palomar airport. We live on Spyglass Circle and I've noticed a number of planes flying low in the late evening around 11:00/11:30 p.m. and several that come by in the late afternoon around 3-ish. The ones at night are the worst as they wake me up. I've also noticed about once a month (with no real pattern other than 10:00 p.m. being the favored time) we have helicopters that circle around the golf course which are very loud and they spend about an hour or so circling the course and waking everyone up. I've not complained to the airport folks. However, I also own a home on Smilax Rd and noticed that about 4 years ago, they started routing plans overhead. I did complain then, but it really didn't help. (2014)

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I believe my wife has sent you an email in the past, but I thought I'd add my 2 cents. Low flying aircraft has always been a problem here in Shadowridge especially on the weekends. Many of the commuter flights are so low you can view the people inside!

When we purchased a home here 25 years ago, we were never told that we are in the flight path of the local airport. The whole issue is silly.....the flight path regulations are only voluntary and not enforced! Maybe the IRS should follow suit and tell us all that there are tax requirements, but they are only voluntary and don't care if you pay or not. (2014)

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Yes, we have had commercial and private planes flying over our HOME, way too low...very loud, and it makes the windows shake and the china cabinet rattle! Ugh. As for exact dates, I never wrote them down. I did call FAA once, and basically got the run around, though. (2014)

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I have lived in Vista since 1984, first on Alta Vista Way and since 2000 in north Vista on Ahmu Terrace. Through the years the airplane noise has gotten worse and worse. I am forced to wear ear protection when working in the yard. I paid extra to live on a quiet cul-de-sac, not next to a freeway, so why should the noise equivalent of flying trucks go over my back yard sometimes up to ten a minute.

The airport may have been there before we moved in BUT the level of activity has hugely increased over last thirty years. It is not the same airport as when I moved here.

Not only is there more propeller plane traffic, but now with expansion of runway we have PASSENGER jets! The screaming whine of some of them is insane. And what about all the commuter helicopters? They are two or three times as noisy as planes. Why can't the helicopters fly over the ocean as they go north?

And you realize that aviation fuel is the only fuel allowed to have a known agent of mental retardation

as a component. That agent is the metal lead. Why do we tolerate this metal being spewed down on our gardens, our children's and grandchildren's playgrounds? (2016)

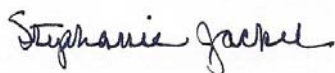
**CONCLUSION:** Vista neighborhoods are being severely impacted by airplane overflights approaching McC-P airport.

For determination of the impacts of particulate emissions affecting **Air Quality**, it is essential that the emissions must be measured on the ground in the pathways of the overhead airplane approaches to the airport over the surrounding residential neighborhoods in Vista.

For determination of the impacts of **Noise**, the use of CNEL as the impact metric will not begin to give you the true picture of the noise experiences of Vista residents. And it is essential that measurements be taken on-the-ground over a number of days in various Vista neighborhoods.

And then the question is, once you understand the high level and frequency of the noise created by the airplane overflights, with accompanying particulate emissions, what will you recommend as a solution in order to mitigate these extremely negative impacts?

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Jackel".

Stephanie Jackel  
President

cc: Honorable Darrell Issa, U.S. Congress  
Deputy Mayor Amanda Young Rigby, Vista City Council  
Aly Zimmerman, Assistant City Manager, Vista

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**From:** Gober2c@aol.com  
**Sent:** Monday, March 21, 2016 6:17 PM  
**To:** Curtis, Cynthia  
**Subject:** Public Comments-Scope & Content of the Airport's Program EIR and Master Plan

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

Dear Ms. Curtis,

In accordance with the instructions provided at the meeting for the Notice of Preparation Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan held on February 29, 2016 (at Carlsbad, San Diego County, California), please find the following information we are formally identifying as areas of environmental impacts and other environmental information we would like included in the scope and content of the technical analysis of the Airport's Program EIR and Master Plan that we understand is currently in process of being prepared in compliance CEQA.

We believe the following environmental and safety matters and issues are very important considerations that should be addressed in the Airport's Program EIR and Master Plan. Accordingly, please include the following identified areas of environmental impacts in the scope of the technical analysis included in the preparation of the Airport's EIR and Master Plan.

Please also ensure the following environmental and safety matter areas are properly reviewed and considered by the FAA, and the public, in any analysis intended to identify, address, eliminate or mitigate any potential environmental impacts that may result from the Airport's current and future plans over the next 20 years.

1. Engine solvents and other residue from small propeller propelled aircraft (and other aircraft) is being regularly dropped and deposited on residential homes, yards, and automobiles in residential areas near the Palomar Airport.

The nature and extent of these solvents and residues should be sampled, tested and analyzed (especially in current high traffic flight areas over residential areas) to ensure they are not resulting in health hazards, air quality hazards, or other negative environmental impacts.

The primary source of these harmful hazardous chemicals appears to be from the continuously increasing number of small propeller propelled aircraft (e.g. from flight school planes and other small planes) flying ascending, loud, low, touch-and-go patterns over the residential areas impacted. This environmental problem has continuously worsened over the last fifteen years since the airport's last master plan update in 1997.

2. The Airport's current flight routes and altitudes are very outdated, especially considering the Airport's significant growth in flight traffic over the last 20 years (and its anticipated significant future growth), and they should be analyzed as environmental impact areas. The outdated flight routes and altitudes were apparently established back in 1959 (when the Airport was first opened), and they apparently have never been subsequently analyzed for negative environment impacts. Moreover, the number of homes and businesses impacted near the airport has increased significantly since 1959.

The analysis should also include a consideration of the environmental impact areas of safe sequencing and separation away from the airport itself, including related environmental impacts on areas surrounding the Airport due to the growth in air traffic, and related public safety concerns.

3. Another environmental impact area we would like to identify and request to be included in the scope and content of the technical analysis of the Airport's Program EIR and Master Plan is our significant concern for the absence of a formal Airport noise abatement agreement providing effective rules, conditions, and

procedures for addressing and enforcing significant community noise problems, issues and complaints related to the continually increasing number of flights utilizing the Airport's outdated routes and altitudes.

This concern has continually increased as the Airport continues to grow, without any regard for the residents and businesses of the City of Carlsbad impacted by the significant increase in aircraft traffic and noise.

Currently, there is no formal noise abatement agreement between the Airport, the FAA, and the City of Carlsbad. This is unacceptable, especially considering the Airport's significant growth since 1959 (and its related on-going growth planning activities). The need for a formal noise abatement agreement should have been recognized years ago, and implemented as a requirement of any formal or informal environmental impact analysis.

Finally, the Airport's Voluntary Noise Abatement Program (VNAP) is completely ineffective. Pilots use Palomar Airport, and regularly disregard the Airport's VNAP. Pilots continuously fly low and fast over residential areas and are not held accountable. The Airport also does nothing to effectively handle complaints to mitigate the negative environmental impacts.

Instead, the Airport's management apparently believes the FAA rules and regulations for flight safety, separation, and sequencing justify disregarding their noise abatement responsibilities to the community. The FAA rules and regulations for flight safety do not justify a pilot's disregard for the VNAP, or the Airport's disregard for enforcing the VNAP. Furthermore, the failure to comply with the VNAP is almost always a result of pilot requests that can easily be modified by the Airport, if desired. The rules and regulations are also intended to work with the VNAP to support it, not to work against its voluntary compliance objectives.

For these reasons, the need for a formal Airport noise abatement agreement providing effective rules, conditions, and procedures for addressing and enforcing significant community noise problems, issues and complaints should be addressed and analyzed as an identified area of environmental impact in the scope of the technical analysis included in the preparation of the Airport's EIR and Master Plan.

Thank you very much for your time and assistance. Sincerely,

Giovanni and Anne Bertussi

This message is intended only for the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable Federal or State law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by a separate return email and delete and permanently destroy the original message and all copies thereof immediately. Thank you.

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**From:** Gail Carroll <justmailgail@gmail.com>  
**Sent:** Monday, March 21, 2016 4:30 PM  
**To:** Curtis, Cynthia  
**Subject:** Stop Palomar Airport Growth

Dear Ms Curtis,

I am irate and incredulous that the airport and FAA and City want to expand operations and runway at Palomar Airport when

Operations are at a great decline and do not justify increased operations.

It continues to be a facility to benefit the very few and subsidized by taxpayers, without representation, when funds should be directed to our deteriorating infrastructure.

- The elite few who regularly use the airport continue to ignore the guidelines and Fly Friendly program by flying between 10PM to 7AM and routing outside the recommended flight path, over homes causing disturbance from noise and pollution.
- The users cannot even be courteous enough now, how would expanding operations ever make this better?
- Street traffic would cause additional gridlock.
- Our City officials are obviously not in tune with the public, as demonstrated by the recent defeat of Prop A, denying the city counsels recommendations.
- Safety is a huge issue already and more air traffic will only create more exposure to local residents.
- Additional exposure on a toxic dangerous landfill is also a ridiculous notion and hazard to the community.

Please do not do any expansion.

Gail Carroll  
1254 Mariposa Rd  
Carlsbad, Ca 92011

Ph. 760.438.7747

March 25, 2016

[Hand-delivered to Cynthia Curtis and Kevin Crawford's offices and emailed or federal-expressed to  
State Division of Aeronautics and FAA]

Ray & Ellen Bender  
1015 Camino del Arroyo Dr.  
San Marcos, CA 92078  
760 752-1716  
[benderbocan@aol.com](mailto:benderbocan@aol.com)

Weekly articles posted at CarlsbadPatch.com  
Related to McClellan-Palomar Airport & FAA <http://patch.com/users/raymond-bender-79afd24d>

Cynthia Curtis, Environmental Planning Manager  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

Kevin Crawford<sup>1</sup>  
City Manager  
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Division of Aeronautics (MS-40)  
California Department of Transportation  
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Sacramento, CA 94274-0001

FAA<sup>3</sup>  
Mr. Mark McClardy, Manager Airports Division  
Western Pacific Region  
Airports Division  
PO Box 92007  
[15000 Aviation Boulevard  
Room 3012 Hawthorne, California – if by Fed Ex or UPS]  
Los Angeles, California 90009

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Re: Bender Comments on County of San Diego February 29, 2016 CEQA Initial Study for Proposed McClellan-Palomar Airport Master Plan EIR [Responding to county request for EIR scoping comments]

### **Preliminary Comments:**

**1. Comment Length.** We wanted to provide much shorter comments. But courts have made clear that an agency preparing an EIR should receive specific, detailed comments from the public so that the agency may timely address them in the EIR. Assure our comments are included in the administrative record so that anyone wishing to challenge the county's EIR in the future may refer to the comments and the county's resulting EIR discussion or non-discussion.

**2: Timeliness of Bender Workshop 3 Comments.** On February 18, 2016 I received a county email invitation to County Workshop 3 entitled "*Master Plan Preferred Alternative and Environmental Scoping Meeting to be held February 29, 2016.*" Expecting to be in New Zealand/Australia from February 29, 2016 until March 18, 2016, I provided 10 pages of comments, including 6 pages of environmental comments, by February 24, 2016 memorandum to the San Diego Airports Director via county's Palomar Master Plan project manager Kimley-Horn. Mr. Hourigan of Kimley-Horn confirmed receipt.

Due to a trip cancellation, I attended the February 29 Workshop 3. I spoke to Ms. Cynthia Curtis (the designated county Environmental Planning Manager) at the meeting and asked her if she had received the environmental comments noted above. She said "no." She also asked why county would consider the comments since they were sent before the county's official 30-day Initial Study comment period, which was to run from February 29, 2016 to March 29, 2016.<sup>4</sup>

The most obvious response is: *Does county really want to say that people invited to a county workshop and invited to provide comments will be ignored because their comments reached the county before February 29, 2016?*

Nevertheless, we again submit the comments in our February 24, 2016 memo. See **Attachment 1** to this March 24, 2016 letter. Since county appears to be a stickler for detail, we supplement the **Attachment 1** comments with the comments below.

**3: Breadth of County's CEQA Analysis Obligation.** When reviewing the comments below, please recall that CEQA Guidelines Appendix G provides in part:

"All answers [related to evaluation of environmental impacts] must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction, as well as operational impacts." And, "[t]he explanation of each [initial study] issue should identify: a) the significance criteria or threshold, if any, used to evaluate each

question; and b) the mitigation measure identified, if any, to reduce the impact to less than significance.”

**4: Breadth of County’s and FAA’s Analysis & Review Obligations Under Federal Law.** Various federal aviation acts and Congressional policy preclude the FAA from spending grant funds on projects having significant environmental impacts when less environmentally impactful projects can be carried out.<sup>5</sup> Review of past county actions suggests that county views CEQA as merely a procedural process that can be sidestepped by adopting a Statement of Overriding Considerations and then approving a project despite its environmental impacts

The environmental laws are generally procedural. They may allow a project sponsor to claim that only one project alternative will achieve the sponsor’s goal thus eliminating the need to fully analyze other project alternatives. In contrast, various federal aviation acts preclude a project sponsor from selecting its preferred goal if other alternatives better satisfy the federal act’s purpose.

For instance, the Airport and Airway Improvement Act (“AAIA”) says: *“It is the policy of the United States – [] that the safe operation of the airport and airway system is the highest aviation priority.”* 49 U.S.C. §47101(a)(1). The AAIA also says that the FAA may grant federal funding for a major airport development project *“found to have a significant adverse effect on natural resources, including fish and wildlife, natural, scenic, and recreation assets, water and air quality, or another factor affecting the environment, only after finding that no possible and prudent alternative to the project exists and that every reasonable step has been taken to minimize the adverse effect.”* 49 U.S.C § 47106(c)(1)(B). **[Emphasis added.]**

Recall that the county KH Runway Feasibility Study proposes extending the Palomar runway 800 feet (900 feet if Supervisor Horn’s wishes as expressed at the December 2015 Board of Supervisor meeting prevail) over a closed methane-emitting landfill that has had past underground fires and periodic continued emissions of methane gas exceeding regulatory explosive limits – as so stated by the county landfill consultants who monitor the 3 closed underground Palomar landfills. (See **Attachment 3.**)

County has previously said the landfills were constructed without the now common 3-foot (or thicker) clay barriers at the landfill bottom to prevent escaping, deteriorating trash waste from flowing into ground waters and underlying clean soil. The county 2013 Runway Feasibility Study proposed runway extensions resting on hundreds (perhaps more than 1,000) of 20-foot to 40-foot piles placed through the east end runway landfill trash through the landfill bottom and into bedrock.<sup>6</sup> It is inconceivable that drilling such pile holes will not create pathways for 30 years of landfill sludge to drain into clean soils.

Recall also that the county’s own October 15, 2013 SCS Engineers 11-page report entitled *“Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport’s Landfill, Carlsbad, California”* lists many bad things that occur if an aircraft crashed into the landfill. See **Attachment 2** to these

comments. Consequences include spillage of flammable liquids such as jet fuel contaminating the landfill, setting off another fire in the underground landfill, spillage of hazardous cryogenic liquids into the landfill, rupture of landfill gas methane collection system piping and venting of methane into the air – among many other environmental problems.<sup>7</sup>

Other federal acts and Congressional policies limit Palomar's ability to focus only on county's preferred runway alternative to the detriment of analyzing other alternatives. Since Kimley-Horn was hired as an expert in meeting FAA requirements, KH in the EIR needs to identify the relevant federal laws, rules, and FAA and Congressional policies and explain to the county Board of Supervisors how these factors apply before the BOS may select its final Palomar Airport alternative

**5. Endnotes.** To increase the readability of our comments, we have placed notes at the end of this document. In particular, we direct Carlsbad, the State Division of Aeronautics, and the FAA to endnotes 1, 2 & 3. These notes explain why Carlsbad and the Aeronautics Division are receiving these comments and explain why the FAA Western Pacific Region needs to closely supervise and independently analyze the validity of county's EIR and Benefit Cost Analysis (BCA) contentions related to Palomar Airport. Presumably, the FAA must prepare a NEPA EIS for Palomar's proposed \$100+ million expansion. Absent our comments in the table below, it is unlikely that county would fully address the Palomar issues in its CEQA EIR. Also, early FAA review of the issues is uniquely important because county will be asking for FAA grant funds to construct a runway extension over a landfill that has had a 6-month underground fire, which likely converted household trash (plastics, batteries, renovation building materials) and portions of the methane gas collection system itself to hazardous waste. In essence, it appears the county will be asking the FAA to pay to place thousands of feet of pile through deteriorating trash to support a Palomar runway extension – at a likely cost up to 10 times the usual cost of extending a runway. Such requests require policy decisions at the Washington D.C. level.

**6. Attachments.** Attachments to these comments include:

- **Attachment 1:** Our County PMP Workshop 3 comments.
- **Attachment 2:** County's October 15, 2013 SCS Engineers report entitled "*Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport's Landfill, Carlsbad, California*"— which shows the problems of operating large, fuel-laden aircraft adjacent to a methane emitting landfill – a problem county has long ignored.
- **Attachment 3:** Our 35-page table summarizing our review of thousands of pages of county Palomar Airport closed landfill records and aviation tank incident reports related to the area over which county wishes to extend its Palomar runway & reconfigure its terminal
- **Attachment 4:** Carlsbad's 1999/2000 Planning Commission 41-page report entitled "*Evaluation of Acquisition of McClellan-Palomar Airport*" notes decades of significant problems with Palomar Airport and county's airport operations.

<b>Bender March 24, 2016 Comments on County February 29, 2016 Initial Study Related to McClellan-Palomar (Palomar) Airport Master Plan Including Construction of a Phased 800 foot Runway Extension to &amp; Relocation of the Existing 4900-Foot Runway &amp; Reconfiguration of Terminal</b>			
	<i>Issue</i>	<i>County Statement [page]</i>	<i>Bender Comment</i>
<b>A. Bender Comments on County 4-Page “Notice of Preparation of Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan Carlsbad, San Diego County, California February 29, 2016</b>			
1	CEQA Guide- line 15168	County proposes a CEQA § 15168 “Program- level” EIR	<ul style="list-style-type: none"> <li>• <b>Few residents know how to find the definition of “program-level” county refers to. Provide a complete reference [14 CCR §15168 ?] and a web link so the public can read the definition. Explain what county means by “program level.” Specifically, what will and will not be now assessed. Provide EIR details.</b></li> <li>• Our view is that county must assess all the environmental risks associated with extending the Palomar runway in the near, intermediate, and long term.</li> </ul>
2	Project Location p. 3	County focuses on the 250-acre active Palomar airport	<ul style="list-style-type: none"> <li>• Lengthening the Palomar Airport runway by 800 feet thereby increasing the size of aircraft using Palomar will change aircraft glide paths over areas outside the airport. Similarly, the FAA’s announced intent to implement its NextGen aircraft satellite guidance system at Palomar will affect the neighborhoods that flights leaving and destined for Palomar fly over.</li> <li>• Carlsbad (Palomar Airport location), county, and the San Diego Regional Airport Authority] regularly review Carlsbad’s Compatibility Land Use Plan [CLUP] to determine how changes to the airport impact the zoning and planning laws governing the properties around Palomar Airport.</li> <li>• <b>Assure the EIR addresses all issues including planning and zoning that expanding the Palomar Airport runway will require Carlsbad, the county, and the SDRAA to address when the Palomar-related CLUP is reviewed for approval during the 20-year master plan period. Board of Supervisor Agenda Item 3 documents for the December 16, 2015 meeting — at which the BOS directed staff to proceed</b></li> </ul>

			<p>with the Palomar Master Plan focusing on converting the airport to a “modified C/D” airport -- include “Attachment A” labeled “Map of Affected Areas.” That Map shows areas affected far beyond Palomar Airport borders. Naturally, an expanded airport would attract larger, more frequent aircraft flying over many neighborhoods adjacent to the airport. Palomar Airport in the late 1990s/early 2000s had about 286,000 annual flights compared to the current 155,000 “recession impacted” annual flights. So even before the proposed 800-foot runway extension, Palomar handled almost double the traffic.</p> <ul style="list-style-type: none"> <li>• Clarify whether the 250 acre area actively used for Palomar Airport on which county focuses does or does not include the airport parking area and the 17-acre vacant parcel at the northeast corner of Palomar Airport Road at El Camino Real. Stated differently: (1) does the county own or lease these two areas and (2) when were these properties acquired by purchase or lease? It is our understanding that the airport parking area has remained largely unused for many years but that increased passenger use of Palomar resulting from increased scheduled commercial service using a longer runway will increase airport traffic, noise, and pollution.</li> </ul>
3	Project Description, p. 3	County’s February 29, 2016 project description ignores the Board of Supervisor December 16, 2016 Palomar Master Plan Action	<ul style="list-style-type: none"> <li>• Clerk of the Board Minute Order No. 3 for the 12/16/15 meeting says that the BOS adopted the Chief Administrative Officer’s recommendation, which states: “<i>Direct staff to proceed with the McClellan Palomar Airport Master Plan focusing on the modified C/D classification as the preferred option, subject to the preparation of a Program Level Environmental Impact Report (EIR).</i>”<sup>8</sup></li> <li>• Define specifically in the EIR what “modified C/D” alternative means so that those areas in which the new facility does not comply with FAA standards may be properly assessed. <ul style="list-style-type: none"> <li>○ FAA Airport Design Guidelines found in FAA AC 150/5300-13A state many requirements for airports, which have previously accepted FAA, grant funds, as county has for Palomar. The requirements include many more than just runway/taxiway separations (which county apparently says will not be met).</li> <li>○ The FAA-required Airport Layout Plan (ALP) must state all deviations that airport facilities have from the FAA design requirements.</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>○ <b>Assure that the Palomar Master Plan (PMP) and PMP IS and PMP EIR list all modifications to FAA standards that county proposes for its extended runway and related facilities as reflected in the Palomar ALP on file with the FAA.</b></li> <li>○ <b>County's Figure 1 on page 2 of its February 29, 2016 Notice of Preparation of an EIR does not fully explain what deviations from FAA standards a future extended Palomar runway would have. For instance, adding 800 feet to the east end runway plus an EMAS reduces the level sandy surface for aircraft approaching from the east (the usual Palomar approach pattern) from about 1600 feet to perhaps 100 feet. As a result an aircraft landing short of the EMAS lands on El Camino Real, which is immediately adjacent to and 30 feet below the east end runway.</b></li> </ul>
4	Project Description: Environmental Setting, pg. 3	County's project description fails to note the unique environmental setting: namely, runway extensions across closed methane-emitting landfills	<ul style="list-style-type: none"> <li>• As noted above, the CEQA guidelines provide: <i>All answers [related to evaluation of environmental impacts] must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction, as well as operational impacts.</i>"</li> <li>• The County 2013 Runway Feasibility Study recommended extending the runway by placing hundreds (perhaps more than 1000) piles 20 to 40 feet deep through an existing methane-emitting landfill, which has had past underground landfill fires and has continuing periodic methane gas emissions exceeding regulatory limits. <b>See, a 35-page table partially listing the findings of county's landfill monitoring consultants over the years. The table does not include data for the last few years.</b></li> <li>• At Palomar Workshop No. 3, Mr. Vince Hourigan of Kimley-Horn (county's PMP consultant project manager) advised that extending the runway 800 feet to the east would of necessity require removal of the existing, extensive methane gas collection system (and presumably replacing it) with a new system).</li> <li>• <b>For the above reasons, the EIR project description must be amended to be consistent with the BOS direction and to both fully disclose the environmental setting and to disclose the landfill work that will be needed to extend the runway.</b></li> </ul>

5	Project Description: Carlsbad Land Use Restrictions, pg. 3	County's project description fails to note unique land use restrictions.	<ul style="list-style-type: none"> <li>• <b>The 1997 County Palomar MP quite properly noted that Palomar Airport is located within the City of Palomar, which restricts Palomar Airport expansion by Carlsbad MC § 21.53.015 and Carlsbad Conditional Use Permit (CUP) 172. [Discussed in detail in our comments on the county Initial Study below. CEQA Guidelines provide that EIRs must address issues involving significant public controversy.</b></li> <li>• <b>Last month Carlsbad residents forced the city council to place a proposed Carlsbad development (Caruso mall) on the ballot and reversed the council's earlier decision to approve the project.</b></li> <li>• <b>Accordingly, the right of Carlsbad residents to approve projects within their jurisdiction is a matter of public controversy, especially in light of MC § 21.53.015, which the council placed in the Code only after Carlsbad residents successfully circulated and initiative petition.</b></li> </ul>
6	Near Term Projects (0-7 years), p. 4	County lists: <ul style="list-style-type: none"> <li>• Glide-slope relocation</li> <li>• FAA Runway Safety Area (RSA)</li> </ul>	<ul style="list-style-type: none"> <li>• <b>The EIR needs to provide glideslope specifics. Glideslope changes impact properties surrounding Palomar Airport and the Compatibility Land Use Plan changes that the San Diego Regional Airport Authority must review.</b></li> <li>• <b>The RSAs adjoin and bookend the runways. County safety reports over the last 10 years show pilots reporting periodic dips in the runway – apparently caused by landfill subsidence under the runway. In the past county has also reported, building structural damage due to landfill subsidence. The IS project list does not discuss this issue.</b> <ul style="list-style-type: none"> <li>○ <b>County needs to describe in the EIR those portions of the runway affected by subsidence and discuss what actions it will take in years 0-7 to assure proper runway grade. Provide accurate maps showing where the Palomar Landfill areas are. The map attached to county's October 2013 SCS Engineers report evaluating safety and environmental concerns at Palomar appears incomplete as it does not show existing runway areas in which runway subsidence damage has occurred. Either the Palomar has landfill under the runway causing the periodic runway subsidence noted by pilots on landing as referenced above or some other voids/unstable soil</b></li> </ul> </li> </ul>



		<ul style="list-style-type: none"> <li>• Western end EMAS.</li> </ul>	<p><b>exists under portions of the existing runway.</b></p> <ul style="list-style-type: none"> <li>• Flights depart Palomar mainly to the west and arrive mainly from the east. In certain weather conditions, including possibly Santa Anna winds, the directions reverse.</li> <li>• <b>Explain in the EIR for years 0-7, how will county meet the FAA 1000-foot long RSA Design Standard for departing C/D aircraft on Palomar's east end and on the West end before an EMAS is constructed? In years 0-7, how will county meet the FAA approach criteria for arriving C/D aircraft? What are the safety and environmental risks associated with county's plan? We understand that operational measures Palomar could implement to increase the safety include displacing the existing runway threshold and implementing runway declared distances – as discussed in various FAA circulars and orders. The EIR needs to discuss the safety and environmental risks analyzed by county consultant SCS Engineers in its October 2013 report entitled “<i>Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport Landfill, Carlsbad, California</i>” See Attachment 2.</b></li> <li>• <b>EIR short term alternatives county must consider.</b> <ul style="list-style-type: none"> <li>○ <b>The county IS does not consider shifting the runway. In lieu of a Palomar west end EMAS, county could shift the runway to the east.</b></li> <li>○ <b>County had this opportunity in the mid 2000s when the FAA gave county millions in a runway rehabilitation grant resulting in county digging up the existing runway. Where in its mid 2000s environmental work did county consider this alternative?</b></li> <li>○ <b>In addition – as county concedes – county will in project years 13 - 20 be digging up the existing runway, new west side EMAS, and new 200 feet extension to relocate the runway 153 feet to the north. County at that time could (1) shift the runway east, (2) avoid a 2nd west end EMAS cost, and (3) still add up to 200 feet to the runway and still have a west end FAA-conforming 1000-foot RSA.</b></li> <li>○ <b>As noted above the law prohibits FAA from funding county's preferred alternative when other cheaper, more environmentally friendly alternatives are available. Especially since the FAA recently funded</b></li> </ul> </li> </ul>
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			<p><b>major Palomar runway work about 10 years ago.</b></p> <ul style="list-style-type: none"> <li>○ <b>Moreover, the 10 years of Palomar operations show that -- whatever BCA forecasts county performed in the mid 2000s to receive the earlier FAA grant -- have not been borne out. County records show that county has received marginal revenues from Palomar Airport operations and we understand its custom facility continues to operate in the red.</b></li> </ul>
		<ul style="list-style-type: none"> <li>• <b>ARFF (rescue &amp; fire fighting)</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>As county admitted in its 2013 Runway Feasibility Study and recent Palomar Airport Advisory Committee (PAAC) meetings, Palomar has been handling thousands of FAA-rated C/D aircraft at Palomar for 5 to 10 years even though the FAA classifies Palomar as a B-II. It is our understanding that the FAA ARFF firefighting requirements differ for airports handling FAA-rated B aircraft and for airports handling C/D aircraft. Our impression is that Palomar does not currently satisfy the ARFF fire fighting requirements for the C/D aircraft it currently handles.</b></li> <li>• <b>The EIR needs to define the differing AARF requirements; state whether Palomar now complies and if not explain the safety and environmental risks created by such noncompliance; and state when and what AARF measures will be implemented in years 0-7 to mitigate Palomar problems resulting from C/D aircraft using Palomar.</b></li> </ul>
		<ul style="list-style-type: none"> <li>• <b>200-foot runway extension</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>The EIR needs to better map the landfill boundaries on the Palomar runway east side. The EIR needs to discuss how much of a 200-foot Palomar runway extension would have to be constructed on grade beams resting on 20-40 foot piles pierced through the runway east end landfill – as the county 2013 Runway Feasibility Study suggests.</b></li> <li>• <b>What are the growth-inducing impacts of lengthening the runway by 200 feet? [At Palomar Workshop 3, a pilot from one of the Palomar tenants stated that once the Palomar runway is extended from its current 4900 feet beyond 5000 feet, many more aircraft would find Palomar attractive. Also, when Skywest left Palomar about 9 months ago, a representative said it would be interested in returning when Palomar could handle larger planes.] The EIR needs to include a discussion of what size aircraft Palomar can handle with a 200-foot runway extension especially in light of the new aircraft coming on the market soon. Include a discussion of how many aircraft and their size that other</b></li> </ul>

		<p>airports with a 5100 foot runway can handle. The EIR needs to address both increased Palomar flights and increased passenger levels. Recall that the 2012 California Pacific Airline FAA NEPA environmental assessment was defective in part because it discussed only increased flights, not also the increased passenger levels. And county environmental failed to note this fact when the CPA EA was circulated.</p> <ul style="list-style-type: none"> <li>• County received millions in FAA grants in the 2000s to rehabilitate the Palomar runway. Rehabilitation apparently involved removing existing runway materials down to about minus three feet and repaving. <ul style="list-style-type: none"> <li>○ When was the runway rehabilitation done and what was the projected life of the rehabilitated runway?</li> <li>○ Confirm the proposed 200-foot runway extension will be added at the existing runway east end.</li> <li>○ When county in years 13-20 moves the existing runway (including the 200 feet added in years 0-7), will the “newly added” 200-feet have to be destroyed and reconstructed?</li> <li>○ If the 200 feet addition has to be built, destroyed, and reconstructed in order to add the further 600-foot extension in the long term, assure the EIR assesses all environmental impacts of building, destroying, and rebuilding the 200-foot extension twice.</li> <li>○ Assure that the county cost estimates and all Benefit-Cost Analyses (BCAs) prepared to request FAA grants include the multiple 200-foot runway costs and multiple west end construction and demolition costs.</li> </ul> </li> <li>• How long will Palomar be shut down during runway development and on how many occasions? Where will excluded flights go? What are the environmental impacts/risks of (1) closing Palomar and/or (2) operating while construction is in process?</li> </ul>
	<ul style="list-style-type: none"> <li>• Short term land-side improvements</li> </ul>	<ul style="list-style-type: none"> <li>• What are these improvements? <ul style="list-style-type: none"> <li>○ Recall that (1) Palomar has 3 separate closed land field areas [Units 1, 2, and 3] including two areas south of the existing runway, (2) over the last 15 years, several of the existing Palomar aviation related buildings have suffered structural damage</li> </ul> </li> </ul>

			<p>due to landfill subsidence (see the county's own annual landfill inspection records), and (3) over the last 15 years there have been several underground Palomar landfill fires burning for months that created underground voids<sup>9</sup>.</p> <ul style="list-style-type: none"> <li>○ Also, drive west along the upper existing road between the Palomar Airport administrative office and passenger terminal to see roadway problems apparently caused by subsidence.</li> <li>○ Describe all improvements to be constructed and their location with relation to the 3 Palomar landfills.</li> <li>○ Identify the environmental consequences of building and operating such improvements.</li> <li>○ As noted above, the landside improvements should include a discussion of the relocation of all existing landfill methane gas collection system piping. Also, retaining walls raise special environmental issues. If county is considering retaining walls, their size and location should be provided.</li> </ul>
7	Intermedate Term Projects (8-12 years), p. 4	<p>County lists:</p> <ul style="list-style-type: none"> <li>• Removal of aircraft fueling tank</li> <li>• Removal of parking on north ramp</li> <li>• Landside improve-</li> </ul>	<ul style="list-style-type: none"> <li>• The EIR needs to list the size, age, capacity, and liquids stored by the fuel tanks and whether the tanks are single or double-bottomed. Older, single storage tanks often leak – as gas stations periodically replacing fuel tanks have discovered. My recollection is that the county consultant records show certain past contamination resulting from storage fueling tanks at Palomar. Identify these past incidents in the EIR and the efforts made to assure that all contamination was cleaned up. Identify the firm and report and date of any report that county claims shows the area around the fueling tank is not contaminated. Our 24-page summary of just some of Palomar's past landfill and past leaking tanks problems is Attachment 3 to these comments. We have not yet review county's consultant comments for the last three years.</li> <li>• Clarify whether parking removal refers to vehicle or aircraft removal. If aircraft removal, where will the displaced aircraft be relocated? If relocated to other airports, be sure the county air quality and traffic calculations include the impacts caused by such relocation.</li> <li>• Identify these improvements, their location, and size – especially in relation to the 3 Palomar closed landfill units 1,</li> </ul>

		ments	<b>2, and 3 and the environmental consequences of building and operating such improvements.</b>
8	Long Term Projects (13-20 years), p. 4	<p>County lists the below projects:</p> <ul style="list-style-type: none"> <li>• Connector Taxiway removal/reconstruction</li> <li>• West end EMAS relocation</li> </ul>	<ul style="list-style-type: none"> <li>• <b>General Comments:</b> <ul style="list-style-type: none"> <li>○ How long will Palomar be shut down when the runway is relocated? Where will flights go? What are the environmental impacts of the shutdown?</li> <li>○ Does the county Benefit Cost Analysis (BCA) in its 2013 Runway Feasibility Study include all the construction and demolition elements of the PMP including the double construction and demolition of the west end EMAS and the initial 200-foot runway extension?</li> <li>○ Does the county EIR analysis – if county Palomar improvements do not qualify for substantial FAA grant funding – account for added project phasing and delays resulting from delayed funding?</li> <li>○ Does the EIR sufficiently analyze the issue to support any bond prospectus that would be needed if county seeks revenue bond funding? To minimize county liability if Palomar Airport bonds are issued, assure county makes full disclosures of Palomar problems.</li> </ul> </li> <li>• Will connecting taxiways be only relocated or also increased in numbers?</li> <li>• Describe what hazardous material testing will be done for all runway, taxiway, and connector taxiway areas dug up? Specify how many tests will be conducted within what area and for what materials tests will be run. A general statement that tests will be conducted is not sufficient.</li> <li>• No added comment.</li> <li>• Arriving FAA-rated C/D aircraft approaching a Palomar west end EMAS in Santa Anna winds and certain other conditions have no safety margin because the west end runway abuts a canyon. Explain from both a safety and environmental point of view why a west end EMAS is preferable to a 1000-foot sandy RSA.</li> </ul>

		<ul style="list-style-type: none"> <li>• Navigation aid relocation</li> <li>• Added 600' runway &amp; taxiway extension</li> <li>• New east end EMAS</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Do navigational aids exist for Palomar Airport east of El Camino Real? If so, do they need to be relocated? If so where? What are the environmental consequences of such relocation?</b></li> <li>• <b>What are the largest aircraft that could safely and routinely use a 5700 foot Palomar runway and PMP reconfigured landside facilities? And how many passengers could each such aircraft carry for each operation?</b> <ul style="list-style-type: none"> <li>○ [Recall that John Wayne Airport 60 miles to the north in Orange County has a similar runway length and handles several million passengers annually.]</li> <li>○ The EIR should explain what a reconfigured Palomar Airport flight and passenger capacity would be, how that capacity compares to John Wayne Airport, and specifically list the Palomar-John Wayne Airport differences that county claims would result in an expanded Palomar Airport having materially different capacities than John Wayne.</li> <li>○ In 2010, the San Diego County Regional Airport Authority completed its Regional Airport Strategic Plan (RASP) with many specific recommendations for Palomar Airport. The EIR needs to discuss how the Palomar PMP dovetails with the RASP and identify the environmental impacts related to RASP measures. <ul style="list-style-type: none"> <li>▪ For instance, the RASP notes that the SDRAA and county could easily divert flights from Lindbergh field to Palomar simply by changing landing fees at each airport to encourage aircraft to land at Palomar. Assure the county EIR discusses this issue in sufficient detail.</li> </ul> </li> </ul> </li> <li>• <b>Initially ignoring market forecasts<sup>10</sup>, what will the Palomar annual aircraft capacity be after the PMP long term improvements (both in annual flights and annual passengers handled)? Show how this capacity was calculated. Discuss the environmental impacts of Palomar handling such a capacity. We recognize that in making these calculations county would have to make alternate assumptions such as whether Palomar becomes primarily an airport for private corporations or primarily an airport for regularly scheduled flights and/or a combination of each. Since both options are reasonably feasible, the EIR</b></li> </ul>
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		<ul style="list-style-type: none"> <li>Land-side improvements</li> </ul>	<p>must consider both. Also, the EIR needs to consider possible Palomar cargo operations – which county is likely to pursue if county is unable to attract sufficient commercial passengers to Palomar. See the discussion of cargo operations later in these comments.</p> <ul style="list-style-type: none"> <li>Based on the Palomar Airport landfill maps that county has previously provided – including the map attached to county’s October 2013 SCS Engineers evaluation of the risks of operating aircraft at Palomar – a runway east end EMAS would have to be constructed in whole or substantial part on one of the closed Palomar landfills. <ul style="list-style-type: none"> <li>Assure the EIR discusses the environmental impacts of a C/D aircraft crashing into the east end EMAS and/or adjacent land areas and draining aviation and firefighting chemicals, radioactive materials, into the landfill.</li> <li>The SCS Engineers report notes that modern aircraft will have radioactive and hazardous materials as part of the aircraft superstructure.</li> <li>Include in the discussion how many cubic feet of trash contaminated with hazardous material would have to be removed if the EMAS surface is breached and how deep of an excavation would be required and at what cost.</li> </ul> </li> <li>The county 2013 Runway Feasibility Study forecasts the construction of significant retaining walls. <ul style="list-style-type: none"> <li>The EIR needs to discuss in detail the size, location, and purpose of proposed retaining walls – such as to increase the size of the Palomar Airport footprint to develop it in a manner similar to John Wayne Airport.</li> <li>The EIR needs to discuss the environmental impacts of the retaining walls including the growth inducing and cumulative impacts of increasing the buildable Palomar land footprint.</li> </ul> </li> </ul>
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**B. Bender Comments on County February 29, 2016 Initial Study and on Items County Must Discuss in its McClellan-Palomar (Palomar) EIR**

**Preliminary Comment 1: *County Failed to Publish a Palomar Master Plan Before Preparing and Environmental Initial Study.***

Using consultant Kimley-Horn & Associates (KH), County began working on the Palomar EIR in 2013 as KH was concluding its multi-year Palomar Runway Feasibility Study on behalf of county. [As of 2016, it appears that KH has had an approximately 8-year contract with county due to several contract amendments, with more amendments foreseeable.]

Despite analyzing Palomar Airport's issues for years on the approximately 285 acres of land Palomar Airport actively occupies, county has as yet failed to circulate its draft 2017-2037 Palomar Master Plan (PMP) for review.

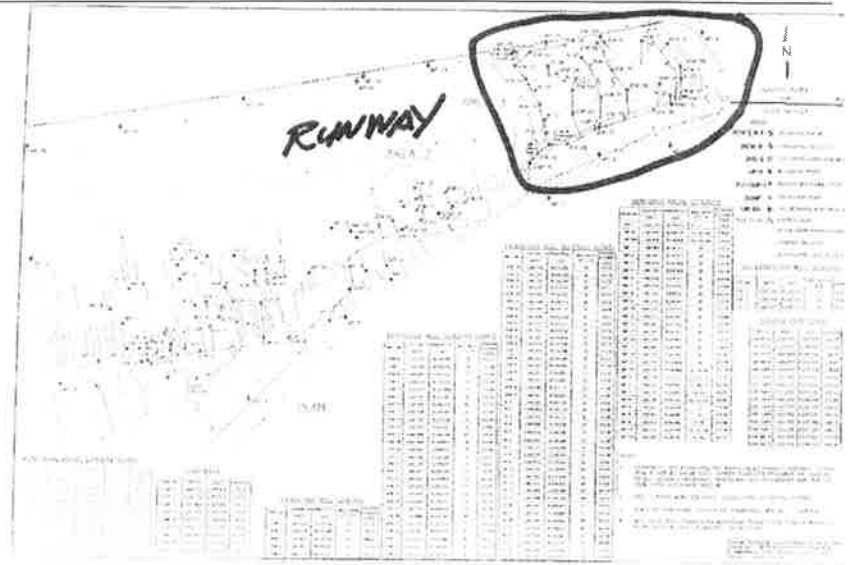
With one exception, county asks citizens to comment on county's Palomar Master Plan EIR Scope without knowing even in concept what county intends to do. County does note that it wishes to expand Palomar by extending and relocating the runway and taxiways from 4900-feet up to 5700 feet. Otherwise, county vaguely refers to relocating airport buildings and ancillary facilities. County's failure to identify other airport elements has caused county to overlook various issues as noted below.

**Preliminary Comment 2: *County's February 29, 2016 Initial Study essentially ignores Carlsbad zoning and planning restrictions on Palomar Airport expansion.***

- First, county in 1979 subjected itself to Carlsbad's zoning by requesting that Carlsbad rezone the airport property, which Carlsbad did. County fails to note that Carlsbad – as a result of a citizen's initiative petition – adopted a Palomar Airport zoning restriction embodied in Carlsbad Municipal Code § 21.53.015. That section requires Carlsbad voter approval of Palomar expansions requiring Carlsbad legislative action.
- Second, county in 1979 subjected itself to Carlsbad's General Plan (GP) by asking Carlsbad, pursuant to the Carlsbad GP, to grant county Conditional Use Permit [CUP] 172. This CUP both granted county the right to operate certain airport facilities at the county's discretion but also imposed 11 express CUP conditions to which county agreed. Conditions limited Palomar expansion and conversion of the airport from a basic transport general aviation airport unless Carlsbad approval was first obtained.
- Third, county correspondence (obtained by public record requests) suggests that county sometimes asserts that it is not subject to Carlsbad General Plan and zoning restrictions. County in its EIR needs to (1) explain why it is not subject to Carlsbad planning and zoning restrictions when county voluntarily subjected itself to Carlsbad regulation, (2) advise the public what sections of the county-adopted General Plan

and what sections of the county-adopted zoning regulate county airport development and (3) show that county staff has always advised the Board of Supervisors – when acting on airport related matters involving the 8 county airports including Palomar – on the applicable county planning and zoning restrictions.			
	<i>Issue</i>	<i>County Initial Study Statement</i>	<i>Bender Comments on the Specific County February 29, 2016 PMP Initial Study Findings</i>
1	Aesthetics, IS pp. 7-8	County says “No Impact”	<ul style="list-style-type: none"> <li>• <b>Retaining wall landscaping.</b> County cloisters its non-runway Palomar developments under the cozy heading “<i>landside improvements to meet aviation forecast needs.</i>” Yet the KH Runway Feasibility Study discussed the need for large retaining walls, presumably so Palomar can increase its buildable footprint for the buildings it needs to relocate when county pushes its runway 150 feet north.</li> </ul> <p>Today, Palomar operates on a plateau perhaps 30 feet above Palomar Airport Road on the South, El Camino Real on the East, and a canyon abutting the west runway end main departure.</p> <p>The Carlsbad state-required General Plan has for decades classified El Camino Real and Palomar Airport Road as scenic arterials. Go north, south, east, or west of the airport, and you will find generously landscaped businesses along the scenic corridors – scarred only by the county’s Palomar perimeter slopes, which are bare soil and eroding for much of the year.</p> <p>Though beauty is in the eye of the beholder, most would likely classify 20 to 40-foot retaining walls bordering Palomar Airport as aesthetic eyesores.</p> <p>There are varied ways to beautify retaining walls including drip irrigated plantings facing the exterior wall visible to the public. As noted in the initial comments above, CEQA law obligates county to identify feasible mitigation measures. County has no support for its February 29, 2016 Initial Study draft finding that the Palomar expansion will not adversely affect aesthetics.</p> <p>Moreover, it is unrefuted that Palomar expansion will cause increased air pollution, both from flights above and increased passenger traffic on the streets that the Carlsbad 2015-2035 already predicts will be gridlocked at certain times of the day. One common way to mitigate air pollution is to increase landscaping.</p>

			<ul style="list-style-type: none"> <li>• <b>Palomar Perimeter Slope Aesthetics.</b> For 50 years, county has failed to permanently landscape the thousands of feet of Palomar slopes along the El Camino and Palomar Airport Road scenic corridors -- despite repeated Carlsbad requests for such landscaping.</li> </ul> <p>At a 2015 Palomar Airport Advisory Committee meeting, a county engineer said permanent landscaping was not possible because (1) Permanent irrigation waters would intrude into the landfill below the perimeter Palomar slopes along Palomar Airport Road and El Camino Real; and (2) irrigation pipes on the slopes would interfere with annual slope grading.</p> <p>County has presented no facts to support the above contentions. To the contrary, available facts show permanent landscaping is possible at the existing facility and would certainly be available for a county reconfigured terminal.</p> <p>At a county workshop, the Kimley Horn project manager for the 2013 Runway Feasibility Study and for the 2017 county PMP (Vince Hourigan) stated that properly constructed irrigation systems only place water about 12 inches below the surface. The County Engineer has said that there is a 3-foot cap over the closed landfill. So water infiltration is not an issue. Also, it is doubtful any substantial trash lies below most of the Palomar Perimeter slopes – especially along Palomar Airport Road. See the landfill location exhibit to the county consultant SCS Engineers report dated October 15, 2016 (<b>Attachment 2</b>) entitled “<i>Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport Landfill, Carlsbad, California.</i>”</p>
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The drawing depicts three closed landfill sites at Palomar Airport. The circled site, Area 3, lies to the east of the runway. It is the area from which Kimley Horn has said the landfill methane collection piping [shown in the diagram] must be removed to extend the Palomar runway. Landfill Areas 1 & 2 lie south of the runway. Notice that the Area 1 & 2 landfills do NOT impact at least half of the south airport slopes along Palomar Airport Road.

Moreover, there is no need to put permanent irrigation pipes on the slopes that might be graded from time to time. Irrigation can be accomplished by rainbirds at the top and bottom of the slopes as is done with baseball and football fields.

If county still contends that the three Palomar landfills prevent permanent slope landscaping, then county also proves it has a problem with placing retaining walls and buildings in the closed landfill areas when the runway and taxiways are moved 150 feet north and buildings are relocated south of the relocated runway and taxiways.

Recall also that failing to permanently landscape the Palomar slopes creates an erosion-water quality issue whenever heavy rains occur.

- **Bender EIR Aesthetic Analysis Request. Assure the EIR addresses all the issues above. Note also that if county does substantially configure the Area 3 closed landfill abutting the east runway end (including removing the existing methane collection system, constructing a new one, and regrading the property, county has the opportunity to**

			<p>install water collection systems under the surface to collect (1) any irrigation water that has the remote chance of entering the landfill and (2) the water from heavy seasonal rains that county seems unconcerned about. Surely out of the \$50 million to \$150 million project cost (including relocation of airport terminal buildings), county can (1) find \$1 million to properly landscape Palomar's perimeter and provide project air quality mitigation</p> <ul style="list-style-type: none"> <li>•</li> <li>• to comply with Carlsbad's General Plan and (2) require its airport tenants to include substantial landscape features to replace their current wastelands.</li> </ul>
2	Agriculture & Forestry IS pp. 9-10	County says: "Potentially Significant Impact"	<ul style="list-style-type: none"> <li>• County says: <i>"To the east of El Camino Real, the County may develop a 17-acre portion of an airport-owned parcel to install landside improvement (See Figure 3.) The potential development area does not currently support agriculture operations, but is designated as Unique Farmland and Prime Farmland. If the mapped farmland is converted to a paved or gravel surface, the project could cause a potentially significant impact to farmland and will be further evaluated in the program EIR."</i></li> <li>• Requests: <ul style="list-style-type: none"> <li>○ Clarify <i>"designated as Unique Farmland and Prime Farmland."</i> Designated where? – especially since county says the land is not zoned for agricultural use. Are any governmental actions required to remove the "Unique Farmland and Prime Farmland" designation? What would the paved or gravel area be used for? Figure 3 needs a more specific label for this parcel – not just "Future Landside Development." County obviously has a specific use in mind. What is it and what are the environmental impacts including zoning and planning changes?</li> <li>○ Answer the same questions just noted as to the mesa parcel just east of El Camino Real.</li> </ul> </li> </ul>
3	Air Quality, IS pp.10-12	"Potentially Significant"	<ul style="list-style-type: none"> <li>• <b>Landfill Impacts.</b> Assure the EIR discusses the construction and operating air quality impacts and risks of constructing over the 3 Palomar landfills – especially those associated with removing and replacing the existing extensive landfill methane gas collection piping system. <ul style="list-style-type: none"> <li>○ In the EIR, list the air quality violation citations that Palomar has received from the air quality agencies</li> </ul> </li> </ul>

			<p>over the last 15 years and describe the mitigation measures that county employed to eliminate the violations. Discuss how county will eliminate the air quality violations in the future if it has been unable to do so over the last 15 years.</p> <ul style="list-style-type: none"> <li>○ Discuss what air quality mitigations measures county will implement to remediate air quality violations including but not limited to permanently landscaping the Palomar slopes abutting Palomar Airport Road and El Camino Real.</li> <li>○ Include in the EIR the amount of methane gas that county assumes the landfill emits into the air. In theory, the amount should be zero due to the methane gas collection system. However, as past Air Quality citations against Palomar show, the methane gas collection system periodically fails.</li> <li>○ Include in the EIR a discussion of the mitigation measures that county will implement to offset periodic methane gas emissions.</li> <li>○ The Palomar Master Plan project manager (Vince Hourigan) has said that extending the Palomar runway will of necessity require removal and relocation of the methane collection system, which runs spaghetti-like through the landfill area abutting the Palomar runway on the east.</li> <li>○ As county landfill monitoring consultants have reported, Palomar methane gas emissions have periodically resulted in Air Quality Agency citations of the county.</li> <li>○ As the 1999/2000 41-Page Carlsbad Planning Staff report entitled “<i>Evaluation of Acquisition of McClellan-Palomar Airport</i>” (Attachment 4) shows, Palomar landfill problems date back 40 years. See report pp. 31-37. As to Palomar landfill problems thereafter, see our table (Attachment 3) summarizing our review of county consultant reports up through 2013.</li> <li>○</li> <li>• <b>Assure the EIR Fully Discusses Growth Inducing &amp; Cumulative Impacts.</b> <ul style="list-style-type: none"> <li>○ Our review of past county Palomar environmental documents – including those county has prepared as well as those it has commented on (or not commented on) suggests that county routinely fails to seriously discuss the growth inducing and</li> </ul> </li> </ul>
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			<p>cumulative impacts of Palomar improvements and of leases related to increasing aircraft use of Palomar.<sup>11</sup></p> <ul style="list-style-type: none"> <li>○ Expanding the Palomar Runway and taxiways, reconfiguring the landside improvements, and implementing the FAA NextGen satellite aircraft guidance system will substantially increase Palomar's operating capacity – as a comparison between the acreage and footprints and runways and passenger sizes of John Wayne Airport in Orange County and a reconfigured Palomar Airport quickly shows. County plans the Palomar runway as 150 feet x 5700 feet, which equals John Wayne's 150 x 5701 runway.</li> <li>○ County argued in its 2013 Kimley-Horn Runway Feasibility Study that lengthening the Palomar runway was necessary to increase the capacity of C/D aircraft so they could handle 90% loads, not just 60% loads. We understand that FAA studies show that aircraft taking off at heavier loads emit more pollution both over the airport and until they exit the County of San Diego. Include in the EIR the studies showing air emissions (and greenhouse gas emissions) from aircraft operating at heavier loads and explain how such emissions affect SD air quality generally, especially the non-attainment pollutant areas.</li> </ul> <ul style="list-style-type: none"> <li>• Within the last two years, the EPA expressed concerns about lead emissions at Palomar Airport. County performed a later evaluation confirming the existence of at least one location at Palomar with unduly high lead emissions. Advise whether county advised the California Air Quality agencies of both the EPA and county analyses and whether county took any remedial actions. <ul style="list-style-type: none"> <li>○ At the December 2016 County Board of Supervisors (BOS) meeting – at which the BOS selected its preferred Palomar Master Plan expansion alternative [conversion of the airport to a modified C/D airport from its current FAA B-II rating] – Supervisor Horn noted that it would be necessary to relocate smaller aircraft including recreational flyers to remote airports.</li> <li>○ We understand that such smaller aircraft are especially a source of air lead emissions due to the fuel they use.</li> </ul> </li> </ul>
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			<ul style="list-style-type: none"> <li>○ Include in the EIR how much lead emissions may be reduced at Palomar by requiring such aircraft to relocate to other locations. Provide a timeframe for such relocations. Explain the air quality impact of requiring such relocation to other locations.</li> <li>• <b>Health Impacts of Palomar Air Quality Emissions.</b> <ul style="list-style-type: none"> <li>○ Include in the EIR a map showing all major sensitive receptor locations within 4 miles of Palomar including but not limited to schools, mobile home parks, recreational venues including golf courses and LegoLand, and all other locations frequented by children and seniors.</li> <li>○ Include in the EIR sufficient weather data to show prevailing winds during the various months of the year to show where, how, and how often airport and aircraft emissions concentrate.</li> <li>○ In the EIR include, a detailed discussion of the health impacts on humans of air pollutants including cancer risks, breathing conditions, and other health conditions.</li> <li>○ County's IS [p. 12] states that construction related odors are only short-term impacts. As the problems and severe health impacts related to methane gas emissions at Porter Ranch in LA County recently publicized in the news show, methane gas can cause a problem long after initial project construction. As noted above, to extend the Palomar runway, county will have to remove an extensive system of methane gas collection piping and replace it. Include in the EIR a full discussion of how county will include "fail safe mechanisms" to assure that all methane gas is properly collected – contrary to county's past 15 year history as documented by its landfill consultants including SCS Engineers.</li> </ul> </li> </ul>
4	Biological Resources	County says: <i>"Potentially Significant"</i>	<ul style="list-style-type: none"> <li>• Include in the EIR the most recent biological inventories on Palomar acreage from 2012 to the present and all others required by federal and/or state agencies so the public may review them.</li> <li>• County says in the IS [p. 14] "appropriate compensatory mitigation" will be required for "jurisdictional wetlands" developed in the EIR. Discuss in the EIR the wetland airport locations (if any) and whether the relevant regulatory agency allows "compensatory mitigation." Our</li> </ul>



			<p>recollection is that some agencies require in-kind” mitigation, that is recreation of a destroyed wetland in an alternate location, rather than mere payment of money. Cite in the EIR the regulatory provision that permits “compensatory mitigation” if such mitigation is claimed to be appropriate.</p>
5	Cultural Resources	County says: <i>“Potentially Significant”</i>	<ul style="list-style-type: none"> <li>• No comment.</li> </ul>
6	Geology & Soils, IS p. 16-19	County says: <i>“Potentially Significant”</i>	<ul style="list-style-type: none"> <li>• <b>As county notes (IS P. 18), portions of Palomar Airport sit on closed underground landfills (Landfill Units 1, 2, and 3 south of the existing runway area and also east of the existing runway).</b> <ul style="list-style-type: none"> <li>○ County fails to note that separate fires have occurred in at least two of the underground landfills, one fire burning for about 6 months according to county consultant records.</li> <li>○ To try to snuff out the fires, county injected carbon dioxide gas and grout underground. The EIR should produce the records to show the extent of the fires, the extent of the grouting, and the extent of the testing to determine how much of the underground landfill may remain a void possibly causing soil instability in the future. The EIR should also produce the regulatory agency citations against county resulting from such fires.</li> <li>○ County also fails to note that the underground fire may have been fed with oxygen by a large diameter county airport storm drain, apparently inadvertently damaged by a county contractor sometime in the 2000s. It appears that county – after belatedly discovering the damaged concrete storm drain – attempted to fill the storm drain with concrete. The EIR should produce the records related to the storm drain damage and remedial actions taken to assess whether soil instability concerns may remain related to the damaged storm drain.</li> <li>○ Over the last 15 years, county has been required to fix various dips in the runway, taxiways, and</li> </ul> </li> </ul>

			<p>surrounding access roads apparently caused by landfill subsidence. County has also been required to repair several buildings sustaining structural damage as a result of such subsidence. The EIR should list all such repairs in the last 15 years, describe what efforts county made to remap the extent of airport areas and improvements subject to subsidence, and provide in the EIR revised landfill maps. Landfill maps now used by the county appear to have been prepared many years ago. If prepared more recently, the EIR should provide the consultant reports documenting such landfill map updating.</p>
7	Greenhouse Gas Emissions, IS pp. 19-21	County says: <i>"Potentially Significant"</i>	<ul style="list-style-type: none"> <li>• <b>Assure the EIR discusses the latest federal and state laws and regulations related to Greenhouse Gas Emissions (GGE).</b></li> <li>• <b>Past county environmental analysis as well as wording in IS pp. 19-21 suggests that county seems to focus on physical improvement impacts only, as opposed to on the impacts of both the improvements and the added aircraft volume and size that the improvements make possible. Assure the EIR captures EPA and FAA discussions and analysis of aircraft GGE impacts.</b></li> <li>• <b>One of the center points of the just adopted Carlsbad 2015-2035 General Plan focuses on how Carlsbad will [not may] meet California GGE goals each year for the next 20 years. However, the Carlsbad GP did not list or analyze GGE from a Palomar construction and operation viewpoint. Assure (1) the county PMP EIR provides this data and (2) explains how county will also meet the federal and state GGE requirements.</b></li> </ul>
8	Hazards & Hazardous Materials, IS 20-25	County says: as to a) <i>Routine Use &amp; Storage</i>	<ul style="list-style-type: none"> <li>• At IS p. 21 county says that construction and use of an expanded airport will create <i>"less than significant impacts resulting from routine transport, storage, use, or disposal of hazardous materials ... or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment."</i> County is wrong for the reasons below and its PMP EIR needs to discuss in detail the serious issues below. <ul style="list-style-type: none"> <li>○ <b>While working at the Port of Los Angeles for 25 years, I was asked to review the Port's "Risk Management Plan" (RMP). The port invited cargo-</b></li> </ul> </li> </ul>

			<p>carrying ships to docks. The ships often took on fuel in the port and also loaded and unloaded cargos that could be hazardous. The RMP analyzed various “risks of upset” including fire, explosion, and liquid and lighter than air chemical releases (such as chlorine gas). The RMP required full disclosure of ship cargoes – in part to assure the safety of tenant and city and county fire fighting personnel who might be called upon to remedy an upset.</p> <ul style="list-style-type: none"> <li>○ In 1976, after being unloaded, a tanker ship blew up at Berth 46 in the Port of Los Angeles during “routine” unloading operations throwing the 1.5 inch thick ship deck plating several football fields away. From 1976 to 2001 when I retired, city found numerous tenant-vacated sites contaminated from various fuel and other chemical tanks used by port tenants on port property.</li> <li>○ Palomar Airport records obtained by public record request over the last 3 years, shows that Palomar has also had incidents of leaking tanks from tenants and/or Palomar underground tanks.</li> <li>○ Among the statements contained in the county’s 2013 SCS Engineers report entitled <i>“Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport Landfill, Carlsbad, California”</i> are those immediately following:</li> </ul>
<p style="text-align: center;"><b>County Consultant SCS Engineers October 15, 2013 Report Identification of Palomar Aircraft Crash Hazards</b></p> <p>➤ Spillage of flammable liquids such as Jet fuel: <i>“These fuels are highly combustible, burn at extremely high temperatures, can be corrosive to aircraft equipment and are highly toxic to human beings ... Ignition of the jet fuel or other flammable material, upon impact, could also be highly probable.”</i> [p. 3]</p> <p>➤ Burning of solids. <i>“Post-crash fires can result in burning of ... aircraft batteries and electrical equipment, engines, tires, wheels, pathogenic substances, radioactive materials, and metals such as aluminum and fiber-reinforced polymer composites of the aircraft fuselage and wings. Most landfills are vegetated with grasses for soil erosion control purposes. If the crash occurs during the dry season, grass fire could ignite and spread to other areas of the site and create secondary environmental issues such as smoke (air quality issues), as well as possible offsite wildfires and or burn, smoke and or structural damage to other onsite or offsite property.”</i> P. 3]</p> <p>➤ <i>“As a landfill site, a violent aircraft crash ground impact ... may ... expose the buried solid</i></p>			

waste to the atmosphere. Post-crash fires can then initiate surface fires as the LFG (landfill gas) is now free to vent directly into the atmosphere. Once a surface fire ignites, it can also potentially begin to burn the exposed waste materials and spread down into the subsurface solid waste. Subsurface landfill fires ... can continue indefinitely as they tend to create a natural draft inducing air into the landfill allowing them to travel and spread horizontally and deeper into the waste mass. ..." [p. 3]

- Spillage of cryogenic liquid. "Cryogenic liquids ... are used as cooling agents to reduce engine temperatures .... These liquids are ... on the Hazardous Materials Information System. Hence, even low quantities of cryogenic liquids can expand into large volumes of gases ... . If not stored in containers with adequate pressure-relief devices, enormous pressures can build up within the containers. The impact from an aircraft rash can cause a sudden rapid increase in the internal pressure of the container. Results can range from damage to surrounding equipment, structures, explosions, called 'boiling liquid expanding vapor explosion,' to asphyxiation hazards." [p. 4]
- Pressurized liquid and/or vapor release. "Aircraft utilize a variety [of] hydraulic and pneumatic accumulators, which contain pressurized air or fluids that assist in the operation of equipment ... . [R]upture can] lead to sudden discharge of large amounts of pressurized fluids, resulting in destruction of property, and possibly injury to persons in proximity to the rupture." [p. 4]
- Pipe rupture. "Impact from an aircraft crash may result in extensive damage to nearby above/below-grade utility lines. Damage or rupture of a buried water, gas or storm drain line, could contaminate nearby soils and water bodies. Emission release from pipes could severely compromise the air quality and even cause explosions, depending on the contents of the carrier pipes. Impact to piping associated with the GCCS [methane gas collection and control system] may damage the system and cause a release of LFG to the atmosphere. If the LFG concentration is within flammable ranges and an ignition source is present, explosions or fires may occur. ..." [p. 4]
- Site-Specific Hazards [pp. 4-6]
  - "Areas north of Areas 1 & 2 of the airport serve as aircraft parking areas, house fuel farms and other structures, which store various chemicals required for routine aircraft maintenance activities. There is an additional fuel island north of Area 3. A crash in this area could result in extensive damage to structures and other parked aircraft. A detailed review of the different types of chemicals, their locations and proximity to the runway and/or to the three landfill areas is beyond the scope of this preliminary evaluation."
  - "The site also contains a below-grade, high-pressure, gas transmission main owned by San Diego Gas & Electric (SDG&E) running east-west along the north fence of the property. Damage to gas mains can vary from a gas leak resulting in the evacuation of surrounding areas, to potentially significant explosions. ..."

<ul style="list-style-type: none"> <li>○ <i>“Additionally, there are several below-grade LFG extraction wells and pipelines ... which are assumed to be damaged/ruptured by an aircraft crash causing free-venting of methane into the atmosphere. Furthermore, a post-crash fire can pose as an ignition source, which can lead to explosions ... . A post-crash fire and/or explosion will also severely compromise the air quality at the site, and possibly, at downwind locations. The San Diego air basis is currently in non-attainment of the 8-hour ozone standard set by the United States EPA ... .”</i></li> <li>○ <i>”Finally, the site also maintains an extensive storm water drainage system with a treatment vortex. ... Storm water runoff from the airport property travels through the drainage system ... to a structure under an existing business park areas, located immediately north-west of the airport. The runoff eventually discharges into Agua Hedionda Lagoon, located north-west of the airport. Under a worst case scenario, it is assumed contaminated liquids from fire-fighting efforts or chemicals released from a crash can enter the storm water management system and potentially impair downstream tributaries and water bodies such as the Agua Hedionda Lagoon. ... “</i></li> </ul>			
8	Hazards & Hazardous Material (CONTINUED)		<ul style="list-style-type: none"> <li>• <b>Given the facts above, any objective analysis of county’s February 29, 2016 CEQA Initial Study Hazardous Materials discussion and conclusions would have to conclude that either the IS preparers failed to review county’s own consultants reports and hence were critically uninformed or intentionally wished to withhold the information above from the public.</b></li> <li>• <b>The IS also fails to note the consequences of (1) the Board of Supervisors direction to convert Palomar from a B-II airport to a FAA-rated C/D-III airport and (2) Supervisor Bill Horn’s direction at the December 2015 BOS meeting that Palomar needed to relocate the smaller recreational flyers off Palomar.</b> <ul style="list-style-type: none"> <li>○ <b>Recreational aircraft typically carry only several hundred gallons of aviation fuel; in contrast many C/D aircraft routinely carry 3,000 – 5,000 gallons of aviation fuel.</b></li> <li>○ <b>B aircraft fly slower and often weigh less than 12,500 pounds while C/D aircraft fly faster and often weigh 60,000 to 100,000 pounds.</b></li> <li>○ <b>County’s 2013 Runway Feasibility Study expressly justified a Palomar runway extension on the thought that C/D aircraft needed to carry 90% loads rather than 60% loads to travel further – thus benefiting Palomar because it could sell substantially more aviation fuel and generate more tax revenue.</b></li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>○ Accordingly, county will foreseeably be increasing the size and number of its aviation fuel storage tanks and/or the frequency of trucks delivering aviation fuel to the airport. In either case, county is creating a source of a bigger bomb or leaks that can cause hazardous material contamination.</li> <li>○ According to county's 2013 Runway Feasibility Study 85% or more of Palomar's roughly 150,000 flights in 2015 were by small aircraft. Do the math. If Palomar converts to an airport with 100,000 C/D aircraft, each carrying 4,000 gallons of aviation fuel instead of 6,000 C/D aircraft with that capacity, the airport annually handles 24,000,000 gallons of C/D aviation fuel instead of 24,000 gallons of such fuel.</li> </ul> <ul style="list-style-type: none"> <li>• <b>EIR Request: For the above reasons, county's Palomar EIR needs to address the above issues including but not limited to:</b> <ul style="list-style-type: none"> <li>○ Providing a copy of Carlsbad's and county's Risk Management Plan for Palomar if any.<sup>12</sup></li> <li>○ A description of all Palomar hazardous material handling facilities and storage tanks including their capacity, age, above or below ground location and depth, whether stored in single or double bottomed tanks, and inspection regime.</li> <li>○ A list of all hazardous material spills at Palomar (including tenants) in the last 20 years (the time since county's last PMP).<sup>13</sup> The list needs to include those resulting in citation by AQMD or any other regulatory agency as well as a list of those that were not reported to regulatory agencies.</li> <li>○ An up-to-date map of all 3 Palomar landfill sites and an overlay showing where current and future Palomar structures will lie over or near such landfill sites. S</li> <li>○ A report explaining whether Palomar landfills should be today classified as hazardous material or non-hazardous material sites. <ul style="list-style-type: none"> <li>▪ We understand that county has always classified Palomar landfills as non-hazardous sites because they were used primarily for household trash, if occasionally as dumps for Del Mar stable muckings.</li> <li>▪ A non-hazardous designation may well have been appropriate – UNTIL PALOMAR HAD</li> </ul> </li> </ul> </li> </ul>
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**MULTIPLE UNDERGROUND LANDFILL FIRES, ONE BURNING FOR AT LEAST 6 MONTHS.**

- Household trash routinely includes hundreds of thousands of pounds of (i) plastic (milk containers, market plastic bags, packing bags, dry cleaner bags, fast food debris including plastic utensils, etc), (2) batteries from radios, toys, and other electronics, (3) rubber (bicycle and car tires, garden hoses, trashed resin patio furniture), and (4) asbestos in the form of ceiling tiles, bath and kitchen flooring, and house insulation resulting from house remodeling.
- Like asbestos – which is relatively safe in its undisturbed state in ceiling tiles, flooring, and heater pipe enclosures – various materials become dangerous when converted into their constituent parts.
- Multiple government and private websites describe the hazardous materials created by burning trash. Just a few of these sites include:
  - <https://www3.epa.gov/epawaste/nonhaz/municipal/backyard/pubs/residents.pdf> [Burning trash produces dioxins which can cause cancer and reproductive disorders]
  - [http://www.gobroomecounty.com/files/planning/\\_pdf/BackyardBurningFactSheet.pdf](http://www.gobroomecounty.com/files/planning/_pdf/BackyardBurningFactSheet.pdf) [Burning trash produces three exceptionally dangerous products: toxic gases, particulate matter (soot), and ash residue.
  - <https://www.pca.state.mn.us/sites/default/files/w-hhw1-17.pdf> [If you're burning trash, you're making poison.]
  - <https://www.pca.state.mn.us/sites/default/files/w-hhw1-17.pdf> [Health effects of burning trash]
  - [http://www7.nau.edu/itep/main/HazSubMap/twrap\\_HzSubMap\\_Burning.asp](http://www7.nau.edu/itep/main/HazSubMap/twrap_HzSubMap_Burning.asp)

Just a few problems burning trash causes include:

			<p><b>Contaminants of Concern:</b></p> <p>It is difficult to tell exactly all the compounds that are released from burning waste. What comes out depends on the types of trash that went in, the temperature of the fire and the availability of oxygen. Here are some of the air pollutants that have been found in the smoke from a burn barrel and their potential health risks:</p> <ul style="list-style-type: none"> <li>• Dioxins and furans (immune suppressions, hormone system disruption, cancer)</li> <li>• Benzene (leukemia)</li> <li>• Formaldehyde (eye, nose and throat irritant, difficulty in breathing, skin rashes, cancer)</li> <li>• Particulate matter (respiratory problems, cardiac arrhythmia, heart attacks)</li> <li>• Polycyclic aromatic hydrocarbons (cancer)</li> <li>• Hydrogen chloride (corrosive to the eyes, skin, and mucous membranes, may cause respiratory tract irritation and chronic bronchitis)</li> <li>• Hydrogen cyanide (neurological, respiratory, cardiovascular, and thyroid effects)</li> <li>• Carbon monoxide (reduces the oxygen-carrying capacity of the blood)</li> <li>• Ash which may contain the following heavy metals: <ul style="list-style-type: none"> <li>◦ Cadmium (lung damage, kidney disease)</li> <li>◦ Arsenic (gastrointestinal problems, anemia, kidney and liver disease, cancer)</li> <li>◦ Mercury (nervous system and kidney damage)</li> <li>◦ Chromium (respiratory effects, cancer)</li> </ul> </li> </ul> <ul style="list-style-type: none"> <li>• <b>So Palomar Airport has four major hazardous material problems.</b> <ul style="list-style-type: none"> <li>○ <b>First, all of the foregoing will happen in the future if an aircraft crash, or perhaps an earthquake and broken methane gas collection system, exposes a landfill trash fire to the public in a monsoon cloud of contaminated cancer producing gas.</b></li> <li>○ <b>Second, as the county October 2013 SCS report notes, firefighting equipment outting a downed aircraft fire and/or landfill fire will wash thousands of gallons of contaminated water into the Palomar storm drain system, possibly into the Agua Hedionda waters.</b></li> <li>○ <b>Third, all of the cancer producing and other hazardous materials caused by the past Palomar landfill fires have been percolating for the last 7 to 10 years to the bottom of the unlined landfill.<sup>14</sup> County has made no effort to contain them.</b></li> <li>○ <b>Fourth, county's 2013 Runway Feasibility Study and PMP workshops tell us that county wants to drill hundreds, perhaps a thousand holes through the Palomar runway east end landfill, so that piles 20 to 40 feet long can be placed through the landfill into</b></li> </ul> </li> </ul>
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			<p>soils below the landfill to support a runway extension. Of necessity, these drilled holes will carry landfill fire contaminated hazardous materials immediately to otherwise clean soil and groundwaters.</p> <ul style="list-style-type: none"> <li>• Accordingly, the PMP EIR needs to explain (1) why the Palomar landfills that have suffered underground fires should not be classified as hazardous waste dumps, (2) why these now-converted hazardous waste dumps should not be relocated to areas of the county which have been approved for hazardous waste dumping whereas the Palomar Carlsbad area has not, (3) the cause of the underground fires and the measures county has taken to eliminate future fires, (4) the number and location and date of “continuing underground hot spots” that county consultants periodically report in the underground Palomar landfills, and (5) why drilling so many holes through a known contaminated landfill makes any sense.</li> </ul>
8	Hazardous Materials [CON'D]	County says as to b) <i>Handling hazardous material w/ ¼ mile of schools, [IS p. 21]</i>	<ul style="list-style-type: none"> <li>• Note especially that county says “<i>The proposed master Plan improvements do not propose any modification to existing Airport operations related to transport, use, or storage of hazardous materials, and therefore, would result in a Less Than Significant Impact</i>” [p. 21] <ul style="list-style-type: none"> <li>○ The EIR needs to recognize that this statement is not accurate. The whole premise of the 2013 Runway Feasibility Study [and the Study Benefit Cost Analysis on which the FAA would purportedly rely] was that at least 40% of Palomar C/D aircraft would fly far enough to require carrying 90%load rather than 60% load, mostly added fuel.</li> <li>○ Accordingly, Palomar will be enlarging and relocating fuel storage tanks and the ancillary chemical tanks noted in the SCS Engineers October 2013 above and/or increasing weekly shipments of aviation fuel in tanker trucks to the facility. Above ground moving tanker trucks may well constitute the greater risk of accident though long term underground storage tanks may pose the greater risk of leakage and soil contamination.</li> <li>○ As noted above, risk management plans typically analyze multiple risks including windborne hazardous materials. If either the Palomar landfills again caught fire or a large aircraft crashed into a</li> </ul> </li> </ul>

		<p>fuel storage facility, a wind borne cloud of hazardous fumes and gases could easily reach nearby schools. The EIR needs to address this issue and produce a Palomar RMP to show what emergency measures Palomar would immediately take to protect airport workers, passengers, and school children – including the Pacific Heights Academy, located 1.75 miles away.</p>
	<p>c) County says as to PMP improvements located on a hazardous materials site compiled pursuant to Government Code § 65962.5</p>	<ul style="list-style-type: none"> <li>• <b>County says “potentially significant impact” and county will check certain state and federal databases.</b> <ul style="list-style-type: none"> <li>○ <b>Checking the listed databases would be the appropriate action if county had not suffered several long lasting underground fires.</b></li> <li>○ <b>The EIR needs to include copies of the notices that county provided to the state and/or local and/or federal agencies notifying them of the Palomar landfill fires and asking for a determination of how such fires affected the proper landfill characterization. Foreseeably, members of the public will contact the regulatory agencies, advise them of the underground fires, and ask them to review the proper classification of the Palomar landfills.</b></li> </ul> </li> </ul>
	<p>d) County says as to PMP improvement safety concerns to property surrounding the airport</p>	<ul style="list-style-type: none"> <li>• <i>County says: “All proposed changes to the airfield facilities or operations are designed for consistency with FAA design standards, and therefore would not result in a new or increased safety hazard to people in the project area.”</i> County contradicts its own IS language and 2013 Runway Feasibility Study for these reasons:           <ul style="list-style-type: none"> <li>○ <b>General Comment: County itself refers to the planned improvements as “Modified C/D-III: Airside &amp; Landside Phasing Plan. County uses the term “modified” because it knows it cannot meet the FAA design requirements for C/D aircraft, in the short, intermediate, or long term. Continuing defects in the planned PMP improvements include but are not limited to:</b> <ul style="list-style-type: none"> <li>▪ <b>Aircraft Separation: Palomar does not now – and concedes it will not meet in the PMP 20-year time frame – the runway and taxiway</b></li> </ul> </li> </ul> </li> </ul>

			<p>centerline to centerline requirement to assure that passing C/D-III sized aircraft wingspans on the runway and taxiway do not interfere with each other if either aircraft deviates from the centerline for some reason.</p> <ul style="list-style-type: none"> <li>▪ <u>Runway Safety Areas. Palomar has no 1000-foot runway safety area at either the west or east end runway to serve the increasing numbers of C/D aircraft.<sup>15</sup> County concedes there will be no west end EMAS (which substitutes for the 1000-foot RSA requirement for departing but NOT for arriving aircraft) for up to 7 years. County concedes there will be no east end EMAS for up to 20 years.</u></li> <li>▪ <u>County plans to extend the Palomar runway from 4900 feet to 5100 feet within 7 years. As a Palomar airport tenant representative noted at a county Palomar PMP Workshop meeting, once an airport runway extends more than 5000 feet, the airport will attract many more aircraft.</u></li> </ul> <p>○ Phase 1: Near Term Improvement Safety Problems (0-7 years) [IS Figure 4 entitled “Modified C/D-III: Airside &amp; Landside Phasing Plan]:</p> <ul style="list-style-type: none"> <li>▪ As consultant Kimley-Horn PMP project manager Vince Horn said at a county PMP workshop, when county extends the runway 200 feet east, large construction equipment will repeatedly grind up and dig up areas of the existing landfill abutting the east end runway. Portions of the existing landfill methane collection system (starting 3 feet below the landfill surface) will have to be removed and replaced. Piles augured 15 to 30 feet down through and adjacent to decomposing trash (required to support all or part of the 200-foot extension) will drain the now hazardous materials created by the landfill fire into the subsoil and possibly into groundwater.</li> <li>▪ After runway extension, heavier aircraft carrying more fuel wishing to take advantage of the entire runway length will then be more</li> </ul>
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			<p>likely to land in the remaining 1200 foot-long landfill area.</p> <ul style="list-style-type: none"> <li>▪ <b>County’s plan to attract larger more fuel laden planes will displace the recreational flyers (as Supervisor Horn stated at the December 2015 Board of Supervisors approval of the Palomar Airport C/D conversion).</b></li> <li>▪ <b>Increasing the fuel-laden aircraft creates at least 4 safety risks.</b> <ul style="list-style-type: none"> <li>• <b>Larger aircraft typically have wider wingspans – hence the FAA runway-taxiway centerline separation requirement noted above, which Palomar will not be meeting under its “modified” plan. These aircraft also have faster approach speeds resulting in less leeway for pilot error.</b></li> <li>• <b>Palomar will need either larger aviation and ancillary chemical storage tanks and/or more frequent fuel truck tanker operations on the premises. These create greater risks of fire, explosion, and leakage -- all increased safety risks.</b></li> <li>• <b>A recreational aircraft weighing less than 12,500 pounds, carrying only a few hundred gallons of fuel, and flying more slowly creates a minimal safety risk to others and the environment if it crashes into the Palomar runway east end landfill. In contrast, a 90,000 pound aircraft with thousands of gallons of aviation fuel, flying faster could easily plow up the shallow methane gas collection system and ignite a methane/aviation fuel explosion.</b></li> <li>• <b>County has recognized it needs an EMAS safety at both runway ends. But county has stated it will not build an east end EMAS until years 13-20. True, Palomar aircraft depart mainly west. But in Santa Anna and other conditions they depart west. Both a</b></li> </ul> </li> </ul>
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			<p>west end and east end EMAS should be built immediately (and should have been built 10 years ago when the FAA funded rehabilitation of the runway).</p> <ul style="list-style-type: none"> <li>○ <b>Phase 2: Intermediate-Term (8- 12 Years) [Also IS Figure 4]</b> <ul style="list-style-type: none"> <li>▪ <b>County states the intermediate improvements involve removal of the north Apron and fuel farm underlying it, and “future airside development.”</b></li> <li>▪ <b>Removal of fuel storage tanks often discloses hazardous material contamination resulting from the leaking storage tanks, especially if the tanks are old, not double-bottomed, and/or sit in corrosive soil. Such contamination creates safety hazards to workers and possibly others depending on the extent of hazardous material migration.</b></li> <li>▪ <b>Clearly county is not eliminating fuel storage tank capacity since its goal is to be able to fuel more larger aircraft for international flights (as stated in its 2013 Runway Study). So county will either be installing more “fuel farms” elsewhere at Palomar or be substantially increasing fuel tanker truck operations on the premises. Such new tanks raise the usual safety issues associated with fire, explosion, and chemical release.</b></li> <li>▪ <b>The EIR needs to discuss all of the specifics noted above as to the existing “fuel farm” and replacement fuel farms including the fuel farm contents and capacity and the requirements that county will impose on site contractors to either confirm there have been no storage tank leaks or to assure removal of now contaminated soil to a proper Class III landfill dump. Include in the EIR the county’s Risk Management Plan disclosing the impacts of a fuel tank upset event and the measures in place to assure minimal harm and remediation of environmental problems created.</b></li> <li>▪ <b>The EIR needs to further define the “future airside development” planned. Because</b></li> </ul> </li> </ul>
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			<p>county has chosen to proceed with its IS and EIR before providing the public a copy of the PMP, county has kept the public in the dark. County may not know the exact size or location of future buildings. No draft EIR should be circulated until at least 3 months after county has published its PMP for public comment.</p> <ul style="list-style-type: none"> <li>○ Phase 3 Long-Term (13-20 years) <ul style="list-style-type: none"> <li>▪ County long term improvements include relocating the runway and taxiways about 150 feet north, rebuilding the 200 foot runway extension and west side runway EMA built in the short term and destroyed for relocation, and adding a 600 foot extension.</li> <li>▪ We incorporate by reference all comments noted above related to county extending the runway over the methane producing landfill adjacent to the runway. Due to the scale of the long-term development, the scale of construction and operating safety problems will be even greater.</li> <li>▪ County in Initial Study Figure 3 has outlined a large parcel in red for “Future Landside Development” east of El Camino Real and off the main airport current operating area. The EIR needs to specifically define the proposed uses of this area so any safety concerns can be identified.</li> <li>▪ Similarly, Figure 3 shows the expanded airport RPZ (Runway Protection Zone) as extending over the building on the southeast corner of Palomar Airport Road and El Camino Real. The EIR needs to define what added restrictions, if any, apply to that building to assure safe Palomar operations.</li> <li>▪ Since this portion of the IS discusses the possible impacts of Palomar Airport on surrounding areas, county needs to discuss the changes that airport expansion may require to the CLUP [Compatibility Land Use Plan] that Carlsbad must present to the San Diego Regional Airport Authority to assure compatibility of Palomar expansion with</li> </ul> </li> </ul>
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		<p>e) County says <i>as to nearby private airstrips</i>, IS p. 23</p> <p>f) County says <i>as to impact on existing area emergency plans</i>, IS p. 23</p>	<p style="text-align: center;"><b>surrounding zoning and planning.</b></p> <ul style="list-style-type: none"> <li>• <b>County says no private airstrips are within a mile of Palomar.</b></li> <li>• <b>Confirm that no private helicopter pads are within a mile of Palomar. If there are any, discuss impacts of Palomar expansion.</b></li> <li>• <b>County says “<i>less than significant impact</i>”</b></li> <li>• <b>Include as an exhibit in the EIR those portions of the existing area emergency plans and multi-jurisdictional plans that discuss what safety and environmental impacts exist and are forecasted for Palomar construction and operation of airport improvements.</b></li> <li>• <b>County says “<i>The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.</i>”</b> <ul style="list-style-type: none"> <li>○ Recall county’s October 2013 SCS Engineers report discussing environmental impacts of a possible aircraft crash at Palomar including fire fighting efforts notes that water contaminated with aviation fuel and other hazardous materials could easily enter the airport storm drain system and possibly reach Aqua Hedionda Lagoon [See p. 5, the 2<sup>nd</sup> ¶ from the bottom.]</li> <li>○ The EIR needs to discuss the consistency of the SCS Engineers report with the Oil Spill Contingency Element noted above.</li> </ul> </li> </ul>
9	Hydrology & Water Quality, IS pp. 25-30	County says “ <i>potentially significant impact</i> ”	<ul style="list-style-type: none"> <li>• <b>In the past, Carlsbad has asked county to document that drainage from Palomar landfills south of the runway has not adversely affected groundwater. Though we reviewed extensive county consultant landfill records after various public record requests, we have been unable to find any county records examining the impact of the Palomar landfills on groundwater or otherwise responsive to the Carlsbad request. In other words, it appears that county ignored Carlsbad’s requests.</b></li> <li>• <b>The PMP EIR – in its discussion of environmental setting – needs to discuss:</b></li> </ul>

			<ul style="list-style-type: none"> <li>○ whether the Palomar landfills have caused deteriorating trash effluent to migrate to the unlined landfill bottom and possibly to ground waters;</li> <li>○ whether the large underground storm drain that county's contractor damaged in the last 15 years and later abandoned in place resulted in deteriorating trash effluent flowing through the storm drain;</li> <li>○ whether the 3 Palomar landfills have an approximately 3-foot clay (or other material) cap to prevent surface waters (such as heavy rains or firefighting water and surfactant) from entering the landfills;</li> </ul> <ul style="list-style-type: none"> <li>• County's EIR needs to explain how drilling hundreds and perhaps up to 1,000 holes 20 to 40 foot deep in order to place runway-extension piles will impact the deteriorating landfill trash effluent and underlying otherwise clean soils and groundwater;</li> <li>• County's EIR needs to explain how it will assure that all of the hundreds (and perhaps thousands) of linear feet of existing landfill methane gas collection system will be removed during construction of the multiple landfill extensions(s) to assure that unremoved pipe does not become an open conduit to carry landfill effluent to clean soils or groundwater.</li> <li>• As noted above, county's EIR needs to explain why firefighting water and surfactant and other chemicals will not enter the airport storm drain and be carried to Hedionda Lagoon – as the county's 2013 SCS Engineers report indicates is a possibility.</li> <li>• Periodically, county grades the Palomar perimeter slopes along Palomar Airport Road and El Camino Real. In part, grading is required because county only landscapes the slopes for about 3-5 months of the year resulting in periodic slope water borne or wind borne erosion. The EIR needs to discuss the environmental impacts of such erosion and explain why the slopes cannot be permanently landscaped and irrigated with proof not just claims of its inability to permanently landscape the slopes.</li> </ul>
10	Land Use & Planning,	County says "No Impact"	<ul style="list-style-type: none"> <li>• <b>Carlsbad Planning &amp; Zoning Restrictions.</b> Assure that the EIR Environmental Setting section discusses the Carlsbad restrictions on Palomar Airport expansion including but not</li> </ul>




	IS pp. 30-31	<p>limited to Carlsbad Municipal Code Section 21.53.015 and Conditional Use Permit 172. Those sections require Carlsbad voters and the Carlsbad Planning Commission to approve certain Palomar expansions and redesignation of the Airport from a basic transport general aviation airport to a commercial airport.</p> <ul style="list-style-type: none"> <li>• Also, discuss Public Utilities Code Section 21664.5, which provides that runway extensions constitute “airport expansions” under state law. List the county and Carlsbad past actions taken to comply with Carlsbad law and the redesignation of the airport from a general aviation airport to an FAA Part 139 Commercial Airport.</li> <li>• Recall CUP 172 &amp; CUP Table 1 (Planning Commission Resolution No. 1699) Limitations. In 1980 Carlsbad adopted Conditional Use Permit (CUP) 172 to regulate Palomar and require Carlsbad review: (i) For “<i>Approval of any uses not specifically listed in (CUP) Table 1 and/or expansion of the airport facility.</i>” (CUP Condition 8) OR (ii) if the Existing designation of the airport as a General Aviation Basic Transport Airport ... changes. (CUP Condition 11) <ul style="list-style-type: none"> <li>○ As to CUP Condition 8, CUP 172 Table 1 lists many facilities county may develop solo. But Table Section I.a.(1) omits runways. When county requested CUP 172 adoption, county submitted a Table 1 that included runways. Carlsbad deleted “runways” when it adopted the CUP. Obviously to retain control over runway development.</li> <li>○ As to CUP Condition 11, the FAA ranks Palomar as a commercial service airport. We have seen no Carlsbad action compliant with CUP 172 to allow county to make Palomar an FAA Part 139 commercial rather than general aviation basic transport airport.</li> </ul> </li> <li>• Also, the Palomar PMP will require the relocation of various tenant structures and operations. To our knowledge, county has not in the past ever stated – assuming county believes that Carlsbad may not regulate county Palomar Airport development (either by county or on behalf of tenants) – what provisions in the county zoning and planning codes regulate Palomar development. The EIR needs to list what specific provisions in the County of</li> </ul>
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			<p><b>San Diego codes limit or otherwise control Palomar Airport development.</b></p> <ul style="list-style-type: none"> <li>• <b>Oddly, county's IS list of "Land Use &amp; Planning" references used to prepare the IS (p. 45) does not refer to Carlsbad Municipal Code § 21.53.015 or to Carlsbad Conditional Use Permit 172<sup>16</sup> or to California Aeronautics Act limitation on runway extensions as airport expansions contained in California Public Utilities Code § 21664.5 or to specific zoning provisions regulating airport development. Nor does county refer to the San Diego Regional Airport Authority 2010 Regional Airport Strategic Plan, which has much to say about Palomar Airport.</b></li> <li>• <b>CEQA requires that EIRs discuss public matters of controversy. When county prepared its last Palomar General Plan in 1996, county did not want to present the plan to the Carlsbad City Council as an action item because county was concerned the public would object to various portions of the plan, and the 1997 County Palomar Plan developments pale in comparison to those proposed by the County 2017 Master Plan. As reflected in the Carlsbad City Planner letter to the then City Manager, Carlsbad staff felt that CUP 172 had to be amended if county adopted its 1997 General Plan. The relevant letter states as below. The letter was obtained by public records request. Note especially paragraph 2 of the 1996 letter.</b></li> <li>• <b>California State Aeronautics regulations [21 CCR § 5001(h) defines "General Aviation" as "all aircraft other than air carrier aircraft and military aircraft." Carlsbad Conditional Use Permit 172 bars county from converting Palomar from a General Aviation basic transport airport without amendment of the CUP. To show its compliance with Carlsbad zoning and planning, the EIR needs to explain when county sought and obtained approval from Carlsbad to operate as a Part 139 airport for regularly scheduled commercial service.</b></li> </ul>
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July 11, 1996

TO: CITY MANAGER


VIA:  COMMUNITY DEVELOPMENT DIRECTOR

FROM: Planning Director

SUBJECT: **AMENDMENT TO THE AIRPORT CUP AND AN UPDATE ON ACTIVITIES AT THE AIRPORT**

The following is an update on activities at McClellan-Palomar Airport including staff's decision to require an amendment to the Airport Conditional Use Permit (CUP) to reflect development outlined in the proposed Master Plan.

1. Over the past two years, the County of San Diego has pursued the preparation of an Airport Master Plan for McClellan-Paloma Airport. A public review draft was distributed to staff for review on June 10, 1996. The review period on the Master Plan will be approximately two months. The Master Plan addresses airport demand; airport capacity; facility requirements; development alternatives; airport development plan; and, financial management and development programs. For your convenience, attached is a copy of the proposed Airport layout plan.
2. The Airport staff is proposing to take the Master Plan forward for Board of Supervisor approval in the near future. Airport staff will be processing the necessary environmental documents concurrently with the Master Plan. Airport staff would like to bring the Master Plan forward for Planning Commission and City Council review as an information item. Staff has reviewed the draft Plan and determined that the Master Plan is substantially different from the Airport plans previously approved under CUP 172 (approved by Planning Commission September 24, 1980). Therefore, staff proposes to advise the Airport staff that they must submit a CUP amendment for the proposed Master Plan. Airport staff have expressed concern regarding an update of their CUP. Their problem with the CUP amendment is the potential for public objections to the proposed Master Plan which could jeopardize new airport terminal improvements.
3. Airport staff are continuing to pursue FAA 139 Certification. Changes necessary to accomplish the FAA 139 Certification include increased security; measures to prohibit auto access to the flight line; measures to limit public and personnel access to various airport facilities; drainage and grading modifications; and, on-site fire facilities. It is estimated that the FAA 139 Certification process will be completed by January 1997.
4. Airport staff are proposing to release a Request for Proposals for the new Airport terminal parking structure in late 1997, with airport terminal design to begin in 1998.



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			<ul style="list-style-type: none"> <li>• In early 2016, Carlsbad voters by initiative petition forced the City Council to hold a special election to decide whether a new mall development (approved by the City Council several month earlier) should be allowed in Carlsbad. At the February 23, 2016 election, the voters rejected the council action.</li> <li>• In combination, Carlsbad Municipal Code § 21.53.015 [adopted after Carlsbad citizens acted by initiative petition], the 1996 Carlsbad staff planning letter prepared when the last county Palomar Master Plan was circulated, and the recent Carlsbad citizen initiative action all indicate that there is substantial controversy in Carlsbad as to what developments should be allowed.</li> <li>• Accordingly, the county EIR needs to fully discuss the Land Use and Planning issues noted above.</li> <li>• County notes at IS p. 31: <i>“All proposed airport improvements would be located entirely on existing airport property. Accordingly, the San Diego Regional Airport Authority’s Airport Land Use Commission (ALUC) does not have jurisdiction over the project itself. However, alterations to runway 06-24 and other applicable facilities, would require an update to the airport’s comprehensive Land Use Plan for changes in noise contours, safety zones, and or’ land use type or density policies within the ALUC jurisdiction for the airport. Potential impacts will be further evaluated in the EIR. The proposed Master Plan improvements would be reviewed for consistency with the County of San Diego General Plan, City of Carlsbad General Plan, and other applicable land use plans, policies and regulations of agencies that have jurisdiction. Some of the improvements could be Potentially Significant, and will b fully addressed in the EIR.”</i> <ul style="list-style-type: none"> <li>○ The updated ALUC reviewed by the SDRAA, which county notes above, must be prepared pursuant to Carlsbad City Council legislative action. This legislative action (among others) triggers the application of Carlsbad MC § 21.53.015.</li> <li>○ Palomar Airport expansions trigger Carlsbad</li> </ul> </li> </ul>
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			<p><b>MC § 21.53.015 Carlsbad citizen voting.</b></p> <ul style="list-style-type: none"> <li>○ <b>Assure the EIR discusses the relationship of the CLUP to MC § 21.53.015.</b></li> </ul>
11	Mineral Resources, IS 31-32		<ul style="list-style-type: none"> <li>• No Comment</li> </ul>
12	Noise, IS 32-35	County says “potentially significant impact?”	<ul style="list-style-type: none"> <li>• <b>County measures noise by the CNEL averaging method which will always result in airport noise contours less than 65 decibels. However, as Vista residents recent letters to the county and state legislators show and Carlsbad resident noise complaints to the Palomar Airport Advisory Committee (PAAC) show, residents are concerned about the number of flights over their neighborhoods, aircraft altitudes, and noise.</b></li> <li>• <b>Carlsbad residents have the right -- pursuant to Carlsbad Municipal Code § 21.53.015 and Carlsbad Conditional Use Permit 172 and pursuant to the legislative actions that Carlsbad must take to revise its Compatibility Land Use Plan (CLUP) as a result of a county Palomar Airport expansion – to vote on county Palomar expansions.</b></li> <li>• <b>Regardless of the county’s position that all average aircraft noise levels less than 65 decibels may be legal, residents around the airport are entitled to sufficient environmental information so that they can intelligently vote on a Palomar expansion. Accordingly, county’s PMP EIR needs to tell such resident:</b> <ul style="list-style-type: none"> <li>○ <b>How many aircraft will fly over particular Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, and Vista neighborhoods as a result of Palomar operations.</b></li> <li>○ <b>How the FAA’s implementation of its NextGen satellite guidance system will alter the neighborhoods in which aircraft concentrate their noise.</b></li> <li>○ <b>How Palomar’s planned relocation of the runway 150 feet north will affect flight paths of aircraft using Palomar.</b></li> <li>○ <b>What aircraft noise limits apply over hospitals, schools, mobile homes, and other restricted areas.</b></li> <li>○ <b>What mitigation measures – including but not limited to installation of dual pane windows,</b></li> </ul> </li> </ul>

			<p>insulation, and other structure protective measures – that county will pay for to reduce aircraft noise levels.</p> <ul style="list-style-type: none"> <li>○ What mandatory aircraft noise reduction measures county is willing to request the FAA to support for any expansion of Palomar Airport including but not limited to: limitations on aircraft (including helicopters) engine thrust levels until such aircraft reach certain altitudes, raising aircraft minimum altitudes over residential neighborhoods, limiting flight hours, disclosing the names and addresses of businesses violating mandatory measures, and imposing fines to be used for public use (such as to fund libraries as is apparently done in Long Beach). Notice this request asks what measures county is willing to support with the FAA – not measures that county can unilaterally impose.</li> </ul>
13	Population & Housing, IS pp. 34-35	County says: <i>“Less than significant”</i>	<ul style="list-style-type: none"> <li>• County says Palomar expansion will have less than a significant impact on road extensions or other business infrastructure.</li> <li>• In 2015 FedEx Ground held a groundbreaking for its new 306,054-square foot distribution center in Oceanside expected to open in August 2017. The coastnews.com says the facility is expected to bring 500 immediate jobs, and will reach 1,000 once it is at full capacity. The Oceanside Mayor spoke at the 2015 Carlsbad General Plan meeting and requested that Carlsbad extend Cannon Blvd (about 2 miles from Palomar).</li> <li>• Amazon.com is also opening distribution centers across the United States and also has plans to deliver package to residents by drone.</li> <li>• County is struggling to attract commercial passenger aircraft such as California Pacific Airlines, which says it will fly out of Palomar within a few months.</li> <li>• Given the facts above, what efforts has Palomar made to attract cargo-handling aircraft to Palomar (and will make in the future) and what are the environmental impacts of such cargo handling aircraft? The EIR needs to discuss what cargo handling aircraft Palomar can now handle and will be able to handle with an extended runway 5800 feet long.</li> <li>• Recall that the EIR must discuss both the growth inducing and cumulative impacts of Palomar operations. Added cargo handling at Palomar might itself have less than significant environmental impacts but still have significant</li> </ul>

			impacts cumulatively or be growth inducing by supporting Fed Ex, Amazon, DHL, UPS, or other distribution facilities.
14	Public Services	County says as to Palomar Airport increasing the need for public services <i>"less than Significant Impact,"</i> IS pp. 35-36	<ul style="list-style-type: none"> <li>• <b>Fire Services:</b> Several thousand FAA-rated C/D aircraft have long called at Palomar and more will call if county lengthens the runway. Such aircraft can weigh up to 90,000 pounds compared to recreational aircraft weights of less than 12,500 pounds. County has failed to show in the past that the landfill areas can support the weight of heavy C/D aircraft and firefighting equipment – as required by FAA ARFF requirements. The EIR needs to provide the facts showing how Palomar will meet ARFF requirements for such aircraft, not just in 15 years but in 2017.</li> <li>• <b>Landfill Management.</b> County's Landfill Enforcement Division already monitors the Palomar landfills and periodically reports "hot spots" – possible indicators of underground burning trash. <ul style="list-style-type: none"> <li>○ As noted above, the Palomar landfills have already likely become hazardous material sites because trash burning for 6 months has converted numerous household materials (plastics, batteries, ceiling and floor tiles laden with asbestos, treated and bleached wood, wall insulation, etc) into cancer causing materials.</li> <li>○ When the underground landfill fires occurred, an underground methane gas collection system comprised of thousands of feet of plastic and/or metal pipes existed. Hundreds, perhaps thousands, of feet of this piping had to burn or melt creating two different problems. First, the fires converted the melting pipes to hazardous cancer producing materials. Second, the fractured pipes likely created weaknesses in remaining pipes that can fracture at any time – a likely cause of county continuing to find hot spots during periodic monitoring.<sup>17</sup></li> <li>○ County wants to drill thousands of feet of holes through the landfill trash and existing methane gas piping system to extend its runway.</li> <li>○ The EIR needs to discuss (i) how Palomar landfill fires converted such trash to hazardous materials, (ii) what hazardous materials now exist in those portions of the landfill that encountered fires and</li> </ul> </li> </ul>

			<p>their estimated volume, (iii) how much of these materials have sunk to the otherwise clean soils and ground waters underlying the landfills, (iv) how drilling holes through the trash will further spread the deteriorating landfill materials including the hazardous materials, (v) how an aircraft crashing into the landfill abutting the Palomar runway and leaking aviation fuel (possibly spread by firefighting equipment water used on an aircraft fire) will change the official landfill designation from non-hazardous to hazardous, and (vi) the mitigation measures – including removal and transport of substantial landfill materials to a dump classified as a hazardous material site – that county will employ when extending the Palomar runway and after any aviation crashes leaking hazardous materials to remove contamination off site.</p> <ul style="list-style-type: none"> <li>• In short, county’s IS claim airport expansion will not significantly impact public services [fire and landfill management] fails. The bill to county will likely exceed several million dollars. Recall that the county 2013 Runway Feasibility Study estimated the cost of relocating the Area 3 landfill as \$50 million to \$100,000,000. That is the level of environmental liability risk that county undertakes by extending the Palomar runway.</li> </ul>
15	Recreation, IS p. 36	County says “No Impact”	<ul style="list-style-type: none"> <li>• County is correct that the Palomar expansion will not physically impact recreation areas including neighborhood and regional parks.</li> <li>• Time will tell – depending on aircraft flight frequency – whether the Crossings Golf Course very close to Palomar will lose business as a result of aircraft noise.</li> </ul>
16	Transportation & Traffic, IS 36-37	County says <i>as to</i> a) airport expansion effect of transportation circulation –“ <i>potentially significant</i> ”	<ul style="list-style-type: none"> <li>• County says (IS 36-37) “The City of Carlsbad’s General plan includes assumptions regarding the long-term use forecast for the airport and associated increases in ground and air transportation. <ul style="list-style-type: none"> <li>○ I have read the recently adopted Carlsbad 2015-2035 General Plan. That plan says almost nothing about future Palomar Airport operations. If county disagrees, please state in the county PMP EIR the pages in the Carlsbad GP EIR which discuss Palomar Airport related traffic and the related</li> </ul> </li> </ul>



		<p>IS p. 36</p> <p>b) County says as to Palomar expansion effect on congestion management  <i>"potentially significant"</i>  IS p. 37</p>	<p>Carlsbad traffic studies which discuss such airport traffic.</p> <ul style="list-style-type: none"> <li>○ Nor could the Carlsbad GP accurately discuss future Palomar airport operations. The county has not itself yet published its Palomar Master Plan — for which county's Initial Study was prepared – and county has suggested it may take at least six more months before county publishes its master plan.</li> </ul> <ul style="list-style-type: none"> <li>• Even without including Palomar-related traffic analysis, the Carlsbad GP already forecasts gridlock traffic conditions along portions of Palomar Airport Road and El Camino near Palomar Airport. So it is clear that added Palomar Airport traffic will significantly impact the environment.</li> <li>• The county IS says that a large project generating 2400 daily average trips requires a comprehensive traffic analysis. (IS 37). The 2400 x 365 daily trip level = 876,000 trips per year. <ul style="list-style-type: none"> <li>○ Recall that in 2015 Palomar had about 150,000 annual flights.</li> <li>○ County has undertaken a concerted course of action to attract regularly scheduled commercial carriers to Palomar. Actions have included obtaining FAA certification of Palomar as a Part 139 airport, increasing Palomar fuel storage to serve the large fuel needs of C/D aircraft, opening a customs facility to encourage international travel, enlarging the passenger terminal (including plans for future passenger terminal improvements as noted in IS Figure 3), increasing passenger parking in the southwest airport quadrant (in the process buying/leasing land outside the 1979 airport boundaries), extending the Palomar runway and taxiways, and proposing EMAS systems to improve safety for FAA-rated C/D aircraft.</li> <li>○ Recall that each increase or conversion of 10,000 annual flights (from small craft recreational flights) to passenger service results in 500,000 increased annual passengers per year, assuming 50 people per aircraft. Cars taking passengers to or from the airport must travel both directions. Hence 500,000 more passengers equals 1,000,000 more annual traffic trips – more than the 876,000 triggering comprehensive requirement.</li> </ul> </li> </ul>
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		<p>c) county says as to safety risks from air carrier changes <i>“potentially significant”</i></p>	<ul style="list-style-type: none"> <li>○ Accordingly, assure the county PMP EIR fairly estimates the number of passenger increases, the associated environmental impacts, and the enforceable mitigation measures county will adopt to offset the impacts.</li> <li>○ Recall that when California Pacific Airlines sought FAA approval to fly at Palomar in 2012, county failed to comment on CPA’s failure to discuss annual passenger levels and environmental impacts in the FAA/CPA environmental assessment. In other words, there is precedent for county failing to discuss all environmental impacts in good faith.</li> </ul> <ul style="list-style-type: none"> <li>• The county PMP EIR needs to discuss the safety impact of substituting EMAS systems for the usual FAA AC 150/5300-13A [Design Standards for airports accepting grant funds] requirement that airports provide 1,000-foot long runway safety areas at the end of runways. <ul style="list-style-type: none"> <li>○ Based on FAA responses to questions we sent to the FAA, the FAA recognizes that EMAS systems are designed only to provide equivalent safety margins for aircraft on departure, not on arrival. The collapsible EMAS systems will stop aircraft on departure rolling over the runway threshold – at least at the EMAS aircraft design speed [apparently 90% of aircraft speeds].</li> <li>○ However, EMAS systems provide no safety margins for aircraft on arrival landing short of the runway and short of the 300-foot EMAS.</li> <li>○ Palomar states it intends to shift the runway north 150 feet. Palomar has sufficient space – without spending about \$50 million for west end and east end EMASs to place 1000-foot RSAs at each end. Such RSAs -- conforming to the standard FAA Design Requirements – provide adequate safety margins for both departing and arriving aircraft at both runway ends.<sup>18</sup></li> <li>○ Today, aircraft arriving Palomar from the east 90% of the time have an about 1400-foot along sandy area leading to the runway. After an 800-foot east end runway extension and 300-foot east end EMAS, arriving aircraft would have less than a 300 foot sandy area. Less because county intends to relocate the runway 150 feet forth and the airport property narrows to the north along the slanting El Camino</li> </ul> </li> </ul>
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		<p>d) County says as to hazards due to design considerations  <i>"No Impact"</i>  IS p. 38</p> <p>e) County says as to interference with emergency access  <i>"No Impact"</i>  IS 38</p> <p>f) County says as to conflict with public transit and bicycles  <i>"less than significant impact"</i></p>	<p><b>Real diagonal. In other words, county and the FAA would be creating the "perfect storm" for aircraft landing short to crash into the traffic on El Camino Real, a major Carlsbad arterial.</b></p> <ul style="list-style-type: none"> <li>○ <b>Assure the PMP EIR discusses these considerations.</b></li> <li>• <b>We incorporate the same comments here as in subsection c) immediately above.</b></li> <li>• <b>The PMP EIR needs to discuss whether the Palomar FAA ARFF requirements include a paramedic team on the airport premises or whether paramedics would be coming from another location. If from off the airport, significant increases in passenger levels will cause added delays that Carlsbad has already said in its General Plan may reach gridlock at certain times of the day. Even if paramedic teams are on the airport, ambulances may expect delays once on Palomar Airport Road or El Camino. Helicopter air ambulances are not a practical alternative, often charging \$35,000 or more for services.</b></li> <li>• <b>Agree</b></li> <li>• <b>County fails to note that the State Aeronautics Act in Public Utilities Code §21664.5 provides that runway extensions constitute airport expansions and are also subject to state review.</b></li> </ul>
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17	Utilities & Service Systems, IS pp. 38-41	c) County says as to expansion of existing water drainage facilities "potentially significant impact"	<ul style="list-style-type: none"> <li>• As county consultant SCS Engineers noted in its October 2013 report entitled <i>"Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport's Landfill, Carlsbad, California"</i> (Attachment 2) contaminated materials from fighting an air crash or from fuel storage tanks on Palomar could contaminate the storm drain on the premises and exceed its filtration capacity. Assure the EIR provides the details to assess whether improvement of that facility is needed to prevent contaminated materials from entering watersheds.</li> <li>• When one is on the Palomar Airport premises and drives west down the road to the parking lot, it appears that a roughly 18 to 24 inch storm drain [or other galvanized pipe] simply releases water or other materials onto the slope between the lower parking lot and the upper FBO premises. Assure the EIR provides a drawing showing all storm drain outlets and other major utility locations on the premises and explains whether they comply with applicable codes. Also, the EIR should explain why storm drain waters can flow freely on airport slopes when Palomar roads and other areas already have a maintenance problem associated with landfill subsidence.</li> </ul>
18	Mandatory Findings of Significance	County says it analyzes impacts at a program level	<ul style="list-style-type: none"> <li>• County says it will reevaluate the PMP EIR program environmental impacts analyzed to see if specific future projects require reevaluation. <ul style="list-style-type: none"> <li>○ County will be able to effectively perform future project-level evaluations only if the PMP EIR sets forth in detail: <ul style="list-style-type: none"> <li>▪ the 2017 environmental setting baselines for the different environmental impacts; and</li> <li>▪ the 2017 PMP forecasted increases in the baselines -- before specific individual projects are undertaken -- are described in detail; and</li> <li>▪ the future forecasted increases.</li> </ul> </li> <li>○ Assure the PMP EIR sets forth the detail noted above.</li> <li>○ As an example related to aircraft annual flight forecasts, Palomar in 2017 may have a baseline of 150,000 annual flights and a capacity without runway extensions to handle 300,000 annual flights.</li> </ul> </li> </ul>

			<b>[Recall Palomar handled about 286,000 flights in 1979 and the early 2000s.]</b>
<b>End of Bender Comments on County PMP February 29, 2016 Initial Study – But see endnotes below, as necessary.</b>			

Submitted by Ray & Ellen Bender

2016 bender comments on county palomar initial study  
bccc

<sup>1</sup> We have sent these comments to Carlsbad because McClellan-Palomar (Palomar) Airport lies in the City of Carlsbad and likely produces the greatest single source of noise, traffic, air quality, hazardous material, and land use impacts on Carlsbad residents. In addition, Carlsbad has the obligation to enforce Carlsbad Municipal Code § 21.53.015 and Carlsbad Conditional Use Permit [CUP] 172. The MC requires county to seek Carlsbad voter approval for Palomar Airport expansions. The CUP requires county to obtain Carlsbad approvals for Palomar Airport expansions and/or for converting the airport from a “general aviation basic transport airport.” The San Diego County Board of Supervisors at its December 2015 meeting directed county airport staff to finalize a Palomar Master Plan (PMP) – which includes extending the Palomar runway from 4900 feet to 5800 feet – so Palomar can be converted to an airport to handle FAA-rated C/D aircraft. In the recent past, both county and Carlsbad have signaled their intent to sidestep the Carlsbad MC and CUP provisions.

<sup>2</sup> We have sent these comments to the Division of Aeronautics because the California Aeronautics Act (PUC §21664.5) states that runway extensions constitute airport expansions and require State review and approval.

<sup>3</sup> We have sent these comments to the FAA for several reasons. Typically the FAA acts behind closed doors with little direct input from the public. When reviewing local airport requests [such as for Airport Layout Plan (ALP) revisions or local airport grant applications] the FAA position seems to be: *“The local airport will forward to the FAA any relevant information that the local community has expressed about airport development and grants.”* However, in 2015, the County of San Diego Board of Supervisors approved an airport staff recommendation allowing airport staff to request FAA grants without the need for further board action. Accordingly, county no longer puts grant application on its public meeting agendas and the public has no ability to comment on them. Past FAA actions suggest that the FAA Western Pacific Region needs to closely monitor San Diego County Airport actions, including grant requests.

Three examples support this conclusion. First, in 2012, the FAA circulated a NEPA environmental assessment (EA) for the proposed Palomar new air carrier California Pacific Airlines. The EA assessed the environmental impacts of increased aircraft flights, but not the impacts of increasing passengers at Palomar from about 50,000 annually to nearly 1,000,000, a rather basic analysis omission. To our knowledge, no final EA was ever circulated. Second, our review of letters between the FAA and county indicate (1) county retained Kimley-Horn and Associates, Inc. (KH) to prepare a \$700,000 2012 Palomar Runway Feasibility Study, (2) county wanted to obtain FAA funding to pay KH to prepare county’s Palomar Airport Master Plan, (3) the FAA noted that county had failed to properly follow FAA procedures to retain an airport planning consultant, but (4) county nonetheless continues to use KH to prepare the Palomar Master Plan, to be finalized in the next 6 months. Third, the county KH Runway Feasibility Study asserts that extending the Palomar runway meets FAA Benefit-Cost Analysis (BCA) criteria. The Study does not meet FAA BCA requirements. KH and county materially undercount improvement costs and overestimate future airport revenues. We request the opportunity to provide the FAA our comments on county’s presumably new BCA analysis when county finalizes its Palomar Master Plan. We simply note

now that county's 2012 KH BCA appears not to have included in its costs the multiple constructions and demolitions associated with extending the Palomar runway in place and later relocating it 150 feet north – as now described in county's February 29, 2016 PMP Initial Study.

<sup>4</sup> We ignore for the moment whether county allowed a full 30 day comment period since it made the county Initial Study available not on the Workshop 4 agenda prior to the meeting but in hard copy form when Workshop 4 was held in the evening of February 29, 2016.

<sup>5</sup> Congress in the 2005 FAA appropriations bill for the Department of Transportation required all commercial airports to come into compliance with FAA design standards for runway safety areas by the end of 2015. County's own 2013 Runway Feasibility Study shows that Palomar has been handling C & D size aircraft with 300-foot long RSAs for many years although the FAA design standards call for 1000-foot RSAs – without any attempt by county over the last 10 years to bring the RSAs into compliance. It is the county's and KH's duty in the EIR to identify all relevant laws, rules, and policies that Palomar must timely comply with because such laws comprise part of the regulatory environmental setting and affect the scope of EIR alternatives that must be considered.

<sup>6</sup> Oddly, county has failed to release its draft 2017-2037 Palomar Master Plan, which county has been preparing since it released its 2013 Runway Feasibility Study, with county consultant Kimley-Horn preparing both studies. It is difficult for the public to comment on the county February 29, 2016 NOP for the PMP when the county has failed to release one. For that reason, we reserve the right to provide added EIR scoping comments after the county releases its PMP – presumably in about 6 months. The PMP non-release is especially odd since county extended the original KH contract for less than a year to prepare the PMP. And county took this action after learning that the FAA denied a grant to county for Kimley-Horn to prepare the PMP apparently because county's initial retention of KH for the Runway Feasibility Study did not comply with FAA Master Plan consultant selection criteria. We incorporate in the EIR preparation administrative record all county records showing the above facts (to be identified by county if a challenge to the EIR becomes necessary).

<sup>7</sup> Recall that even county's own airport contractors in the past apparently damaged a large underground Palomar Airport storm drain, which may have been the source of oxygen feeding one or more of the Palomar underground landfill fires. County records suggest that county discovered the storm drain breach substantially after the county contractor finished the job. As I recall, county addressed the problem by belatedly filling the storm drain with concrete.

<sup>8</sup> FAA Airport Design standards in FAA AC 150/5300-13A [Design Standards] vary with the speed and size of aircraft using airports. As county is aware, different standards apply to runways, runway safety areas [the usually sandy or grassy area around the runway perimeter], runway object free areas, and other areas. To date, county's Figure 1 addresses less than all FAA design standards.

<sup>9</sup> According to county consultant reports, county apparently pumped carbon dioxide and grout into the land field fire areas to snuff the flames and try to fill voids resulting from the burning trash decomposing. We are aware of no county consultant side scan sonar or other testing performed to assess how much of the void area was filled. Recall also that sometime in the 2000s, a county Palomar contractor apparently inadvertently crushed a large storm drain underlying the airport and resulting in county later abandoning this storm drain.

<sup>10</sup> Both the county and FAA have said that once a facility is built with FAA grant funds, neither the FAA nor airport can limit the aircraft using the airport, absent perhaps a clear safety issue. Even if Palomar in the long term initially operated at less than its PMP-increased capacity, the 2010 Regional Airport Strategic Plan (RASP) prepared for the San Diego Regional Airport Authority (operator of the SD International Airport at Lindbergh Field) tells us that aircraft could be diverted from Lindbergh simply by Lindbergh implementing "pricing strategies" that economically drive Lindbergh aircraft to Palomar. Since increased aircraft flights to Palomar do not necessarily trigger "discretionary Palomar airport decisions", CEQA would not require the county to amend the 2017 PMP EIR. Accordingly, the 2017 EIR must discuss the environmental impacts that Palomar could handle at maximum operating load.

<sup>11</sup> Examples include:

(1) the failure of both the FAA and county to discuss proposed quantum passenger increases at Palomar resulting from forecasted CPA flights in 2013; the circulated NEPA EA discussed proposed increases in operations without discussing either the numbers of increased passengers or the forecasted increases in aircraft to be used and cities to be served;

(2) the use of a defective categorical exemption for the short-lived BIZCharters/BIZ Shuttle operations at Palomar in 2015 [see the discussion of the defects in the electronic newspaper, BULLETIN BOARD section of CarlsbadPatch.com in July 2015 articles entitled **Palomar Airport: BIZ's Categorical Exemption, Part III, 134** Hustling a CEQA Exemption; **Palomar Airport: The BIZ Categorical Exemption, Part II, 133** County Good Faith Environmental Compliance & Solomon? and **Palomar Airport: The BIZ Categorical Exemption, Part I** County Good Faith Environmental Analysis? Articles may also be accessed by going to <http://patch.com/users/raymond-bender-79afd24d>]; (3) (According to Ted Vallas, CEO of CPA), the county's apparent intent to issue a negative declaration for proposed 2016 CPA operations (and thereafter) when county has conceded it its PMP Initial Study that Palomar lies in an air quality non-attainment area for several pollutants, including criteria pollutants, and any addition of air quality pollutants by definition constitutes a significant environmental impact, and (4) county's failure to provide any substantive comment on the Palomar Airport environmental impacts in the 2015 City of Carlsbad certified EIR on the Carlsbad 2015-2035 General Plan, despite the fact that the Carlsbad GP had very little information about Palomar or its upcoming expansion. As the public record shows, CPA sued county several years ago apparently because county did not process a county permit fast enough. It appears that county's desire to issue CPA a CEQA negative declaration, if true, results from suit concerns rather than CEQA provisions.

<sup>12</sup> No doubt the City of Carlsbad Fire Department and county fire department – which may be called upon to fight Palomar aircraft crash fires – have some requirements relocated to handling hazardous materials. However, those requirements focus mainly on post accident policies and procedures rather pre-accident policies. For instance, once county starts “parking” multiple large aircraft at Palomar, what should be the spacing distances? What requirements exist for disclosing aircraft hazardous material cargo? What is any inspection of aircraft cargo does Palomar carry out? [Likely none.] In short, Fire Department policies and procedures are no adequate substitute for a detailed Risk Management Plan for its 8 county airports including Palomar.

<sup>13</sup> Twenty years is a long period. But county has not prepared a Palomar-related EIR since approximately 1975 [45 years ago]. Nor has county provided any on-airport hazardous discussion of which we are aware in its rare CEQA negative declarations.

<sup>14</sup> State of the art landfills are created with a 3-5 foot clay liner at the bottom to avoid deteriorating landfill contaminated water and chemicals from migrating into the soil and groundwater. Public records obtained from county show that county failed to line the Palomar canyons into which it dumped millions of tons of trash.

<sup>15</sup> According to FAA AC 150/5300 13-A [Design Standards], county should have either lengthened its RSAs or installed EMASs at least 10 years ago – or installed displaced runway thresholds to discourage C/D aircraft from using the runway until safety improvements could be made. The FAA says that an airport having annual flights of at least 500 C/D aircraft triggers the 1000-foot long RSA standard. As county's 2013 Runway Feasibility Study conceded, Palomar has served several thousand C/D-III annual aircraft flights for nearly a decade. According to the Design Standards, when an airport does not meet the design standards, the FAA tower airport should implement operating measures to improve airport safety. In response to our FAA FOIA request last year, the FAA stated it was unable to find any FAA tower measures the FAA had implemented to improve Palomar safety. The FAA Design Standards provide that once airports have taken FAA grants – as Palomar has – the standards become mandatory, not advisory. Note especially that the foregoing requirements would apply even if Palomar did not have the serious landfill methane gas problems noted above. Such problems only emphasize the past county and FAA lack of due diligence.

<sup>16</sup> County does refer to the City of Carlsbad General Plan, Approved September 22, 2015. However, review of that General Plan reveals almost no discussion of Palomar Airport development.

<sup>17</sup> Even without being subjected to corrosive underground materials such as those caused by deteriorating landfill trash, plastic piping can fail. One of our adjacent neighboring communities, only 30 years old, is paying more than \$100,000 to replace its landscape piping throughout the neighborhood.

<sup>18</sup> Aircraft now mainly depart west but sometimes east depending on Santa Anna and other weather conditions.

# Attachment 1



To: San Diego County Airports Director [2016 PMP Workshop 3 Feb 29 Bender Comments]  
Via: County McClellan-Palomar (Palomar) Airport Master Plan [PMP]Consultant  
Kimley-Horn & Associates [KH]  
From: Ray Bender  
Re: Workshop #3 Comments and PMP EIR NOP Comments  
Date: Wednesday, February 24, 2016

Preliminary Comments:

1. **PMP Workshop 3 Continued Date.** I (Ray Bender) made plans to attend PMP Workshop 3, first set for Tuesday February 23<sup>rd</sup>. County announced the new date of February 29 last week. Due to a scheduling conflict on February 29<sup>th</sup>, I cannot attend the February 29<sup>th</sup> meeting. I therefore provide these comments without having the benefit of county's meeting materials or comments.
2. **Incorporation of Prior Bender PMP Comments.** I attended Workshops 1, 2 and 3 in 2014 and 2015. I provided detailed comments on the proposed PMP to Kimley-Horn and/or county on February 10, 2014; May 22, 2014; June 23, 2015. I attach copies of those letters to this letter for your ease of reference.

I incorporate those comments by reference here. I request that KH provide those comments in full to the County Board of Supervisors (BOS) and to the FAA when actions related to the PMP are processed to the BOS and FAA. All comments should be made part of the Administrative Record relevant to any challenge of county and/or Carlsbad and/or FAA actions or non-actions related to expanding Palomar.

3. **Workshop 4 Focus.** The county's one page "Join Us for a Public Meeting" notice says the airport project team will review the **county's preferred alternative, capital improvement phasing plan, overview of the environmental process, and discuss public involvement and next steps.** The comments below focus on these items. Comments may later be added after I have been able to review the county Workshop 4 materials.<sup>1</sup>
4. **Compliance with Legal Requirements.** Review of the county/FAA 2012 NEPA Environmental Assessment [never finalized] for the proposed operation of California Pacific Airline at Palomar suggests that county analysis of proposed projects confuses environmental requirements (under NEPA and CEQA) with requirements under the

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<sup>1</sup> As of Wednesday, February 24, 2016 county's project websites [PalomarMP@kimley-horn.com and www.Palomar AirportMP.com referenced only prior county PMP actions but provided no specific Workshop 4 information that the public could review before the February 29, 2016 meeting.

various federal aviation acts.<sup>2</sup> The environmental laws are generally procedural. They may allow a project sponsor to claim that only one project alternative will achieve the sponsor's goal thus eliminating the need to fully analyze other project alternatives. In contrast, various federal aviation acts preclude a project sponsor from selecting its preferred goal if other alternatives better satisfy the federal act's purpose.<sup>3</sup>

For instance, the Airport and Airway Improvement Act ("AAIA") says: "*It is the policy of the United States – [] that the safe operation of the airport and airway system is the highest aviation priority.*" 49 U.S.C. §47101(a)(1). The AAIA also says that the FAA may grant federal funding for a major airport development project "*found to have a significant adverse effect on natural resources, including fish and wildlife, natural, scenic, and recreation assets, water and air quality, or another factor affecting the environment, **only after finding that no possible and prudent alternative to the project exists and that every reasonable step has been taken to minimize the adverse effect.***" 49 U.S.C § 47106(c)(1)(B). [Emphasis added.]

Recall that the county KH Runway Feasibility Study proposes extending the Palomar runway 800 feet (900 feet if Supervisor Horn's wishes as expressed at the December 2015 Board of Supervisor meeting) over a closed methane-emitting landfill that has had several past underground fires and periodic continued emissions of methane gas exceeding regulatory explosive limits – as so stated by the county landfill consultants who monitor the 3 closed underground Palomar landfills.

County has previously said the landfills were constructed without the now common 3-foot (or thicker) clay barriers at the landfill bottom to prevent escaping, deteriorating trash waste from flowing into ground waters and underlying clean soil. The county KH proposed runway extension apparently rests on hundreds (perhaps more than 1,000) of 20-foot to 40-foot piles placed through the east end runway landfill trash through the landfill bottom and into bedrock. It is inconceivable that drilling such pile holes and if also necessary, driving the pile bottom firmly into bedrock will not create pathways for 30 years of landfill sludge to drain into clean soils.

Recall also that the county's own October 15, 2013 SCS Engineers 11-page report entitled "Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport's Landfill, Carlsbad, California" lists several catastrophic consequences that occur if an aircraft crashed into the landfill. Consequences could include spillage of flammable liquids such as jet fuel contaminating the landfill, setting off another fire in the underground landfill, spillage

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<sup>2</sup> The failure of CPA, the FAA, and county to publish a final CPA EA for proposed Palomar operations is odd. As one of the detailed commentators on the EA, I saw the draft FAA proposed response. Although the draft EA, if finalized, would likely have been defective for the reasons pointed out in the EA comments, I am not aware of any reason the FAA gave to avoid release of a final CPA EA. Nevertheless, that exercise in futility – which wasted hundreds of hours of time of consultants, county, FAA, and the public emphasizes the importance of the county applying proper criteria initially.

<sup>3</sup>

of hazardous cryogenic liquids into the landfill, rupture of landfill gas methane collection system piping and venting of methane into the air – among many other environmental problems.<sup>4</sup> Attached to this letter is a copy of the SCS report.

Other federal acts and Congressional policies limit Palomar's ability to focus only on county's preferred runway alternative to the detriment of analyzing other alternatives. Since Kimley-Horn was hired as an expert in meeting FAA requirements, KH needs to identify the relevant federal laws, rules, and FAA and Congressional policies and explain to the county Board of Supervisors how these factors apply before the BOS may select its final Palomar Airport alternative.<sup>5</sup>

### Specific Comments & Requests

#### **A. County's Preferred Alternative: Converting Palomar to a C/D "Modified" Airport**

1. Define the FAA requirements for a C/D compliant airport runway and runway safety area (RSA) layout. Cite the specific applicable FAA Orders, Advisory Circulars, and other requirements that apply.
2. State how Palomar could meet FAA C/D requirements without lengthening the runway. Alternatives would seem to include:
  - a. Adding FAA-approved Engineered Materials and Arresting Systems [so-called EMASs] at both the Palomar runway east and west ends without lengthening the runway. This is the only alternative that avoids construction over the continually subsiding, methane-emitting Palomar east end landfill and the only alternative that assures county compliance with the AAIA requirement that an alternative be selected to avoid harming the environment.
  - b. Adding an FAA-approved EMAS at the Palomar west ocean-oriented end and grading the Palomar runway east end to satisfy the FAA 1,000-foot long RSA requirement.<sup>6</sup> Currently, there are about 1500 feet between the Palomar El Camino Real (ECR) runway end and ECR. Most of this 1500 fee lies over the

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<sup>4</sup> Recall that even county's own airport contractors in the past apparently damaged a large underground Palomar Airport storm drain, which may have been the source of oxygen feeding one or more of the Palomar underground landfill fires. County records suggest that county discovered the storm drain breach substantially after the county contractor finished the job. As I recall, county addressed the problem by belatedly filling the storm drain with concrete.

<sup>5</sup> For instance, I it appears that Congress in the 2005 FAA appropriations bill for the Department of Transportation required all commercial airports to come into compliance with FAA design standards for runway safety areas by the end of 2015. We understand that KH's own runway study shows that Palomar has been handling C & D size aircraft with 300-foot long RSAs for many years although the FAA design standards call for 1000-foot RSAs – without any attempt over the last 10 years to bring the RSAs into compliance. It is the county's and KH's duty to identify all relevant laws, rules, and policies that Palomar must timely comply with. [RB – See p. 2 of Pac. Shores Prop. Owners Ass'n v. FAA 2014 U.S. Dist. LEX IS 29962, No. C 13-2827 PJH. – **DELETE REFERENCE FROM FINAL VERSION BUT SAFE FOR FUTURE US**

<sup>6</sup> See, among other requirements, FAA AC 5100-13A, ----- . As you know, although FAA AC requirements are sometimes referred to as "advisory," the requirements become mandatory for airports, like Palomar, that have accepted FAA grants in the past.

closed landfill. Most RSAs comprise sandy areas. Grading the area would not disturb the methane collection pipes lying about 4 to 7 feet below the surface. Omitting an RSA at the ECR runway end has the benefit of providing approaching C/D aircraft (the predominant landing direction) the greatest distance before touching down on the existing runway. This alternative also eliminates the \$25 million or more in EMAS costs at the ECR end.

3. Identify all modifications to FAA C/D requirements that would exist if county proceeded with its plan to lengthen the runway by at least 800 feet including but not limited to modifications to: RSA lengths and widths, airport aircraft approach lengths and widths.
4. Identify all modifications that Carlsbad would have to make to surrounding residential, commercial, and industrial uses including changes to height limitations resulting from aircraft approaching an extended 800-foot runway and therefore flying lower at earlier times over surrounding uses. Include the changes that Carlsbad would have to make to its Compatibility Land Use Plan (CLUP) resulting from changes to use restrictions on areas surrounding the airport.
5. For county's preferred alternative [modified C/D conversion], what design aircraft are used?

## **B. Capital Improvement Phasing Plan**

1. Advise when the McClellan-Palomar Airport Layout Plan [ALP] will be completed and when and where it may be reviewed.
2. Advise when county will be applying for FAA grant(s) to fund any Palomar improvements including the proposed runway extension.
3. Advise whether county will be relying on its 2013 Runway Feasibility Study Benefit Cost Analysis (BCA) to support its FAA grant application.
4. Advise where and when the materials supporting the 2013 BCA will be available for review.
5. Advise - if county is preparing a new or amended BCA to support its FAA grant application – when the new BCA will be available for review and where.
6. Advise when the first work on a Runway Safety Area EMAS for the Palomar runway west [ocean side] is expected to begin.
7. Advise when the first work in a Runway Safety Area EMAS for the Palomar runway east [El Camino Real side] is expected to begin.
8. Advise when the first work on a Palomar runway extension is expected to begin. If the work is expected to be phased, advise how and when.
9. If the Palomar Airport North side ramp is to be modified, advise when and how.
10. If any Palomar Airport buildings are to be relocated, advise when and how.
11. If any off Palomar Airport improvements are needed – such as for navigational aids – advise when and how.
12. If any off Palomar Airport zoning restrictions are necessary to accommodate aircraft beginning landings on an extended runway earlier or takeoffs later, advise what restrictions are needed and when they will be accomplished.

13. If approving an extended Palomar runway will require amendments to the Carlsbad/San Diego Regional Airport Authority/Palomar Compatibility Land Use Plan, advise when and which.
14. How will the recommendations in the San Diego Regional Authority Airport Strategic Plan [2010 RASP] affect the Palomar Capital Improvement Projects.
15. County's preferred alternative refers to converting Palomar to a "modified C/D" airport. Provide a list of the FAA Facility requirements for a C/D airport and a list of the modifications county will make to these requirements when county phases its Palomar capital improvements. The FAA requirements should include but not be limited to runway specifications, runway safety area specifications, runway approach specifications, runway object free specifications, navigational aids, and all other FAA requirements in FAA AC 150/5300 13-A including the appendices.
16. If Palomar does not fully meet FAA design requirements for C/D rated aircraft, what operational restrictions are proposed including but not limited to FAA tower restrictions and the use of declared distances and runway threshold displacements?

### C. Overview of the Environmental Process<sup>7</sup>

1. When will the county CEQA EIR be available for review?
2. When will an FAA NEPA EIS -- related to a county request for FAA grants -- be available for review?
3. Specific CEQA Questions/Comments
  - a. *Alternatives:* Recall -- for the reasons above -- that the county may not, consistently with the requirements of the AAIA and other federal aviation acts noted above -- simply choose to environmentally assess the county's preferred alternative: converting Palomar to a "modified C/D" airport. The analysis must be sufficient so that the environmental consequences of several alternatives can be compared. Advise what alternatives are being considered. If the alternative(s) suggested above and in earlier comments are rejected, state why.
  - b. *Airport Forecasts:* Aircraft Traffic Levels. As I recall, the 2013 Palomar Runway Feasibility Study focused only on corporate jet use, not scheduled passenger service. What forecasts are being made for corporate jet use, commercial scheduled service, and recreational flyers?
  - c. *Airport Forecasts:* Operations v. Passenger Use. Assure that the EIR considers both forecasted annual operational changes and annual passenger level changes.
  - d. *Airport Forecasts:* Newer more efficient aircraft. -----
  - e. *Airport Runway Expansion Environmental Construction Impacts.* County's 2013 Runway Extension Feasibility Study recommends that a runway

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<sup>7</sup> As this letter is written, Carlsbad citizen votes are being counted on the "Prop A Initiative Measure" which forced the Carlsbad City Council to allow citizens to vote on the proposed Caruso Mall development along the I-5 freeway North of Cannon. The outcome is still in doubt by a few votes with project supporters and opponents almost evenly split. The successful initiative shows that the Carlsbad community expects a full environmental discussion of projects affecting the Carlsbad quality of life including noise, traffic congestion, safety, air pollution, and water quality -- among others. The Carlsbad City Council tried to prevent environmental review by approving an earlier initiative supporting the project.

extension be placed on grade beams resting on hundreds (perhaps more than a 1000) piles constructed of concrete and rebar placed in holes drilled through the closed landfill decaying trash. Piles would be 20 to 40 feet in length and rest on stable ground underneath the decaying trash. County has previously said the Palomar landfills have no protective 3-foot clay lining placed at the bottom of the landfills – as is standard operating procedure today. But even if the lining existed, drilling the pile holes creates thousands of lineal feet of pathways allowing decaying trash to quickly escape to the clean soil under the landfill and surrounding ground waters. Although county characterizes the Palomar closed landfills as containing mainly only household trash, we know today that “household trash” often contains hazardous materials such as decaying batteries used for everyday household purposes. Moreover, the county 2013 ECS Engineers (see next item) states that in an aviation crash many hazardous materials including radioactive materials could be released into the landfill. Assure the EIR discusses all these issues including the cost of having to relocate the landfill if aircraft operations contaminated it with hazardous materials.

- f. *Environmental Impacts of Airport Operations Adjacent to Palomar Closed Landfills.* Assure that the EIR considers the issues and environmental impacts partially discussed in the county SCS Engineers October 15, 2013 report entitled “*Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport Landfill, Carlsbad, California.*” I attach a copy of the SCS report with this letter. Also – because county consultants periodically monitor Palomar closed landfills, including by SCS Engineers – include in the EIR the findings, conclusions, and recommendations of such consultants related to the Palomar landfills for the period 2010 to the present. For instance, include the number of instances in which such consultant found the Palomar landfill methane emissions to exceed regulatory explosive limits; the corrective actions that were taken; the corrective actions that remain to be taken; and identify the reports (if any) that county made to the regulatory agencies including AQMD when methane emissions exceeding regulatory limits were found; and state the regulatory actions such agencies took, if any.
- g. *Carlsbad Planning & Zoning Restrictions.* Assure that the EIR Environmental Setting section discusses the Carlsbad restrictions on Palomar Airport expansion including but not limited to Carlsbad Municipal Code Section 21.53.015 and Conditional Use Permit 172. Those sections require Carlsbad voters and the Carlsbad Planning Commission to approve certain Palomar expansions and redesignation of the Airport from a basic transport general aviation airport to a commercial airport. Also, reference and discuss Public Utilities Code Section 21664.5, which provides that runway extensions constitute “airport expansions” under state law. List the county and Carlsbad past actions taken to comply with Carlsbad law and the redesignation of the airport from a general aviation airport to an FAA Part 139 Commercial Airport.

- h. *Air Quality Discussion.* Within the last 3 years, an EPA air quality study expressed concerns about Palomar lead emissions (apparently from aviation fuel). A subsequent county review incompletely discussed the issues, ignoring several of the EPA points. Assure the EIR fully discusses the issues relevant to lead emissions at Palomar and the possible effect on schools and residences near the airport.
- i. *Noise.* Assure the EIR fully discusses Palomar noise impacts including changes resulting from the FAA's implementation of its NextGen satellite guidance system. Implementation of this system at other airports shows that NextGen can substantially shift noise from one neighborhood to another and increase the number of flights over neighborhoods. Regardless of whether average noise increased above 65 decibels, citizens are entitled to know how single noise events may change in their neighborhood, which would be relevant to their vote on Palomar expansion. Note that the noise analysis should discuss how the Palomar flight mix between small aircraft and large aircraft will change. Today, Palomar has about 155,000 flights annually. About 10% of flights are larger, corporate C/D aircraft. At the December 2015 county Board of Supervisors meeting, Supervisor Horn stated that smaller, recreational aircraft should shift to outlying airports to make room for larger aircraft. Consequently, even if Palomar flight numbers did not increase substantially, a shift to larger aircraft could nonetheless materially change noise impacts on neighborhoods. Assure all these noise issues are discussed.
- j. *Growth Inducing Impact.* At a county KH meeting discussing the Palomar Runway Feasibility Study, one of Palomar's tenants stated aircraft pilots frequently avoid runways less than 5000 feet in length and increasing the Palomar runway beyond 5000 feet would bring many more aircraft. It therefore appears that increasing the runway to 5800 feet would have a major growth inducing impact. The EIR needs to discuss this issue with supporting data.
- k. *Cumulative Impact.* The recently released Carlsbad 2015-2035 General Plan EIR projects significant air quality impacts and traffic gridlock conditions along certain portions of Palomar Airport Road and El Camino Real – the two main arteries adjoining Palomar Airport. Further, a review of the EIR shows that its analysis did not consider specific projects at Palomar Airport including the county's proposed runway expansion. Assure that the Palomar PMP EIR analyzes how airport operations will even further damage air quality and traffic gridlock, especially if commercial passenger carriage will increase materially above the current annual level of less than 50,000 passengers.
- l. *Carlsbad Scenic Corridor Along Palomar Airport Road & El Camino Real.* For 50 years, county has failed to permanently landscape and irrigate the airport slopes adjoining Palomar Airport Road and El Camino Real even though the Carlsbad General Plan declares these roads to be Carlsbad scenic corridors. Slopes north and south, east and west of Palomar airport have been nicely landscaped. To date, county has said that it cannot permanently plant and irrigate the slopes because the slopes lie above closed landfills that cannot tolerate water infiltration and irrigation pipes would interfere with periodic

grading of the slopes. As detailed in Carlsbadpatch articles ----- (incorporated by reference here; see -----), the facts do not support these claims. Palomar does have closed landfills. But no facts suggest the slopes (which border the former canyons that county filled with trash), have any significant trash below them. Moreover, (1) a county representative said at a Palomar Airport Advisory Committee (PAAC) meeting last year that a several foot clay caps sits near the top of the landfill and (2) county consultant Kimley Horn has said that properly irrigating a slope would allow water to only migrate about 1 foot below the slope top. In other words, county's unanalyzed anecdotal claim that a Palomar landfill prevents it from permanently landscaping and irrigating the scenic corridor slopes cannot be assumed. Assure the EIR provides the data necessary to determine if the slopes can be permanently landscaped. Such data includes: (1) maps showing how much if any landfill lies directly below the Palomar slopes to be irrigated, (2) what landfill cap exists, its thickness, and its depth below the surface, (3) why irrigation systems would be in the way of annual slope grading if the systems were comprised mainly of rainbirds (as on baseball and football and soccer fields) and/or place on movable swing joints easily moved during grading.

- m. *Mitigations*: The 1997 county Palomar PMP environmental assessment conceded that significant impacts would occur but ignored mitigation measures, presumably in the belief that a statement of overriding considerations was sufficient. That approach does not comply with today's CEQA. Assure county has identified proper mitigation measures to alleviate project impacts – beginning with the selection of a proper project alternative complaint with the AAIA and other federal aviation laws.

#### **D. Public involvement and next steps**

1. Provide a list of actions the county needs to take in the next 18 months in order to extend the Palomar runway and state whether and how the public will be notified of such actions and given a chance for public input.
2. Among other county actions state specifically what actions county will take with regard to the following:
  - a. Receiving FAA approval for an up-to-date Palomar Airport Layout Plan;
  - b. Receiving City of Carlsbad approval for Palomar runway extensions consistent with Carlsbad MC §21.53.015 and Conditional Use Permit 172;
  - c. Receiving Public Utilities Commission approval to expand Palomar Airport by extending the Palomar runway;
  - d. Receiving San Diego Regional Airport Authority approval of any changes to the Compatibility Land Use Plan (CLUP) needed to restrict properties around Palomar Airport as a result of extending the Palomar runway;



- e. Determining what costs the county Department of Airports should pay and what costs the County Department of Landfill Management<sup>8</sup> should pay related to the construction and subsequent maintenance, monitoring, and operation of the Palomar closed landfills resulting from the material alteration and/or replacement of the landfill methane-gas collection system associated with placing hundreds (perhaps more than 1000) piles through the landfill;
- f. Determining whether any Coastal Commission approvals are needed related to the expansion of Palomar Airport and/or alteration of its flight paths over the ocean;
- g. Retaining consultants including soils firms and engineering firms to design Palomar runway extensions and runway Engineered Materials Arresting Systems (EMASs);
- h. Retaining construction firms to extend the Palomar runway;
- i. Applying for FAA grants for Palomar improvements including especially grants related to the design, construction, and/or operation of an extended Palomar runway including EMAS systems and
  - i. assuring that the most up-to-date Palomar construction, operation, and maintenance costs are included in the benefit-cost analysis (BCA) including costs related to the risks of operating C/D flights whose crash could contaminate the Palomar landfill; and
  - ii. assuring that the projected Palomar benefit costs of extending the runway are fully documented including by presenting the data showing what use C/D aircraft have made of Palomar and Lindbergh Field from 2010 to the present. Such data, to be credible, must show (aa) actual, historical aircraft origins and destinations, (bb) the number of aircraft stopping at Lindbergh to refuel for long distance flights, (cc) the aircraft used, (dd) the amount of aviation fuel such aircraft purchased at Palomar and Lindbergh, (ee) the amount of revenue that aviation supplies at Palomar Airport and Lindbergh Field received, and (ff) the amount of revenue that Palomar and Lindbergh respectively received from fees/taxes due from the sale of aviation fuel related to such aircraft.

#### Conclusion:

Thank you for the opportunity to comment. After I have seen the county/KH Powerpoint presentation for the February 29, 2016 meeting, I may have more comments. I look forward to county/KH responding to the comments above. Please also advise all county representatives to whom KH provided copies of this letter request.

/s/

Ray and Ellen Bender

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<sup>8</sup> Over the last ten years, the "Department of Landfill Management" has had several names, including possibly "Landfill Enforcement." The reference above relates to the County of San Diego governmental branch(es) that monitors, maintains, and or operates the closed landfills at Palomar Airport.

# Attachment 2

Environmental Consultants  
and Contractors

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## SCS ENGINEERS

October 15, 2013  
File No. 01213281.00

DRAFT

Mr. Jason Forga, P.E.  
County of San Diego  
Department of Public Works  
5510 Overland Avenue, Suite 210  
San Diego, CA 92123

**Subject: Evaluation of Possible Environmental Impacts of a Potential Aircraft Crash into the Landfill Cover at Palomar Airport Landfill, Carlsbad, California**

Dear Mr. Forga:

The County of San Diego (County) is currently evaluating the possibility of extending the east end of the existing runway at the McClellan-Palomar Airport (Airport). Since the Airport is constructed on a closed landfill site equipped with a below-grade landfill gas (LFG) collection and control system (GCCS), SCS Engineers (SCS) was retained to evaluate the possible environmental impacts of a potential aircraft crash into the landfill cover at the site. Please note that this report attempts to evaluate the worst case "what-if" scenario, and assumes that the impact from an aircraft crash into the landfill cover would result in uncovering buried solid waste materials and damage to the GCCS. Whether or not this scenario is possible, is beyond the scope of this report. Further analysis on whether or not the landfill cover could be penetrated by an aircraft impact, and to what degree, may be the subject of a future study. These services were approved by the County, and Task Order #250 was issued authorizing work on August 30, 2013.

### 1 BACKGROUND

Palomar Airport, located in Carlsbad, California, is owned and operated by the County (Figure 1, Location Map). The airport is partially located over a closed landfill site, which operated as a Class III municipal solid waste (MSW) disposal facility between 1962 and 1975. Over time, the anaerobic decomposition of the organic waste components buried in the landfill produces a by-product gas known as "LFG". LFG primarily consists of about 50 percent methane and 50 percent carbon dioxide. It also includes trace amounts of nitrogen and oxygen, and minute amounts of non-methane organic compounds (NMOCs) and inorganic compounds. Methane, is a principle component of natural gas, and is explosive at concentrations of 5 percent and 15 percent by volume, in air. Hence, to prevent possible hazards associated with the migration of methane beyond the limits of the buried waste footprint, a below-grade GCCS has been installed on the site that collects and disposes the collected LFG in an enclosed flare.

## 2 EXISTING CONDITIONS

The Palomar Airport landfill consists of three (3) distinct MSW areas, designated as Unit 1, Unit 2, and Unit 3, also referred to as "Areas" (Figure 2: Site Map). Area 1 is located in the south-central portion of the airport, beneath a complex of aircraft fixed base operators. Area 2 is located adjacent to, and south of the east end of the runway. Area 3 is located in the easternmost portion of the airport (east of the runway). All three (3) areas are covered with between two to seven feet of soil, but Areas 1 & 2 are also covered with asphaltic-concrete (AC). Areas 1, 2 and 3 include a network of LFG extraction wells and high-density polyethylene (HDPE) piping, installed below-grade. The wellheads for the existing extraction wells are constructed in below-grade vault boxes. Table 1: "GCCS Layout in Areas 1, 2 and 3 at the McClellan-Palomar Airport Landfill" shows the distribution of the existing seventy-two (72) LFG extraction wells and, the average depths of the vaults and HDPE piping over the site.

Table 1: GCCS Layout in Areas 1, 2 and 3 at the McClellan-Palomar Airport Landfill

Area	# of LFG Extraction Wells	Average Vault Depths (feet)	Average HDPE Pipe Depths (feet)
Area 1	26	2 - 4	2 - 7
Area 2	11	3 - 6	2 - 7
Area 3*	35	3 - 6	2 - 7

The GCCS also includes a blower flare system used to provide the vacuum to extract the LFG from the landfill and deliver it to a skid-mounted enclosed flare, with a heat release rating of 9.35 million British Thermal Units per hour (MMBtu/hr), used to destructively combust the LFG. The flare stack has an outer shell diameter of 4 feet and is 24 feet high. Presently, the flare is being operated at a heat release rating of approximately 2.2 MMBtu/hr, based on an LFG methane content of 30 percent, at 120 standard cubic feet per minute (scfm). The flare is located in the southern portion of the airport, south of Area 1 (Figure 2). In addition to the GCCS, the site also includes nineteen (19) LFG monitoring probes located along the perimeter of the site used for compliance monitoring to verify the GCCS is effectively controlling the potential for offsite subsurface migration of LFG.

The airport footprint also consists of office buildings, hangars and storage facilities (Figure 3: Airport Layout and Facilities Map). While portions of the landfill in Areas 1 & 2 are used for aircraft parking and other facilities, no areas of the closed landfill are used for aircraft runway.

In order to meet the existing demands of the airport, several improvements are currently under study. One such improvement is the extension of the east end of the existing runway. The objective of this preliminary evaluation is to assess the potential environmental impacts resulting

from a 'worst-case scenario' of a near vertical impact, i.e., 'nose-dive', crash into the landfill cover and its potential impact on the existing GCCS.

### 3 IDENTIFICATION OF HAZARDS

SCS reviewed a variety of standards and documents, including Federal Aviation Agency (FAA), National Transportation Safety Board (NTSB) and Department of Energy (DOE) resources, to identify potential hazards resulting from an aircraft crash event. Based on our assessment of these resources, the following identifies the most likely source of hazards and environmental impacts that could be encountered during and following an aircraft crash at a landfill site equipped with a GCCS.

- **Spillage of flammable liquids such as Jet fuel**

Most aircraft carry large volumes of petroleum-based aviation fuels, such as aviation gasoline, and Jet A and Jet A-1 fuels, in the wings and/or the fuselage of the aircraft. During a crash, the wings and fuel lines in the fuselage of the aircraft can be severely damaged in impact with the ground or with other aircraft, resulting in the release of the gasoline or jet fuel. These fuels are highly combustible, burn at extremely high temperatures, can be corrosive to aircraft equipment and are highly toxic to human beings. The fuel types and quantities can vary from aircraft to aircraft. Ignition of the jet fuel, or other flammable material, upon impact could also be highly probable.

- **Burning of solids**

Post-crash fires can result in burning of a variety of solids such as aircraft batteries and electrical equipment, engines, tires, wheels, pathogenic substances, radioactive materials, and metals such as aluminum, and fiber-reinforced polymer composites of the aircraft fuselage and wings.

Most landfills are vegetated with grasses for soil erosion control purposes. If the crash occurs during the dry season, grass fires could ignite and spread to other areas of the site and create secondary environmental issues such as smoke (air quality issues), as well as possible offsite wild fires and/or burn, smoke, and/or structural damage to other onsite or offsite property.

At a landfill site, a violent aircraft crash ground impact, such as a near vertical impact, may also result in an impact crater that exposes the buried solid waste to the atmosphere. Post-crash fires can then initiate surface fires as the LFG is now free to vent directly into the atmosphere. Once a surface fire ignites, it can also potentially begin to burn the exposed waste materials and spread down into the subsurface solid waste. Subsurface landfill fires, once started, can continue indefinitely as they tend to create a natural draft inducing air into the landfill allowing them to travel and spread horizontally and deeper into the waste mass. For this reason, smoldering solid waste materials that are below grade can be difficult to control and extinguish. Subsurface landfill fires will damage below grade GCCS components while surface fires can damage above grade GCCS components.

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- **Spillage of cryogenic liquid**

Cryogenic liquids, such as liquid nitrogen and liquid helium, are liquefied gases that are retained in their liquid state at very low temperatures. These liquids are used as cooling agents to reduce engine temperatures, thereby reducing equipment stress and increasing life. These liquids are classified as 'compressed gases' on the Workplace Hazardous Materials Information System (WHMIS). Hence, even low quantities of cryogenic liquids can expand into large volumes of gases, while maintaining their low temperatures. If not stored in containers with adequate pressure-relief devices, enormous pressures can build up within the containers.

The impact from an aircraft crash can cause a sudden, rapid increase in the internal pressure of the container. Results can range from damage to surrounding equipment, structures, explosions, called 'boiling liquid expanding vapor explosion,' to asphyxiation hazards.

- **Pressurized liquid and/or vapor release**

Aircraft utilize a variety hydraulic and pneumatic accumulators, which contain pressurized air or fluids that assist in the operation of equipment, such as brakes, landing gear and Auxiliary Power Units (APUs). In the event of an aircraft crash, the accumulators can rupture and lead to sudden discharge of large amounts of pressurized fluids, resulting in destruction of property and possibly, injury to persons in proximity to the rupture.

- **Pipe rupture**

Impact from an aircraft crash may result in extensive damage to nearby above/below-grade utility lines. Damage or rupture of a buried water, gas or storm drain line, could contaminate nearby soils and water bodies. Emission releases from pipes could severely compromise the air quality and even cause explosions, depending on the contents of the carrier pipes.

Impact to piping associated with the GCCS may damage the system and cause a release of LFG to the atmosphere. If the LFG concentration is within flammable ranges and an ignition source is present, explosions or fires may occur. The quantity and general location of LFG extraction wells and piping are summarized above in Table 1.

- **Other**

Aircraft crashes can also create flying debris which could damage buildings and structures on and off the airport property, including above grade GCCS components. SCS did not study the buildings and structures in the vicinity of the site as our analysis was limited to the GCCS. However, it is important to note there are no buildings and structures on Area 3.

- **Site-Specific Hazards**

Depending on the type and the location of the crash site, any or all of the above described hazards may be encountered during an aircraft crash at Palomar Airport. Areas north of Areas 1

\* and 2 of the airport serve as aircraft parking areas, house fuel farms and other structures, which store various chemicals required for routine aircraft maintenance activities. There is an additional fuel island north of Area 3. A crash in this area could result in extensive damage to structures and other parked aircraft. A detailed review of the different types of chemicals, their locations and proximity to the runway and/or to the three landfill areas is beyond the scope of this preliminary evaluation.

The site also contains a below-grade, high-pressure, gas transmission main, owned by San Diego Gas & Electric (SDG&E), running east-west, along the north fence of the property. Damage to gas mains can vary from a gas leak resulting in the evacuation of surrounding areas, to potentially significant explosions. Please note SDG&E transmission main is more than 450 feet north of the existing runway centerline.

\* Additionally, there are several below-grade LFG extraction wells and pipelines, as described in Table 1, which are assumed to be damaged/ ruptured by an aircraft crash causing free-venting of methane into the atmosphere. Furthermore, a post-crash fire can pose as an ignition source, which can lead to explosions, depending on the concentrations of methane and oxygen in the affected LFG pipelines, affected by the crash. No explosion related energy release calculations or emissions calculations were conducted as part of this evaluation. A post-crash fire and/or explosion will also severely compromise the air quality at the site and, possibly, at downwind locations. The San Diego air basin is currently in non-attainment of the 8-hour ozone standard set by the United States Environmental Protection Agency (USEPA) as well as non-attainment for state particulate matter standards. Regulatory consequences of emissions release from a gas leak, fire or explosion were not assessed under this preliminary evaluation.

Finally, the site also maintains an extensive storm water drainage system with a treatment vortex. It is our understanding that the treatment vortex is inspected once a year and cleaned out, if necessary. Storm water runoff from the airport property travels through the drainage system and the treatment vortex, to a structure under an existing business park area, located immediately north of the airport. This runoff eventually discharges into Agua Hedionda Lagoon, located north-west of the airport. Under a worst case scenario, it is assumed contaminated liquids from fire-fighting efforts or chemicals released from a crash can enter the storm water management system and potentially impair downstream tributaries and water bodies such as the Agua Hedionda Lagoon. However, this would require a substantial quantity of fuel and/or fire-fighting chemicals for this scenario to even be possible. No calculations were performed under this preliminary evaluation.

#### 4 DISCUSSION

In accordance with the scope of services identified in the proposal, SCS evaluated a vertical impact scenario into the landfill cover, focusing on the east end of the runway. During the past ten (10) years, there have been twelve (12) separate incidences of aircraft accidents, both fatal and non-fatal, in nature, all of which occurred during take-off and landing related operations. Since the lengthening of the runway can potentially alter the glide path of the aircraft, SCS has

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included brief discussions on two (2) additional aircraft crash scenarios. The following sections present a summary of the effects of runway extension on the existing landfill and GCCS, and also discuss possible environmental impacts from typical aircraft accidents during take-off and landing, as well as the vertical impact scenario, requested by the County.

## EFFECT OF RUNWAY EXTENSION ON THE EXISTING LANDFILL AND GCCS

In a feasibility study for potential improvements at Palomar Airport, prepared by Kimley-Horn and Associates, Inc. (Kimley-Horn), dated August 2013, three different runway extension alternatives were identified. These include a 200-foot extension, a 900-foot extension, and a 1,200-foot extension to the east of the existing runway, over areas containing the existing landfill and GCCS (See Figure 5H: Runway Extension Alternative and Approximate Location of Landfill, Kimley-Horn). The feasibility study also states that under the 200-foot extension alternative, there would be minimal impact to the existing landfill and GCCS, while the other two alternatives (900 feet and 1,200 feet) would require extensive ground stabilization efforts and reconstruction of the GCCS. Furthermore, the feasibility study recommends 'Drilled Displacement Columns' (DDC) as the most suitable method for improving the bearing capacity and stability of soils, and reducing settlement in compressible materials i.e., solid waste, in this case. Under this method, columns would be constructed by advancing a drilling tool through the existing landfill, to the native formations below. The drill would then be slowly retracted, while filling the borehole with concrete or grout. Finally, an asphalt concrete runway pavement would be constructed, with geogrid-reinforced fill soils placed directly over the DDC. Depending on the extension alternative selected, additional portions of Area 3 may be covered by runway pavement, potentially minimizing landfilled areas where cover soils and solid waste could be stripped in the event of an aircraft crash. Consequently, a portion of the Area 3 GCCS extraction well and HDPE piping system will likely need to be re-designed and re-constructed.

## SCENARIO 1 – TAKE-OFF

Aircraft at Palomar Airport are permitted to take-off and land from the east end as well as the west end of the existing runway, depending on wind direction. During take-offs, aircraft are at their highest weight due to the aviation fuel they carry for the length of the flight. A heavier aircraft requires higher take-off speeds. It is our understanding that some of the larger aircraft at Palomar Airport do not take-off on a full tank of fuel. This is because a full tank of fuel increases the weight of the aircraft, thus necessitating higher take-off speeds, which in turn require greater runway lengths. The length of the existing runway is insufficient for certain aircraft operating at Palomar Airport to achieve the higher speeds needed. By extending the runway to the east, it is the intent of the County to facilitate these aircraft to achieve higher speeds, needed with higher on-board fuel quantities.

With the current runway configuration, when an aircraft takes-off from the east end (as is typical, based on the prevailing wind direction in San Diego County, which is generally from the west), aircraft would not fly directly over the landfill units once becoming airborne, reducing the

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possibility that an aircraft crash could impact the landfilled areas. If aircraft are taking-off toward the east (for example during "Santa Ana" winds from the east to northeast), then it is likely that aircraft would fly over landfill units leading to a possibility of the environmental impact scenarios discussed above. In case of mechanical failures or other events that could contribute to aborting a take-off, the probability that an aircraft now carrying a larger quantity of fuel impacting the landfill, could increase. Please note, SCS did not review and/or analyze glide paths during take-off or landing for aircraft operating at Palomar Airport. Also, per Airport records, take-off toward the east is infrequent (approximately 5% of all take-offs), thereby reducing the possibility of such an event. As stated in the earlier sections, aviation fuel is highly flammable and spillage of the same has the potential to cause the various impacts detailed above, if not contained during firefighting efforts.

## SCENARIO 2 – LANDING

Currently, when an aircraft lands from the east, it would touchdown in the vicinity of Area 3 landfill. Discussions with the airport authorities indicate that under any of the runway extension alternatives, the landing threshold will be moved back further to the east, an estimated distance of approximately 200 feet. Please note that the landing threshold and end of the runway are not necessarily the same. If an east side "displaced threshold" is implemented at Palomar Airport, then the landing threshold would be displaced some distance from the end of the runway. During take-off, aircraft would utilize the entire runway, while during landing, aircraft would be required to extend their approach to touch down at or beyond the displaced threshold. This would mean that aircraft landing on the new runway may touchdown at a location approximately 200 feet further east of the current touchdown location. In the event of failure to touchdown at the predetermined threshold and/or other mechanical issues that prevent a typical touchdown, there could be aircraft accidents with potential environmental impacts.

- However, as previously discussed under the different runway extension scenarios, additional portions of Area 3 may be covered by pavement, potentially minimizing landfilled areas where cover soils and solid waste could be stripped in the event of an aircraft crash. Theoretically, a runway with a typical section consisting of subgrade cover, geogrid, lightweight cement and asphalt concrete, would decrease the possibility of an aircraft penetrating the landfill by creating a substantial barrier that would have to be breached before impacting the landfill.

## SCENARIO 3 – VERTICAL IMPACT TYPE CRASH

As discussed previously, this report assumes that an impact from an aircraft crash into the landfill could breach cover soils and expose solid waste. This scenario could result in the free-venting of LFG to the atmosphere. Alternatively, the impact from the crash could rupture below-grade HDPE pipes and damage LFG extraction wells, also leading to the free-venting of LFG to the atmosphere.

Under this worst case scenario a post-crash fire could theoretically aggravate this situation by serving as an ignition source to the potentially explosive LFG vapors. There could also be a

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subsurface fire, which could continue for an unspecified duration of time. The site has also reported instances of subsurface oxidation events in the past, not related to the airport or any aircraft accidents.

As stated earlier, SCS did not perform any energy or emissions calculations or assess the regulatory implications under this preliminary evaluation. Post-crash firefighting methods for crash related fires, landfill surface and subsurface fires would include one or a combination of methods such as water, smothering with soil, using heavy equipment and foam type suppression agents, which could cause some of the impact described above.

Based on the current location of the blower/flare facility (on the south side of Area 2), it is unlikely that it would be directly impacted or damaged as a result of an aircraft crash event. However, in the event that landfill cover soils are breached at the crash site and there is damage to the HDPE pipe network, air would be introduced into the collection system. With the GCCS still being under vacuum, air drawn into the ruptured end of the piping would slowly move towards the blowers and, possibly, into the flare. Under this scenario, it is possible for the flame within the flare, to propagate back into the collection piping, depending on the composition of the residual gas mixture in the collection piping. It is difficult to predict the magnitude or duration of this scenario, however, there could be extensive damage to the flame arrestor at the flare, blowers, knockout pot and piping, unless the system shuts itself down due to a no-flame or low temperature alarm.

## 5 CONCLUSIONS & LIMITATIONS

This report attempts to evaluate the worst case 'what-if' scenario, and assumes that the impact from an aircraft crash into the landfill cover would result in uncovering buried solid waste materials and damage to the GCCS. The above described events are noted as a 'worst case' scenario and only postulated upon the request from the County. Whether or not this scenario is possible, is beyond the scope of this report. For this preliminary evaluation, it is assumed that any or all of these events are theoretically possible during an aircraft crash event. However, SCS did not conduct any statistical analysis to assess the probability of any of these events or the vertical impact type aircraft crash event. SCS did not assess or evaluate the energy released from any aircraft crash or pipe explosions. Analysis on whether or not the landfill cover itself could be penetrated by an aircraft impact and to what degree may be the subject of a future study. Lastly, SCS did not review and/or analyze typical glide paths for aircraft operating at Palomar Airport, or glide slope for the airport itself.

If, after further planning and study, a suitable runway extension alternative is selected, the limits of proposed ground stabilization efforts, and associated construction activities, will be established. Associated re-design/re-construction of the GCCS will depend on the runway option selected and the extent to which the proposed runway will impact refuse disposal areas.

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CLOSING

SCS appreciates the opportunity to assist the County with this important project. For any questions, please call either of the undersigned.

Sincerely,



Srividhya Viswanathan, PE  
Senior Project Professional  
**SCS ENGINEERS**



David Vonasek, PE  
Project Manager  
**SCS ENGINEERS**

Cc: Steve Cooper, SCS Field Services  
Chuck Houser, SCS Engineers

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## RESOURCES & REFERENCES

1. *Accident Analysis for Aircraft Crash into Hazardous Facilities*, Department of Energy, May 2006.
  2. *Civil and Military Aircraft Accident Procedures for Police Officers and Emergency Services Personnel*, June 2010.
  3. *Contingency Analysis Modeling for Superfund Sites and Other Sources*, EPA, January 1993.
  4. *Emergency Response Guide. Military Aircraft Incidents*, July 2007.
  5. *Resource Guide to Aircraft Fire Fighting & Rescue*, Aviation Safety Advisory Group of Arizona.
  6. *Post-crash Health Hazards from Burning Aircraft Composites*, Galaxy Scientific Corporation.
  7. [http://www.faa.gov/regulations\\_policies/policy\\_guidance/envir\\_policy/airquality\\_handbook/media/App\\_C.PDF](http://www.faa.gov/regulations_policies/policy_guidance/envir_policy/airquality_handbook/media/App_C.PDF)
  8. <http://www.calrecycle.ca.gov/SWFacilities/Fires/Ifiresguide/default.htm>
  9. [http://www.faa.gov/regulations\\_policies/handbooks\\_manuals/aircraft/amt\\_handbook/media/FAA-8083-30\\_Ch04.pdf](http://www.faa.gov/regulations_policies/handbooks_manuals/aircraft/amt_handbook/media/FAA-8083-30_Ch04.pdf)
  10. [http://www.nts.gov/aviationquery/brief2.aspx?ev\\_id=20060202X00149&ntsbno=SEA06MA047&akey=1](http://www.nts.gov/aviationquery/brief2.aspx?ev_id=20060202X00149&ntsbno=SEA06MA047&akey=1)
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# Attachment 3

## **Ongoing Problems with Palomar Airport Landfill Units 1, 2, & 3 Summary of City of Carlsbad Year 2000 Findings & Summary of County of San Diego Palomar Airport Consultant Findings from 2000 to 2013**

### **Executive Summary [pp. 1 to 5]**

**Preliminary Note.** Palomar has 3 closed landfills. These landfills were formerly canyons that the County filled with trash. These old landfills, operating in the 1970s and 1980s, do not meet current design standards the County would impose for new landfills in order to prevent contamination of surrounding land and water. For instance, the landfills were constructed without impermeable barriers.

For the reasons below, the landfill on the East side of the Palomar runway may cause safety and environmental problems because Palomar intends to service larger planes carrying several thousand gallons of aviation fuel and carry up to 70 passengers per plane.

The substantial evidence noted below supports the conclusion that the County needs to immediately study the safety and environmental concerns caused by a 90,000 pound plane traveling at 100 to 150 miles per hour that may leak 2000 to 3000 gallons of aviation fuel crashing into the Palomar landfill. Specific questions include:

- (1) what force would such a crash place on the landfill?
- (2) what is the Palomar landfill methane gas collection system piping made of, how deep is it, and how would the plane crash affect the collection system?
- (3) what is the chance of the methane gas collection system rupturing and sparking a fire on the crashed plane?

(4) what hazardous material contamination would occur to the Palomar landfill if 2000 to 3000 gallons of aviation fuel leaked into the fill?

(5) if aviation fuel contaminated the landfill, would federal and/or state law require the County to haul away the contaminated trash at a significant cost to the taxpayers?

Landfill trash naturally decomposes. As it does, subsidence [ground settlement] occurs and various contaminants from household and other trash result. Decomposing trash creates significant quantities of methane gas. Landfill contaminants migrate through the ground. Without an impermeable barrier at the bottom of the landfill, the contaminants can migrate to the groundwater. Without an intact and fully functioning methane collection system [a series of underground vertical and lateral pipes], the methane gas can escape to the surface. Methane gas in excess of certain concentrations is explosive.

The County maintains the Palomar closed landfills and classifies them as containing non-hazardous materials.

Units 1 & 2 are paved, mainly on the South side of the airport. Over time, County airports has had to repair buildings and asphalt surfaces damaged by the decomposing trash that lead to settlement of the ground.

Unit 3 is on the East side of the only Palomar runway. It has a sandy surface. If a plane crashed into the landfill on approach to or on departure from Palomar runway, the crash could result in aviation fuel leaking into the landfill.

Due to concerns about the stability of airport landfill areas, the County has previously studied how the landfills could be stabilized. One method would be to dig up the decomposing trash and move it to a site away from the airport. The County has estimated this cost at \$50 to \$100 million dollars. The County has also studied "dynamic compression." The County could try to speed up the trash decomposition process by compressing the trash. To do this the County would repeatedly drop heavy weights onto the landfill surface. Unfortunately, dynamic compression slows but does not eliminate landfill settlement to continued leaking of harmful materials when the Landfill has no impermeable barrier.

Attachment A shows the general boundaries of Units 1, 2, and 3.

Significant past and ongoing Palomar landfill problems documented include:



- A. *City of Carlsbad Conclusion in July 2000.* After studying whether Carlsbad should buy Palomar Airport, Carlsbad concluded: "A review of RWQCB and Department of Environmental Health files on the Landfill reveal (1) concerns about landfill gas emissions and the protection of ground water that date back nearly 10 years; and (2) the County Department of Public Works' slow and inadequate responses to the requests of the environmental oversight agencies for measures to prevent environmental degradation and protect the public's health." [See Item below for much more detail.]
- B. *Continued Palomar Airport Landfill Problems: 2000 - 2012 Including Underground Landfill Fires & Consultant Falsification of Records.* Since the Carlsbad 2000 study, many County Consultant reports have noted ongoing problems in all 3 Palomar Airport landfills. County consultants have continued to note landfill methane gas emissions at explosive levels, migration of landfill related contaminants, and subsidence. County records note several underground landfill fires. The fires burned from a few weeks to as much as 5 months. To extinguish the fires, the County pumped liquid carbon dioxide to remove the oxygen feeding the fire and grout to replace the waste being burned that created voids in the landfill. In ----, the FBI reported arresting \_\_\_\_\_
- C. *No County CEQA Environmental Landfill Environmental Analysis.* While all the environmental problems noted were ongoing, the FAA and County undertook many Palomar projects at substantial cost without the preparation of a California Environmental Quality Act EIR or National Environmental Policy Act EIS. The County Palomar Airport environmental documents essentially ignore the ongoing landfill problems and the problems they could create as Palomar invites larger and larger planes to the airport.
- D. *Current Internally Inconsistent County Consultant Landfill Documents.* Monthly, the County landfill consultant [SCS Field Services] routinely includes a "Conclusions" statement on page 1 of its reports. The statement is: "Testing for methane gas at the subject site, as described in this report, indicated that the LFG [Landfill Gas] control facilities were operating satisfactorily at the time of our testing." Oddly, these monthly reports frequently include data showing problems at the landfill.
- Apparently, satisfactory LFG operations as defined by SCS includes malfunctioning Palomar landfill equipment. For instance, the **March 11, 2013** report includes the following statements on p. 2 of the SCS report:
- 1) "As reported in the January 2013 monthly monitoring report for this site, the Local Enforcement Agency [LFA] conducted methane monitoring on January 30, 2013, and reported that monitoring probe MP-15S and MP-15D had methane concentrations in excess of 5%

methane gas, in air, by volume.[Ray Bender Note: The regulatory lower explosive limit – as reported by the County consultants – is 5%.]

SCS conducted additional follow-up monitoring events for these probe locations throughout the reporting period and average observed concentrations were 8.9% methane by volume at MP-15S and 8.4% methane by volume at MP-15-D respectively.

In response to the MP-15 results, SCS had all sumps in Unit 3 [RB note: the sandy landfill area East of the Palomar runway] pumped out and made significant adjustments at the blower flare station and other parts of the gas collection system to increase available vacuum to wells that are believed to control this prove location. The most recent results [collected March 4, 2013 and included in this report] indicate a decrease in methane concentrations [6.6% methane by volume at MP-15S and 6.5% methane by volume at MP-15D respectively].”

**RB Note: On March 22, 2013, the County Solid Waste Local Enforcement Agency sent a letter to Jason Forga of County Department of Public Works entitled “Remediation Plan Approval for Perimeter Landfill Gas Probe MP-15 Palomar Airport Landfill, Carlsbad CA.**

2) During the monthly probe monitoring event, an anomaly occurred while monitoring IMP-8 and methane reading went to 100% causing the reading to turn to “Chevrons” [RB note: a red alert?] and thus, the reading appears as blank. SCS believes something other than landfill gas is affecting the GEM-2000 at this location.”

As early as June 10, 2010, SCS had reported problems with the Mp-15 probes. See the SCS reports.

### **Executive Summary Conclusion**

Both Carlsbad and the County have documented more than 30 years of landfill problems at Palomar Airport. The County contends that its periodic consultant landfill monitoring shows that Palomar methane gas and landfill contaminant migration are under control. The Carlsbad and County documents show that County response to problems has been continuously slow and partial. Note for instance that the so-called “anomaly” related to the March, 2013 methane reading of 100% has been an SCS-reported anomaly for several years.

The County needs to immediately analyze the safety and environmental problems associated by new large planes in substantial numbers using Palomar. In 2012, a new air carrier asked the FAA to certify for Palomar use large aircraft weighting about 90,000 pounds and carrying

up to 70 passengers and 2000 to 3000 gallons of aviation fuel. If the FAA certifies the planes, the carrier in year 1 proposes about 10,000 flights [30 landings and takeoffs per day x 365.] By year 5, the carrier has suggested it could double its flights.

Historically, Palomar has handled mainly small aircraft weighing up to 12,500 pounds, some corporate flights carrying only a few passengers, and smaller commuter planes carrying up to 30 passengers.

In short, substantial facts in the record show:

1. Serious potential safety and environmental problems at Palomar associated with using large planes near a problem-plagued landfill;
2. The County's failure to provide a California Environmental Quality Act EIR since 1975 and County failure to assess the problems noted above in any County environmental study;
3. County encouragement of increasingly large aircraft at Palomar;
4. The possibility of substantial avoidable liabilities against the County if the County fails to properly assess the Palomar landfill/large plane risks in a report showing all of the assumptions made, the analytic methods used, the engineering and environmental supporting data, and the conclusions reaches.

## Definition of Terms & Acronyms Used in Table

1. **Ongoing Environmental Problems.** This table details an ongoing 30-year history of environmental problems that Palomar Airport has encountered. Methane gas, a byproduct of landfill decomposition, continues to escape from three-closed County landfills on the Palomar site and from contaminated soil and water associated with the landfills. The County has also found leaking airport related storage tanks. Problems include emission of vapors into the air in violation of State air pollution regulatory standards, soil and water contamination, and even underground fires.
2. **Data Sources.** Unless otherwise noted below, the information below was gathered from multiple public record reviews of County Department of Public Works, Airport Division, and County Landfill Enforcement records. Records reflect findings from the County's own experts.
3. **Complete Information.** Of necessity, the information below provides only snapshots. See the complete reports for a full discussion.
4. **Agency Acronyms & Abbreviations Used**
  - APCD = Air Pollution Control District
  - BGS = below ground surface
  - CCR = California Code of Regulations
  - CHHSL = California Health Human Screening Levels
  - Department of Environmental Health [San Diego] = DEH
  - HMMD = Hazardous Materials Management Division
  - Hydrocarbons = HC
  - LEA = County of San Diego Local Enforcement Agency
  - LEL = the 5% lower explosive limit for methane gas specified in 27 CCR §20921(a)(2) [CCR = California Code of Regulations]
  - LFG = Landfill Gases
  - McClellan-Palomar Airport = Palomar Airport
  - Palomar Airport Landfill Units 1, 2, 3. Palomar Airport plane parking and certain buildings are located over 2 closed paved County Landfill sites called Unit 1 & Unit 2. Unit 3, the largest of the closed landfills, is an unpaved area directly to the East of the existing Palomar Airport 4900 foot runway. Note: Consultants analyzing Palomar landfill gas emissions and waste

migrations apparently sometimes refer to Units 1, 2 & 3 as Areas 1, 2 & 3.

- RWQCB = Regional Water Quality Control Board
- TDS = total dissolved solids
- UST = Underground Storage Tank
- VOCs = volatile organic compounds

See especially the larger type items below for special Palomar landfill problems.

	Year	Consultant	County Consultant Findings, Conclusions, Recommendations	Ray Bender Comment/Summary /Follow Up Questions
1	2013 April 10	SCS Field Services	<ul style="list-style-type: none"> <li>• "As reported in the January 2013 monthly monitoring report for this site, the Local Enforcement Agency [LEA] conducted methane monitoring on January 30, 2013, and reported that monitoring probe <b>MP-15S</b> and <b>MP-15D</b> had methane concentrations in excess of 5% methane gas, in air, by volume." [RB Note: 5% = the methane lower explosive limit [LEL]]</li> <li>• "SCS conducted additional weekly follow-up monitoring events for these probe locations throughout the reporting period, and average observed concentrations were 11.4% methane by volume at <b>MP-15S</b> and 11.6% methane by volume at MP-15D respectively."</li> <li>• During the monthly probe monitoring event, an anomaly occurred while monitoring <b>IMP-8</b>, the methane reading went to 100% causing the reading to turn to "Chevrans" and thus, the reading</li> </ul>	<ul style="list-style-type: none"> <li>• Compare SCS Pg. 1 Conclusions to pg 2 noted problems</li> <li>• The noted problems continued since at least June 2010 as may be verified by checking the SCS monthly reports.</li> </ul>

			appears as blank. SS believes something other than landfill gas is affecting the GEM-2000 at this location.”	
2	2013 March 22	County Solid Waste Local Enforcement Agency [LEA]	<ul style="list-style-type: none"> <li>Finally, gives “Remediation Plan Approval for Perimeter Landfill Gas Probe <b>MP-15</b> Palomar Airport Landfill” work after several years of SCS reported problems with the probe. See for instance page 2 of the SCS June, 2010 report.</li> </ul>	<ul style="list-style-type: none"> <li><b>Why did it take the County nearly 3 years to respond to the problem? [June 2010 to April 2013]</b></li> </ul>
3	2013 January 10 & February 11, 2013	SCS Field Services	<ul style="list-style-type: none"> <li><b>Same MP-15 excess methane gas</b> problems as noted above</li> <li><b>Same IMP-8 anomaly</b> problem as noted above</li> </ul>	
4	2012 September 12	SCS Field Services	<ul style="list-style-type: none"> <li><b>Same IMP-8 anomaly</b> as noted above</li> <li><b>“All LFG extraction wells tested were receiving adequate vacuum with the exception of N5, N22, N23, VCW37, VCW38, H5, H6, and H7. S has attributed the vacuum loss to settlement that has occurred in the area of these well locations ...”</b></li> </ul>	
5	2012 July 10		<ul style="list-style-type: none"> <li><b>Same IMP-8 anomaly</b> as noted immediately above</li> <li><b>Same LFG extraction well inadequate vacuum loss due to settlement noted immediately above</b></li> </ul>	
6	2012 May 18	County Landfill Mgmt to County	<ul style="list-style-type: none"> <li>Palomar Airport Landfill Monthly Status Report for April, 2012</li> </ul>	<ul style="list-style-type: none"> <li><b>High underground</b></li> </ul>

		LEA, Dept of Health Services	<ul style="list-style-type: none"> <li>• <b>Reports a "Unit 3 High Temperature Event"</b> <ul style="list-style-type: none"> <li>○ <b>Records 133.7 degrees F at 23 feet below ground</b></li> <li>○ <b>This reading is 27.2 degrees lower than 1/19/12 reading</b></li> <li>○ No sign of smoke</li> </ul> </li> </ul>	temperature event – possible fire?
7	2012 April	Kimley-Horn Reconstruction Taxiways A3, A4, A5	<ul style="list-style-type: none"> <li>• Notes Palomar landfill history as follows: <ul style="list-style-type: none"> <li>• "A report prepared by Geosyntec states that: <b>"The landfill was constructed without a liner, and does not have a leachate collection or removal system. Other than the groundwater monitoring wells, no leak detection system has been installed at the landfill."</b></li> <li>• "The landfill facility is reported to have accepted residential, commercial, and agricultural waste; <b>however, occasionally industrial waste such as paint, oils and thinners, treated sewage sludge, and medical wastes were reportedly accepted (Geosyntec 2005).</b>"</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Palomar landfill does not have modern protection systems to prevent leakage.</b></li> <li>• <b>Palomar repeatedly mislabels the landfill as containing only household waste when it knows the fill contains some hazardous materials.</b></li> </ul>
8	2011 May 5	SCS Engineers 858 571-5500 Report For RWQCB	<ul style="list-style-type: none"> <li>• Assignment: SCS works for RWQCB to develop assessment work plan for Palomar Airport site</li> <li>• Current Palomar Site Use: Short term parking</li> <li>• Study: <b>Re 2 former UST 10,000 jet-fuel storage tanks</b></li> <li>• UST History</li> <li>○ <b>Nov 1997 Western Pump removes UST &amp; soil samples show</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Shows 10 year History of Aviation Leaking Tank Problems</b></li> <li>• <b>Why did it take more than 5 years to implement a</b></li> </ul>

		<p><b>HC above regulatory levels; SCS confirms</b></p> <ul style="list-style-type: none"> <li>○ Nov 1998 environmental work plan sent to DEH</li> <li>○ July 1999 DEH approves plan; SCS assesses</li> <li>○ Nov 1999 DEH reviews SCS assessment &amp; requires further assessment</li> <li>○ Feb 2000 new SCS assessment plan sent to DEH</li> <li>○ Mar 2001 SCS assesses again &amp; prepares report: “<i>Environmental Site Assessment Activities at Former Air Resort Airlines</i>” dated Nov. 20, 2001</li> <li>○ May 2002 DEH requires added monitoring wells</li> <li>○ Jan 2003, DEH issues work plan approval letter</li> <li>○ <b>June 2006 DEH inspection letter [June 12] notes:</b></li> <li>○ <b>“Monitoring wells could not be located and appear to have been asphalted over. Uncover the wells.”</b></li> <li>○ Jan/Feb 2007 SCS returns to site &amp; finds: <ul style="list-style-type: none"> <li>▪ <b>HC have impacted the shallow groundwater at the Site</b></li> <li>▪ The principal source areas of petroleum hydrocarbons in soil and groundwater at the Site are the locations of the UST tank pit and gasoline dispenser islands.</li> </ul> </li> <li>○ Mar 2007 regulatory oversight of Site UST moved from DEH to RWQCB</li> <li>○ Nov 2007 RWQCB approves SCS destroying Monitoring wells MWIA &amp; MW4 due to redevelopment activities at the Airport.</li> <li>○ May 2010 SCS reports “assessment work could not be conducted until the airport expansion was completed in May 2010.</li> <li>○ <i>May 2011 SCS Findings, Conclusions &amp; Recommendations</i> <ul style="list-style-type: none"> <li>▪ Estimated volume of HC-bearing soil = 72,600 cubic feet</li> <li>▪ <b>A potential human health risk occurs at the Site as a</b></li> </ul> </li> </ul>	<p><b>satisfactory monitoring system?</b></p> <ul style="list-style-type: none"> <li>• <b>How could the monitoring wells have been paved over?</b></li> <li>• SCS File # = 11981630.06 = <i>Additional Site Assessment</i></li> <li>• SCS = formerly Environmental Business Solutions [EBS]</li> <li>• <b>County has not prepared any CEQA document admitting that the landfill has “impacted the shallow groundwater at the site” or committing to remedial measures.</b></li> </ul>
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			<p>result of the release of constituents of concern (CoCs) to the ground water.</p> <ul style="list-style-type: none"> <li>▪ The CoCs present in the groundwater could migrate and be discharged to surface waters.</li> <li>▪ Site monitoring should continue</li> <li>▪ An assessment of the enclosed buildings in close proximity to areas of residual petroleum HC-bearing soil or groundwater (e.g. Jet Source hanger) should be conducted for the likelihood that an unacceptable human health risk exists due to possible vapor intrusion.</li> </ul>	
9	2010 June 14	SCS Engineers 562 426-9544 "Interim Field Investigation Report Palomar Airport Landfill" Presented to County of San Diego DPW, Landfill Management	<ul style="list-style-type: none"> <li>• The SCS field investigation primarily involved 18 borings including 15 into paved landfill Unit 2 and 3 into unpaved landfill Unit 3.</li> <li>• SCS Findings: <ul style="list-style-type: none"> <li>○ "In Area 2, most borings encountered decomposed waste. The deepest boring hit the bottom of the landfill at 36 feet bgs.</li> <li>○ Boring 4 in the west end of Area 2 could not be advanced below 5 foot depth as it encountered a large hard object, possibly a concrete structure. Attempts to move the boring 10 feet northwest of the original location encountered the same hard object. Ultimately, the location was abandoned.</li> <li>○ Along the Western Flight hanger Borings #5 and #6 were drilled to measure the thickness of asphalt in the vicinity. Asphalt in this area was several feet thick -- at boring location 6, asphalt was 10 feet thick.</li> <li>○ In unpaved Area 3 [the proposed Palomar Runway extension area] only 3 borings were made. Strong</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• See SCS Engineers File No. 07206406.01</li> <li>• Question: Why were the Palomar engineering drawings for subsurface utilities not sufficient to disclose the obstacle SCS encountered?</li> <li>• Was the concrete object discovered the storm drain later found to be</li> </ul>

			<p>odors were detected from the borings. Two borings were less than 20 feet deep. The 3<sup>rd</sup> boring went to the bottom of the fill [no depth listed].</p>	<p><i>damaged? [See this Table Item ____.]</i></p> <ul style="list-style-type: none"> <li>• Question: Why were the Palomar engineering drawings for subsurface structures insufficient to show 10-foot thick asphalt at Boring 6?</li> <li>• Question: How can the County safely drive hundreds of piles through landfill 3 to create a "bridge" for the proposed 1100-foot runway extension under review in 2012?</li> </ul>
10	2009 Nov 13	<p><b>FBI Press Release</b> <b>November 13, 2009</b> fbi.gov/sandiego/press-releases/2009/sd111309a.htm</p>	<ul style="list-style-type: none"> <li>• "United States Attorney Karen P. Hewitt announced that Mr. ---- was arraigned today in federal court in San Diego ... on charges of Mr. ... making false statements and tampering with a monitoring method. The indictment alleges that Mr. --- prepared false landfill gas emission reports by copying data already in his computer database without conducting the actual monitoring. <b>According to the indictment, between October 2004 and May 2007, Mr. --- was employed as a technician by a company under contract with the San Diego County</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>FBI Press Release</b> <b>suggests SD County consultant falsifying data related to numerous landfills including at Palomar Airport</b></li> <li>• <b>FBI Press Release</b> <b>notes that one possible result of falsifying of</b></li> </ul>

			<p>Department of Public Works, responsible for taking readings of the emissions of landfill gases from closed landfills within the County of San Diego, including the San Marcos Landfill, the Palomar Airport Landfill, ... among others. ... According to the indictment, on September 23, 2005, an underground fire was discovered at the Palomar Airport Landfill, although no unusual readings had been reported in the monitoring data from the methane extraction wells and migration probes at that location.”</p>	<p>Palomar Airport data was a Palomar Airport subsurface landfill fire. See this Table Item — for further discussion.</p> <ul style="list-style-type: none"> <li>• Did County take any corrective action? <ul style="list-style-type: none"> <li>○ Reconduct fieldwork at falsely reported data locations?</li> <li>○ Attempt to collect extra expenses from the firm involved?</li> <li>○ Create &amp;/or amend its list of consultants ineligible to propose on County contracts?</li> </ul> </li> <li>• <b>FIRE!!!</b></li> </ul>
<b>11</b>	<b>2008</b> Decem- ber	Geosyntec Report of Additional Environmental Evaluations - Unit 3, Palomar Airport Landfill Prepared for	<ul style="list-style-type: none"> <li>• <b>Assignment:</b> Conduct field investigation to (1) further evaluate elevated concentrations of methane detected in LFG probe GW-9A; (2) evaluate northern extent of Unit 3 waste; and (3) potential presence of additional unidentified subsurface utilities near Unit 3. <ul style="list-style-type: none"> <li>• History <ul style="list-style-type: none"> <li>○ Unit 3 is an inactive Class III municipal solid waste landfill.</li> <li>○ <b>Recently, methane concentrations exceeding the</b></li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• See Project # SC0230</li> </ul>

	County, DPW, Landfill Management	<p>5% lower explosive limit [LEL] specified in 27 CCR §20921(a)(2) have been detected.</p> <ul style="list-style-type: none"> <li>○ Three consultants have differed on the limits of the Unit 3 fill [SCS Engineers, Metcalf &amp; Eddy, and Geosyntec.]</li> <li>○ A SDG&amp;E natural gas transmission pipeline that traverses the property near the Unit 3 fill boundary interferes with the ability to take more precise borings.</li> <li>○ “Subsurface utilities may provide a conduit for storm water to enter the subsurface and potentially saturate buried waste. Geosyntec recently encountered a storm drain traversing Unit 3 from the north to the south that previously had been reported as abandoned.</li> <li>○ In December 2007 &amp; February 2008 Geosyntec replaced leaking LFG extraction wellheads in Unit 3.</li> <li>○ In February, 2008 SCS, the County’s landfill gas contractor reported elevated temperatures in the northwest portion of Unit 3 where noticeable subsidence was occurring.</li> </ul>	<ul style="list-style-type: none"> <li>• How deep is the SDGE natural gas line? What risk does it pose if a 90,000 pound plane with 70 passengers aboard crashed into the Unit 3 fill?</li> <li>• County Palomar Airport CEQA documents have not reported or analyzed this problem.</li> <li>• Fire???</li> </ul>
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			<ul style="list-style-type: none"> <li>• <b>Conclusions &amp; Recommendations</b> <ul style="list-style-type: none"> <li>○ Document review suggests there are other subsurface utilities through Unit 3 apparently not used.</li> <li>○ Intrusion of surface water into Unit 3 could result in saturated waste.</li> <li>○ Soil vapor sampling results indicate LFG appears to be migrating beyond the limits of buried waste near well GW-9A.</li> <li>○ Abandon Unit 3 storm drain in place and study rerouting it.</li> <li>○ Resume LFG control operations to reduce methane.</li> <li>○ Continue monitoring Unit 3 perimeter.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• How many of these recommendations have been carried out? What did the contractors find when they dug up the affected portions of the landfill?</li> </ul>
<b>12</b>	2008 August 14	Meeting of Air Pollution Control District Hearing Board	<ul style="list-style-type: none"> <li>• <b>Purpose: County requests variance to allow excess emissions of Palomar landfill emissions due to ongoing underground fires</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Underground landfill FIRE!!!</b></li> </ul>
<b>13</b>	2008 Mid May to September 25	Palomar Airport Underground Landfill Fire [See series of emails from Vicky Gallagher to John Snyder with later copies to Peter Drinkwater, Director of Airports & Willie Vasquez,	<ul style="list-style-type: none"> <li>• <b>Palomar Landfill Unit 3 [County-proposed area for 1100 foot runway extension]</b> <ul style="list-style-type: none"> <li>○ Initially detected temperature above 217 degrees F about 25 feet below ground and in area about 40 feet in diameter.</li> <li>○ Mitigation considered: injecting water or CO2.</li> <li>○ RWQCB opposed water. CO2 used.</li> <li>○ Carlsbad Fire Department notified.</li> <li>○ Broken under landfill storm drain contributes to bringing oxygen in to feed fire</li> <li>○ "It will be months and maybe a year before</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>FIRE!!!</b></li> </ul>

		<b>Director of Palomar]</b>	<b>temperatures reach a normal range. [July 17, 2008 email: Vicky Gallagher to John Snyder (Update #6)]</b>	
<b>14</b>	<b>2008</b> July 25	Geosyntec Report for County Public Works Landfill Management 858 674-6559	<ul style="list-style-type: none"> <li>• Assignment: Evaluate quality of soil vapor near the soil vapor monitor problems installed near the Premier Jet aircraft hangar at Palomar Airport Landfill</li> <li>• Landfill Gas History: <ul style="list-style-type: none"> <li>○ In Dec 2005 Palomar tenant Premier Jet [by a consultant] installed vapor monitor probes near the Unit 1A landfill.</li> <li>○ Since June 2006, the County San Diego Law Enforcement Agency [LEA] has routinely reported elevated landfill gas [LFG], i.e. methane.</li> <li>○ Between July &amp; Dec 2007 LFG extraction well HCW-9 in the Unit 1A landfill was inoperable because the lateral connecting it to the LFG control system was severed by an electrical contractor working for Premier Jet.</li> <li>○ Geosyntec in 2007/2008 found soil vapor samples “consistent with aviation gasoline and not methane.”</li> <li>○ Upon beginning field inspection, Geosyntec discovered that the PVC lines installed did not conform to the construction logs and some fittings were loose.</li> <li>○ Geosyntec “upon initiating purging [detected] leaks in [certain probes] that could not easily be repaired .... [T]he leaks were determined to be due</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>How accurately does Palomar map subsurface lines when contractors can cut them?</b></li> <li>• <b>How good was the Palomar inspection and construction management of the lines previously installed that Geosyntec was inspecting?</b></li> <li>• <b>If the previously installed lines were defective in any way, what efforts did Palomar or Premier Jet make to hold the original contractor accountable?</b></li> <li>• <b>For more detailed info, apparently see</b></li> </ul>

			<ul style="list-style-type: none"> <li>to the construction of the probes.”</li> <li>Geosyntec Conclusions &amp; Recommendations: <ul style="list-style-type: none"> <li>“It appears that soil vapor in the vicinity of the Premier Jet probes may have been affected by both fuel related compounds resulting from the current and former use of hydrocarbon fuels at the side and LFG migrating from the Unit 1A landfill. VOCs [benzene, vinyl chloride, PCE and TCE] were detected at concentration exceeding CHHSLs. [California Health Human Screening Levels.]</li> <li>“The following indicate the Premier Jet probes may not be suitable for monitoring potential LFG migration from the Unit 1 A landfill: <ul style="list-style-type: none"> <li>The detection of significant concentrations of non-LFG-related constituents that are erroneously reported as methane by the field instruments used to monitor the probes;</li> <li>Leaks in the probes, apparently to be due to probe construction; and</li> <li>The use of PVC cement in constructing the probes indicate[d].”</li> </ul> </li> </ul> </li> </ul>	SC0230/Premier Jet probe Sampling/pj probe sampling.rptF.072520 08.doc.
15	2008 July 17	County Air Pollution Control District Issues Notice of	<ul style="list-style-type: none"> <li>Violation Date: April 1, 2003 to March 31, 2006: “Knowingly and with intent to deceive falsifying records required by the landfill permit to be kept</li> </ul>	<ul style="list-style-type: none"> <li>Note: This Violation not Palomar but shows widespread County</li> </ul>

	Violation	regarding the presence of methane in the off site migration probes located at the Encinitas landfill.	problem throughout County at the landfills
16	2008 March Geosyntec Premier Jet Methane Investigation Report, Palomar Airport Landfill Prepared for County of San Diego, DPW, Landfill Management	<ul style="list-style-type: none"> <li>• Assignment: Conduct field investigation to evaluate elevated concentration of methane detected in Unit 1-A gas monitoring probe.</li> <li>• History: <ul style="list-style-type: none"> <li>○ Unit 1-1 is inactive Class III municipal solid waste landfill site.</li> <li>○ County LEA monthly reports note elevated methane levels 10 to 90 feet outside the northern limits of Unit 1A wastes.</li> <li>○ LEA noted violations of 27 CCR 20919 = failure to control migration of landfill gas.</li> <li>○ Excavation of the HCW-9 lateral line revealed two electrical conduits resting on line. The lateral had to be reconnected in a manner to avoid problems with the electrical lines. A sump was installed that will require periodic pumping to remove condensate near electrical lines.</li> <li>• Conclusion. Leaking wellheads were replaced and a broken subsurface lateral line to HCW-9 was repaired to correct problem.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• See Project # SC0230</li> <li>• How good can County construction be when County fails to catch contractor placing electrical conduits directly on methane gas lines?</li> </ul>
17	2008 March 6 Geosyntec Letter	<ul style="list-style-type: none"> <li>• Topic: Request to Revise Monitoring and Reporting Program 96-13, Palomar Airport Landfill</li> <li>• Notes: <b>"The landfill was constructed without a liner,</b></li> </ul>	



			<p>and does not have a leachate collection or removal system. Other than the groundwater monitoring network (26 wells) [for 32 acres], no leak detection system has been installed at the landfill.:</p> <ul style="list-style-type: none"> <li>• “An annual or biennial sampling frequency is recommended for ethylbenzene, TCE, cis-1, DCE, and 1,1 DCE for each well at the Palomar Airport Landfill ...”</li> </ul>	
18	2008 January 15	County letter to Air Pollution Control District re: Fire	<ul style="list-style-type: none"> <li>• Letter requests variance to allow excessive emissions related to underground Palomar Airport fire.</li> <li>• Letter notes: “In January 2008, during a routine post storm inspection, County staff observed a depression approximately 50 feet in diameter and 3 feet deep in the northwestern portion of Unit 3.”</li> <li>• Temperature probes were installed and confirmed an underground fire.</li> </ul>	<ul style="list-style-type: none"> <li>• Unit 3 is adjacent to the runway and site of the 1000 foot Runway Safety Area</li> <li>• FIRE!!!</li> </ul>
19	2007 November	Geosyntec “Additional Methane Investigation Report & Corrective Action Plan, Palomar Airport Landfill Prepared for County, DPW, Landfill	<ul style="list-style-type: none"> <li>• Assignment: Evaluate elevated methane concentrations in gas monitoring probe MP-10S.</li> <li>• History: <ul style="list-style-type: none"> <li>○ November 2006 routine monitoring by Consultant SCS Engineers showed methane gas exceeding 5% lower explosive limit [LEL].</li> <li>○ Investigation suggested elevations related to construction and placement of engineered fills in the northern portion of</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• See Geosyntec Project # SC0230</li> <li>• Why did it take the County 1 year to follow up on its own consultant explosive gas field finding?</li> <li>• NOTE: STRONG EVIDENCE</li> </ul>

		<p>the site during 2006.</p> <ul style="list-style-type: none"> <li>o July 2007 routine monitoring by County Local Enforcement Agency [LEA] found methane above LEL in violation of 27 CCR 20919.5</li> <li>• Summary of Results [See report pages 11 &amp;12]: <ul style="list-style-type: none"> <li>o “Soil moisture is a critical component in methane generation. Methane generation will not occur in the presence of oxygen. Once soils are saturated, the dissolved oxygen in the water can be consumed by microbial, plant, or animal respiration. The consumption of dissolved oxygen in interstitial water results in anaerobic conditions, which are required for methane generation.</li> </ul> </li> </ul>	<p><b>AS TO WHY AN AIRPORT NEGATIVE DECLARATION IS NOT ACCEPTABLE EVEN FOR A PROJECT APPARENTLY AS SIMPLE AS PLACEMENT OF FILL ON SITE [FILL PLACEMENT CAUSES SURCHARGES AFFECTING FILL GAS MIGRATION]</b></p> <ul style="list-style-type: none"> <li>• Why did it take County 6 months to further evaluate methane above LEL when even County enforcement had found a problem?</li> <li>• The County left the large area above the Unit 2 landfill bare for many years thus allowing annual rainfall to enter the landfill and contribute to more methane gas formation. Why?</li> </ul>
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		<p>o Geosyntec has recently had numerous conversations regarding soils encountered during the earthwork activities in the northern portions of the site in 2006. The earthwork was conducted to construct the plane tie down area and the access road along the northern property boundary. Messrs. Willie Vasquez(Palomar Airport Manager), Tony Torres (LEA), and Mike Tisdale (IEC Infrastructure Engineering Corporation, the contractor conducting the earthwork), each indicated in separate conversations that dark odiferous soils were encountered during earthwork activities in the northern portions of the site. The odors observed during earthwork activities are likely a result of localized methane generation in the dark soils. In addition. Geosyntec obtained test pit logs prepared by Ninyo and Moore that indicate two test pits excavated along the northern portions of the site contained organic matter in soil or soil with an organic smell. ... [T]he specific locations of these dark odiferous soils ... are consistent with those observed in boring PAL-B1, indicating localized methane generation unrelated to the landfill is occurring in the northern portions of the site.</p>	<ul style="list-style-type: none"> <li>• What if any CEQA environmental work was done for the plane tie down earthwork.</li> <li>• Note that if the Geosyntec conclusion is correct that the methane generation is not landfill-associated, then the airport problem is even worse than suspected because areas outside the landfill are causing problems. [Presumably, an Geosyntec or another engineering firm</li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Conclusions &amp; Corrective Action Plan:</b> <ul style="list-style-type: none"> <li>○ “The methane concentration of 4 October 2007 active gas sampling test [50.1% is greater than methane concentrations detected in 96% of the LFG extraction wells during the routine monthly Monitoring by SCS in September 2007 ... Therefore, it is unlikely that LFG migrating from one of the three-landfill units at the site is a likely source of methane detected in MP-10S.</li> <li>○ Probe MP-10S is unsuitable for use as a perimeter probe because its ability to monitor potential LFG migration is obscured by localized methane production. Probe MP-10S will be relocated to a location where localized methane production is not occurring.</li> </ul> </li> </ul>	<p>would have to study whether the County surcharged the Unit 3 landfill by placing piles of dirt over it resulting in landfill gases being “squeezed” out of the landfill into other areas.]</p> <ul style="list-style-type: none"> <li>• <b>Then it appears Palomar has a 3<sup>rd</sup> problem [in addition to landfill methane gas and Underground Storage Tank leaks] that needs to be properly assessed. Especially since the 50.1% level exceeds the lower explosive limit for methane gas of 5%.</b></li> <li>• <b>Question: Why would Probe MP-10S be moved? Yes,</b></li> </ul>
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				another probe for perimeter monitoring should be added. But MP-10S should have stayed.
20	2007 July	Geosyntec "Methane Investigation Report Palomar Airport Landfill" Prepared for County Landfill Management	<ul style="list-style-type: none"> <li>• Assignment: Evaluate elevated methane concentration in probe MP-10, GW-9A, GW-10, and MP 1-R on the northern portion of the Palomar Airport Landfill property.</li> <li>• History: In November 2006, SCS Engineers detected elevated methane concentrations at probe MP-10S. This probe is several hundred feet from the nearest documented location of landfill waste. [Emphasis added.]</li> <li>• Conclusions: <ul style="list-style-type: none"> <li>○ It appears unlikely that methane is migrating from the landfill waste in unit 2, Unit 3, or the natural gas transmission pipeline to monitoring probe MP-10S.</li> <li>○ The volatile organic compounds [VOCs] detected in the soil gas samples from MP-10S AND temporary probes P6-10 and P11-10 do not appear to be consistent with either LFG or natural gas methane sources. <ul style="list-style-type: none"> <li>○ DCDFM [dichlorodifluoromethane [DCDFM]] was detected from monitoring probe GW-9A-D at a concentration significantly higher than that detected in the LFG. Additionally, hydrogen sulfide was detected in both the LFG and GW-9A-D soil gas samples.</li> <li>○ The paving of areas surrounding monitoring probe MP-1R and near monitoring probe MP-10S with asphalt may have</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Why did it take the County 6 months to further explore methane gas concentrations exceeding explosive limits?</li> <li>• Thus far, no environmental assessment for the Palomar Airport engineered fills and the apparent paving for airplane parking has not been found. The County's own evidence suggests that its projects are causing added gas problems at the site above and beyond the problems from the landfills and</li> </ul>

			<p>resulted in favorable methanogenic conditions in these areas. Additionally methane was not detected at elevated concentration until after the conclusion of earthwork grading in the northern portions of the site. Therefore, it seems likely the elevated methane concentrations detected in MP-10S and MP-1R, following the completion of the earthwork, may be attributable to the presence of engineered fills in the northern portion of the site.</p>	leaking underground storage tanks.
21	2007 July 25	County letter to Air Pollution Control District Compliance	<ul style="list-style-type: none"> <li>References a July 17 APCD Notice of Violation [#218838] related to a 12,000-gallon aviation self-servicing fuel station.</li> </ul>	
22	2007 May 3	Airports Letter of Palomar Airport Center dba Premier Jet	<ul style="list-style-type: none"> <li>“Portions of your lease lay above/adjacent to closed municipal solid waste landfill. ... the Local Enforcement Agency has been having some difficulty getting compliance from Premier Jet and they are concerned for the health, safety and welfare of Premier Jet and its tenants due to potential impacts associated with landfill gas.”</li> <li>The concerns noted relate to installing automatic methane detectors inside the office building, installing certain monitoring probes, and certifying the adequacy of the ventilation systems within the hangars to prevent methane buildup.</li> </ul>	
23	2007 April 30	The 2000 to 2005 MOU Between County Airports & County Inactive	<ul style="list-style-type: none"> <li>The May 2, 2007 Pete Drinkwater [Executive Director County Airports] letter to John Snyder notes the landfill MOU extension and other issues related to the Palomar</li> </ul>	<ul style="list-style-type: none"> <li>The same risks related to dynamic compaction would exist from</li> </ul>

		Landfill Site Management was Extended to April 30, 2007.	landfills. <ul style="list-style-type: none"> <li>Notes that if dynamic compaction [i.e. dropping heavy weights from height] were used at Palomar to compact fill “extreme risks include cracking nearby building foundations, cracking concrete slabs on hangar floors and ... pounding the soil may release buried hazardous materials, as the airport has undocumented waste buried in some units.</li> <li>“Clean closure [removal of waste from airport property] may be an alternative long term solution that would address both Airports and Landfills needs. Clean closure would address development and operational impediments imposed by the landfill, improve safety ion operational areas, eliminate the potential for future environmental issues associated with this landfill, and reduce ongoing Solid Waste Environmental Trust Fund commitments.”</li> </ul>	driving hundreds of piles 20 to 45 deep through Palomar Unit 3 landfill to create a bridge over the landfill.
24	2007 April	Geosyntec “Operation & Maintenance Plan: Sub-Drain Discharge Treatment System, Palomar Airport Landfill prepared for County Solid	<ul style="list-style-type: none"> <li>Assignment: In 1985 the County installed a sub-drain system below an engineered soil fill area “down gradient” of landfill Unit 1. The drain was intended to provide slope stability for the “emplaced” engineered fill. Because low levels of VOCs and relatively high levels of total dissolved solids [TDS] have been detected in the sub-drain discharge, Geosyntec is to develop an operation &amp; maintenance program for the sub-drain.</li> <li>History: <ul style="list-style-type: none"> <li>The RWQCB prepared a SD Basin 9 water plan in 1981 requiring</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Project # SCO230-12-05</li> </ul>

		Waste Management	<p>mitigation of untreated water discharges.</p> <ul style="list-style-type: none"> <li>Initial analysis of the RWQCB plan suggested reduction-costs would be excessive.</li> <li>Hence, the treatment system at Palomar targeted VOCs, not solids.</li> <li>Palomar landfill Unit 1 contains about 214,000 cubic yards of waste.</li> <li>In 2003 the County installed a discharge water treatment system. The discharge in April 2007 is about 2.6 gallons per minute [3,800 gallons per day].</li> <li>Conclusions: Improve operations and maintenance of the sub-drain system components.</li> </ul>	
25	2007 February 8	SCS Engineers Assessment of Gas from Landfill Gas System Components at the Palomar Airport Landfill	<ul style="list-style-type: none"> <li><b>Assignment: Investigate whether outside sources contribute to methane gas found along northern perimeter.</b></li> <li><b>Recommendations: County should perform an isotopic analysis to determine if certain gas found is an outside source such as sewer gas or solvent spill plume or an undocumented landfilled refuse.</b></li> </ul>	
26	2007 January 9	County of San Diego Department of Environmental Health Closed Disposal Site Inspection Report	<ul style="list-style-type: none"> <li><b>Noted explosive methane at 24.5%. The regulatory limit is 5%.</b></li> <li><b>Noted the problems cited in November and December of 2006 continued.</b></li> </ul>	



27	2006 December 7 And November 14	County of San Diego Department of Environmental Health Closed Disposal Site Inspection Report: North Coastal Landfill Palomar Airport	<ul style="list-style-type: none"> <li>• <b>County found violations for “Post closure land use,” “gas controls,” and “explosive gas control.” Also found “areas of concern” related to site maintenance and perimeter monitoring network.</b></li> <li>• <b>Explosive methane was detected at concentrations of 29.7% - substantially in excess of the regulatory limit of 5%. In the prior month, the level was 41.7%</b></li> <li>• <b>Copies of report were provided to Palomar Airport Manager, RWQCB, and APCD.</b></li> <li>• <b>Same problems noted in the November report.</b></li> </ul>	
28	2006 October	GeoSyntec Phase II Evaluation Monitoring Program [EMP] Palomar Airport Landfill – Unit 2 Prepared for Landfill Management	<ul style="list-style-type: none"> <li>• Assignment: Assess Palomar landfill Unit 2 site again to further evaluate the nature and extent of landfill-related constituents in groundwater down gradient from Unit 2.</li> <li>• History:</li> </ul>	
29	2006 June 2	GeoSyntec Letter to Barry Pulver, Landfill Management	<ul style="list-style-type: none"> <li>• Assignment: Document groundwater sampling to profile total petroleum hydrocarbon concentrations [TPH] in groundwater at the Palomar Airport Landfill.</li> <li>• <b>“TPH was detected in both groundwater samples from upgradient monitor wells MW-28 and MW-30 in Unit 1. TPH signatures indicated the presence of</b></li> </ul>	

				<ul style="list-style-type: none"><li>gasoline, diesel, AVGas, Jet A, and JP-4.”</li><li>TPH as diesel, Jet A and JP-4 were detected in all groundwater samples from Unit 2.</li></ul>	
30	2005 Sep-tem-ber To Novem-ber	<i>Palomar Underground Landfill Fire:</i> See for example October 19, 2005 County Landfill Management letter to Kerry McNeil, Local Enforcement Agency	<ul style="list-style-type: none"><li>Unit 2<ul style="list-style-type: none"><li>Burned from approx Sept 23 to Nov 23, 2005, temperatures of 190 degrees F initially noted</li><li>1<sup>st</sup> reported by FAA tower</li><li>Grouting company pumped grout underground to seal hole and minimize oxygen entry for about 6 weeks</li><li>After approx 700 cu yards of grout injected, temperature dropped to 158 degrees F</li><li>Air Quality cited County for excessive methane emissions into the air. County violated air quality Rule 59.</li><li>Fire presumed out by December due to grouting</li></ul></li></ul>	<b>FIRE!!!</b>	
31	2004 July 22	Advanced GeoEnvironment al, Inc. letter to Gary Backe, Tank Specialists of California	<ul style="list-style-type: none"><li>Notes: “Four 10,000 underground storage tanks [USTs] were removed from the subject property [Jet Source at Palomar Airport] recently. Two of the USTs contained aviation gas and the other two contained jet fuel. ... Following the removal, an unauthorized release into the subsurface soil was discovered beneath the eastern jet fuel UST. ... Based on site circumstances, it appears that the most effective method of remediation is over excavation.”</li></ul>		

32	2000 July 7	<p>Carlsbad City Council Rejected Purchase of Palomar Airport Due to Problems</p>	<ul style="list-style-type: none"> <li>• Carlsbad prepared a 41-page document entitled: “Evaluation of Acquisition of McClellan-Palomar Airport.”</li> <li>• Pages 31-37 summarize the many problems at the Palomar landfill pre-2000 including: <ul style="list-style-type: none"> <li>○ “A review of RWQCB and Department of Environmental Health files on the Landfill reveal (1) concerns about landfill gas emissions and the protection of ground water that date back nearly 10 years; and (2) the County Department of Public Works’ slow and inadequate responses to the requests of the environmental oversight agencies for measures to prevent environmental degradation and protect the public’s health.</li> <li>○ “Environmental hazards documented by the Air Pollution Control District, RWQCG and Department of Environmental Health include: (1) inadequate monitoring and control of methane gas emissions; (2) cracking of asphalt which allows infiltration of water into underlying wastes; (3) ‘differential settlement’ that (a) impacts drainage structures, (b) impacts side slopes (causing erosion rills which can result in exposed solid wastes), (c) impacts the integrity of structures, and (d) provides a pathway</li> </ul> </li> </ul>	

		<p>for the release of landfill gases into the atmosphere an structures ...; and (4) methane emissions through asphalt fractures exceeding the 'lower explosive limit'. Documentation also includes (1) the Landfill is leaking and needs monitoring to assess the extent of contamination of ground water, (2) there are an insufficient number of monitoring wells to determine ground water flow direction; and (3) correspondence over inadequate responses, insufficient required reports from DPW, and the issuance of numerous notices of violation.</p> <ul style="list-style-type: none"> <li>• Carlsbad Conclusions related to the Palomar landfill i include: <ul style="list-style-type: none"> <li>○ Without County Board of Supervisor intervention and/or regulatory enforcement, poor maintenance and property deterioration may be an ongoing issue at Palomar.</li> <li>○ The likely reasons there has been inadequate ground water monitoring at the airport are: (1) the lack of enforcement by RWQCB; and (2) the threat of required abatement actions if ground water flow direction is established and the landfill is tied directly to the Dry Weather Test results.</li> </ul> </li> <li>• Without greater RWQCB oversight, our ground water degradation and storm drain test results will likely</li> </ul>
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			<b>continue.</b>	
<b>33</b>	2000 June 15	MOU Between County Airports and County Inactive Waste Site Management [IWSM] [Ending June 30, 2005]	<ul style="list-style-type: none"> <li>Notes that on April 22, 1999 the RWQCB inspected <b>Landfill Units 1 and 2 and issued IWSM a Notice of Violation.</b></li> <li>On MARCH 22, 2000 the County awarded a contract for major repairs to Landfill Units 1 &amp; 2 to correct settlement and drainage problems.</li> <li>Per the MOU, Airports agreed to pay 55% of the cost of the corrective work.</li> <li>Airports agree to share equally with ISM the responsibility for the long-term maintenance, repair and landfill regulatory agency fines related to surface areas underlain by solid waste.</li> </ul>	<ul style="list-style-type: none"> <li>Note that it took the County 11 months to correct the RWQCB notice of violation.</li> </ul>
<b>34</b>	1990s [Exact date uncertain]	Woodward-Clyde Consultants Site Assessment and Subsurface Investigation Draft Report Prepared for Carlsbad Airport Centre Partnership	<ul style="list-style-type: none"> <li><b>"The results of our record review indicate that five facilities at Palomar Airport have been cited by the HMMD for an unauthorized release of hydrocarbons from an underground storage tank system. Two of the facilities have received a case closure from the HMMD and three cases remain open... One of the facilities, Air Resorts Airlines, had evidence of VOC contamination [PCE and methylene chloride], in addition to petroleum hydrocarbons, in a sediment sample collected from a floor drain.</b></li> <li>Landfill gases from cell No. 1 of the former Palomar Airport landfill have migrated onto the subject site in</li> </ul>	<ul style="list-style-type: none"> <li>See report A/9153065E-RP01</li> <li>Note: The reference to lots 29 and 30 is</li> </ul>

			the area of Lots 29 and 30.	apparently to the area to which Palomar Airport relocated its parking in the mid-2000s. The quoted language is deleted by an ink cross out. It is unclear why the deletion was made. One possibility is that the County did not want a record of gas migration outside Palomar landfill cell 1.
35	1999 July	URS Greiner Woodward Clyde Corrective Action for the Cinema Hanger McClellan- Palomar Airport	<ul style="list-style-type: none"> <li>• Assignment: Develop corrective plan for foundation failures under the Palomar Cinema Hanger caused by subsidence from the landfill partially under the hanger.</li> <li>• Findings: <ul style="list-style-type: none"> <li>○ The hanger foundation continues to fail.</li> <li>○ Problems were first noted in 1993. Corrective work was performed in 1994 including a new foundation system with pier and grade beams.</li> </ul> </li> <li>• Recommendations: Demolish existing building and relocate to more suitable site OR retrofit existing</li> </ul>	

				structure using piles and grout injection.	
36	1998 March 2	Woodward-Clyde Consulting Report Financial Risk Assessment for the Palomar Airport Landfill - Units 1 & 2		<ul style="list-style-type: none"> <li>• Noted 26 financial risks issues associated with the Palomar landfills including landfill settlement and ground water contamination.</li> <li>• Noted that none of the remediation options would be profitable.</li> </ul>	
37	1993 April 9	Metcalf & Eddy, Inc, Geotechnical Consultants Palomar Airport Landfill Solid Waste Water Quality Assessment Test [Final SWAT Report]		<ul style="list-style-type: none"> <li>• “Notable subsidence has occurred along the upper deck of the covered landfill units. This is particularly evident across Unit 1 and Unit 2 where much of the area has been paved and used for airport operations, including individual, portable hangars. Local depressions in the pavement as deep as five feet have been observed.... Evidence of subsidence can also be seen across Unit 3.</li> <li>• The City of Escondido contributed approximately 3 cubic yards of treated sewer sludge per week to the landfill. ... Several employees did report minor health problems such as headaches, and on rare instances, nausea and vomiting while working at the landfill.</li> <li>• Landfill volume in cubic yards is estimated respectively for Unit 1, Unit 2, and Unit 3 at 214,000;</li> </ul>	<ul style="list-style-type: none"> <li>• X</li> </ul>

			<p>195,000; and 697,000.</p> <ul style="list-style-type: none"> <li>• “Groundwater monitoring immediately downgradient of Unit 1 indicates that a discharge has been occurring to the local groundwater environment. Based on analytical test findings, 13 volatile organic compounds are present in the underlying groundwater, five of which at concentrations exceeding California Department of Health Services Maximum Contaminant Levels for Drinking Water.”</li> <li>• “With respect of Unit 2, the County of San Diego, Department of Health Services, Hazardous Materials Management Division, has records of an unauthorized discharge estimated at 4,000 gallons from underground fuel tanks located on the northeast side of the landfill unit ...”</li> <li>• “Overburden. There are several areas within the airport boundaries in which additional asphalt concrete was placed as a temporary mitigation to settlements under the asphalted surfaces. Considerable additional settlement should be expected in areas where additional overburden such as new fill is placed over the completed landfill. Overburden has been observed to generate significant settlements up to 40 feet away from the point of application. ... Typical settlement for a one</li> </ul>	<ul style="list-style-type: none"> <li>• Review of Palomar records suggest that in the mid 2000s, the Airport placed various fill materials on or near the several landfills for various reasons. The reasons seem to have included: (1) to have material available to fill up subsidence depressions and (2) to reconstruct taxiways. Records review suggests that such fill placement was done</li> </ul>
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			foot thick layer of asphalt in a 20 foot deep area of the landfill is approximately six inches.”	without environmental analysis despite the County’s own records showing that “overburden” [storing materials on top of or near landfill areas] can cause subsidence.
38	1968 June 20	County Planning Dept granted Special Use Permit 68-97 for a sanitary landfill at 2386 Palomar Airport Road	<ul style="list-style-type: none"> <li>• Special Use Permit states the three sanitary landfill sites are located on the Palomar Airport property.</li> <li>• Permit notes that “a previous sanitary land fill had been operated by the County on the airport property.”</li> <li>• Permit states “No permanent structures or facilities will be constructed.”</li> </ul>	
			<p><b><i>Note: This table is not comprehensive. Due to time limits there were other records I have not looked at, particularly those of the Regional Water Quality Control Board and the Air Pollution Control District. If the County were properly tracking landfill problems, it would maintain a chronological log similar to this table. Otherwise it is impossible for decision makers or the public to know the extent of the landfill problems – and the extent of County remedial measures, if any - without reviewing many, many thick reports.</i></b></p>	

# Attachment 4

22 10

**CITY OF CARLSBAD - AGENDA BILL**

<b>AB#</b> 15,841 <b>MTG.</b> 7-25-00 <b>DEPT.</b> RM/ED	<b>TITLE:</b> Evaluation of Acquisition of McClellan-Palomar Airport	<b>DEPT HD.</b> <i>EC</i> <b>CITY ATTY.</b> <i>JS</i> <b>CITY MGR.</b> <i>JS</i>
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**RECOMMENDED ACTION:**

Accept the *Evaluation of Acquisition of McClellan-Palomar Airport Report*.

Item Explanation:

In 1999, staff was assigned a City Council goal for fiscal year 1999-2000 to evaluate the acquisition of McClellan-Palomar Airport. In support of the goal staff has prepared an in depth report, shown as Exhibit 1, which addresses many of the pertinent issues that the Council would need to consider before taking further action toward acquisition, as well as issues which impact the City regardless of any interest in acquisition.

In order to develop the report staff first interviewed City Council members to obtain clarification on the intent and expectations around the goal. The interviews revealed two primary goals for acquisition that were shared by all five Council members. These included: (1) control of land uses, and (2) improved operation of the airport. Other goals cited include, ensuring that funds earmarked for airport improvements are spent at McClellan-Palomar and implemented in a timely manner, generation of more revenue to the City, management of noise issues more effectively, and expansion of commercial service. In addition, the City Council asked staff to consider environmental issues and liabilities.

Based on staff's findings, it is clear that through an acquisition of McClellan-Palomar Airport the City would achieve greater land use control than currently exists. However, while greater land use control could be achieved, staff has concluded that there are a number of factors that limit the City's ability to influence or affect how the airport operates. In addition, other factors were identified that offset the benefits of airport ownership.

It is staff's opinion that acquisition of McClellan-Palomar Airport would not be prudent at this time; therefore, staff is recommending that Council accept the report that includes measures that provide the City Council with alternatives to address some of their concerns.

**Fiscal Impact:**

None.

**Exhibits:**

1. *Evaluation of Acquisition of McClellan-Palomar Airport Report* (On file in the Office of the City Clerk)

**COUNCIL ACTION:**

**APPROVED**

## **EVALUATION of ACQUISITION of MCCLELLAN-PALOMAR AIRPORT REPORT**

**April 3, 2000**

### **EXECUTIVE SUMMARY**

In 1999 staff was assigned a City Council goal to evaluate the acquisition of McClellan-Palomar Airport. In support of the goal staff has prepared an in depth report which addresses many of the pertinent issues that the Council would need to consider before taking further action toward acquisition, as well as issues which impact the City regardless of any interest in acquisition. In order to develop the report staff first interviewed City Council members to obtain clarification on the intent and expectations around the goal. The interviews revealed two primary goals for acquisition that were shared by all five Council members. These included: (1) control of land uses, and (2) improved operation of the airport. Other goals cited include, ensuring that funds earmarked for airport improvements are spent at McClellan-Palomar and implemented in a timely manner, generation of more revenue to the City, management of noise issues more effectively, and expansion of commercial service. In addition the City Council asked staff to consider environmental issues and liabilities.

Based on our findings, it is clear that through an acquisition of McClellan-Palomar Airport, the City would achieve greater land use control than currently exists. However, while greater land use control could be achieved, our research concluded that there are a number of factors that limit the City's ability to influence or affect how the airport operates. In addition, other factors were identified that offset the benefits of airport ownership. These factors are included in the Conclusions and Recommendations section of the report.

It is staff's opinion that acquisition of McClellan-Palomar Airport would not be prudent at this time; therefore, we are recommending City Council not take any further action on this matter. However staff has identified measures in the report that provide the City Council with alternatives to address some of their concerns.

Finally, environmental concerns associated with the landfill beneath the airport and exacerbated by airport maintenance practices were identified. The significance of these issues and their relevance to the community, as well as recommendations for addressing them are included in the report.

### **REPORT OUTLINE**

The report is divided into the following sections: I. How Airports Operate; II. San Diego County Airports Overview; III. McClellan-Palomar Airport - Land Use; IV. Economic Benefit of McClellan-Palomar Airport; V. Airport Financing; VI. McClellan-Palomar/County Airports Sale or Lease; VII. McClellan-Palomar Airport Environmental Issues; VIII. Conclusions & Recommendations; IX. Exhibits: Exhibit 1 Total Impact of McClellan-Palomar Airport ; Exhibit 2 Airport Enterprise Fund; Exhibits 3-15 Airport Noise.

## **I. HOW AIRPORTS OPERATE**

Although each airport or system of airports in the United States is unique, most county and multi-government airport facilities function similarly. In most cases airports are overseen by a special district or authority, commission, special department of a city or county, or an advisory board. Authorities can be multi-purpose or aviation only, and are increasingly prevalent. An authority form of management is considered appropriate when:

- A task or service is judged inappropriate to be performed by a private enterprise;
- Large amounts of capital are needed;
- Efficient management with initiative and business imagination is essential;
- Long-range planning must be in the hands of competent business, financial, and professional technicians;
- The task/service must be self-supporting;
- The task/service must be free from political interference;
- The scope of the task/service involves areas more extensive than the established geographic boundaries of state and local government.

Whatever the operating entity, it is critical for the airport administration to be able to report directly and independently to the source of policy flow, and not be subordinated in another unit created for another purpose. Airport officials must plan, develop, operate and maintain airports so that they meet user's requirements and owners level of quality. Administrators must also arrange financing for capital improvements and budget revenues from the various products so that costs can be equitably shared among the users and owners.

Airports are usually divided into "air-side" and "land-side" areas for financing and accounting purposes. The air-side portion consists of areas upon which an aircraft can operate (runways, taxiways, aprons, and hangars). Land-side means terminals, automobile parking, airport oriented businesses, roads, or mass transit leading to the airport. The airport general manager is responsible for providing (or supervising the provision by others) of air-side and land-side products at the quality levels established by the policy source. For example, a major activity of the airport's operations or administration office focuses on negotiating leases with concessionaires, landing fees with airlines, parking rates, and taxi-airport drop off fees. Essentially, airport administration provides tools, procedures and programs under which the airport's management delivers, or supervises the delivery of the airports products and services.

### **Sources of Revenue**

The most important product provided is air transportation. Carriers that wish to serve a particular community or region seek to lease space at the airport of their choice. They negotiate landing fees, the number of gates, space for ticket counters and offices, and assorted other fees with airport administrators. For example, some airport authorities

have individual lease agreements with several carriers. The rental fees charged them are calculated to ensure that the airport generates sufficient revenues to operate the airport on a break-even basis after paying debt service on all outstanding bonds; paying the costs of operation and maintenance; and making agreed-upon contributions to the capital reserve accounts.

Under the "residual cost" formula established in the agreements, revenues from sources other than airline rentals and fees are credited against the airport's total operating, maintenance, and capital outlay requirements to determine the amount the carriers will pay. Additional airfield and aviation revenues include ground and building rentals of sites, hangars, and facilities leased to other airport tenants including fixed base operations (FBO's). There are also fuel flowage fees, and concession fees from in-flight catering services. Ground transportation and concession revenues typically come from public parking, employee parking, rental cars, food and beverage restaurants, as well as news and gift stores. Airport revenues are also derived from telephone, advertising, and taxi and limousine service.

Over the past several years, airlines have been able to negotiate favorable deals for improved facilities at little cost to them. For example airport administration generally has the discretion to waive or reduce certain fees, offer free ticket-counter and baggage claim rental, and limit the cost of office space. However, one item that usually cannot be waived is landing fees. If management reduces one carrier's fees, the other airline(s) generally will demand, and are entitled to the same treatment. Depending on the size and degree of cost/revenue control, some airports generate revenues predominantly from the rental of space, land or other facilities, rather than from landing fees and other operating charges.

Airports can also be partially supported through city and county appropriations and/or dedicated taxes; however, most medium sized and large airports are able to turn a profit on their own and do not require local assistance. State governments have traditionally played a subordinate role in financing air facilities, but the federal government has played a primary role. When a decision is made to construct, improve or expand an airport, federal grants are nearly always involved, as are local funds and money from the airlines that stand to benefit from the change or improvement.

The portion of airport revenue derived from federal aid bears an inverse relationship to the size of the airport. In other words, large airports receive significantly less funding on a percentage basis than do non-hub reliever airports and general aviation airports. This federal money comes from the Federal Aviation Administration's (FAA) Trust Fund.

#### FAA Trust Fund

The FAA Trust Fund was created in 1958, with part of its mission to manage federal grants for airport planning and capital improvement projects. This money was appropriated from the General Fund. The Airport and Airway Trust Fund and its grant program, the Airport Development Aid Program, were established by Congress in 1970.

The Trust Fund is capitalized through passenger ticket taxes and other excise taxes and user fees. Congress reauthorized the budget for the Trust Fund under the Airport and Airway Act of 1982. The grant program was renamed the Airport Improvement Program (AIP), and the 1982 act defined airports eligible for grants.

#### Local Funding Mechanisms

In the United States, ownership of airports rests almost entirely with local governmental agencies. These typically have few capital resources, but federal involvement does not eliminate the need for local financing mechanisms. Airport capital requirements are generally met through the sale of obligation bonds or revenue bonds, with some measure of state assistance.

## II. SAN DIEGO COUNTY AIRPORTS OVERVIEW

### COUNTY AIRPORTS SYSTEM

The San Diego region has a total of 16 airport facilities owned and operated by a variety of public agencies both local and federal. Eight of the region's airports are owned and operated by the County of San Diego, making it the largest airport system, serving the greatest number of users in the San Diego Region. The County has been operating airports since 1947, during which time it has developed into one of the largest regional airport systems in the State of California. It is considered a part of the National Air Transportation System and includes one (1) primary commercial airport, McClellan-Palomar; two (2) regional airports, Gillespie Field and Ramona; three (3) community airports, Jacumba, Borrego Valley, and Fallbrook; and two (2) limited use facilities, Agua Caliente Springs Airstrip and Octotillo Airport. These airports collectively provide for general aviation, corporate and commercial aviation, and provide land available for lease, for aviation, industrial and non-aviation purposes.

Since these eight airports are owned and operated by the County of San Diego, the County Board of Supervisors sets all policy and provides the overall direction for the County airport system. In addition to its policy role, the Board of Supervisors has appointed a number of advisory committees to monitor and advise County staff and the Board on airport activities and issues. These committees include the Gillespie Field Development Council, the Palomar Airport Advisory Committee, and the Fallbrook Community Airpark Advisory Committee. The County airport system is operated by the County's Department of Public Works, Airport Division which includes a support staff of 25. Twelve of airport system team provide management and administrative support to all eight airports, the balance of personnel are located at Gillespie Field, McClellan-Palomar and Ramona airports.

A primary goal for the County Board of Supervisors has been to keep the airport system fully self-supporting. In 1980, the Board established an Airport Enterprise Fund (AEF), where revenues generated from each of the eight county airports are collected so that they may be kept separate from the County's General Fund. These airport revenues are then used to fund the entire airport system as well as pay any debt service the system has incurred. These monies also provide the required matching funds for FAA capital grants. In addition, the AEF has provided some of the funding of other public improvements and enhancements at individual airports deemed important for the continued economic growth and financial health of the entire airport system. The use of an enterprise accounting system has enabled the County airport system to operated within the revenues it generates. The FY2000 County Airports budget request totals \$25.6 million with \$16 million requested for funding of a variety of capital improvement projects in the airport system.



#### POLICY F-44

In 1987, the County Board of Supervisors established a policy (F-44) to provide guidelines for the operation and development of McClellan-Palomar Airport. The policy was modified in 1991 and then again in 1996. The policy is scheduled to sunset on December 31, 2002, but can be reviewed for continuance prior to this date. The following eight items are outlined in Policy F-44:

1. The role of Mc-Clellan Palomar Airport shall be to provide air transportation for the residents of North San Diego County and to facilitate General Aviation activities while minimizing noise impacts on surrounding areas and communities.
2. Scheduled commuter airline operations are limited to aircraft having 10 to 60 seats and meeting the approach speed and wing span categories for McClellan-Palomar Airport in accordance with FAA regulations. Commuter airline aircraft shall meet the FAA State III noise criteria.
3. The Airport will operate with one runway that simultaneously accommodates a 4,700 foot landing distance and a 5,000 foot take off distance; the 300 foot difference, a displaced threshold on the runway's east end, will increase safety of the airport while reducing noise levels.
4. The County will take a proactive role working with local agencies and the FAA to protect the airspace around the airport from encroachment and to promote compatible off airport land development, and to insure the future safety and compatibility of the existing runway length.
5. The County will operate the airport in accordance with any adopted FAA Part 150 Noise Compatibility Program and in full compliance with any State or Federal mandated noise standards relating to the operation of a public airport. The program will recognized the Noise Element of the City of Carlsbad's General Plan and implement mitigation measures to minimize noise impacts.
6. The County will monitor aircraft noise and verify the Community Noise Equivalent Level (CNEL) noise contours within the airport influence area as described in the Palomar Airport Comprehensive Land Use Plan as well as monitor pilot compliance with any adopted FAA Part 150 Noise Abatement Program. The County will continue to monitor air traffic around the airport with a noise monitoring and flight tracking system and implement procedures to mitigate single event noise complaints.
7. The Airport Manager will produce distribute and promote a detailed noise abatement program for the airport. The program will contain specific flight information and a chart identifying noise sensitive areas. The noise abatement Program will be updated annually and distributed to pilots. The Airport Manager will request pilot compliance with the program.

8. This policy recognizes SANDAG's Airport Land Use Plan.

#### HISTORY OF MCCLELLAN-PALOMAR AIRPORT

Most of the land on which the County's airport facilities are located were dedicated by the federal government as a means of maintaining a general aviation network throughout the nation. Originally the Airport was referred to simply as Palomar Airport, however, in 1982 the airport was rededicated to McClellan-Palomar Airport in honor of Gerald McClellan, an aviator and North San Diego County leader who was instrumental in developing the airport.

- In 1958, the County purchased approximately 238 acres for \$144,000 to site Palomar Airport in the City of Carlsbad. The Palomar Airport site was acquired as a replacement for the Del Mar Airport, which was also owned and operated by the County of San Diego.
- In 1958, the Federal Aviation Administration (FAA) provided a grant for additional land and improvements for Palomar Airport.
- In 1959, Palomar Airport opened for business after construction was completed on a 3,700 foot long, 100 foot wide runway.
- During the 1960's, a terminal building was constructed, the runway was extended to 4,700 foot in length and widened to 150 feet, and runway lighting was installed.
- The air traffic control tower was installed by the FAA in 1973.
- In 1974, when the County acquired an additional 225 acres for \$1.5 million, Palomar Airport was expanded again.
- In 1976 an Airport Master Plan was approved by the County Board of Supervisors.
- An Instrument Landing System (ILS) and approach lighting system were installed in 1977.
- During the early 1990's high intensity approach lights and airport perimeter fencing was installed.
- In 1996/97 improvements were completed to comply with FAR Part 139 certification. The certification took effect December 1, 1998.
- In 1997 the County Board of Supervisors approved a new Master Plan for McClellan-Palomar Airport.
- In 1999 a new, interim terminal facility was added.

In total, it is estimated that the FAA, through numerous grants, has participated in more than 50% of the acquisition and development costs of McClellan-Palomar Airport.

### AIRPORT FACILITIES

McClellan-Palomar Airport is a single runway facility serviced by an air traffic control tower operated by the FAA. It is classified as a general utility facility, an airport mainly serving aircraft with a maximum gross takeoff weight of 12,000 pounds or less, although some larger aircraft do operate at the airport. The airport occupies approximately 255 acres of land, with an additional 211 acres of County owned airport separated from the airport by Palomar Airport Road and El Camino Real. McClellan-Palomar Airport is the only airport with an Instrument Landing System (ILS) between Lindbergh Field and Santa Ana that can accommodate the business aircraft over 12,500 pounds. The Airport is open 24 hours a day, however, most take-off and landings occur between 7 a.m. and 11 p.m., with a voluntary curfew of 10 p.m. to 7 a.m.

Currently Palomar Airport is served by two regional airlines, United Express and America West Express. United Express makes 11 round-trip flights per day to and from Los Angeles International Airport. America West operates 4 round-trip flights per day to and from Sky Harbor Airport in Phoenix, Arizona.

Air traffic statistics at McClellan-Palomar Airport are recorded by on-site county airport management staff. Information on aircraft operations is provided by the FAA control tower staff. County staff also collects and records data concerning commercial passenger activity at the airport.

### AIRPORT OPERATIONS

In 1998 Palomar Airport handled over 60,000 enplanements and 132,000 total passengers. The airport also serves a variety of corporate aircraft, general aviation fliers, and offers sightseeing excursions on vintage aircraft. McClellan-Palomar recently became a Federal Aviation Regulation Part 139 Certificated Airport, expanding safety and security features, thereby enabling larger commercial aircraft to service the facility. Enplanements at Palomar are projected to grow to more than 287,000 within the next 20 years, with passenger throughput forecast to exceed 630,000.

There are six (6) fixed base operators providing aircraft parking, aircraft storage hangars, aviation fuel, major aircraft and engine repair, automobile rental and flight instruction. In 1998 there were 490 aircraft based at the airport, most of which involved single engine aircraft. Revenue from Palomar Airport are derived primarily from aviation and commercial leases, and represent approximately 34% of the total airport system revenue.

### III. MCCLELLAN-PALOMAR AIRPORT - LAND USE

#### CARLSBAD GENERAL PLAN

There are eight elements of the Carlsbad General Plan, with four of them applicable to McClellan-Palomar Airport. These include the Land Use Element, Circulation Element, Noise Element and Public Safety Element. However, the General Plan elements that are most comprehensive with respect to McClellan-Palomar are the Land Use and Noise Elements. The General Plan also designates McClellan-Palomar Airport as a Governmental Facility.

The General Plan requires coordination with the San Diego Association of Governments and the Federal Aviation Administration to protect public health, safety and welfare by ensuring the orderly operation of the Airport and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around the airport.

#### Land Use Element

Land for development of McClellan-Palomar Airport was purchased in 1958, with construction of the airport complete in March of 1959. The airport was built atop the mesa just south of the Agua Hedionda valley and lagoon. Oriented to take advantage of the on-shore winds, the runway lies on an east-west axis. The associated glide path, crash hazard, and noise impact areas around the airport significantly influence the type and intensity of development across the entire central area of the City of Carlsbad. This area of influence extends generally in a broad band east and west of the runway, and to a lesser degree, north and south of the airport. To limit noise impacts on noise sensitive land and for reasons of general health and safety, the City has designated areas surrounding the Airport for predominately planned industrial and commercial uses. To accomplish this, a significant amount of non-residential land has been designated on the General Plan. Residential development and most institutional land uses, such as hospitals and schools, are precluded from this area of airport influence.

#### Noise Element

California's Planning and Zoning Laws require a Noise Element which identifies and appraises noise problems in the community. The Law specifically requires that noise levels of commercial, general aviation, heliport, helistop, and military airport operations, aircraft overflights, jet engine test stands, and all other ground facilities and maintenance functions related to airport operations be analyzed and quantified, to the extent practicable by the legislative body.

In California, the technique used for quantifying aircraft noise is the community noise equivalent level (CNEL). The CNEL is a descriptor of daily noise environment. It accounts for the magnitude, the time of day, and the frequency of occurrence of noise intrusions. The CNEL is calculated from the hourly noise by a formula prescribe in the

California Noise Standards. The outside boundaries of the areas generally subject to such noise are usually portrayed by lines overlaid on a map of the area around the airport. These boundary lines are referred to as "noise contours". The noise contours are the basis for delineating the airport's Area of Influence and for establishing a pattern of land uses in the General Plan Land Use Element. Projected noise contours are provided in the Comprehensive Land Use Plan for Palomar Airport.

#### COMPREHENSIVE LAND USE PLAN (CLUP)

In 1970, the State of California enacted a law requiring the formation of an Airport Land Use Commission (ALUC) in each county containing a public airport. The law required that a comprehensive land use plan be formulated that would provide for the orderly growth of each public airport as well as the areas that surround an airport. This was done as a means to insure the safety and the general welfare of the inhabitants within the vicinity of the airport and the public in general.

The San Diego County Board of Supervisors, by unanimous vote on December 15, 1970, recommended that the San Diego Association of Governments (SANDAG) be designated to assume the responsibility of the county's Airport Land Use Commission (ALUC) and be charged with development and adoption of a Comprehensive Land Use Plan (CLUP) for each public airport. The purpose of the CLUP is to identify areas likely to be impacted by noise and flight activity created by aircraft operations at the airports. Its primary use is to provide information about specific impacted property in terms of land use or construction implications, and mitigation measures necessary to permit development that is compatible with airport operation. The most recent CLUP for McClellan-Palomar Airport was adopted in April 1994. As a long range master plan the CLUP reflects the anticipated growth of the airport over the next 20 years. So that the information contained in the CLUP remains current, it is updated every five years.

State law requires that the City's General Plan comply with the Airports Comprehensive Land Use Plan. If the City chooses to overrule a finding of the Airport Land Use Commission, it must do so by a two-thirds vote of the City Council, it makes a specific finding that the General Plan and the CLUP are consistent. The City's General Plan, adopted in 1994 is consistent with the CLUP.

#### AIRPORT INFLUENCE AREA

The Airport Land Use Commission establishes an Airport Influence Area for each airport in the region. The Influence Area encompasses those areas adjacent to airports that could be impacted by noise levels exceeding the California State Noise Standards or where height restrictions would be needed to prevent obstructions to navigable airspace as outlined in the Federal Aviation Administration regulations. It represents the boundary of the Commission's planning and review authority. The Commission procedure ensures a regional overview to protect the airport's operations and to prevent the creation of new noise and safety problems. The cities of Carlsbad, Encinitas, Vista, San Marcos, and

Oceanside, through their community planning processes and zoning ordinances, retain land use control within the Airport Influence Area.

The City of Carlsbad has established an overlay zone for the ALUC designated Area of Influence. The procedure requires that all parcels of land located in the Airport Influence obtain either a site development plan, planned industrial permit, or other discretionary permit and comply with the noise standards of the CLUP and Federal Aviation Administration building height and lighting obstruction requirements.

#### RUNWAY PROTECTION ZONE

The Runway Protection Zone for McClellan-Palomar Airport are the land areas adjacent to the ends of the runway's primary surface, over which aircraft using the airport must pass for each operation, either arrival or departure. The only land uses compatible with the Runway Protection Zone are: natural recreation areas or habitat and species preservation areas; public rights-of-way, agriculture, or storage facilities. In addition, areas immediately adjacent to the airport in every direction are zoned with a height limit of 35 feet (average), to ensure that new construction will not penetrate either the approach surfaces at the runway ends or the transitional surfaces along the length of the runway.

#### FLIGHT ACTIVITY ZONE

Areas designated as within the Flight Activity Zone are sites where most problems may be expected to occur. Flight activity hazard areas are those areas most likely to experience a crash and generally lie beneath the flight pattern, especially in the final approach to the runway. The Flight Activity Zone overlays private properties. It identifies areas which should be held free of intensive development, including high rise development and all uses that involve the assembly of large groups of people (more than 100).

#### MC-CLELLAN PALOMAR AIRPORT MASTER PLAN

The County Board of Supervisors approved a Master Plan for McClellan-Palomar Airport in 1976 that had a planning horizon of twenty (20) years (1975-1995). The purpose of the Airport Master Plan is to identify the Airport's potential needs and future development during a twenty year period. In 1996, the County began an update of the 1976 Master Plan and provided the Carlsbad City Council with an overview of the major components. In September 1997 the County Board of Supervisors approved the new Airport Master Plan. As with the first Master Plan, it also has a 20 year planning horizon (1995-2015).

The Plan is divided into five year increments. Certain facilities are required to be in place as certain important thresholds are reached. A key factor in determining future facility requirements was to estimate future demand. Forecasts of future aviation activity at the Airport were estimated based on national, regional, and local trends in aviation activity and economic growth as well as projected population growth in the Carlsbad area. This information was then used to estimate numbers of based aircraft, aircraft fleet mix,

passenger enplanements, annual aircraft operations, and peaking characteristics. Since airport improvements are based primarily on demand and not a specific year or timeframe, improvements are programmed as specified levels of activity are reached.

#### CITY OF CARLSBAD CONDITIONAL USE PERMIT

On September 24, 1980, the Carlsbad Planning Commission issued a Conditional Use Permit (CUP 172) for McClellan-Palomar Airport which allowed for certain structures and facilities without additional discretionary review. Provided uses proposed by the County are consistent with the approved Master Plan and the Conditional Use Permit, they are permitted to apply directly for a building permit. In this way the Airport Master Plan is implemented administratively.

In 1998 the County of San Diego began processing a Conditional Use Permit Amendment (CUP 172A) to update their existing conditional use permit to reflect (1) existing conditions; (2) reflect the 1997 Board approved Master Plan, and (3) adjust the configuration of the property covered by CUP 172. On February 4, 1999, the CUP Amendment was withdrawn by the County, because of mitigation concerns for the Palomar Airport Road/El Camino Real intersection failure. To date there has been no resubmittal of the CUP amendment by the County.

#### CARLSBAD MUNICIPAL CODE

On August 5, 1980, an initiative petition dealing with future expansion of Palomar Airport was presented to the Carlsbad City Council by Carlsbad voters. On August 12, 1980, the following ordinance was adopted by the Carlsbad City Council:

“21.53.015 Voter authorization required for airport expansion.

- (a) The City Council shall not approved any zone change, general plan amendment or any other legislative enactment necessary to authorize expansion of any airport in the city nor shall the city commence any action or spend any funds preparatory to or in anticipation of such approvals without having been first authorized to do so by a majority vote of qualified electors of the city voting at an election for such purposes.
- (b) This section was proposed by initiative petition and adopted by the vote of the city council without submission to the voters and it shall not be repealed or amended except by a vote of the people.”

Based on this section of the Carlsbad Municipal Code, any proposal for construction of structures or facilities which are not listed in the approved Conditional Use Permit, would require an amendment.

#### **IV. ECONOMIC BENEFIT OF MCCLELLAN-PALOMAR AIRPORT**

##### **ECONOMIC STUDY**

The overwhelming majority of studies that examine the impact of airports on local or regional economic development conclude that they exert a positive effect. However, it is not altogether clear whether airports lead or follow economic growth. Air transportation appears to be a prerequisite, but not necessarily a sufficient condition for certain industries in their site selection deliberations. Also airport facilities alone are not the only element involved in regional and local development. What is clear is that air travel has grown significantly since deregulation in 1978, resulting in thousands more travelers passing through airports across the country. It is also clear that a number of businesses and industries value access to an airport.

In a study conducted by Carnegie Mellon University in 1989-90, researchers verified that one of the most significant airport attributes affecting a regional economy is the number of destinations available and the frequency of flights to those destinations. Combine the expanding market with the need to reach those markets, and consistently the response from public leaders has been clear, pro-growth airport policies. Cities across the nation have begun to improve and expand their airports while others are constructing new ones from the ground up. However, as air traffic in an area increases, and airports are expanded to handle the flow and or boost the local economy, noise and vibrations from aircraft create a problem for people living nearby. It is not uncommon for airport development to be curtailed due to citizen opposition. In fact, economic impact studies are often commissioned to convince nay-sayers of the advantages of airport development;

In 1994, the County of San Diego commissioned an Economic Benefit Study for McClellan-Palomar Airport. The study was conducted by Coffman Associates and Arizona State University College of Business and followed procedures in its methodology that were recommended by the Federal Aviation Administration (FAA) and the California Department of Transportation (CalTrans). Since 1994, no new or updated studies have been conducted and the estimates made at that time of future growth of the airport are understated compared with actual data we have today. This section of the airport analysis will not make an independent assessment of the economic benefits, rather it will highlight the findings and predictions of the 1994 study.

According to the Study:

“Airports benefit the regional economy through the employment, payroll, and spending associated with aviation activity both on and off the airport. Airports are sources of measurable economic benefits impacting jobs, income and regional spending levels.



Suppliers of aviation services, such as airlines, private businesses serving general aviation, other airport tenants, and various government agencies, all create jobs and value added for the local economy.

Air travelers create economic benefits that extend throughout the region. Visitors who arrive by air generally have greater expenditures for lodging, retail, entertainment, and food as compared to visitors using other modes of travel.

However, it is important for citizens and policy makers to be aware that airports create significant unmeasured social and economic benefits for the regions which they serve. For example, convenient air transportation allows freedom for individuals to travel to satisfy their preferences for goods, services, and personal needs. Airports make the regional economy more competitive by providing businesses ready access to markets, materials and international commerce.

Airports also bring essential services to a community, including enhanced medical care (such as air ambulance service), support for law enforcement and fire control, and courier delivery of mail and freight. These services raise the quality of life for residents and maintain a competitive environment for economic development.”

“An efficient airport can provide a competitive edge for communities seeking corporate relocations and expansions. Two out of every three Fortune 500 companies use private aircraft for their business to transport goods, material, and personnel.”

Data collected during the study was input into special economic impact models developed by the FAA and CalTrans in order to determine McClellan-Palomar Airports contribution to the local, regional and state economy. Benefits were categorized as either Direct or Induced (multiplier effect of direct benefits) and then combined to represent a Total Benefit (Exhibit 1).

#### DIRECT BENEFITS

These are benefits that result from (1) on-airport economic activity of airlines, fixed base operators, all other airport tenants, and government agencies including the airport authority, as well as (2) off-airport activity that includes spending by air travelers for lodging, restaurants, entertainment, ground transportation and retail goods and services. These measures represent the amount of “first round spending, value added (new output), payroll, and jobs in the McClellan-Palomar service area that were the result of the presence of the airport during the study period. This is the direct economic activity that would not have occurred without the airport, the aviation services provide there, and spending by users of these services.

### INDUCED BENEFITS

These are the multiplier effects of the Direct Benefits and represent additional spending that is generated as a result of the on and off airport activities. It in effect becomes a "second round" of spending that occurs as a result of the airport. Dollars spent by suppliers or users of aviation services create or induce additional output, jobs and payroll, as they circulate within the economy, creating a multiplier effect. Induced impacts occur when an on-airport service provider purchases supplies or services locally, pays wages to its workers, or undertakes capital expenditures. All of these outlays create local jobs, additional output and income as the dollars circulate in the economy.

In addition to direct and induced Benefits, the study looked at gross revenues, value added, payroll and employment as a way of measuring the economic benefits.

### GROSS REVENUE

Total sales of business firms and budgets of government agencies, or the total flow of dollars from aviation-related activity. These are not subject to multiplier effects, since only the value added component stays within the local economy.

### VALUE ADDED

This is a measure of new output created within the region. Value added results when input materials are processed by labor, under the direction of management, to produce a product for resale or service.

### PAYROLL

This is a component of value added, representing the payment for labor used to create new output from aviation related activity.

### EMPLOYMENT

This is the number of jobs required to create the gross revenues and value added.

According to the 1994 study, in 1993-94 McClellan-Palomar Airport provided the following benefits to the regional/local economy:

### TOTAL ECONOMIC BENEFITS OF MCCLELLAN -PALOMAR

- 1,270 Jobs
- \$33 Million Total Payroll
- \$88 Million Value Added
- \$108 Million Gross Revenues

These Total Economic Benefits can be broken into the following categories:

Total Benefits from Air Operations: Includes airlines, air cargo, auto rental, FBO services, food services, flight instruction, charter services, medical transport, aerial photography, aircraft maintenance, aircraft sales and rentals, government agencies, airport administration, and capital projects.

- 290 Jobs
- \$7.4 Million Total Payroll
- \$27.4 Million Value Added
- \$32.9 Million Gross Revenues

Total Benefits from Air Visitors: Includes lodging, food and drink, retail goods and services, entertainment and transportation.

- 320 Jobs
- \$6.6 Million Total Payroll
- \$12.7 Million Value Added
- \$17 Million Gross Revenues

Total Benefits from Travel Agents:

- 13 Jobs
- \$296,000 Payroll
- \$740,000 Value Added
- \$11 Million Gross Revenues

## SUMMARY

The County commissioned study anticipated the future economic impact of McClellan-Palomar Airport and made a number of projections for both 2000 and 2005 utilizing a projected number of passenger enplanements of 33,000 and 45,000 respectively. Unfortunately these figures understate the actual number of enplanements that occurred even as early as 1998 (over 60,000 enplanements and 132,000 passengers) and therefore significantly under estimate McClellan-Palomar's future and current economic impact. However, utilizing the projection of 45,000 enplanements for the year 2005, the direct economic benefits from the airport were expected to be \$114.5 Million in business revenues, 1,472 Jobs, \$33.9 million in payroll, and \$71.1 million in value added. Indirect benefits were expected to be an additional 1,531 jobs, \$46 million in payroll and \$113.6 million in value added. Although the estimate of operations are lower than the actual data they do indicate a significant economic contribution to the City of Carlsbad, North San Diego County and the region.

It is safe to assume that continued growth in the number of enplanements and passengers will result in greater economic growth and benefit to the City and the region in the future. However, the extent of economic benefit will likely be contingent upon the County's

ability to continue to upgrade airport facilities and provide other on and offsite improvements in support of this growth.

## V. AIRPORT FINANCING

### NATIONAL OVERVIEW

Airports are required by federal statute to operate as self-sufficiently as possible (49 U.S.C. Section 47107(a)(13)(A)). This is a condition of federal grants, airports' traditional source of capital, and an increasingly important obligation. Intense competition in the airline industry has resulted in greater pressure on airports to contain costs, the federal government has reduced the amount of grant funding available, and the ability of existing sources of capital to meet airport infrastructure needs is uncertain.

### Airport Improvement Program (AIP)

The Federal Aviation Administration administers the federal airport grant program, the Airport Improvement Program (AIP). AIP grants help finance projects that enhance airports' capacity, safety, security, and noise mitigation. Generally, most types of airfield improvements, such as runways, lighting, navigational aids, and land acquisition, are eligible, while hangars and interest expense on airport debt are not. AIP-eligible projects for airport areas serving travelers and the general public - called "land-side development" - include entrance roadways, pedestrian walkways and movers, and space within terminal buildings that does not produce revenue and is used by the public, such as waiting areas. AIP-ineligible land-side development projects include revenue-producing terminal areas, such as ticket counters and concessions, and the interest on construction bonds.

The AIP plays a significant role in funding airports, especially smaller airports (commercial-service airports with fewer than 1.5 million passenger boardings a year). In a 1999 report by the U.S. General Accounting Office (GAO), using data from 1996, the most recent year for which the GAO conducted an analysis, the nation's 3,233 smaller national system airports obtained \$1.5 billion in funding, about 22 percent of the total that year. These airports relied on AIP grants for half of their funding, followed by tax-exempt airport and special facility bonds, and state grants. Passenger facility charges (PFC), a fee imposed on each passenger per trip segment and which is to be used on airport related capital projects, accounted for only 7 percent of smaller airports' funding mix. Conversely, larger airports received more than \$5.5 billion in funding, relying on airport bonds for 62 percent of their total funding, followed by PFC collections. AIP grants accounted for only 10 percent of larger airports' funding.

Whether existing sources of capital will be adequate to meet future development needs is uncertain. In GAO reports on airport development needs published in 1999, the Office looked at studies which indicate substantial future investment in airport infrastructure is needed. The reports use airport funding in 1996 and conclude that as much as \$1.4 billion, or ½ of smaller airports' planned development that is eligible for grants may not be funded on an annual basis (a lack of funding for only about 1/5 of larger airports' planned development was projected). Small airports planned to spend nearly \$3 billion per year for capital development during 1997 through 2001, or \$1.4 billion per year more

than they were able to fund in 1996. Smaller airports' planned development consists of projects eligible for Airport Improvement Program grants, such as air-side items which include runways, taxiways and noise abatement, and projects not eligible for grants, such as roads, parking lots, hangars and terminal retail space.

Despite smaller airports' heavy reliance on federal funding and GAO reports identifying critical capital improvement needs, the trend for the AIP is reduced funding that "will represent a shrinking percentage of airport funding", according to the GAO. At its peak in fiscal year 1992, AIP spending was \$1.9 billion, almost 25% of that year's national airport capital costs. Spending dropped below \$1.5 billion in 1995, and did not increase until 1998 when it totaled only \$1.62 billion. Fiscal year 1999 AIP funding was \$1.95 billion, but the AIP was authorized for only 6 months, through Mar, 31, 1999, and the FAA was allowed to commit to airports only half the amount funded, or \$975 million, until the AIP was further extended. The inability of Congress to resolve FAA reauthorization issues resulted in two more short term extensions and FAA funding gridlock. The year ended with the FAA operating two months without authorization and Congress continuing to debate legislation to reauthorize the FAA's programs. Funding for fiscal year 2000 is \$1.85 billion, but as of February 17, 2000, the program remained suspended without authorization.

#### McClellan-Palomar/Capital Improvements/County Airports

The County's airport system depends on financial assistance from the FAA to meet the majority of its capital needs but it operates within the revenues that it generates. According to "A Study of County Airports" conducted by the County in 1999, the system is funded through the Airport Enterprise Fund (AEF), it does not receive any funding from the County's General Fund, and it has an operating budget of approximately \$4 million, a capital budget close to \$9 million, and operating revenue in the amount of \$4.26 million. The report also shows that the cost of operating the entire airport system is \$3.85 million, and only 2 of the system's 8 airports operate with a surplus of revenue over expenses: (1) Gillespie Field, with industrial leases contributing approximately 45% of total operating revenues for the County airport system; and (2) Palomar, generating 34% of the total operating revenue of \$4.26 million, or 37% of the cost of operating the entire airport system with revenue primarily from aviation leases and commercial leases. The 7/1/98 thru 1/8/99 AEF revenue and expenses statement provided by the County is shown in Exhibit 2.

A few years ago, County Airports had a reserve of around \$6 million. Since that time, according to the Study, the agency has embarked on a very aggressive capital program and the great majority of this "reserve" was allocated to specific projects. The end result is that the reserve fund is close to being depleted. The balance at the end of Fiscal Year 1998-99 was projected at \$1.44 million.

The largest of the expenditures that has led to the reserve depletion was a loan of approximately \$6 million to the County's Redevelopment Agency to help fund the establishment of an industrial park next to Gillespie Field Airport, located in a

Redevelopment Agency Project Area. It is a contiguous area of approximately 746 acres, of which 342 acres are devoted to airport related activities. There are more large parcels within this area to be developed. As a result, to continue the development of property for non-aviation uses, additional loans from the AEF are projected through fiscal year 2012-13 and the issuance of nearly \$16 million of debt by the Redevelopment Agency is planned before the end of 2006.

The County's efforts to increase non-aviation revenue are consistent with federal statutes that (1) require the airport system to operate with an overall goal to be "as self sustaining as possible" (49 U.S.C. Section 47107(a)(13)(A)); and (2) encourage airports to become totally self-supporting by enhancing their commercial or groundside revenues. Under 49 U.S.C. Section 47107(b), airports are mandated to limit total aeronautical revenues to total aeronautical costs-thus prohibiting any operating income from aeronautical sources. Moreover, without the development of non-aviation sources of revenue the County airport system could not sustain itself. According to the Study, the County's aviation lease revenues do not support the cost of services provided to the airport users. The addition of non-aviation and industrial park revenue provides needed capital for both the operations and capital development of the airport system. Land placed in the non-aviation arena brings five times the return of land that is restricted to aviation uses. Finally, the non-aviation property is critical to airport funding as it provides for a more diverse source of revenue than the land restricted to aviation uses only.

While there are ample opportunities for expansion of non-aviation revenue sources at Gillespie, such opportunities at Palomar are limited. The airport is land locked and has very little opportunity for expansion beyond the existing property boundaries. According to Bob Durant, Airports/Transit Public Works Manager, there is a significant need, however, for the expansion of commercial aviation uses at the airport. Mr. Durant reports that the Fixed Base Operators (FBOs) are now moving toward more corporate clients because they purchase more fuel than do general aviation aircraft operators, and the FBOs may be able to increase rents with these clients. In addition, according to Airport Manager Floyd Best, more commuter airlines are interested in Palomar. Expansion for these uses, however, requires a new terminal and additional parking. According to the County's 1999 Airports Annual Business Plan, with a financial plan spanning 20 years, *...aviation revenue at McClellan-Palomar airport should increase substantially with the construction of the new terminal building and parking facility to service the growing commercial passenger market. This will propel the aviation revenue system-wide to a level of near self-supportability. This will likely occur between years five and ten based on our current enplanement forecasts.* At this time, however, there is little progress toward realizing this projection. Both a new terminal and additional parking have not been moved out of the early stages of planning.

A parking study to address long term needs and the design of a new terminal were projected for this current and next fiscal year respectively. However, according to Mr. Durant, the earliest the parking study could begin is fiscal year 2000-01 and it is uncertain if the terminal design can be realized that year.

Over the past year or longer, the County has been discussing the development of the terminal and parking with Palomar Airport Centre (PAC), the management firm for the "Burrows Leasehold", an FBO with the first right of refusal for the development of their 12 acre parcel. According to Mr. Durant, a study on the development of a terminal, just south and west of the existing terminal, and parking on this property will be done by the end of March, 2000. On the basis of that study, he believes that the parties should be able to determine if they can pursue the project. While working with PAC, the long term parking needs study has been put on hold. In any case, development of a new terminal cannot proceed without first resolving the issue of parking.

Last year, Mr. Durant reported to the Palomar Airport Advisory Committee that the cost of a new terminal is estimated at \$4.5 million to \$5 million, which cannot be justified unless there is adequate parking. However, additional parking cannot be constructed without an approved amended conditional use permit (CUP). The County has not obtained this permit for 2 reasons.

- (1) A CUP amendment application (CUP 172A) was submitted on May 12, 1998. It was withdrawn on February 4, 1999, as a result of traffic mitigation requirements. According to Mr. Durant, the County's contribution to the Palomar Airport Road improvement project should satisfy the requirement for County participation in traffic mitigation on this roadway. In a March 22, 2000 interview of Mr. Durant, he added that the improvements to the airport are even more important to the City than the County, and some time ago, he sent the City a letter requesting relief from the requirement but has not yet had a response. He acknowledged that this may be because the CUP amendment application has not been re-submitted. According to both the Planning and Engineering Departments, the letter has not been received, and to date, the application has not been re-submitted.
- (2) According to Mr. Best, there has not been adequate staff time to complete and re-submit the application.

Until the CUP amendment can begin to be processed, long term parking and a new terminal cannot be addressed, and opportunities for expansion of revenue and revenue sources will continue to be limited.

In the Business Plan the AEF reserve is projected to decline to about \$500,000 in fiscal year 2000-01, and then grow again to approximately \$1 million in 2004-05, nearly \$17 million in 2009-10, and approximately \$80 million in 2018-19. However, capital projects between 1999-00 and 2004-05 total more than \$58 million with the AEF share targeted at just over \$11 million. As Mr. Durant wrote in the Fall '99 issue of PLANENEWS, the County Airports' newsletter, "while the 20-year financial plan for County Airports provides a picture of prosperity, the immediate future has demands for improvements that exceed available resources." In addition, as the Business Plan emphasizes, the growing level of the reserve over the twenty-year period should be viewed with caution because



(1) years 6-20 of the Plan are very scant in terms of capital development; (2) it is based on current economic conditions - if the economy deteriorates, the lease revenue streams and the tax increment revenue that is generated by the Gillespie Field Redevelopment Project will be affected and the reserve level will decline; and (3) the Plan assumes a very high level (60%) of FAA assistance for capital development.

Another reason to view the projected growth in the AEF reserve with caution is the financial liability County Airports has picked up since the Business Plan was completed. At the end of 1999, improvements needed at Palomar as a result of airport property deterioration associated with the underlying landfill were identified. While the County Inactive Waste Site Management Group, a division of the County Department of Public Works (DPW), has a trust fund of approximately \$100 million that funds the maintenance of the County's eighteen (18) inactive landfills, part of the responsibility for the current condition of the property has been allocated to the Airports Division of DPW. As a result, some of the estimated \$4 million cost of improvements taking place this year will be "billed" to Airports. According to John Rollin, Public Works Manager in the Inactive Waste Site Management division, in an interview in late 1999, the amount to be funded by Airports has yet to be worked out. In the interest of time, his division agreed to pay the full amount now and work out later the amount to be reimbursed by Airports. Finally, it is unknown if there will be any future financial liability for the landfill allocated to the Airports Division. According to Mr. Rollin, the re-grading and re-paving work in progress is only a "temporary fix."

## VI. MCCLELLAN-PALOMAR/COUNTY AIRPORTS SALE OR LEASE

### NATIONAL OVERVIEW

Various legal obstacles have deterred attempts to sell or lease commercial airports in the U.S. According to the November 7, 1996 GAO report "Airport Privatization: Issues Related to the Sale or Lease of U.S. Commercial Airports", the primary obstacle stems from the legal assurances airports agree to meet as a condition to obtaining federal grants. The FAA maintains that airports must continue to adhere to these assurances as part of any transfer of control, and these legal obligations cannot be unilaterally extinguished by repaying the grants (in testimony by the GAO earlier that same year, it was noted that the FAA has not sought any reimbursement when airport ownership has been transferred between public entities). Particularly problematic is the assurance regarding the use of airport revenue. Current law generally requires that revenue generated by public airports must be used exclusively to pay for their capital and operating costs and cannot be diverted for non-airport purposes. Because the FAA contends that airport revenue includes any sale or lease proceeds, local and state governments are entitled to recover only their un-reimbursed capital and operating costs from these proceeds. As a result, the GAO concludes, the financial incentive to sell or lease is diminished.

### McClellan-Palomar/County Airports

In 1999, the County evaluated the feasibility and advisability of the sale or lease of one or more of its airports. The County's study included the results of a survey of twelve airport agencies, a general assessment of the state of the County's airports (County Airports), and a review of the federal regulations related to the sale of a County airport.

Report findings include:

- While the great majority of agencies develop and manage their own hangars, County Airports is one of the few agencies that solely rely on the private sector to develop hangar facilities, thus minimizing the County's risk in economic downturns;
- Although four of the twelve agencies surveyed depend on the receipt of general government funds, County Airports does not rely on the County's General Fund;
- County Airports has one of the lowest fee structures and still is able to remain self-sufficient;
- County Airports' staffing is very lean (staff of 25 to support 8 airports);
- Tie-down fees could be increased;
- Efficiency of lease administration needs to be examined; and

- Stakeholders have a high level of customer satisfaction.

Major conclusions of the study include:

1. Three "critical success factors" for County Airports are: (a) self-sufficiency; (b) aggressive property development; and (c) partnership with the private sector to help develop its airports.
2. The sale of any County airport would require FAA approval of those airports that occupy land that was dedicated by the federal government, and reimbursement to the FAA of funds that were awarded through grants for the improvement of the subject airports. Specifically, the approximately \$6.1 million of FAA funds that were used to purchase and develop McClellan-Palomar Airport would have to be returned to the FAA, assuming that the FAA approved of the sale.
3. Any sale of airport property would require that the County address its past use of redevelopment bonds. The County issued redevelopment bonds in 1995 to finance the development of an industrial park adjacent to Gillespie Field. The Master Pledge Agreement for this bond issue requires the County to provide a solvent airport system to ensure the security of the bonds. Because of this requirement, the Agreement prohibits the sale of airport property except in narrowly defined circumstances.
4. About \$230,000 of County Airports' overhead is charged to Palomar on an annual basis. While the elimination of Palomar from the County system would decrease some overhead expense, the majority of this expense would need to be carried by the remaining airports.
5. Any sale of Palomar would require consideration of the issue of the inactive landfills upon which it is built. The sale would remove revenues but leave the County with ongoing liabilities for the landfills.
6. Because the County's airport system is self supporting and not a burden to the General Fund, coupled with the revenue diversion restriction and grant repayment requirement, there is no compelling reason for the County to sell at this time.

The report was given to the Board of Supervisors for their review with recommendations to (1) continue with the current management system; (2) continue to explore legal restrictions to long term leases or sale and assess the strength of the market as it becomes mature; and (3) implement a process improvement plan to expedite the lease adjustment when there is an escalation clause to ensure that the County receives market value on all leases.

## **VII. MCCLELLAN PALOMAR AIRPORT** **ENVIRONMENTAL ISSUES**

Airports create smog, contaminate waterways and generate a significant amount of noise pollution. The environmental impacts of airports that will be discussed include noise, and ground water contamination and hazardous gas specific to the landfills beneath Palomar Airport.

### **NOISE**

#### **NATIONAL OVERVIEW**

Communities throughout the U.S. are struggling to address the impact of aircraft noise on residents. This nationwide struggle is the result of federal regulations that restrict the control of airport operations for noise control purposes.

The limitations on noise control activities are spelled out in the Airport Noise and Capacity Act of 1990 (ANCA). This legislation resulted in large part due to the efforts of local agencies to restrict airport operations to reduce airport noise impacts on residents, and concerns that these efforts would impede growth in aviation. Findings of Congress cited in the Act include: (1) aviation noise management is crucial to the continued increase in airport capacity; (2) community noise concerns have led to uncoordinated and inconsistent restrictions on aviation which could impede the national air transportation systems; and (3) a noise policy must be implemented at the national level. The main features of the Act are requirements that (1) by the year 2000 all jet aircraft weighing 75,000 pounds or more at civilian airports be Stage-3 aircraft (aircraft that incorporate the latest technology for suppressing jet-engine noise); and (2) impose further constraints on the authority of airport owners to introduce any new noise and access restrictions.

Now, to obtain FAA approval for a restriction, ANCA implementing regulations in Federal Aviation Regulation (FAR) Part 161 require substantial evidence to support compliance with six statutory conditions. To meet these conditions, the airport sponsor must demonstrate that the proposed restriction:

- is reasonable, non-arbitrary, and nondiscriminatory between classes of aircraft;
- does not create an undue burden on interstate or foreign commerce;
- is not inconsistent with maintaining the safe and efficient utilization of the navigable airspace;
- does not conflict with any existing Federal statute or regulation;
- has been afforded adequate opportunity for public comment; and
- does not create an undue burden on the national aviation system.

According to FAA attorney Monroe Balton, compliance with Part 161 is very expensive, time consuming, and requires an extensive noise study. Mr. Balton reports that there

have been only two attempts at this study in the Western Pacific region, and in the ten years since passage of the Act, none have been completed.

#### McClellan-Palomar Airport

*Noise Compatibility Program (Part 150 Program):* In 1992, the County proposed some noise abatement and mitigation measures to the FAA, through the development of a noise compatibility program under Federal Aviation Regulation Part 150. The FAA's FAR Part 150 noise compatibility program focuses on airport noise as it relates to land use planning. It provides for the voluntary development of noise exposure maps and noise compatibility programs by airport operators, and FAA approval procedures. An approved Part 150 noise compatibility program is required for an airport operator to receive FAA grant funds for most noise mitigation projects.

Many of the proposed measures that were approved were administrative, represented a continuation of existing practices, or were already within the authority of the City of Carlsbad and the County of San Diego. These included measures such as updating City and County land use plans to reflect noise exposure areas, ensuring that aircraft noise levels are included in the fair disclosure statement for certain properties (see the "Noise Impact Notification Area" discussed in Exhibits 3a-c), educating pilots about noise sensitive areas, and continuing to have the airport advisory committee serve as a forum for discussion of noise abatement actions.

Only two other measures were approved as proposed: (1) a noise monitoring system, and the FAA specified that "this approval does not extend to the use of monitoring equipment for enforcement purposes by insitu measurement of any pre-set noise thresholds"; and (2) a voluntary stage 2 (a level of technology for suppressing jet-engine noise) jet departure curfew between 10:00 p.m. and 7:00 a.m. through a letter of agreement between the County and stage 2 jet aircraft at the airport.

The remaining measures proposed were either disapproved, approved with the modification that they be voluntary measures only, or the FAA determined that there was "no action required at this time". For some of the measures disapproved or for which no action was taken, the FAA noted that additional analysis was required. According to FAA Environmental Specialist David Kessler, who worked with the County on its program, he is not aware of any additional analysis that was submitted. A complete listing of the measures proposed and the FAA's response to each is shown in Exhibit 4.

*Noise Complaints:* Noise complaints received at the airport center around low flying planes, pilots who fly over residential areas, and planes that fly outside the voluntary curfew hours. The following is a summary of relevant airport operations and noise complaint statistics, some of the constraints to addressing the complaints, and recent actions taken to address the issue.

## **1. Airport Operations:**

- (a) Level: Airport operations - take-offs and landings - were greater in every month of 1999 than any previous year since 1992. Total operations in 1999 were 292,000, up 19% from the total of 245,000 in 1998 (Exhibit 5). Palomar Airport was the busiest airport in the county last year, with more operations than both Lindbergh and Montgomery airports (Exhibit 6).
- (b) Factors in airport operation levels and aircraft type: General aviation (GA) makes up 78% of the aircraft using the airport; corporate jets make up 18% and commercial flights make up 4%. According to Airport Manager Floyd Best, the predominant factors responsible for the increase in operations are the mild weather and healthy economy, which encourage general aviation flights (Exhibit 7). Mr. Best reports that most GA pilots can't fly in inclement weather because they are not instrument rated, and the strong economy has made the high cost of flying more affordable.
- (c) Traffic - Local and Transient: The majority of airport operations are transient. In 1998 about 2/3 of the operations were transient. In 1999, the total was closer to ¾ (Exhibit 8). According to the 1999 National Business Aviation Association Handbook, Palomar is in the top 20 airports based on itinerant general aviation operations (Exhibit 9).

**2. Complaints:** The following data is limited by the fact that technical problems at the airport during 1999 prevented an unknown number of callers from logging their complaints.

- (a) Level: Complaints in 1999 were well above that of 1998, equivalent to the total in 1997, and with the exception of 1994, higher than any other year since 1992. Airport staff has acknowledged that during 1999, as a result of technical problems, not all callers were able to log their complaints. As a result, it can only be concluded that complaint levels in 1999 were most likely the second to the highest if not *the* highest recorded since 1992. (Exhibit 10).
- (b) By community: In 1999, 2/3 of the complaints were from residents of Carlsbad, and of those, nearly half originated from the Poinsettia area, southwest of the airport (Exhibit 11).
- (c) By aircraft type: Noise complaints are predominantly over propeller-driven aircraft. In 1999, the noise complaints by aircraft type were: propeller - 41%; jet - 28%; helicopter - 7%; commercial - 5%; and unknown - 19% (Exhibit 12).
- (d) By time of day: Noise complaints are most often the result of flights between 7:00 a.m. and 5:00 p.m. In 1999, the noise complaints by time of day were: 7:00 a.m.-5:00 p.m.: 75%; 5:00 p.m.-10:00 p.m.: 13%; and 10:00 p.m.-7:00 a.m.: 12% (Exhibit 13).

**3. Constraints to resolving complaints about (a) low-flying aircraft; (b) flight paths over residential areas; and (c) flights outside the voluntary curfew hours:**

- (a) **Flight Altitude** - The airspace is controlled by the FAA. To provide maneuvering room for aircraft to safely descend into and climb out from the airport, the FAA established a cylinder of airspace 7 miles in diameter and 2,800 feet in altitude, centered around the airport runway. This airspace is known as "Class D Airspace". "Class E" areas have been designated as extensions of this airspace to provide controlled airspace for instrument approaches from the north and east (Exhibit 14). These areas coincide closely with the noise impact notification area discussed in Exhibits 3a-c and shown in Exhibit 15.

According to Mr. Best, a pilot needs to get to 1,000 feet as he exits the Class D air space if he is going to transit over a populated area. However, while in this airspace he may be lower than 1,000 feet and he can climb within the performance capabilities of his airplane, or per instructions from the tower, to reach a cruising altitude or the coast. Propeller-driven aircraft cannot climb as quickly as other aircraft, which may account in part for the significant percentage of complaints attributed to these planes.

- (b) **Flight Path:** Flight paths are controlled by the FAA's control tower at the airport. The "preferred path", established by the FAA in consultation with airport management to minimize aircraft noise impacts on the community, is directly west out of the airport and over the intersection of Palomar Airport Road and I-5 to the ocean. This flight pattern is recommended and voluntary to pilots. A pilot is free to take any course he/she wants unless directed otherwise by a tower controller who is charged with keeping aircraft at safe distances.

According to Air Traffic Control Tower Chief Sallyanne Rice, the tower must frequently direct aircraft outside the preferred path for safety reasons. The airport is a single runway facility with jet aircraft mixed in with much slower aircraft, and when patterns are busy, controllers must vector ("fan out") aircraft in other headings to maintain a safe margin between them. According to Ms. Rice, this occurs 200-300 times per day. With an average of 811 operations per day last year, this means that  $\frac{1}{4}$  to more than  $\frac{1}{3}$  of the aircraft fly outside the preferred path every day.

- (c) **Curfew:** Per the FAA, the airport's curfew may be voluntary only. Any attempt to make it mandatory would require the extensive studies required by the Airport Noise and Capacity Act discussed earlier. According to Mr. Best, Airport staff does, however, attempt to contact pilots who fly during curfew hours. Mr. Best reports that when the security guard can, he notes the identification number of an aircraft that "violates" the curfew and staff follows up with a letter to the operator. Mr. Best also reports the following difficulties in reaching the operators and getting "compliance" with the curfew: (1) transient aircraft may be registered to an aviation company in another state with an address that is difficult to locate; (2) registration to a business makes it difficult to locate the individual pilot; and (3) a pilot may have to fly after hours because a client needs to travel during that time.

**(4) Actions in response to complaints:**

- (a) Complaint call and response process - The airport's response to complaints is to identify the plane and its flight path through the noise monitoring system, and educate pilots on proper flight procedures. Both the software and hardware of the noise monitoring system were upgraded at the end of last year.

Since the end of December, the County has contracted with a Noise Reporting Specialist who collects noise complaints left on voice mail, and according to Mr. Best, investigates each one (in 1999, Mr. Durant reported that complaints were addressed on an ad hoc basis and that this was going to change). In addition, the phone system was updated at the end of last year to ensure that all callers could leave a message, and a complaint form was added to the airport website to provide another means to file a complaint.

- (b) Education/Awareness: Actions the County reported taking the past year to reinforce noise abatement efforts include: (1) meetings with FAA tower personnel, airline owners, flight schools and air carrier chief pilots; (2) reinforcing the preferred flight pattern, and noise sensitivity in the County's PLANENEWS publication; and (3) placing the noise abatement procedures on County Airports' website.
- (c) Coordination between FAA, County and City and outreach to public: As a result of escalating noise complaints in 1999, a public workshop on airport noise issues was held by the County, along with the FAA and the City of Carlsbad, on January 20, 2000. About 100 citizens attended the meeting. As a result of the workshop and a meeting between the City, County and FAA held earlier that same day, consensus was reached on 3 actions items: (1) update the Part 150 Noise Compatibility Program; (2) the County will request that the FAA allow the airport to use the noise monitoring equipment for enforcement purposes; and (3) establish periodic roundtable discussions involving all the interested stakeholders to better understand and address the complexities of airport operations and noise control.

Since the workshop and as of February 16, 2000, the following actions have been taken: (1) the County has sent a letter to the FAA requesting permission to use the monitoring system for enforcement purposes; (2) Mr. Durant reported to Council that in March, County staff would like to visit roundtable discussions in the cities of Santa Monica and Torrance, and he would like City staff and interested groups to go as well; (3) on February 8, 2000, the Council expressed support for these actions, City participation in the roundtable discussions, and the County seeking solutions by investigating noise control activities at other airports; and (4) on February 15, 2000, the County Board of Supervisors gave staff approval to apply for a grant to update the existing Part 150 Noise Study. According to the staff report that went to the Board, the study is expected to cost approximately \$250,000 (the FAA's grant program typically funds 90% of the cost) and take a minimum of three years to complete.



## LANDFILL

### STATE OVERVIEW

According to the State Water Resources Control Board (SWRCB), until the early 1980s, little attention was given to regulating or investigating potential ground water pollution sources. Water pollution control efforts focused primarily on controlling the discharge of sewage and industrial wastes into surface waters - rivers, streams, lakes and the ocean. Since then, pollution concerns have shifted to contamination of ground water by toxic chemicals and other substances. This change in focus was prompted by the introduction of thousands of new chemicals into the environment since World War II, and major advances in detection technology which revealed traces of chemicals in wells state and nationwide.

A significant source of ground water contamination is leaking landfills. In a 1995 SWRCB study of active and inactive landfills in California, for which water quality solid waste assessment test reports were submitted, the percentage found to be polluting ground water with municipal solid waste (MSW) leachate ("garbage juice") was between 72% and 86%.

In a 1994 paper by G. Fred Lee, Ph.D., PE, DEE, prepared for the California Environmental Protection Agency, Dr. Lee wrote that chemicals released from landfills to nearby ground water and to the air via leachate and landfill gas contain a wide variety of potential carcinogens and potentially toxic chemicals that represent a threat to public health. According to Dr. Lee, the leachate from MSW landfills is a highly concentrated "chemical soup", so concentrated that small amounts of leachate can pollute large amounts of ground water rendering it unsuitable for use for domestic water supply. Furthermore, he wrote, *both gas and leachate from MSW landfills contain many organic chemicals that have not been characterized with respect to specific chemical content or their associated public health or other hazards. These 'non-conventional pollutants' include more than 95% of the organics in MSW leachate.*

According to SWRCB, monitoring data collected in the late seventies "indicated that fluids leaked from landfills were reaching ground water." In 1984, an increased awareness of the adverse environmental and health effects caused by many common organic compounds prompted the inclusion of organic compounds in water quality analyses from landfills. These analyses indicated that volatile and semi-volatile organic compounds (VOCs) were found in ground water near landfills, and in many cases, at concentrations exceeding regulatory levels. That same year, revisions to the California Code of Regulations, Title 23, Division 3, Chapter 15, governing discharges of waste to land, required landfill operators to prepare a monitoring plan for all active landfills; the decision as to whether to monitor an inactive landfill was at the discretion of the Regional Water Quality Control Board (RWQCB), based on potential threat to water quality. Monitoring wells were to be designed specifically for the purpose of ground water monitoring. After the RWQCB approved the plan, the discharger was to establish monitoring points, start monitoring and submit monitoring reports. In 1986, the first year

of the program, few such monitoring programs had been established. In addition, according to SWRCB, funding for this program was reduced significantly in 1988, cut completely in fiscal year 1991-92, and only limited funds were available in fiscal years 1992-93 through 1994-95 to review a backlog of submitted reports. According to San Diego RWQCB staff, funding has not been appropriated since that time, resulting in little review of these ground water monitoring reports.

#### PALOMAR AIRPORT LANDFILL

Three closed landfill sites, owned and operated by the County between 1962 and 1975, and referred to as Landfill Units 1-3, lie beneath the airport. Situated from west to east, Unit 1, the oldest unit, is approximately 9 acres, Unit 2 is 5 acres, and Unit 3 is 19 acres. The average trash depth for each unit is approximately 20 feet. The top deck of Unit 1 is paved with asphalt concrete and the area is leased for general aviation purposes. Portable hangars and light weight storage buildings have been erected over Unit 1, with adjacent parking facilities for automobiles and fixed-wing aircraft. Similarly, the top deck of Unit 2 has been paved with asphalt concrete, and this area provides maneuvering room for aircraft, aircraft tie downs, and access to permanent hangars outside the Unit. There is no development on Unit 3, located at the eastern end of the runway.

A review of RWQCB and Department of Environmental Health files on the Landfill reveal (1) concerns about landfill gas emissions and the protection of ground water that date back nearly 10 years; and (2) the County Department of Public Works' (DPW) slow and inadequate responses to the requests of the environmental oversight agencies for measures to prevent environmental degradation and protect the public's health.

Environmental hazards documented by the Air Pollution Control District, RWQCB and Department of Environmental Health include: (1) inadequate monitoring and control of methane gas emissions; (2) cracking of asphalt which allows infiltration of water into underlying wastes; (3) "differential settlement" that (a) impacts drainage structures, (b) impacts sideslopes (causing erosion rills which can result in exposed solid wastes), (c) impacts the integrity of structures, and (d) provides a pathway for the release of landfill gases into the atmosphere and structures, and which can compromise the integrity of the landfill gas collection system; and (4) methane emissions through asphalt fractures exceeding the "lower explosive limit". Documentation also includes (1) the Landfill is leaking and needs monitoring to assess the extent of contamination of ground water; (2) there are an insufficient number of monitoring wells to determine ground water flow direction; and (3) correspondence over inadequate responses, insufficient required reports from DPW, and the issuance of numerous notices of violation.

The County's lack of action to resolve these problems resulted in actions by the oversight agencies that include: (1) the issuance of 2 notices of violation by the Regional Water Quality Control Board, one in 1998 and one in 1999; (2) a letter from the Local Enforcement Agency (LEA) reviewing the recent history of numerous violations and requiring immediate corrective actions (the LEA is the County Department of Environmental Health, responsible for the regulation of solid waste disposal sites under

the authority of the Public Resources Code and Title 27 of the California Code of Regulations); and (3) an inspection by the California Interactive Waste Management Board.

These actions and the agencies seem to have a limited impact on DPW. While some remediation work is currently in progress, there is little evidence to suggest that there will be on-going and long term efforts to prevent environmental degradation and comply with waste discharge regulations to protect the environment and the public. A review of the violations documented by RWQCB and the LEA, as well as information about ground water issues documented over several years, recent actions by DPW, and implications for the City's Dry Weather Testing Program and ground water quality in Carlsbad are discussed below.

(1) Regional Water Quality Control Board (RWQCB):

(A) On June 12, 1998, RWQCB issued a notice of violation for failure to perform adequate landfill maintenance, and the percolation of surface drainage through waste. A workplan to mitigate the landfill settlement and improve drainage was required by July 31, 1998. DPW submitted a workplan on July 30, 1998; however, the RWQCB responded to the submittal with concerns about both the vague scope of work and design of remediation and repairs, and the lack of a start date for long-term compliance work.

(B) On April 22, 1999, a second notice of violation was issued in follow-up to the earlier one because the violations regarding landfill maintenance and drainage had not been addressed. The notice also included (1) the fact that gas measurements by the LEA "indicated the lower explosive limit was exceeded for methane" and that this also was a violation; and (2) the agency's concerns about DPW's lack of specific milestones and dates in its long term workplan remained to be addressed and were required by May 20, 1999. On May 19, 1999, DPW submitted a list of 5 general tasks: preliminary engineering report, engineering, environmental approval, advertise/award contracts, and construction with tentative completion dates between November 1999 and December 2000. RWQCB requested a more detailed schedule which was submitted the following November with work projected to occur during the same time frame.

Missing from these notices was any mention of ground water monitoring, even though attached to the April 22, 1999 notice was a April 8, 1999 inspection report documenting inadequate ground water monitoring because of "inadequate number of monitoring wells to determine ground water flow direction for each unit". Furthermore, the need for additional monitoring wells for the determination of ground water flow direction had been documented many times since 1997, the first year DPW submitted a ground water monitoring report under the RWQCB's 1996 updated waste discharge requirements (WDR). In that report the County's consultant noted the following violations: (1) ground water flow rate and direction has not been determined (because existing wells are inadequate to enable this determination); and (2) water quality protection standards have not been developed (because ground water flow directions are not available). The report also noted that the County plans to establish additional wells.

According to RWQCB staff, the violations did not mention the insufficient number of wells because "there are so many things wrong out there" that RWQCB decided to just focus on a few items, and the County has consistently reported that they will put in more monitoring wells. RWQCB staff also reports that for some time the County maintained that it would construct a "subsurface barrier" as a ground water protection measure. This intention was communicated in a letter from DPW to the Department of Health Services back in 1993, as a result of refuse found outside the known boundaries of Unit 2 and discovered while drilling ground water monitoring wells. According to RWQCB staff, the barrier was never constructed.

RWQCB has continued to document the inadequate ground water monitoring at the airport, and information submitted by DPW during the past year, information collected in the City's Dry Weather Testing Program during the past year, and recent actions by DPW highlight the importance of these wells. These three areas are discussed below.

On April 30, 1999, DPW submitted the 1998 annual monitoring report and cover memo which included the following: (1) a number of volatile organic compounds (VOCs) were detected in the wells at all of the units; (2) testing of a "seep" near the southwest corner of Unit 3 revealed "constituents similar to those historically detected in ground water wells downgradient from Units 2 and 3." *The seep occurred in the north face of a trench associated with storm drain and road construction along the north side of Palomar Airport Road. Evidence of seepage was noted along 30 to 50 feet of the trench wall east and west of a storm drain outlet box located approximately 40 feet from the southwest corner of Unit 3.... Standing water was present in the bottom of the storm drain outlet box and, based on the assumption that the seep was the source of that water, a sample was collected for analysis. The results were typical leachate indicators. Several metals also exceeded applicable standards. The VOC constituents detected match those detected in wells MW-1, MW-5 and MW-7, all of which monitor shallow ground water. The laboratory results and the proximity of the seep to the landfill suggest leachate as the source....*; (3) *The County is developing a site characterization and work plan for implementation of an Evaluation Monitoring Program (EMP) at the site.... The investigation is intended to evaluate the source, nature and extent of impacts to ground water and determine ground water flow directions.... As part the of EMP investigation, ... the County plans to install a sufficient number of wells in each aquifer to establish ground water gradients and flow directions. Ground water contour maps will be generated at that time. A preliminary draft site characterization and work plan has been completed and is scheduled for submittal June 11, 1999.*

In a June 22, 1999 letter regarding the 1998 monitoring report, RWQCB commented that the submittal of a ground water contour map is required, it has not been done because there are an insufficient number of monitoring wells for each landfill unit, this is a violation, and if not addressed in the next semi-annual monitoring report, a notice of violation will be issued. In the October 30, 1999 cover memo to the 1999 semi-annual monitoring report, John Rollin, DPW Public Works Manager, just reiterated the County's intentions regarding an EMP, with no report of any progress made on this effort and no

new date for it to be submitted. As of March 22, 2000, the EMP still has not been submitted and no notice of violation has been issued.

During this same time frame, the City's dry weather testing results at the intersections of Camino Vida Roble and Yarrow Drive, and Camino Vida Roble and Palomar Oaks Way, identified storm-water flow with a low pH reading, indicating a high acid content in the runoff. In a July 20, 1999 memo from Associate Engineer Steve Jantz, Mr. Jantz reports that the most recent dry weather testing report concludes that, *based on the results of field investigations, review of current and previous storm-water testing events, and ground water sampling results from the test wells around the airport property, there is a high possibility that the source of the low pH flow observed at outfall EN-23 [the intersection of Camino Vida Roble and Yarrow Drive] is the ground water flow moving from the aquifer underneath Palomar Airport Landfill Unit 2. Due to the distance between EN 14-A [the intersection of Camino Vida Roble and Palomar Oaks Way] and the airport property, there is no clear connection between the landfill and the discharge point. However, the constituents in the runoff at EN 14-A are very similar in concentration and make-up.* Mr. Jantz met with County staff to share these results and reports that they were not receptive to the possibility of a connection between the results and the landfill.

While the findings in the City's Dry Weather Testing Program are disconcerting, they also place the City in a difficult position. Under this program, mandated by RWQCB Order 90-42, the City is responsible for the control of the discharge of waste in our storm drain system. However, without an adequate number of monitoring wells at the airport to determine ground water flow direction, it is difficult to directly tie the landfill leachate to the stormwater test results. According to RWQCB staff, if the connection can be made, RWQCB can require corrective action. When asked, RWQCB staff agreed with the observation that DPW does not want enough monitoring wells established because this would allow identification of responsibility for ground water contamination. According to RWQCB Executive Officer John Robertus, "This is the psychology".

Prospects for adequate ground water monitoring at the airport worsened during the week of March 13, 2000. According to Carol Tomaki, RWQCB Associate Water Resources Control Engineer, DPW "destroyed" 6 monitoring wells as part of their re-grading and re-paving work currently in progress. She reported that despite quarterly meetings with DPW, the plan to do this had never been mentioned and she had not been notified by DPW. She became aware that this was going to happen the day before it took place and instructed that it not occur, to no avail. She also reports that DPW maintains that it will not replace the destroyed wells until all re-paving is done under a schedule to complete the work by the end of December, 2000. According to Ms. Tamaki, there is now only 1 well per unit left, and there should be at least 1 upgradient and 3 downgradient for each unit. Finally, when asked if a notice of violation would now be issued, she responded that she anticipates asking for a schedule for putting in wells and then issuing a violation if DPW does not honor the schedule. Due to design and planning work that will be needed, she believes that the monitoring wells will not be replaced until well into the year 2001.

In a March 24, 2000 interview of RWQCB Executive Officer John Robertus, to obtain information about the RWQCB's enforcement process, City staff concerns about the results of our stormwater testing and the County's lack of responsiveness to RWQCB were shared. Highlights of Mr. Robertus' comments from that interview are summarized below.

- Take a serious look at the threat to water quality at Carlsbad beaches. What you may be seeing in your storm drains could be "just the tip of the iceberg". Last year, the closure of beaches in Huntington Beach as a result of pollution from storm drains is a good example of the tremendous impact this situation can have on the City and local businesses.
- Steps the City can take to focus attention on the County's poor compliance history and the apparent connection between the landfill and the dry weather testing results include: attending a public hearing of RWQCB or sending a letter to the Board requesting that the issue be placed on their agenda and (1) state the City's concerns about water quality, and based on our review of the records we would like a status report on the landfill, and we want to know what actions we can expect the County to take to abate and control; and (2) state that the City thinks the source of the test results of our storm drains is the airport property and the City is requesting that RWQCB invoke California Water Code Section 13267 and require the County to conduct and fund an investigation. This code section "is a powerful tool".
- Fines up to \$1,000 per day can be levied for violations of waste discharge requirements. Based on inaction by the County for problems at the San Marcos landfill, RWQCB recently imposed a fine of approximately \$250,000. *[He didn't go into the details about the amount but it should be noted that under Section 13264 of the Water Code, the Superior Court may impose civil liability of up to \$25,000 per day of violation.]*
- RWQCB has an enforcement unit of only 2 people, headed by Mark Alpert, Senior Engineering Geologist. A lack of funding for adequate staffing levels to carry out the agency's many oversight duties is one of the biggest obstacles his agency faces.

In an interview of Mr. Alpert, he reported that he was unaware of the results of our Dry Weather Testing Program and offered to meet with City staff to review the data. He also confirmed that violations on the matter of inadequate wells can be issued and more enforcement can occur, but first, more documentation and follow-up on the County's promises is needed.

(2) On September 10, 1999, the LEA (Local Enforcement Agency (County Department of Environmental Health)), sent a letter notifying DPW that it is in violation of CCR Title 27 State Minimum Standards and corrective actions are required. The letter summarized the violations and areas of concern (a condition that, if not corrected, has the potential to become a violation) that had been cited over the previous seventeen (17) months.

According to the letter, since 1998 there has been a succession of continuing violations. Violations and areas of concern were noted in LEA inspection reports dated 3/31/98, 5/21/98, 6/18/98, 9/3/98, 12/3/98, 12/7/98, 3/29/99, 6/29/99, and 8/20/99. The violations and areas of concern were cited because settlement was jeopardizing the integrity of structures and providing a pathway for the release of landfill gases into the air and structures, substantial cracking of the asphalt was allowing surface waters into the underlying wastes, waste was exposed (DPW disputed this finding in a follow-up letter), and because landfill gas was found to be migrating from Unit 3.

The letter was entitled "Official Notice", which according to LEA staff is meant to indicate to the landfill operator that the letter is very serious. It does not carry the weight of an "Order", which is part of a specific enforcement process.

DPW actions required in the letter include the repair of cracks in the asphalt, a monitoring program for the presence of methane in on-site structures to be submitted for review and approval by September 27, 1999, a monthly report to the LEA detailing the status of the Landfill, required repairs completed, and all methane monitoring data beginning October 1, 1999. In addition, DPW required the submittal and approval of a workplan detailing corrective action(s) and associated timelines to address the violations and areas of concern by September 30, 1999.

According to the LEA, DPW's reply was a draft submitted November 1, 1999. It was not found to be adequate. The LEA notified DPW that a meeting would be scheduled to discuss finalizing the submittal, and the LEA asked DPW to finalize it as soon as possible so that the corrective action and monitoring plans could be provided to the City. A January 14, 2000 submittal with monitoring to begin that month and a re-grading and re-paving schedule between July and December 2000 was accepted by the LEA.

According to Mr. Rollin, Department of Public Works Manager in the Inactive Waste Site Management Division, in an interview last November, this work is being done now because "Horn wants it fixed." When asked if this work will address the pollution problems from the landfill, he responded that the ground water wells on the site reveal no indication that there is any damage to ground water. He stated that the purpose of the work is to address regulatory agency requirements that they must prevent water intrusion into the trash, prevent water ponding on the asphalt, and to improve the surface and level of the pavement for airport operations. Mr. Rollin also reported that this will be a temporary fix only. Dirt will be imported to bring up areas that are now sunken, and then they will re-pave. Subsidence will be continual as the trash continues to compact and decompose. Finally, he stated that hopefully, these repairs will last 5 years, and if lucky, 10 years, but it is difficult to predict.

(3) On August 21, 1999, the California Integrated Waste Management Board (CIWMB), and the LEA conducted an inspection of the airport property, and in a follow-up report on the visit the CIWMB wrote the following in a letter to the LEA: *...we noticed the same conditions at the site as we had observed previously; namely settlement, drainage and erosion problems. We noted structures notwithstanding the effects of differential*

*settlement and we observed huge cracks on the landfill surface. We further observed runoff from washing an aircraft, simply infiltrating into the landfill through the asphalt cap. Based on the state of the landfill, Board staff believes that the site continues to suffer from lack of adequate maintenance and that the routine and scheduled maintenance of the site, as required and as designed to protect the health and safety of the public and the environment, has been and continues to be either postponed or ignored, despite the conditions at the site and the repeated requests from the regulatory agencies to have the site be in compliance with state minimum standards. We have been told that this airport is the largest single runway airport in the nation, and with so many people using the airport, it only seems logical that adequate and on-time maintenance should be first priority, however, no evidence of previous or on going maintenance was observed during our inspection.*

*The apparent lack of maintenance has caused substantial damage to the landfill cover system and has jeopardized its integrity (27 CCR, S21140). Depressions, large and small, apparently caused by settlement, were observed throughout the site. The settlement has effected site drainage (27 CCR, S21150) and if not corrected immediately would continue to allow ponding of water and water infiltration into the landfill. Furthermore, it is possible that the settlement at the site will have already compromised the integrity of the landfill gas collection system. Cracks approximately 4 to 6 inches wide and 2 to 3 feet deep were also noted over some areas of the landfill. The cracks are conduits for gas migration (27 CCR, S21160) and water infiltration and air intrusion into the landfill.*

*...Overall, the site requires immediate and adequate maintenance to minimize the potential threats the existing conditions pose to the health and safety of the public and the environment. Please note that conditions noted above have been repeatedly cited in the LEA's previous inspection reports as violation of Title 27 of the California Code of Regulations. We have reviewed the Official Notice dated September 10, 1999 from your Department to the operator, ...and we support your action and would like to offer our assistance with any matter which would lead to site improvements.*

According to RWQCB staff, the County appears to be on track with preparations to keep to the re-grading and re-paving schedule to repair the landfill cover during the last half of 2000.

The first methane gas monitoring report was submitted to the LEA on February 14, 2000. This report reviews some maintenance activities and concludes that the Landfill Gas Migration Control facilities appear to be performing satisfactorily as of the date tested. According to DPW's cover memo to the report, a consultant has been retained "for the design and implementation of the permanent on-site structure monitoring."



## VIII. CONCLUSIONS & RECOMMENDATIONS

### CONCLUSIONS:

#### Land Use:

- The City of Carlsbad currently participates in land use review and approval of all projects in and around McClellan-Palomar Airport, along with other agencies.
- Under the existing Conditional Use Permit (issued by the Carlsbad Planning Commission in 1980), certain structures and facilities are allowed without discretionary review. In the event that an amendment to the CUP is submitted for review and approval, the City will have an opportunity to revise the existing conditions of approval to provide for a greater role in review of new improvements.
- Acquisition of the airport, by the City, would allow the City to control all on-site planning, improvements, and uses.

#### Economic Benefit:

- McClellan-Palomar provides significant economic benefit to the City, the North County area, and the San Diego Region. These benefits should continue as long as the airport is able provide for the necessary capital improvements and infrastructure to support its projected growth (enplanements/passengers).
- Economic Benefits from airport growth must be weighed against "quality of life" and safety impacts on Carlsbad and the neighboring cities.

#### Finance/Capital Improvements:

- Palomar, like the airport system, does not generate enough revenue to cover all the needed capital improvements.
- County Airports has been proactive in developing non-aeronautical revenue sources which are critical to the long term financial health of the airport system and the goal to be self-sustaining. For at least the short term, the cost of not relying on General Fund money has been high at Palomar - general maintenance for operations, public safety and protection of the environment has been poor.
- It may be difficult to separate airport maintenance from landfill maintenance. The potential for County Airports' recent and unanticipated financial liability for property deterioration associated with the landfill under Palomar to continue will be important in future airport system financial planning. The extent to which this financial liability could extend to a new owner will be important to any potential purchaser.

#### Sale:

- FAA regulations and the County's dependence on Palomar to sustain the airport system make it unlikely that the County would be interested in selling Palomar at this time.

#### Noise:

- Noise complaints will continue to increase as the City builds out, especially as people begin to occupy the Carrillo Ranch and Bressi Ranch developments, and airport operations continue to increase.
- As operations continue to increase so too will the number of aircraft waiting on the runway, resulting in more aircraft directed outside the "preferred path" and over residences.
- The City's ability to mitigate airport noise impacts on residents is very limited as a result of the FAA's control over the airspace and flight paths, federal regulations designed to make aircraft restrictions for noise control purposes difficult to impose, and the County's control over airport operations.
- The success of efforts to emphasize noise sensitivity will depend heavily on the airport staff's ability to reach and affect itinerant pilots.

#### Landfill:

- Without County Board Supervisor intervention and/or regulatory enforcement, poor maintenance and property deterioration may be an ongoing issue at Palomar.
- The likely reasons there has been inadequate ground water monitoring at the airport are: (1) the lack of enforcement by RWQCB; and (2) the threat of required abatement action if ground water flow direction is established and the landfill is tied directly to the Dry Weather Test results.
- Without greater RWQCB oversight, our ground water degradation and storm drain test results will likely continue.

#### RECOMMENDATIONS:

##### Land Use:

- Consider adding new conditions to any future amendment to the existing Conditional Use Permit (172) that would provide the City with greater review/approval/oversight of new structures and facilities proposed for the airport, as well as airport maintenance levels.

#### Financing/Capital Improvements:

- Support legislation which increases AIP funding and/or makes more funds available to smaller airports.
- Investigate the advisability of participating in a redevelopment area around the airport in exchange for the expenditure of tax increment funds on Palomar.

#### Sale:

- No further action toward acquisition at this time.
- If it is decided to continue working toward acquisition, any feasibility study should include an analysis of:
  1. the legal assurances an airport owner must agree to as a condition to obtaining federal grants;
  2. the legal obligations that may be inherited by a new owner because of prior use of federal funds in the purchase and development of the airport;
  3. restrictions on the use of airport revenue;
  4. any relevant differences between the sale to a public entity versus a private entity;
  5. potential FAA conditions of approval of the sale;
  6. the airport's revenues, expenses and capital improvement needs;
  7. the potential for increasing revenue and expanding revenue sources; and
  8. a new owner's potential liability for the landfill beneath the airport.

#### Noise:

- Evaluate the need for additions to the Council's legislative platform addressing the measurement of community noise levels and aircraft noise levels.
- Encourage the County to evaluate the feasibility of tying lease agreements to compliance with noise mitigation activities.
- When the FAA responds to the updated Part 150 Study, review the response for any comments on the need for additional information or analyses, and where appropriate, recommend to the County that these needs be met.

#### Landfill:

- Evaluate the need for additions to the Council's legislative platform addressing ground water protection.
- Review land use authorities for avenues to facilitate adequate and timely landfill maintenance.

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**From:** Hentrich, Katie <Katie.Hentrich@sandag.org>  
**Sent:** Friday, March 25, 2016 8:07 AM  
**To:** Curtis, Cynthia  
**Cc:** Baldwin, Susan  
**Subject:** McClellan-Palomar Airport Master Plan PEIR Comments - SANDAG

Ms. Curtis,

Thank you for the opportunity to comment on the County of San Diego's Program Environmental Impact Report (PEIR) for the McClellan-Palomar Airport Master Plan. Please consider the following minor comment:

- SANDAG encourages the County to continue to coordinate with SANDAG's Planning Department on any updates regarding circulation and ground access relating to the Project

We appreciate the opportunity to comment on the McClellan-Palomar Airport Master Plan's PEIR. If you have any questions, please contact myself or Susan Baldwin ([susan.baldwin@sandag.org](mailto:susan.baldwin@sandag.org)).

Thank you,

**Katie Hentrich**  
Regional Energy/Climate Planner  
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401 B Street, Suite 800 | San Diego, CA 92101  
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**From:** Jenene McGonigal <jenenemcg@gmail.com>  
**Sent:** Saturday, March 26, 2016 9:58 PM  
**To:** Curtis, Cynthia  
**Subject:** McClellen Palomar Airport

Dear Ms. Curtis,

As a 19 year resident of south Carlsbad, I am very familiar with living near the airport. I realize the airport was here before the homes were, and I realize that I acknowledged there would be noise because of where I reside in Carlsbad. But that doesn't change the fact that the Carlsbad community has CHANGED, and the airport needs to accommodate the residents (that pay a huge amount in taxes and home sale prices to live here) and the fact that the airport needs to be a good neighbor to the homeowners. Most of the time, it isn't an issue. What is an issue is when small planes buzz our house, or when the occasional, but extremely loud larger jet planes take a path right over our home. It is frightening.

Whether the airport is expanded or not, I know that some hard and fast rules and regulations need to be put into place in order to keep homeowners from being unduly disturbed and/or put in danger. First, airplanes of any size need to be REQUIRED to take a path directly west of the airport, so that as they gain altitude they are less of a noise disturbance and less of a danger to the residents below them. Once they've gained the required altitude, they can then bank north or south or east as required to get to their destination. If pilots fail to follow these rules, then severe fines and penalties need to be enforced, CONSISTENTLY. Second, any planes that use this airport should only do so while the control tower is open. And I do not believe those hours should be extended. Flights should not be allowed in or out of the airport any earlier than 7:00 am, and the last flights should be no later than 10:00 pm, due to the residential community the airport now resides in. Carlsbad is not just a bunch of flower fields any longer that don't mind noise or danger...Carlsbad is a thriving community of wonderful people who want the character of the community preserved, without adding danger or noise to their existence.

Sincerely,  
Jenene Gaudreau McGonigal

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Jenene McGonigal  
(858) 229-2610

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**From:** Janis Murphy <deck55@aol.com>  
**Sent:** Saturday, March 26, 2016 7:52 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport

Hi! Just wanting to write in support of the runway and taxi way expansion that has been proposed for the McClellan-Palomar Airport. I feel the expansion will only make the airport safer for the aircraft already coming in. Also feel those who moved to the area surrounding the airport need to be reminded that there was full disclosure of the nearby airport and all that goes with that RE: airplanes flying in the sky ;), when they purchased their homes. Our son learned to fly there while in High School. Then went on to an aviation career after college as a pilot, currently a pilot with Southwest Airlines. Previous to that was a corporate pilot for several different companys, which flew in and out of Carlsbad quite often. Hopefully this extension will go thru, making it safer for the aircraft already using the facility. And perhaps enticing a return of some type of feeder airline-we personally really miss that service out of Carlsbad.

Thank you for your time on this project!

Janis Murphy  
1678 Brady Circle  
Carlsbad CA 92008  
619-857-3325

Sent from my iPhone Janis

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**From:** Frank Sung <franksung01@gmail.com>  
**Sent:** Saturday, March 26, 2016 9:43 PM  
**To:** Curtis, Cynthia  
**Cc:** Hope Nelson  
**Subject:** Fwd: Deadline for comment on the Palomar Airport Master Plan Tue 3/29/2016

Hi Cynthia - I live at the intersection of Poinsettia and Aviara ... and am very much affected by this planned airport expansion. Any plans to proceed **MUST** include the enforcement of hours of operation and flight patterns. My primary concerns are with the noise and with airplanes flying over our neighborhoods. I live right next to Pacific Rim Elementary school and Poinsettia Park. Today ... airplanes regularly fly low over our neighborhood as they cut South and then head East. They are trying to save time and fuel by not making their turn over the ocean ... while gaining altitude. They are endangering the school children and neighborhoods beneath them + making such a noise where one can not even carry on a conversation or talk over the telephone. The "recommended" flight patterns are NOT being followed and there seems to be absolutely nobody enforcing them. **THERE MUST BE ENFORCEMENT OF THE FLIGHT PATTERNS GOING FORWARD!**

----- Forwarded message -----

**From:** Hope Nelson <[hopen51@att.net](mailto:hopen51@att.net)>  
**Date:** Sat, Mar 26, 2016 at 9:05 PM  
**Subject:** Deadline for comment on the Palomar Airport Master Plan Tue 3/29/2016  
**To:** Hope Nelson <[hopen51@att.net](mailto:hopen51@att.net)>

To all:

## **DON'T MISS THIS DEADLINE!**

The window for commenting on the **MCCLELLAN-PALOMAR AIRPORT MASTER PLAN closes on March 29, 2016**. Please don't let the date pass by without taking a look and commenting.

Ultimately, the plan allows for 800' expansion of the runway, shifting it north, creating an expanded airport in Carlsbad. The plan does not concern itself with anything regarding departure hours, noise levels, airport security, or pollution...all affecting our communities!

Here's the current fact sheet:

[www.sandiegocounty.gov](http://www.sandiegocounty.gov)

[SANDIEGOCOUNTY.GOV](http://SANDIEGOCOUNTY.GOV)

**Your comments on this are critical and there is very little time left!**

Comment to: County of San Diego, Dept of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager  
Email: [Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

Sincere thanks to all of you,

Hope

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Frank Sung  
[franksung01@gmail.com](mailto:franksung01@gmail.com)  
(m) 760-213-9036



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**From:** Beverley Woodworth <woodworthbeverley@gmail.com>  
**Sent:** Saturday, March 26, 2016 3:27 PM  
**To:** Curtis, Cynthia  
**Subject:** Citizen input re Environmental Impact Report (EIR)

We have been asked to submit any environmental concerns that we believe expansion of the airport could generate. Following are my comments:

1) With the expansion of the runway length more and bigger planes will be flying in to CRQ. As a resident of Vista I have noted that corporate and charter planes approaching Palomar Airport generate noise that lasts far longer than, for example, a plane flying over houses on the approach to near San Diego Airport. The reasons are twofold:

1a) The airport is surrounded by hilly terrain in many areas such as Vista. This results in planes which are approaching the airport at the minimum 1500 feet over sea level elevation are actually flying much lower, closer, and louder to houses situated on the hills they pass over. For example a house situated at 800 ft elevation has planes passing over their house only 700 feet above them. With more planes flying the same approach route more frequently the expansion of the airport runways and subsequent increase in volume of planes approaching the airport will greatly disturb the rural and peaceful nature of the neighborhood. Property values could well decline. Therefor noise monitoring needs to be done in these hilly areas under the flight path in order to accurately gauge the level and duration of sound disturbance/impact.

1b) For residents living in the hills surrounding the airport and under the approach path, the hilly terrain around the airport "contains" the sound of approaching/descending aircraft much longer than would be the case for houses at sea level. The roar of the plane engines and, concomitantly, the disturbance to the affected neighborhoods lasts much longer for those residents living in hilly areas. The sound cannot dissipate as it might around other geography. Rather is amplified and augmented in duration by the hilly terrain. This creates a disproportionate disturbance to the sound quality of the hilly neighborhoods on the approach path to the airport - one which would be amplified by more flights over the area as due to the airport expansion..

2) Additionally more planes flying over hilly neighborhoods surrounding the airport means more engine fuel pollutants that are distributed closer to houses on the hills. For example, if you have a plane flying 600 feet over houses located at 800 ft elevation on the hills then plane fumes, exhaust and chemicals are being distributed closer to and in more concentrated amounts over those homes.

I object to the expansion of the airport due to the fact that the quality of life and environment will be affected negatively for residents in neighborhoods such as Vista - all to pander to the interests of rich corporate jet owners and with very little benefit to the public.

Beverley Woodworth

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**From:** sandi blake <sandra.blake@gmail.com>  
**Sent:** Sunday, March 27, 2016 7:28 PM  
**To:** Curtis, Cynthia  
**Subject:** Airport runway expansion plan.

Hello Ms Curtis,

We live in Carlsbad fairly near the airport. We are not in favor of the runway expansion as there is no plan for controlling noise levels, pollution, security etc. We already have airplanes and helicopters flying over our home, and we certainly would not appreciate more airplane traffic and noise.

Thank you for considering our comments,

Sincerely,  
Dr. and Mrs. Paul Blake  
4783 Flying Cloud Way  
Carlsbad, Ca 92008

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**From:** Chris Cereghino <cereghino98@gmail.com>  
**Sent:** Sunday, March 27, 2016 9:37 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion

To: County of San Diego, Dept of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager

I am expressing my disapproval of the Palomar Airport Expansion. Currently, the departure hours are a complete nuisance: planes flying out on a consistent basis at 11pm and as early as 5:30am. The smaller single prop airplanes flying over our house creating noise levels that are an extreme burden. Not to mention the safety issues with these planes and others flying over our house at very low heights. Expanding the airport is going to invite more air traffic further exacerbating these issues. Also, further generating additional air pollution by these aircraft. With the additional aircraft using the airport, how are we going to handle the airport security? What's the plan? Has anyone in your office developed a plan? These are legitimate issues that affect and are currently affecting all of our communities.

Concerned Carlsbad resident,

Chris Cereghino  
1538 Turquoise Drive  
92011 Carlsbad, CA

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**From:** William Clayton <bckfire07@yahoo.com>  
**Sent:** Sunday, March 27, 2016 12:01 PM  
**To:** Curtis, Cynthia  
**Subject:** CARLSBAD AIRPORT EXPANSION

Dear Cynthia Curtis,

I have been a Carlsbad resident spanning some 54 years and I am against the airport expansion plan.

My problem is not with the airport expansion per say but with the fact that departure routes allow small low flying aircraft to fly directly over homes and the Pacific Rim Elementary School. They can easily fly just one mile and be over the ocean before they make their turns; this path takes them over a golf course, agricultural areas and minimal occupied areas.

The twin engine jets take this the safest route why not the smaller aircraft?

Your impact report should address these safety problems and not just the physical expansion of the airport. Why weren't these issues part of the report??

Thank you for taking my comments,

Bill & Ila Clayton  
6569 Coneflower Dr.  
Carlsbad, Ca  
92011

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**From:** Aileen Heimlich <treasuresfound1995@yahoo.com>  
**Sent:** Sunday, March 27, 2016 10:15 PM  
**To:** Alex, Nicholas  
**Subject:** Palomar McClellan Airport

PLEASE make the "voluntary" flight path mandatory. The noise from the planes flying overhead is unnerving! at times it even seems like some of the pilots take great joy in buzzing neighborhoods.

Additionally, I do not want to see another accident like that which happened when a PSA flight flew over a heavily populated neighborhood in San Diego.

Thank you!

Aileen Heimlich

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**From:** Rachel LaMar <rachel@lamarrealestate.org>  
**Sent:** Sunday, March 27, 2016 2:14 PM  
**To:** Kashak, Jeff; Alex, Nicholas  
**Cc:** LaMar Rachel  
**Subject:** Palomar Airport expansion commentary

Hello,

I understand you are the person to whom the public should comment on the possibility of expanding Palomar Airport's runway.

As a resident of South Carlsbad for over 22 years, I feel very passionate that expanding the runway so close to a major residential area-with thousands of homes, schools, churches and shopping and recreational venues - is a big mistake. I live about a quarter of a mile away from the airport, and the noise levels are already bad. The voluntary flight pattern that has been established is not followed by all pilots, and many of them bank over our homes at very low altitudes. There have been several flyovers in this past year alone that have scared the daylights out of me and shook my entire house. I report them to both the airport on the FAA every time, but it does not stop future flyovers.

When airplanes take off from the airport you can see the black smoke hailing down from the sky. Much of it lands on local businesses, schools, the golf course, and can be blown all over the area depending on wind factors. The jets have the worst emissions of all the planes. It is very scary for those of us who live and raise families here. Allowing more planes to fly this route and deposit toxic emissions all over our neighborhoods is not going to be helpful to property values or the quality of life.

As a real estate agent/broker in the area for the last 13 years, I cannot tell you how many people have refused to look at homes anywhere close to the flightpath. The noise and environmental impact is a big negative for many people, especially those with families. They worry about resale value as well, in light of this possible expansion. If the airport expands my family (and many others I know) will most likely be leaving the area.

I, as well as others who take the same views, have never been against the airport, we have only been against expansion due to noise and environmental factors. I was vocal many years ago about the the VNAP enforcement, until I was threatened online and had to stop.

There is a large airport in San Diego, and another not too far away in Orange County. We do not need to bring more commercial jets to residential areas - especially here in Carlsbad where there are other significant and scary factors concerning the land on which the airport sits. Expansion to any land that was a former dump site is always risky, and I have been told by officials that there are fires burning underground to this day. To build more runway seems like it has the potential of releasing toxins into the atmosphere that could damage the health of thousands of people.

South Carlsbad is a very dense and populated residential area. Palomar was never meant to be a major airport and there are just too many potential disasters if more planes are brought here. There have already been several crashes at and around the airport. Expanding and bringing in more planes sets the possibility of crashes even hire-and next time it might be a crash into a neighborhood, school, church or shopping area. Please do not take this risk-for the safety of everyone who lives in Carlsbad. Please don't make people want to leave this beautiful city. There are many other options where an airport will not impact the lives of so many citizens and not lie in

such close proximity to the places where they live, go to school and religious venues, play and work.

Respectfully,

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Rachel LaMar, J.D.

Broker, Attorney

LaMar Real Estate

[760-310-9466](tel:760-310-9466) cellular

[760-652-4870](tel:760-652-4870) facsimile

[Rachel@LaMarRealEstate.org](mailto:Rachel@LaMarRealEstate.org)

[www.LaMarRealEstate.org](http://www.LaMarRealEstate.org)

BRE #01399682

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**From:** nina luisi <asknina@sbcglobal.net>  
**Sent:** Sunday, March 27, 2016 11:01 AM  
**To:** Curtis, Cynthia  
**Subject:** palomar airport plan

hello cynthia

i live in the solamar senior community and would like the planes both currently and into the future, to fly just north of palomar airport road (as is my understanding with current suggested flight plans, but are not always complied with).

i am not opposed to the runway expansion, as i feel a north runway extension is safer for any take-off and landing situations. but please consider the noise and particulate debris that falls from all jets flying directly overhead. as seniors many like my 90 yr old mom who lives with me here and i who are concerned with breathing issues - which is why we moved to the coast in the first place - as we are pre-asthmatic and are particularly sensitive to pollution.

thank you for this consideration.

nina luisi & joann west  
6531 easy street  
carlsbad, ca 92011



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**From:** Lawrence Posner <lhposner@hotmail.com>  
**Sent:** Sunday, March 27, 2016 8:52 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport

**Importance:** High

Hi Cynthia

After attending and following the Airports advisory commissions meetings it is my recommendation that the county STOP any plans for an expansion of the airport, or any reclassification of it ASAP...

How many small shuttle airlines have pulled out of Palomar in the last 2 years? 3 that's right 3....

Lengthening the runway without real and verifiable noise impact on the surrounding residential areas is a just a simulation and not a actual test, like monitoring aircraft taking off and landing under actual conditions....

Expanding the airport in the hopes of attracting a "regional" airline is just a hope on the part of the commission, while the staff has repeatedly have said there are no regional airlines interested in using Palomar Airport at this time...Nor have any expressed any interest in it...

The expansion is not a proven financially viable nor has there been any real studies on the impact on job growth on the area...

I think you should consider that "Measure A" was defeated in Carlsbad by a vote, and the same voters and more will join in OPPOSING this expansion...

Please stop wasting taxpayer money and staffs time by pursuing this "fantasy project"

— Larry Posner  
LHPosner@hotmail.com  
646-247-7742  
No Land Line :)

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**From:** Beth Rosselle <beth.rosselle@gmail.com>  
**Sent:** Sunday, March 27, 2016 3:31 PM  
**To:** Curtis, Cynthia  
**Subject:** NO to Palomar Airport Expansion

I am writing to you because I want you to know that the proposed (and planned) expansion is unacceptable to me and my family. We live on the South Side of Palomar Airport Rd. and just West of Aviara. Any expansion of runway will add to the size of aircraft and frequency of flights. As it is now, we have to stop talking and can't hear the TV when planes are taking off. Forget having friends over and trying to talk. It is embarrassing. It is also very disruptive waking up to the loudness of the engines in the morning. Also, increased traffic will increase poisonous jet fuel pollution in our adjacent neighborhoods.

I watch ALL of the aircraft taking off when sitting at my kitchen table. We are affected.

About a year and a half ago I was listening to NPR at noon and it caught my attention when the County Supervisor said that the future expansion at Palomar would make it like John Wayne Airport. The commentator said that the nearby residents wouldn't like that and he said that we would just have to get used to it and that it didn't matter.

Is this a done deal? Is this open commentary period supposed to appease us and make it appear that we have a voice in the decision? Don't we have anything to do with this????

I am requesting a solid NO vote on any expansion of this airport. Why don't we deserve a peaceful life? Thank you.

Beth Rosselle  
6430 Torreyanna Circle  
Carlsbad, CA 92011

Sent from my iPad

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**From:** vernie seach <vaseach@hotmail.com>  
**Sent:** Sunday, March 27, 2016 8:25 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion

*Cynthia,*

*I would like to go on record with my concerns that the Palomar Airport Expansion does not address, noise levels, departure and arrival times, pollution, or airport security. How can these important issues not be included as it affects several thousand people living around the airport. We have lived near this airport since 1982 and do not think the airport expansion is needed. All of our concerns over the years have fallen on deaf ears, therefore, I would expect the same if the expansion is approved.*

*Sincerely yours,*

*Vernie A. Seach  
6531 Camino del Parque  
Carlsbad, CA 92011*

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**From:** Barbara Thurman <barbarathurman@earthlink.net>  
**Sent:** Sunday, March 27, 2016 2:45 PM  
**To:** Curtis, Cynthia  
**Subject:** MCCLELLAN-PALOMAR AIRPORT

Every day, we get jets, props, and helicopters that fly across our residential areas. These aircraft are flying south of Palomar AP Road due west off the runway and their noise is very disruptive. Props are constantly buzzing our home both in daylight and after dark. They are close enough that I can tell you the color of their tail. Few follow the so-called voluntary noise abatement route north of Palomar. We see a dozen or more props every day that make early turns over our home. It is evident that air traffic control has directed them on this route because there is a jet waiting to take off even though the VNAP states to avoid residential areas.

I do not think that lengthening the runway 800 feet to accommodate larger jets is a very good plan. The county claims larger jets will be quieter than jets currently operating from this airport because larger jets will be able to achieve greater heights faster. Larger jets will just add to safety problems.

County of San Diego needs to take care of its residents instead of seeing dollar signs from expansion. The FAA needs to establish mandatory rules to eliminate the problems of early turns, takeoffs during quiet hours (mostly jets), incoming traffic (helos) failing to follow VNAP guidelines for approaches to Palomar to follow Batiquitos Lagoon inland before making turn to land, and other safety issues.

In short, the Voluntary Noise Abatement Plan is useless and ignored by a great number of pilots.

Barbara M. Thurman  
[barbarathurman@earthlink.net](mailto:barbarathurman@earthlink.net)

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**From:** Geoff Balkan <reef760@ymail.com>  
**Sent:** Monday, March 28, 2016 10:21 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar airport expansion

Dear Cynthia

As a resident of south Carlsbad I am writing to express ***my opposition*** to any expansion of Palomar airport. As there are no limitations on planes that fly dangerously low over homes polluting with emissions and noise now why would an expansion help the citizens of Carlsbad.

This expansion is another illustration of a city/county bureaucracy shoving an unwanted project down the throats of the citizens of Carlsbad (similar to Prop A). I suggest let the voters decide! Put a measure on the November ballot. Please be advised the voters of Carlsbad are mobilized and ready to fight these projects that benefit the few and reduce the standard of living for the many.

Concerned citizen of Carlsbad.

Geoffrey Balkan

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**From:** Robert Billmeyer <rbillmeyer@roadrunner.com>  
**Sent:** Monday, March 28, 2016 2:46 PM  
**To:** Curtis, Cynthia  
**Subject:** Comments on Palomar Airport expansion

Hi,

Our concern for the plans for expanding the Palomar airport includes the absence of any mitigation for the probable increase in noise from jet departures during quiet hours from 10 pm to 7 am. Now it seems many pilots ignore the voluntary quiet hours and regularly depart whenever their preferred schedule desires. With the runway expansion to accommodate jets with heavier fuel loads for longer flights, this condition of ignoring quiet hours for departure almost certainly will get worse. Longer destinations likely means both earlier and later departures to accommodate increased flight durations. Since the current abatement procedures are voluntary, it seems the airport needs to be more proactive in publicizing the procedures and increasing the awareness of the pilots of their noise impacts to surrounding residences, starting now in preparation for future expansion, as well as improving current conditions.

Thank you,

Robert and Donna Billmeyer  
1566 Maritime Dr  
Carlsbad, CA 92011

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**From:** mahapix@roadrunner.com  
**Sent:** Monday, March 28, 2016 11:11 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion

Dear Ms. Curtis,

I would like to address the issues I personally foresee with expanding the runway at KCRQ.

First and foremost, this expansion will cause neighboring homes an excessive amount of noise for extended periods of time. I understand that "the airport was there first" is a valid argument for some, but Palomar Airport is a Class D, first as a "general aviation" airport. Expanding the runway and bringing larger category aircraft will make the airport more corporate and commercial, completely altering the environment and its surroundings. I respectfully disagree that there will be less noise as we know that larger aircraft need a longer stretch of the (extended) runway for their take-off roll, especially when they're taking off with full tanks.

Rialto airport was there first, and now it is gone. The residential sector prevailed.

I am a certified flight instructor and know the airspace well. Heavier commercial traffic will negatively impact flight safety for student pilots. These students will have to deal with a faster moving environment where they will have to compete with regionals, charter and corporate jets for the tower's attention. There will be more wake turbulence to deal with, more mid-air collisions to avoid, more IFR traffic, faster aircraft and, finally, and most importantly, less "safe zone" ground area to land safely in the event of an emergency as the surrounding land has been mostly developed with residential neighborhoods. Carlsbad is known for its May grey and June gloom which translates into challenging conditions for us pilots. Coming out of the clouds and doing a missed approach will more than likely send the disoriented pilot who is low on fuel over a residential neighborhood.

Whether accidents include mid-air collisions, engine-out during take-off or running out of fuel after a couple of missed approaches, the situation spells disaster for the occupants of the aircraft as well as those on the ground. This hardly justifies the effort that was designed primarily so Qualcomm could fly their Gulfstreams to the Orient and charter passengers have a few minutes less to drive. I don't believe putting lives in danger justifies either of the above risks.

Lastly, the air quality will be absolutely horrendous. If you've spent any time at the Garden Center at Lowe's, you've certainly filed your lungs with toxic jet fuel.

This doesn't even start to address the traffic, pollution and problems with digging up a landfill.

I respectfully ask that you consider all these factors.

Sincerely,  
Maha Calderon

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**From:** Nancy Carpenter <ndcarp1@gmail.com>  
**Sent:** Monday, March 28, 2016 8:53 AM  
**To:** Curtis, Cynthia  
**Subject:** McClellan-Palomar expansion plan

I live south of Palomar Airport Road on one of the hills above. The M-P Airport Planning Committee no doubt is aware of the community concerns as local homeowners have expressed them repeatedly at the Planning Committee meetings. What is lacking in the plan is how it is going to address those concerns regarding **air and noise pollution, hours of operation and airport security**. While you provide a forum for the public to give input on the plan, is this just a formality, or do you really want to hear what we have to say?

Most of us who live here in Carlsbad like our city just the way it is. Understandably, an expanded airport would be good for the business community and city/county revenues, but who's to say that bigger and richer is better. As voters, our citizens have time and again rejected measures that diminish the quality of life in our community - illustrated most recently by the defeat of Prop. A. At this point I'm sure many are unaware of the impact this expansion could potentially have if the above openly expressed concerns are not mindfully addressed.

Thanks for listening. You are listening, aren't you?

Nancy DeNio Carpenter  
Carlsbad, CA resident



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**From:** Phil & Alisa Chacon <pchacon@ieee.org>  
**Sent:** Monday, March 28, 2016 1:08 PM  
**To:** Curtis, Cynthia  
**Subject:** Airport expansion

Dear Ms. Curtis,

I am a resident of Carlsbad and I am deeply concerned with the proposed expansion of the McClellan-Palomar Airport. Over the 14 years we have lived in Carlsbad, there have been numerous incidents of planes flying over our house. I have been told that the pilots are encouraged to fly out to the ocean and then turn around. That does not always happen and there are not any repercussions that happen to the pilots. The density of housing and commercial buildings around the airport seem to be a dangerous combination. As you are aware, there have been several crashes and casualties resulting from air travel at this airport. It is very worrisome that a longer runway is proposed so that larger and heavier planes would be allowed to utilize Palomar airport.

I hope that the county looks to other options for expanded air travel and leave Palomar Airport as it is.

Thank you,  
Alisa Chacon

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**From:** David de Cordova <David.deCordova@carlsbadca.gov>  
**Sent:** Monday, March 28, 2016 3:54 PM  
**To:** Curtis, Cynthia  
**Subject:** City of Carlsbad Comments on McClellan-Palomar Airport Master Plan NOP  
**Attachments:** NOP comment letter 03292016.pdf

Hi Cynthia,

Please find attached the City of Carlsbad's comments on the County's Notice of Preparation of a Program Environmental Impact Report for the McClellan-Palomar Airport. The hardcopy original of this letter will follow by mail.

If you have any questions or would like to discuss this comment letter, please don't hesitate to contact me.

Thanks.

Dave



David de Cordova  
Principal Planner  
City of Carlsbad  
1635 Faraday Avenue  
Carlsbad, CA 92008-7314

(760) 602-4604 office  
(760) 602-8559 fax  
[David.deCordova@carlsbadca.gov](mailto:David.deCordova@carlsbadca.gov)



March 29, 2016

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

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT  
FOR THE MCCLELLAN-PALOMAR AIRPORT MASTER PLAN (SCH #2016021105)**

Dear Ms. Curtis:

The City of Carlsbad received the Notice of Preparation of a Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan, dated February 29, 2016, and we appreciate the opportunity to comment. As you know, McClellan-Palomar Airport is located within the City of Carlsbad's jurisdiction and is an important asset to the Carlsbad and the San Diego region. As such, both the City of Carlsbad and County of San Diego (as owner and operator of the airport) have mutual interest in the continued safe operation of the airport and in protecting the well-being of the Carlsbad community and its environment. It is with this mind that we offer the following comments for your consideration as you draft the Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan.

It is our understanding that the updated McClellan-Palomar Airport Master Plan will be used to phase in various airside and landside improvement projects on the airport property over a twenty-year period. The master plan update process was initiated after the County Board of Supervisors received the completed *Feasibility Study for Potential Improvements to McClellan-Palomar Airport Runway* on September 25, 2013. The study's data and findings were incorporated into the framework of the new master plan, and on December 16, 2015, the County Board of Supervisors determined that the "Modified C/D-III" airport design classification was the preferred option for purposes of moving forward with the master plan update and environmental analysis. The Airport Master Plan conceptual phasing plan describes a number of near term (0-7 years), intermediate term (8-12 years), and long-term (13-20 years) projects necessary to transition to a modified C/D-III airport classification. The FAA currently classifies McClellan-Palomar as a B-II airport.

For the proposed project, the City of Carlsbad is a Responsible Agency under the meaning of the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15381 states that, "for purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency [County of San Diego, in this case] which have discretionary approval power over the project." In 1980, the County voluntarily applied for and obtained a Conditional Use Permit (CUP-172) from the City of Carlsbad to operate the McClellan-Palomar Airport. In 2004, the city amended the conditional use permit at the County's request (CUP-172(B)) and issued Planned Industrial Permit 04-07 to allow additional airport parking. In 2007, the city issued Administrative Variance 07-02 and Planned Industrial Permit 07-02 to the County for the elevator and pedestrian bridge associated with the airport parking lot.

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE  
MCCLELLAN-PALOMAR AIRPORT MASTER PLAN (SCH #2016021105)

March 29, 2016

Page 2

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In 2004, the City of Carlsbad received final approval of its Habitat Management Plan for Natural Communities (HMP) and with it, the authorization from the state and federal departments of fish and wildlife to issue permits for the "take" of certain sensitive plant and animal species. Development projects within the HMP planning area become third party beneficiaries to the city's take authority. Portions of the airport property are adjacent to lands protected under the city's HMP.

Given that future airport projects contemplated in the Airport Master Plan Update may fall within the terms and conditions of CUP-172, or may result in direct or indirect offsite impacts to protected habitat that would require issuance of a HMP permit, the County should include the City of Carlsbad in the list of other public agencies whose approval may be required (identified in Initial Study Section 9) and consider the city as a Responsible Agency for purposes of CEQA.

We have reviewed the Initial Study (IS) prepared for the McClellan-Palomar Airport Master Plan, dated February 29, 2016, and note the information and analysis contained in it. We offer the following additional information and recommendations for EIR preparation purposes:

AESTHETICS

El Camino Real is a designated scenic corridor, the scenic qualities of which are protected by the El Camino Real Development Standards. Palomar Airport Road also represents an important viewshed, especially on the approach from the east looking west toward the ocean. These roads are the most heavily travelled in the city, carrying between 35,000 and 50,000 vehicles through this area daily. The airport's largely unlandscaped manufactured slopes visually dominate the northwest intersection of these two corridors. Over the years, and in connection with some of the permits noted above, the city has expressed concern over the lack of perimeter landscaping at the airport, and has attempted to work with County officials to identify mutually acceptable solutions to improving the aesthetics of this scenic corridor.

The IS concludes Less than Significant impact to aesthetics, in part on the basis that changes to flat aircraft surfaces on the airport's mesa and improvements to structures would not be immediately visible within the viewshed (p.8). However, the airport mesa, runway, taxiway, buildings and other improvements are all clearly visible from the elevated westerly approach along Palomar Airport Road towards El Camino Real. In fact, this viewshed enables an unobstructed view all the way to the coast. Also, Figure 4, Modified C/D-III Airside & Landside Phasing Plan (p. 50) indicates a number of improvement are proposed in the area of concern, including: #7 200' Extension of Taxiway 'A'; #11 Future Airside Development; and #15 Construction of EMAS System on East End. Figure 4 also indicates unknown Future Landside Development along Palomar Airport Road east of El Camino Real.

Given the potential for future airport improvements to further degrade the scenic quality of this area, the city recommends that the EIR analyze in more detail the potential aesthetic impacts of the project. For example, the extension of Taxiway 'A' appears to extend into the south-facing slope almost to the Palomar Airport Road right-of-way. A question arises as to whether the taxiway extension would require re-grading of the slope and construction of retaining walls, and if so, what the visual impacts might be.

#### AIR QUALITY

The Initial Study correctly identifies that the San Diego Air Basin (SDAB) is nonattainment for PM<sub>10</sub> under CAAQS, but is unclear about PM<sub>2.5</sub>. For clarification, the EIR should acknowledge that the SDAB is also nonattainment for PM<sub>2.5</sub>.

#### BIOLOGICAL RESOURCES

While the IS correctly points out that the project area is within the County's draft North County Multiple Species Conservation Program (MSCP), portions of the airport property are adjacent to sensitive habitat areas protected by the City of Carlsbad's adopted Habitat Management Plan (HMP). The EIR should evaluate the potential for direct and indirect impacts to habitats and species covered under the city's HMP, and address any potential project conflicts with the plan.

On the question of wildlife movement, we note that the Airport Master Plan update proposes undefined future landside development on airport property east of El Camino Real. This parcel is adjacent to city HMP hardline preserve area, and also contains Pre-approved Mitigation Area (PAMA) identified in the draft County MSCP. Unlike the airport itself, this area is largely unfenced and unrestricted. As such, the EIR should evaluate the potential for future development to substantially interfere with wildlife movement within or between the PAMA and the HMP preserve areas.

#### CULTURAL RESOURCES

Effective July 1, 2015, lead agencies are now required to address potential project impacts on tribal cultural resources through the CEQA process, and to engage in early consultation with local tribal governments. The city encourages the County to use the Governor's Office of Planning and Research (OPR) draft CEQA guideline and the AB 52 Technical Advisory in preparing its Tribal Cultural Resources analysis. Also, for your information the San Luis Rey Band of Mission Indians has formally requested that the City of Carlsbad notify them of proposed projects the city reviews as lead agency under CEQA.

To assist in your evaluation of potential impacts to archaeological and paleontological resources and identification of potential mitigation measures (if necessary), we recommend that you review and consider City of Carlsbad General Plan Arts, History, Culture, and Education Element policies 7-P.7 through 7-P.11.

#### GREENHOUSE GAS EMISSIONS

Along with its update to the General Plan, the City of Carlsbad adopted a Climate Action Plan (CAP), which is the city's enforceable strategy to reduce greenhouse gas (GHG) emissions. The CAP accounts for existing and future transportation-related GHG emissions (including ground travel to and from the County's airport), but it does not consider on-airport operations, including emissions from aircraft operations. Nor does the city's CAP contemplate changes in GHG emissions that might result from the proposed Airport Master Plan update. And while a number of the GHG reduction measures in the CAP will indirectly benefit airport-related activity, they are not designed to directly address on-airport operations. Therefore, the Airport Master Plan EIR should address potential conflicts with the city's adopted CAP, to the extent future airport improvements under the proposed Master Plan may affect projected GHG emissions within the CAP's scope.

The city recommends that the EIR address the project's consistency with state and local emissions reductions targets throughout the twenty-year time horizon of the proposed Airport Master Plan.

#### HAZARDS & HAZARDOUS MATERIALS

As the IS points out, the McClellan-Palomar Airport Land Use Compatibility Plan (ALUCP) provides guidance on compatible land uses surrounding the airport. Among other things, the ALUCP establishes safety zones and compatibility criteria for various land uses within these zones. The safety zones depict the relative risks of aircraft accidents near the runway ends. The current ALUCP is based on the FAA-approved 2004 Airport Layout Plan as amended by the January 2008 update airport diagram.

The IS concludes No Impact to the project resulting in a safety hazard for people residing or working in the project area (Section VIII.d, p. 22). The Airport Master Plan update proposes a northward shift and eastward and westward extensions of the runway. This will likely require reconfiguration of the safety zones, particularly Safety Zone 1 – Runway Protection Zone, and an update to the ALUCP. There are existing and planned industrial land uses adjacent to the north and west of the airport runway. The EIR should evaluate the extent to which the proposed runway changes (and presumed increase in aircraft operations) may result in new safety risks to persons working and residing near the airport.

Regarding consistency with applicable emergency response or emergency evacuation plans, we recommend that the County consult with City of Carlsbad Fire and Police Departments in further evaluating potential project impacts on such plans.

Regarding wildland fires exposure, the IS discusses the County's vegetation maintenance program at the airport, including the mowing of grassed infield areas (Section VIII.g, p. 24). The proposed Master Plan update includes unspecified future landside development on airport property east of El Camino Real, which is in and adjacent to Very High Threat Fire Hazard Severity Zone (see General Plan Figure 6-10). The EIR should address the project's potential exposure to this threat.

#### LAND USE & PLANNING

The IS acknowledges that the EIR will examine the proposed Airport Master Plan for consistency with the City of Carlsbad General Plan and other applicable land use plans, policies and regulations of agencies that have jurisdiction. In addition to the city's General Plan, we recommend that the EIR also review for consistency with the following local plans, policies and regulations:

- Growth Management Program – which requires that new development meet local facilities standards as identified in the Citywide Facilities and Improvements Plan. The airport is located in Local Facilities Management Zone 5. The EIR should address consistency with the adopted Local Facilities Management Plan for Zone 5.
- Habitat Management Plan for Natural Communities in the City of Carlsbad – which contains strategies and requirements for the protection of habitat and sensitive plant and animal species within the city, but outside the airport property.
- Carlsbad Airport Centre Specific Plan (SP 181(C)) – which contains design and development standards in the specific plan area, including portions of the airport.
- Conditional Use Permit 172(C) – which regulates certain uses and improvements on airport property.

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE MCCLELLAN-PALOMAR AIRPORT MASTER PLAN (SCH #2016021105)

March 29, 2016

Page 5

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- Carlsbad Municipal Code 21.35.015 – which requires voter authorization prior to City Council approval of “any zone change, general plan amendment or any other legislative enactment necessary to authorize expansion of any airport in the city”, or to “commence any action or spend any funds preparatory to or in anticipation of such approvals without having been first authorized to do so by a majority vote of the qualified electors of the city voting at an election for such purposes.”
- City of Carlsbad Landscape Manual, Policies and Requirements – which details policies and standards for water-efficient landscaping and irrigation, as well as fire protection (fuel modification) policies and requirements.

#### NOISE

The IS identified the project as potentially resulting in significant noise impacts to the environment, and states that the EIR will conduct a new noise analysis for the airport based on projected annual airport operations, aircraft fleet mix, and traffic patterns using the existing and proposed runway/taxiway alignments. Ground noise will also be analyzed.

The new noise analysis should take into account noise analysis conducted by the City of Carlsbad in preparation for the recently-adopted General Plan update, which included an updated Noise Element. The EIR should evaluate the effectiveness of existing and proposed noise mitigation measures, including the Voluntary Noise Abatement Program / Fly Friendly Program. Additionally, the EIR should evaluate noise impacts in the context of the FAA’s proposed Southern California Metroplex “NextGen” air navigation system, given the potential for the NextGen system to affect flight patterns and schedules within the vicinity of McClellan-Palomar Airport.

#### PUBLIC SERVICES

We recommend that the County discuss with City of Carlsbad Fire and Police Department representatives the future airport improvements and service changes contemplated by the Airport Master Plan, and the potential impacts on the city’s ability to provide emergency services to the airport.

#### TRANSPORTATION/TRAFFIC

As mentioned previously, the City of Carlsbad adopted a comprehensive update to its General Plan in September 2015. This update included a significant revision to its Mobility Element which emphasizes a balanced, livable streets approach to transportation planning and implementation. The Mobility Element describes the city’s street network according to a street typology system and the preferred attribute of each street type. The Mobility Element also takes a multi-modal approach to evaluating level of service (MMLOS) of city street facilities, assigning MMLOS performance standards to the various modes of travel (auto, pedestrian, bicycle, transit) by street type.

The Mobility Element recognizes that in some cases there are limits to vehicle capacity-building improvements, and therefore promotes transportation demand management, transportation system management, and transit improvements to maintain acceptable levels of service, manage congestion, and reduce greenhouse gas emissions. We recommend that the EIR evaluate the potential impacts that the Airport Master Plan might have on the city’s transportation system and the ability to realize the vision, goals and policies articulated in the Mobility Element.

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE  
MCCLELLAN-PALOMAR AIRPORT MASTER PLAN (SCH #2016021105)

March 29, 2016

Page 6

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In September 2013, the Governor signed into law Senate Bill 743, which makes significant changes to the way lead agencies are to evaluate transportation impacts in environmental studies. To carry out the objectives and requirements of SB 743, OPR has issued technical advice and draft guidelines that recommend a vehicle-miles-traveled approach to measuring transportation impacts. We recommend that the County consult these guidance documents as it prepares the EIR. We believe doing so can integrate well with the objectives of the city's recently-adopted Mobility Element.

The IS (Section XVI.b, p. 36) discusses the Airport Master Plan's potential impact on the San Diego region's Congestion Management Program (CMP). Please note that the San Diego region exempted itself from the State CMP in 2009; instead SANDAG has been abiding by the federal congestion management process since that time (see San Diego Forward: the Regional Plan, Appendix U.7).

UTILITIES & SERVICE SYSTEMS

As described previously, the City of Carlsbad enforces a voter-required Growth Management Program (GMP) that requires the city to maintain minimum service standards for 11 types of public facilities, including some of those evaluated in IS Section XVII. The GMP also requires new development to comply with GMP facilities standards. We recommend that the EIR evaluate the project's consistency with the city's GMP facilities standards and program requirements.

Finally, we note that the City of Carlsbad General Plan was the only local document referenced in the preparation of the Initial Study Checklist. We encourage the County to utilize the many available City of Carlsbad resources, including those referenced in this letter, as you prepare the McClellan-Palomar Airport Master Plan EIR.

We look forward to assisting you and your team as you move forward with this important project. If you questions or need further information, please contact Principal Planner David de Cordova, [david.decordova@carlsbadca.gov](mailto:david.decordova@carlsbadca.gov), (760) 602-4604.

Sincerely,



**GLEN VAN PESKI**

Community and Economic Development Director

c: Kathy Dodson, Assistant City Manager  
Pat Thomas, Public Works Director  
Don Neu, City Planner  
David de Cordova, Principal Planner



March 22, 2016

Kimley-Horn and Associates, Inc.

Attn: Project Manager Vince Hourigan

401 B Street, Suite 600

San Diego, CA 92101



RE: McClellan-Palomar Airport Expansion Plan

We have lived in the OCEAN HILLS COUNTRY CLUB, an age-55+ community in Oceanside, since 2009.

During that time, we have noted that the peaceful environment we purchased has been degraded by more aircraft, more low-flying aircraft, and noisier aircraft.

While our failing eyesight makes it impossible for us to report the type of aircraft or the registration number of these aircraft which disturb our peace, our peace is nonetheless disturbed.

We were shocked when The San Diego Union-Tribune (March 1, 2016) reported: "County Supervisor Bill Horn and Carlsbad Mayor Matt Hall have said the improvements will make the airport SAFER, QUIETER AND MORE ECONOMICALLY VIABLE WITHOUT SIGNIFICANTLY INCREASING TRAFFIC."

REALLY??? How has it been determined that the airport will be:

Safer,

Quieter,

More economically viable,

Without significantly increasing traffic?

We have the following 4 concerns:

1. Our very lives will be in danger from the increase in the size and number of larger aircraft, with their larger fuel tanks, flying over our homes.

Likewise, we will be in danger from the plan to mix large- and small-aircraft on such a small facility.

We remember Pacific Southwest Airlines (PSA) Flight 182, a Boeing 727-214 that collided with a private Cessna 172 light aircraft, over San Diego on September 25, 1978. The death toll of 144 made it the deadliest aircraft disaster in

California history. Both aircraft crashed into North Park, a San Diego neighborhood, killing all 137 people on both aircraft and seven people on the ground in houses, including two children. Nine others on the ground were injured and 22 homes were destroyed or damaged by the impact and the spreading of debris.

The FAA investigation concluded that the Boeing 727 and Cessna 214 lost visual sight of each other, and that the Cessna 214 was below the Boeing 727. The Boeing 727 overtook the Cessna 217 and while descending for landing, struck the smaller Cessna 214, causing both aircraft to crash.

In our opinion, this disaster scenario could be repeated if the "expansion" plan is implemented. Imagine a Boeing 727 (or even larger) aircraft, with 8,000 gallons (or more) of fuel, crashing into our neighborhood. Imagine it crashing into a school, your school, your neighborhood....

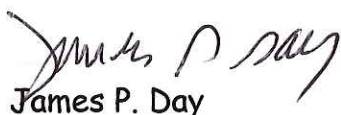
2. Our health will be negatively impacted by an increase in noise pollution, day-in and day-out and even, at night, which exacerbates cardiovascular disease and is a known stressor. Imagine the aggravation you would feel every time your peace and tranquility was shattered by more and worse noise. Imagine the toll this would take on your physical and mental health.

3. Our health will be negatively impacted by an increase in hydrocarbon pollution, which leads to a variety of health problems, including cancer and birth defects. Imagine having to wonder by how much your health was being degraded by breathing polluted air.

4. Our property values will be negatively impacted by a larger, noisier, more polluting airport, with larger aircraft being ever more present. Studies show the negative impact larger airports have on property values. Imagine watching your home equity and financial security decline as the airport expands to accommodate corporate fatcats.

Thank you for the opportunity to provide our input on this ill-conceived airport expansion plan.

Sincerely,

  
James P. Day

  
Marilyn W. Day

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**From:** john@enterpriserecruiting.net on behalf of John DeMaio  
<jmdemaio@roadrunner.com>  
**Sent:** Monday, March 28, 2016 8:55 AM  
**To:** Curtis, Cynthia  
**Subject:** Airplane Noise above our House

Hi Cynthia

We love living in Carlsbad! Especially the peace and quiet Carlsbad offers. Please limit the size and frequency of planes at our airport. Thanks!

Warm Regards,  
John DeMaio Carlsbad Resident

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**From:** Stuart Hepburn <stuart.hepburn@mac.com>  
**Sent:** Monday, March 28, 2016 6:47 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport  
**Attachments:** Airport Letter 1.pdf

Dear Ms. Curtis:

Please find attached a letter expressing concerns about the planned expansion of Palomar Airport. It expresses concerns that are shared by a number of my neighbors who have also signed this letter.

Please confirm receipt.

I'd also appreciate knowing who will review and consider my letter, and what the process and timing will be for publishing the comments that I and others are offering. Please let me know.

Yours truly

Stuart P. Hepburn

*7040 Corintia Street  
Carlsbad, CA 92009  
Monday, March 28, 2016*

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

RE: Palomar Airport Master Plan

My wife and I are writing to express our grave concerns about the proposed runway extension at Palomar Airport.

We have lived in North County for 15 years, and chose this area in part because it was NOT subjected to the type of noise, congestion and pollution arising from operations at Lindbergh and Miramar airports.

We have only recently become aware of the development of a new Master Plan for Palomar Airport, and we can only say that we were APPALLED to hear Supervisor Horn's comments in the video of the December 16 meeting of the Board of Supervisors of San Diego County.

If we understood him correctly, he and others want to shoehorn a major passenger airport into Carlsbad, using it to offload the expected growth in passenger aircraft using Lindbergh.

We note the following:

Justification for Runway Extension

Those developing the new Master Plan have conflated two distinct issues, presenting their findings and recommendations as if the improvement in safety facilities, stimulated by the CD-III aircraft currently using the airport, and the extension of the runway are inextricably linked.

While the option to maintain the airport as a category B-II airport (with enhanced safety features) was one of three options presented at the December 16 meeting, it was described as getting less support than other options. Those in support of runway extension included current business operators at the airport and North County business interests (executives using corporate or chartered jets) – i.e. those with a vested interest. There was reference to comments made by residents concerned about increases in noise, but in both the presentations and the discussion at the December 16 meeting, such concerns were not properly addressed – they appeared to be simply ignored.

If the runway is extended, the benefits will accrue to those with a vested interest in the enhanced facilities, while the costs in terms of degraded environment, noise, pollution and traffic congestion would be borne by tens of thousands of residents of Carlsbad, Vista and other communities.



And if the airport is upgraded to C/D-III standard, in a few years we will be having another conversation about further upgrades required to accommodate even larger aircraft, at which point planners may invoke eminent domain in order to acquire sufficient real estate.

The experiences of other regional authorities that have previously addressed comparable facilities issues might be a valuable guide. There are two directly comparable airports nearby – John Wayne in Irvine, and Santa Monica Airport. Since their conversions to commercial airports, both have been the subject of numerous complaints and lawsuits. As a result of litigation, commercial pilots dislike flying out of John Wayne because noise abatement requirements require them to take off at a much steeper rate of climb than normal. Why the Board of Supervisors would want to risk replicating such problems at Palomar is beyond comprehension.

There is also the amorphous claim that an enhanced airport would be an economic driver for North County. Those making such statements presented no data to support this contention. Since there are plenty of examples – Mid-America Airport in Illinois for example – where faith that economic development would follow airport construction have proven false, it is essential that any such claim be supported by substantive justification. Past experience would suggest that airport improvements at Palomar (for example, the new terminal) have NOT resulted in any significant economic development.

#### Funding

Although the FAA may make grants available to provide for safety upgrades, the price tag for the runway extension will need to be funded locally. As a San Diego County taxpayer, I am opposed to spending any tax dollars to extend the runway at Palomar Airport. Since the benefits resulting from the runway extension accrue to those executives who have access to private jets, the operators of such aircraft, and perhaps to a putative passenger airline business, the runway extension costs incurred MUST be assessed against airport users and NEVER on the taxpayers of San Diego County. If such costs result in the C/D III planes relocating to another airport, the economic case for runway extension simply collapses.

#### Traffic

We have lived in Carlsbad since 2001, and in that time traffic on Palomar Airport Road and El Camino Real has increased substantially. Drive time for many routes using those highways has at least doubled in that period. Expanding the airport to relieve pressure on Lindbergh Airport, as desired by Supervisor Horn, can only result in greater congestion on the roads leading to and around Palomar Airport.

The failure of the relevant authorities to develop a meaningful long-term plan to replace or supplement the capacity at Lindbergh is not a reason to dump the expected airline passenger growth into a small airport that lacks the infrastructure to absorb such passengers and the related extra road traffic.

And if the solution to the traffic problem is to enhance the roads, the costs of such enhancement should be baked into the overall budget for the project.

## Noise

The claim that a longer runway would result in lower noise levels is incomplete at best, and deliberately misleading at worst.

At the West end of the airport, heavier laden aircraft will work harder (and therefore more noisily) on their climb out. While a higher takeoff speed enabled by a longer runway may mean that the climb-out is of shorter duration, briefer but louder does not constitute a reduction in the noise aggravation experienced by those living below or adjacent to the flight path. And as at John Wayne, in order to take off, CD-III and larger aircraft will engage their brakes, and rev their engines towards maximum power in order to accelerate faster. The noise made by the revving engines will be both loud and omnidirectional, so that residents north and south of the airport, as well as to the east and west, will find their peace disturbed.

At the East end of the airport, touching down closer to El Camino Real will mean that areas of San Marcos, Carlsbad, Vista etc. that are under the landing path will experience even more noise. At any given point in the glide path, the planes will necessarily be at a lower altitude than if their approach was aiming at the current landing strip. And after landing, larger planes employ reverse thrust creating noise that is both loud and omni-directional. More such planes mean more such noise.

## Legality of Authority

In 1979 Carlsbad citizens filed an initiative petition to limit Palomar Airport growth. The City passed CUP 172 and Ordinance 21.53.015 to comply with the initiative.

- a) The city council shall not approve any zone change, general plan amendment or any other legislative enactment necessary to authorize expansion of any airport in the city nor shall the city commence any action or spend any funds preparatory to or in anticipation of such approvals without having been first authorized to do so by a majority vote of the qualified electors of the city voting at an election for such proposes.*
- b) This section was proposed by initiative petition and adopted by the vote of the city council without submission to the voters and it shall not be repealed or amended except by a vote of the people.*

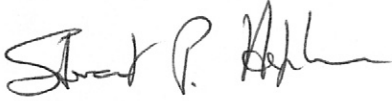
No expansion can or should go forward until the citizens of Carlsbad have voted in the affirmative.

Although this ordinance is recognized in the 1997 Master Plan for Palomar Airport (page I-17), none of the County Board of Supervisors, management at the airport, or their consultants has so far addressed this issue in relation to the new Master Plan.

We trust that given the recent debacle on the Caruso project at the strawberry fields in Carlsbad, the County Board and its associates understands the strength of conviction among the citizens of Carlsbad to not quietly submit to major changes in their environment which are imposed from afar.

As retirees living in the La Costa Ridge community, we would be directly affected by more and noisier flights. Our property value would likely decline. However, our reasons for speaking out against the runway extension at Palomar Airport are much greater than our personal concerns. Our concerns pertain to the health and wellbeing of the entire community.

Yours truly



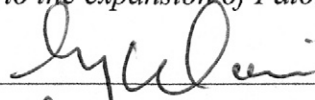
Stuart Hepburn



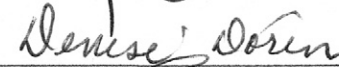
Kathy S Hepburn

*By signing below, each of the signatories expresses his or her agreement with the comments of Mr. and Mrs. Hepburn above, and his or her opposition to the expansion of Palomar Airport.*

Greg Dorin, 7024 Corintia St, Carlsbad 92009



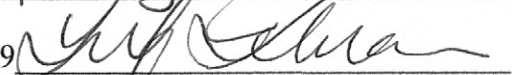
Denise Dorin, 7024 Corintia St, Carlsbad 92009



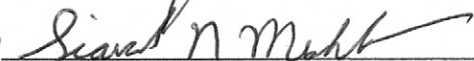
Sigrid Tehrani, 3194 Corte Tamarindo, Carlsbad, CA 92009



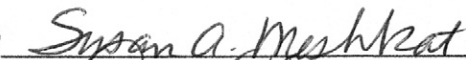
Yoosef Tehrani, 3194 Corte Tamarindo, Carlsbad, CA 92009



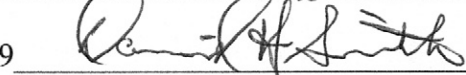
Siavash Meshkat, 7044 Corintia St, Carlsbad, CA 92009



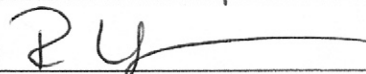
Susan Meshkat, 7044 Corintia St, Carlsbad, CA 92009



David Smith, 6986 Calle Langosta, Carlsbad CA 92009



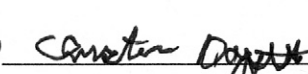
Renee Younger, 6986 Calle Langosta, Carlsbad CA 92009



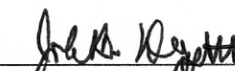
Susan Hertz, 3221 Corte Tamarindo, Carlsbad, CA



Christine Daggett, 7052 Corintia St, Carlsbad, CA 92009



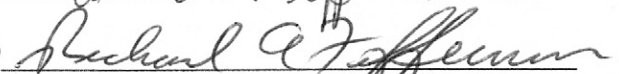
John Daggett, 7052 Corintia St, Carlsbad, CA 92009



Pamela L. Fefferman, 7016 Corintia Street, CA 92009



Richard A. Fefferman, 7016 Corintia Street, CA 92009





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**From:** Dirk Jensen <d911dirk@msn.com>  
**Sent:** Monday, March 28, 2016 9:48 AM  
**To:** Curtis, Cynthia  
**Subject:** Airport Expansion

County of San Diego, Dept of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager

Hello,

I wanted to comment on the plan for expanding the Palomar Airport. I have lived in the Marbrisa development for over 18 years. When I purchased my home I was aware of the airport and did not have a problem with the smaller planes flying out of airport at the time of purchase. The number of flights out of Palomar has increased dramatically as well as the size of jet allowed to fly out of the airport. There are times when talking to a neighbor outside our homes that the jet noise is so bad we have to stop talking because we cannot hear each other. I did not sign up for this noise nor was I ever told there would be a plan in place to expand the airport.

I am 100% against any expansion of the Palomar Airport. Being a real estate agent I know this expansion will have a negative affect on our home values, and I will do everything in my power to stop this plan.

Dirk Jensen

[Find Out How Much Your Home Is Worth By Clicking Here.](#)

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**From:** pam.kennedy@cox.net  
**Sent:** Monday, March 28, 2016 9:51 AM  
**To:** Curtis, Cynthia  
**Subject:** Airport Expansion

To Whom it May Concern,

We live in Seaside Estates. Our home was expensive. We are very concerned about the recent airport expansion which will allow much bigger and louder planes to land at Palomar Airport. The planes taking off and landing from the airport are already loud. This upgrade in airport status will allow planes the size of 757's to use the airport. The noise will be horrific and it will be as bad or worse than John Wayne Airport in Orange County. This will directly impact Carlsbad citizens' quality of life with noise, potential accidents etc. Specifically it will definitely lower property values a great deal. Home owners biggest investments are their homes. Citizens of the area already voted down a very carefully planned shopping area in large part because it would impact the quality of peoples lives with much more traffic in the area. People have spent a great deal of money to live in Carlsbad because of the high quality of life in the area. Why is there such a pressing need to expand the airport? This question should be examined in detail. Can the citizens of the impacted areas be allowed to vote on this proposed change? Please very strongly consider the impact the airport expansion will have on a very large section of the citizens of Carlsbad, Vista and the surrounding areas. If this is completed it will be a permanent blight on the area and greatly change the appearance and quality of these cities. Pamela Kennedy, Shannon Hughes and Jason Hughes.

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**From:** June Lombardi <jllombardicpm@yahoo.com>  
**Sent:** Monday, March 28, 2016 1:44 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Feedback

Dear Ms. Curtis,

I'm am the home owner at 7037 Heron Circle, cross streets are Crystalline Dr. and Poinsettia Dr. in Carlsbad. My concern is three-fold, first the noise and air traffic concerns, secondly the air pollution from increased and heavier weight airplanes and increase of vehicles in proximate neighborhoods and lastly, crime.

Currently, I'm wake up as early at 4:15am to the sound of aircraft engines, as well as aircraft taking-off and short-cutting their south/eastern turn directly over my home. Also, throughout the day many flights short-cut over my home rather than turn south/east over the ocean as defined in the Voluntary Noise Abatement Guideline. Especially, the "touch and goes". With future expansion, this issue will grow exponentially from pilots who do not respect or choose to ignore the Voluntary Noise Abatement flight path. With the exception of medical/fire emergency flights, the Noise Abatement Flight patterns MUST be followed and if not, stiff financial penalties should be administered. The penalty monies should be returned to the communities affected by supporting an insulated windows change out program or other noise dampening needs a homeowner may require in the future. The expansion plan highlights the newer jets, however with the longer runways - older jets with the louder engines will be attracted to this airport as well.

Secondly, the amount of particles and overall pollution will increase with the increase in flights, more vehicles, and planes that are older that currently are limited to land or take-off by the length of the runway. When the wind is from the north, I have smelled airplane exhaust at my home as well.

Lastly, with more traffic will come a larger transient population potentially increasing crime and theft.

The expansion is not good our community!

Thank you,  
June Lombardi  
7037 Heron Circle  
Carlsbad, CA 92011  
650-868-8383

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**From:** Amanda Mascia <amandamascia77@gmail.com>  
**Sent:** Monday, March 28, 2016 11:13 AM  
**To:** Curtis, Cynthia  
**Subject:** Oceanside Resident/Homeowner AGAINST McClellan-Palomar Airport expansion

Ms Curtis,

I am an Oceanside resident, homeowner and voter, who stands firmly AGAINST an expansion of the McClellan-Palomar Airport.

The pollution, noise and detrimental effects to our quality of life would be significant. We bought our home because it is in a suburban area, with low level of noise and decent air quality. To change the fabric of our community to such a large degree, in order to provide a small amount of our community with an additional service, is not fair.

Sincerely  
Amanda Mascia  
Amigos Court  
Oceanside CA 92056

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**From:** Jean Muldoon <Muldoon@coveycommercial.com>  
**Sent:** Monday, March 28, 2016 2:01 PM  
**To:** Curtis, Cynthia  
**Subject:** McClellan-Palomar Airport Master Plan - EIR - Comments

Dear Ms. Curtis,

I am writing to you on behalf of Carlsbad Ranch Maintenance Association II (CRMAII). The Association represents a group of business property owners located around the Armada Drive/Fleet Street sector of Carlsbad, CA. There is concern regarding the expansion of the Mc-Clellan-Palomar Airport Master Plan and the noise impact it may have on businesses in the surrounding area. I understand it is in its initial stages, however will or has a projected noise survey been completed? And how will the airport handle any additional noise impact?

I appreciate your follow up. Should you require additional information from me or have any questions, my contact information is below.

Thank you,

Jean Muldoon  
As Managing Agent for CRMAII



**Jean Muldoon**  
Property Manager

P 760.476.0911  
F 760.476.0912  
E [muldoon@coveycommercial.com](mailto:muldoon@coveycommercial.com)

5800 Armada Drive, Suite 102  
Carlsbad, CA 92008

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**From:** Melanie Murnane <smmurnane@roadrunner.com>  
**Sent:** Monday, March 28, 2016 4:04 PM  
**To:** Curtis, Cynthia  
**Cc:** manager@carlsbadca.gov; Council@carlsbadca.gov; Kashak, Jeff; Alex, Nicholas; Ron-Roberts; Jacob, Dianne; Horn, Bill; adamkaye@sdcounty.ca.gov; Roberts, Dave; Cox, Greg  
**Subject:** Palomar Airport Expansion

Dear Cynthia,

I am a Carlsbad citizen and I am writing to inform you that I am opposed to the proposed expansion of the McClellan Palomar Airport for many reasons. To keep this message short I will make a list of the key issues that need to be evaluated in making this decision that will have a major impact on people living in Carlsbad, Vista, San Marcos and Oceanside.

Quality of life: noise, pollution, health issues from jet fuel fallout, increased traffic, safety issues over homes, schools and churches

Economic impact: decreased property values

Expansion is unnecessary: San Diego Int'l Airport, 35 miles away; Montgomery Airport, 29 miles away for private, corporate and charter uses

Thank you for your consideration,

Melanie Murnane  
5233 Milton Road  
Carlsbad 92008  
Sent from my iPad

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**From:** Patrick Quillin RR <patrickquillin@roadrunner.com>  
**Sent:** Monday, March 28, 2016 1:45 PM  
**To:** Curtis, Cynthia  
**Subject:** expanded airport in Carlsbad

Hello Cynthia

Am registering my serious concerns about the proposed expansion of the airport in Carlsbad.

We don't need a major airport in Carlsbad.

Already, the Palomar airport is one of the busiest in the state, based on take off and landings, due to pilot training from this field.

Within 35 minutes south is an international airport, Lindberg, that can take the burden of major jets.

Carlsbad is a pleasant upscale commuter community. We do not want the noise, pollution, or congestion from an expanded airport runway.

Thank you,

Patrick Quillin  
4280 Clearview Dr.  
Carlsbad, CA 92008  
760-402-9164

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**From:** Larry See <thesees1@gmail.com>  
**Sent:** Monday, March 28, 2016 6:28 PM  
**To:** Curtis, Cynthia  
**Cc:** benderbocan@aol.com  
**Subject:** Carlsbad/Palomar Airport expansion

copy of email sent to Bill Horn, Supervisor, 5th District:

Supervisor Bill Horn

County of San Diego

Supervisor: I am opposed to the proposed plan to extend the runway and expand the Carlsbad/Palomar Airport for the following reasons:

Increased traffic by significantly larger aircraft will increase the Carbon Emission levels, something San Diego has strived to remedy. San Diego has adopted one of the nation's most ambitious plans to cut carbon emissions, creating legally binding mandates for reducing levels of greenhouse gases. Currently aircraft are exempt from this. How will increased aircraft emissions hamper local efforts to reduce GHG, and how will this affect the Climate Action Plan?

Increased vehicle traffic in the area of I-5, Carlsbad Airport Rd and El Camino Real. Studies have estimated an increase from 50,000 vehicle trips/year to over ten million trips/ year. How will that affect local vehicle emission levels, and how will the City of Carlsbad cope with Assembly Bill 32 restrictions if it can not meet greenhouse gas emissions levels? What is the estimated cost of fines to the City?

The No-longer-used landfill at the East end of current runway will need serious remediation (at unknown extra costs) before the extension can be paved over it. As the contents of the landfill de-compose and the volume shrinks, what happens to the new pavement on top? The extra weight of heavier aircraft could conceivably collapse the pavement, even considering the thousands of proposed underground concrete columns. This seems to be an on-going maintenance issue with unknown costs. As happened at San Diego Lindberg Field, the building of a new terminal over a former dump involved hauling away much of the old hazardous waste(where does it go and how much will that cost?) Also at issue is the affect on local groundwater when that fill is disturbed at Palomar.



Reduced property values causing reduced property tax revenue to the County. Studies have shown a significant(over 20%)decrease of property values when a runway is extended and/or an airport is expanded.

By-passing the Vote of the People for benefit of the Few. Carlsbad City Ordinance

21.53.015 requires voter authorization for Airport Expansion. When will that vote occur?

Forcing out small aircraft facilities to the North of main runway. Where will these aircraft move? We have heard: "The Airport will make every effort to accommodate moving small aircraft to other locations" Where are these locations? What is the extra cost? Is there a guarantee that space will be found?

And the final reason is difficult to provide a cost of : the end of a 'small-town' community like Carlsbad

Sincerely:

Larry See

4667 Cordoba Way

Oceanside, CA 92056

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**From:** Erik Staley <es@valicom.com>  
**Sent:** Monday, March 28, 2016 10:27 AM  
**To:** Curtis, Cynthia  
**Subject:** Comment re McClellan-Palomar Airport expansion

Dear Ms. Curtis,

I've been a Carlsbad resident for 13 years and currently live near Carlsbad Village Dr and I-5, which is sometimes in the takeoff path from the Palomar airport.

I support the proposed extensions of the airport runway for the following reasons:

1. Extension will invite the return of commercial airlines to Palomar. I regularly used United Express before they stopped serving the airport.
2. San Diego International (SAN) is at capacity. Due to tourism and business destinations in North County, the expansion of Palomar will better serve these peoples' needs and reduce congestion on the freeways and around SAN for those driving to/from the north.
3. Environmental and noise impacts will be minimal. There may be more and larger aircraft taking off and landing, but there are buffer zones around the airport containing either businesses or open space that will mitigate noise effects. Many housing developments near the airport were built after the airport was already there, so people moving into those neighborhoods knew the downsides re noise already.
4. Most airport expansions are federally-funded. Expansion of Palomar would not, I assume, cost Carlsbad and the county much, but would result in increased tax revenues due to travel-related expenditures at and near the airport. It would also increase the likelihood of large and well-paying employers moving to the vicinity.

Please note that I usually side with the environmentalists during development. For example, I was very publicly against Measure A, which sought to develop a large shopping mall by a local lagoon. In this case, however, I find that airport expansion makes sense, with benefits far outweighing risks and costs.

Please feel free to call me if you wish to discuss.

Best regards,

Erik Staley  
2630 Lewis Ln  
Carlsbad, CA 92008  
(949) 285-5711

~~~~~  
**Erik Staley**  
Principal Consultant,  
Valicom, Inc.

[es@valicom.com](mailto:es@valicom.com) | [www.valicom.com](http://www.valicom.com)

Phone: 866-730-9298  
Mobile: 949-285-5711

Valicom is proud to be a corporate sponsor of the Leukemia and Lymphoma Society and Team In Training (TNT). Please support TNT athletes: see <http://valicom.com/tnt.htm>.

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**From:** Sigrid Tehrani <sigrid.tehrani@att.net>  
**Sent:** Monday, March 28, 2016 10:27 PM  
**To:** Curtis, Cynthia  
**Subject:** McClellan-Palomar Public Comment  
**Attachments:** 2016 03 28 - EIR letter - final.pdf

Dear Cynthia Curtis,

Please see my comments regarding the McClellan-Palomar Airport Master Plan and airport expansion. Let me know if there is anything else you need from me.

Best Regards,

Sigrid Tehrani  
Carlsbad, CA

Sigrid Tehrani  
3194 Corte Tamarindo  
Carlsbad CA 92009  
Phone: 760-846-4496

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

### **RE: Palomar Airport Master Plan**

Lengthening the runway at McClellan-Palomar Airport puts Carlsbad, Encinitas, Vista, and San Marcos on a slippery slope of unwanted noise, pollution, and traffic, not to mention the degradation of a cherished and finite resource: the beautiful California coastline.

Expanding Palomar has been fought since the 1970s when laws<sup>1</sup> were passed to prevent unwanted growth. But these laws and our right to vote appear to be conveniently ignored. But not forgotten.

North County communities are not in a unique position when it comes to battling airports and the noise and pollution that accompanies them. Nor do we have to look far to see the undesirable consequences that go hand-in-hand with airport expansion.

### **Santa Monica Municipal Airport**

In Santa Monica, the mayor rails against the “aircraft carrier” known as Santa Monica Airport, which disrupts the daily lives of residents.<sup>2</sup> At 4,973 ft. x 150 ft., the Santa Monica runway is comparable to the McClellan-Palomar Airport runway of 4,897 ft. x 150 ft.

### **John Wayne Airport**

Then there is John Wayne Airport, where the main runway is 5,701 by 150 feet. It may be one of the shortest runways of any major airport in the United States, but that is no deterrent to commercial carriers, which flock there.

John Wayne is “the third busiest commercial airfield in southern California, served by 14 carriers including Delta, American Airlines and United Airlines.” It welcomes Boeing 757s, 737s, and Airbus 320s. Cargo aircraft (such as the FedEx A310/300) also partake of John Wayne’s runway.

And how does John Wayne’s runway length compare with proposals for Palomar? Current plans for Palomar include a runway longer than the one at John Wayne Airport, which will make us susceptible to the same noise problems that plague Newport and surrounding cities.

But there's even more than runway length that would make an expanded Palomar enticing to commercial and cargo fleets. Unlike Santa Monica and John Wayne airports, Palomar has no takeoff and landing curfews.

A longer runway combined with a lack of curfews will turn Palomar into a virtual nirvana for a wide range of commercial and cargo carriers. Consider the anticipation among cargo companies where profits are tied to the mantra: "When it absolutely, positively has to be there overnight." Care for a 3 AM wakeup call? Every night?

### **The Question of Noise**

The situation at John Wayne Airport highlights the fact that no one has come up a solution for airport noise.

Planes leaving John Wayne Airport are required to take steps to mitigate noise, but it's not working. The noise abatement procedures turn takeoffs into what has been described as a missile launch and the airport dubbed one of the nation's "scariest airports."<sup>3</sup>

But even these nerve-wracking aerial acrobatics have not solved the problems as evidenced by Newport's continuing battles over noise and posts on the City of Newport's website.<sup>4</sup>

It seems absurdly masochistic for North County to be wooing the very airport traffic that both Santa Monica and Orange County communities are vehemently trying to eliminate. Have we learned nothing from our neighbors' plight?

If you want a bigger airport, then there is only one solution: Locate it away from populated areas. It's the option Denver chose with their airport. And sleepy island tourist spots do the same, sticking the airport far from tourist and resort areas.

### **Paradise Lost**

If the Palomar runway is transformed into a John Wayne-sized tarmac, we will be on a slippery slope to becoming paradise lost.

Lengthening the runway will gut our North County communities by introducing inescapable noise, pollution, and traffic while at the same time ruining the beauty and serenity of our cherished coastline. Look at all the economic value San Diego lost with the location of Lindbergh Field on prime coastline property.

"County Supervisor Bill Horn and Carlsbad Mayor Matt Hall have said the improvements will make the airport safer, quieter and more economically viable without significantly contributing to increased traffic."<sup>5</sup>

And a major point among supporters is that lengthening the runway will better serve our corporate neighbors, allowing them to make the hop to Japan in their private jets easier and pad their bottom line.

But lengthening the runway for this select few has unintended consequences that extend beyond a few extra corporate jets. That's because lengthening the runway will also make it long enough for a fleet of commercial carriers and cargo jets.

Rest assured, if you build it, they will come. And they can't be stopped by the airport manager nor the FAA.

As has been stated in news reports, neither the airport manager nor the FAA, can deny landing rights to any airplane if the plane is "capable" of landing at the airport. So, while a longer runway will benefit our corporate neighbors, it will also open the door to a whole host of larger aircraft that currently cannot land at Palomar. Consider the impact of these aircraft, which land at John Wayne Airport: Boeing 757s, 737s, Airbus 320s and the FedEx A310/300.

Runway proponents pooh-pooh that possibility, arguing that Palomar Airport is simply too small to function like John Wayne. For example, there's insufficient parking at Palomar, an essential ingredient for commercial airline use.

But wait a few years. Those same arguments will be used as *justifications* to expand the airport again. And Palomar will continue to grow, as will the problems.

### **Subpar Location Equates to Overblown Price Tag**

Due to the location of the Palomar airport and what lies beneath (an unstable, rotting landfill) lengthening the runway requires an expensive engineering sleight of hand. Add to that Supervisor Bill Horn's "vision" to extend the runway even further over El Camino Real using a bridge/tunnel system, which would also require a land grab for City of Carlsbad Open Space on the other side of El Camino.

All this for a tarmac? Surely, if approved, this will be one of the more expensive runways conceived. All at taxpayer expense.

I'm certain it's a marvelous challenge that engineers would relish to tackle ... and bill us for. But if it were my money (and it is), a runway over a landfill hardly seems practical and opens us up to additional reconstruction costs in the future as the structure degrades from a combination of the subpar substrate and repeated landings.

Is this really the best use of tax dollars? Years from now, people will look back and say "What were they thinking?"

But let's give Supervisor Horn and Mayor Hall the benefit of the doubt. Let's put on our magical thinking hat and assume that building a runway as large as John Wayne will not be a magnet for an expanding fleet of commercial and cargo jets. Let's assume, as Horn and Hall state, that lengthening the runway is "economically viable without significantly contributing to increased traffic."

If aircraft traffic is only minimally increased and the runway costs are excessive due to the required engineering needs, how will the airport make money? Will all the income from the airport be calculated as pure profit since the taxpayers will be footing the bill?

Is that why the project at Palomar keeps ballooning? What was once merely a longer runway has turned into a tarmac that stretches across El Camino via a bridge sturdy enough to withstand landings. Are the taxpayers a bottomless pit of largesse?

## **Safety**

We all agree safety is paramount when it comes to Palomar Airport and the plan to create traps at the west end of the runway to capture errant aircraft is a good use of taxpayer money. But these traps are not wedded to the project at the runway's east end, the runway extension. These are separate issues that should not be co-mingled as one project. You can have one without the other.

As for lengthening the runway, that project is also promoted as a safety measure. But, in reality, it's not a solution for the current issue, which is that planes too large for the runway are landing at Palomar. Building a longer runway does nothing to stop that.

Planes too large for even a longer runway will continue to land at the airport. That's because neither the airport manager nor the FAA actually controls who lands at an airport. As reported by KPBS:

The FAA controls the airspace, but Ian Gregor, public affairs manager of the FAA's Pacific Division wrote: "As far as limiting the size of aircraft using the airport, the FAA generally does not have a mechanism to prevent an aircraft larger than the design aircraft from using an airport. This is provided that the aircraft can safely land and take off on the available length, width and strength of runway pavement."

So lengthening the runway doesn't solve the problem at all; it simply bumps up the size of the aircraft that are pushing the envelope of safety.

## **Who wins? Who loses? And how is that calculated?**

How do you calculate costs when it comes to expanding an airport? It's easy to discern the costs that fit into the columns of a ledger sheet. But ledger sheets are imperfect catalogs of all the pros and cons for a project like this.

As one MIT analysis noted on the costs of airports:

While policymakers often focus on aggregate cost-benefit analysis to examine tradeoffs in aviation environmental policy, these analyses do not always indicate who bears the costs or who gains the benefits of aviation.

It's easy to see why. Income and profits are easy to tally for ROI. But:

- How do you put a price tag on quality of life?

- How do we tally the health costs of sleep deprivation due to aircraft noise?
- How do we calculate the cost to the surrounding communities when the simple pleasures of an afternoon in your own backyard are ruined for thousands due to the noise pollution from jets over head?

You can't. Because it's priceless.

Issues such as air pollution and health issues are simply, in accounting terms, "externalities" that can be given short shrift since they don't fit neatly into the ledger.

Yet, I believe there is a way to measure them, indirectly, by cataloging how people are dealing with comparable airport issues in the real world. So I would like to make some recommendations regarding what to include in the EIR report.

### **EIR Recommendations**

In addition to noise, traffic, and pollution calculations, the EIR report should also study:

1. Community complaints and their outcomes for airports of Palomar's current and proposed runway sizes. This will give North County residents a better perspective on how real-world problems play out and paint a more accurate picture of the future.
2. Growth trajectories for airports Palomar's size where expansion was allowed. Do airports stay the same size? Or do they continue to grow into an ever-expanding urban wasteland?
3. A complete explanation of our obligations (FAA Grant Assurances) in accepting federal money for Palomar airport. This would include, in language the average taxpayer could understand, explanations of how local control will be limited. In addition, it should include real world examples of the typical FAA issues communities face and how those are or are not resolved. The EIR should also clearly state how long we would be required to maintain grant assurances if we accept federal money.

### **In Closing**

Lengthening the runway will open a Pandora's Box of noise and pollution problems that will permeate every part of our lives. Communities across the state and country are battling airport noise and pollution issues, so it is inexplicable that we are actively promoting these same problems for our own communities.

Based on what I have read, the only solution is to prevent the problems before they occur.

Best Regards,

Sigrid Tehrani



## References

1. Local laws regarding McClellan-Palomar expansions. <http://www.savecarlsbad.com/#!cup-172-page/ci98> and <http://www.savecarlsbad.com/#!ordinance-page/c1crq>
2. Santa Monica Mayor Kevin McKeown: As Mayor, my primary responsibility is to protect the health, safety, and welfare of the residents of Santa Monica. I also am concerned for the impacts of SMO on surrounding communities. Besides protecting our residents, I must also protect our resources. I'm here today because Santa Monica Airport endangers both our residents and our resources. What was once a grass landing strip in the midst of beanfields is now often described as "an aircraft carrier in a sea of homes."  
[https://www.smgov.net/Departments/Airport/About/Remarks\\_of\\_Mayor\\_Kevin\\_McKeown\\_to\\_the\\_FAA\\_July\\_8,\\_2015.aspx](https://www.smgov.net/Departments/Airport/About/Remarks_of_Mayor_Kevin_McKeown_to_the_FAA_July_8,_2015.aspx)
3. The Orange County Register: SANTA ANA – The runway is short, the climb is steep and the whole takeoff experience at John Wayne Airport is just different enough that pilots often warn their passengers to hang on. A travel website recently named John Wayne among the nation's "scariest airports," comparing those takeoffs to a missile launch or a space-shuttle liftoff.  
<http://www.ocregister.com/articles/john-364661-wayne-airport.html>
4. City Of Newport website: "The airport's growth has brought a number of adverse impacts - such as noise, traffic and aircraft emissions – that pose significant threats to the quality of life for Newport Beach residents. In addition, the Newport Beach City Council and a number of Orange County cities (known as the "Corridor Cities") located along the airport's arrival and departure corridors have publicly agreed to oppose:
  - Any expansion of JWA beyond its current physical footprint;
  - A second commercial runway or the extension of the existing runway;
  - Any significant reduction in general aviation operations / facilities, which could allow for more commercial aircraft use; and
  - Any detrimental change to air carrier or general aviation noise ordinances.
  - Newport Beach believes that the coordinated, collective efforts of local citizen groups, the Corridor Cities, and the County are essential to controlling the adverse impacts of JWA and protecting the quality of life here for this and future generations of residents.  
<http://www.newportbeachca.gov/trending/projects-issues/john-wayne-airport>
5. "County Supervisor Bill Horn and Carlsbad Mayor Matt Hall have said the improvements will make the airport safer, quieter and more economically viable without significantly contributing to increased traffic."
  - <http://matthall.org/2016/03/county-launches-review-of-carlsbad-airport-plan/>
  - <http://www.sandiegouniontribune.com/news/2016/mar/01/county-launches-review-of-carlsbad-airport-plan/>
6. Olivier Brackett, the manager at Palomar Airport, he has no control over the air traffic. "I am forbidden from restricting the airport to certain types of aircraft using it, or the times of day that aircraft can land and depart," Brackett said. The FAA controls the airspace, but Ian Gregor, public affairs manager of the FAA's Pacific Division wrote: "As far as limiting the size of aircraft using the airport, the FAA generally does not have a mechanism to prevent an aircraft larger

than the design aircraft from using an airport. This is provided that the aircraft can safely land and take off on the available length, width and strength of runway pavement."

<http://www.kpbs.org/news/2015/dec/02/mcclellan-palomar-airport/>

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

March 28, 2016

Email: Cynthia.Curtis@sdcounty.ca.gov

Reference: Additional responses needed to be included in the  
McClellan-Palomar Airport CEQA Initial Study

Dear Ms. Curtis:

At this time, I think it is premature for the County of San Diego (County) to ask for Public comments on the CEQA process regarding the McClellan-Palomar Airport (Palomar) Next Twenty (20) Year Master Plan. In all four (4) past workshops the County has not presented one concise future plan for Palomar, only numerous possibilities or as was presented in Workshop #4 only a proposed airport redesign with no real details or an open forum to allow the Public to ask questions of the presenters.

That being said, since the County has asked for help on what may be overlooked in its CEQA document, hopefully the following will help. To date, the only firm reasons the County has expressed for the expansion of the airport is to accommodate the larger Bombardier Global 8000 business jets that will be in production starting as early as 2017 and/or to allow the present Design Class C/D-III aircraft to fly nonstop from the certified Design Class B-II airport to China or Europe. Fact, the County is proposing spending One to Three Hundred Million Dollars on an airport to accommodate .003% of today's airport traffic. Something is not adding up.

Maybe that something is as Benjamin Franklin first published in 1758 - *"Half truth is often a great lie"*.

**Page 4** of the CEQA document list **"Environmental Factors Potentially Affected"** sections of the document that has "Potential Significant Impact or a "Less Than Significant With Mitigation Incorporated"

**Page 5** of the CEQA has the following box checked *"On the basis of this Initial Study, Department of Public Works finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required."*

In reviewing Page 4's checked boxes listed sections, it is obvious the County is downplaying the potential impact and effects of a number of the checked boxes.

In today's world, it is impossible for the ecological impacts of airports to be hidden. With all the worldwide studies published about airport noise and pollution and the impact they have on the health of the airport's surrounding communities, it is most interesting the following is missing from any information thus far presented to the Public:

1. Supervisor Bill Horn
  - **December 16, 2015**, County Board Meeting, to paraphrase — *We are planning a very, very viable commercial operation for the next 50 years if not 100. It's time to move the small recreational pilots out.*
  - **March 7, 2016**, interview with KUSI News on the new Palomar Airport Master Plan — *"...you will be able to get to Palomar from the east coast even Europe; it allow planes to leave and go all the way to Japan and China so it makes it almost an international airport..."*
2. The County's own "Feasibility Study for Potential IMPROVEMENTS RECOMMENDATION to McClellan-Palomar Airport Runway — Final Report August 1, 2013" — **Page 0-1** *"Although the footprint of the overall airport is able to handle a runway extension to reclassify the airport as a C-III, the change would involve extensive reconfiguration of the entire airfield including tenant improvements, airplane parking loss and/or relocation, impacts to buildings, and the relocation of NAVAIDs, fuel tank/station and the airfield lights and signs systems. Therefore any extension alternative that would reclassify the airport would be considered not feasible."*

**What has now changed to allow Palomar to be reclassified as a Design Class C/D-III airport?**

3. As airports grow, the FAA has reported the surrounding communities property will be lose value. Where is that FAA projection?

Additionally, why are there no projections for lower rental or property tax revenues as a result of a less than desirable area to live?

4. Because of airport noise and greenhouse gas pollution, more and more United States and worldwide health studies are now stating some of the following — living within a 10 mile radius of a commercial jet airport is showing higher incidences of cancer, cardiovascular disease and 10 to 20 years earlier onset of dementia than previously found in the normal population. Why is there no mention of that fact?
5. In 2002, the Airport, FAA and the surrounding communities had a number of meetings to discuss the growing aircraft noise. Those meetings concluded with a promise from The Airport and FAA to solve the noise issue. A promise made, but never kept. From 2000 to 2015, Palomar has received approximately 45,050 noise complaints. Using the United States Commerce Department statistics — for each complaint, 26 do not complain or 45,050 times 26 = more than 1,171,300 households around Palomar airport have been negatively impacted by airport noise. Given that statistically, the average household equals 2.3 occupants, that means 2,693,990 citizens have be impacted over the last fifteen (15) years from mostly small recreational aircraft. Now compound the fact that Design Class C/D-III aircraft generate a lot more noise than recreational aircraft, where are the increased noise projections from the larger jet traffic?

History Matters - The airport has proven it is a bad neighbor. The last 15 years of complaints reported to Palomar has resulted in no action taken to resolve the complaints. No action by Palomar, the FAA nor the Palomar Airport Advisory Committee (PAAC) who's Charter from the County under DUTIES states:

- *"To review and make recommendations on issues pertaining to noise control at Palomar Airport."*
- *"To provide an open forum between the Communities and the County on matters pertaining to Palomar Airport."*

The FACT is, neither of the above duties have been complied with. The PAAC refuses to have an open forum with the public. Additionally, numerous complaints have been recorded and ignored by the County, Airport and the PAAC. The PAAC has been asked "What do you do with

the complaints? Do you ever follow-up on a complaint to get more details? The answer was no, the complaints are archived. We are only interested in the trending of the complaints.

6. The County never divulged to the Public any statistics it has in its possession and how they will impact the surrounding communities, e.g.,:
  - a. What is the projected Palomar increased passenger load?
  - b. What is the projected increase in ground traffic required to support Item a.?
  - c. What is the increase in air pollution?
  - d. What is the increase in noise pollution?
  - e. What is the projected increase in more and more aborted approaches (Go Arounds) over public and private schools?
  - f. What exactly did the County's SCS Engineering Study state on the potential of disaster with the landfill directly under an airport servicing Design Class C/D-III aircraft?
7. In 1996, the County is on record it was concerned about the fact that Carlsbad's Conditional Use Permit (CUP 172) and Ordinance 21.53.015 require Carlsbad residents vote on changes to the airport. That same concern was expressed on Page 2-11 of the County's Palomar 1997 Master Plan.

Therefore, WHY is the County's new massive redesign Palomar Airport Master Plan not in violation of Carlsbad's CUP 172 and Ordinance 21.53.015?

8. TODAY it has been recorded more than 50% of the aircraft traffic are not on an approach path and are flying below FAA regulated minimums. Given that fact, what percentage of the new airport air traffic will be flying over surrounding communities below FAA minimums?
9. Fact, John Wayne Airport (SNA), a Design Class C/D-III airport, has mandatory curfews. With the tens-of-thousands of noise complaints over the years, WHY is there no plans for Palomar implement any form of mandatory curfews?
10. With all the pollution generated from commercial jet airports, why does the County feel the public health and lifestyle would benefit from the increased noise and pollution the Palomar airport redesign would create?
11. Given the demonstrations and lawsuits caused by the rollout of the FAA NextGEN system all over the county, what impact (noise, pollution, decreased health, quality of life, property values and tax revenues) will NextGEN have on the more than 800,000 citizens of North County?
12. What about security issues both from flight schools and larger commercial jets?
13. What is the percentages of foreign nationals being trained in the Palomar flight schools?
14. In 2013, the EPA released the final report on its four year lead air quality compliance testing of 17 airports. According to the report, Palomar and San Carlos airports failed the testing. San Carlos has corrected the conditions that caused it to fail, but according to the County, it disagreed with the way the EPA conducted the test and refused to correct the situation causing Palomar to fail the EPA testing. Is Palomar still not complying with the EPA lead testing requirement? If not, why not?
15. According to the Palomar Workshop #3, the airport's runway must be extended to accommodate the new class of future jets, e.g., Bombardier Global 8000 business jet that will be in production by 2017/18. According to the Bombardier Global 8000 specification sheet, this plane will require a runway length of 5,950 feet at Maximum Takeoff Weight. Yet the now planned 800 feet extension to today's 4,897 foot Palomar runway will only lengthen the runway to 5,697 feet. This leaves the new runway 253 feet short and still will not accommodate a fully loaded Bombardier Global 8000 business jet flying to China or Europe. After more than three years of studying the design criteria/options, the recommended Modified C/D-III runway will be too short. **OOPS!** What is the real reason the County is pushing to completely redesign Palomar?

16. In Workshop #4 it was stated the County sent out 250 emails and placed a notice in the newspaper about the upcoming workshop. Given the tens-of-thousands North County citizens that will be impacted by the Palomar redesign, does the County think it fulfilled its fiduciary responsibility to the more than 800,000 North County citizens? Or did the County just check another government required box?

The above are just a few of the reasons why it must be asked - why is the County of San Diego not protecting its citizens quality of life, health, property values and children's safety?

WHY are the needs of the few business interests outweighing the needs of the residents/voters to pursue a better quality and healthy lifestyle?

In the words of President Ronald Reagan,  
*"Government's first duty is to protect the people, not run their lives."*

Palomar airport started its life with the promise of not growing beyond a "General Aviation Basic Transportation Airport". Rather than the airport looking at expanding into a Modified C/D-III airport it needs first to get permission from the voters as described in Carlsbad's CUP 172 and Ordinance 21.53.015. Only the voters of Carlsbad can decide if they would like to have their quality of life destroyed, for the sake of the few business interests.

As first stated, *"At this time, I think it is premature for the County of San Diego to ask for Public comment on the CEQA process regarding the McClellan-Palomar Airport Next Twenty (20) Year Master Plan."*

Lastly, I am reminded of a quote by Mr. Jamie Dimon, Chairman, President and Chief Executive Officer of JPMorgan Chase at the World Economic Forum Annual Meeting in Davos-Kiosters, Switzerland, January, 2016, when he was asked *"Today what worries you most?"* Mr. Dimond's answer was, *"The thing that worries me most, honestly is bad, badly designed public policy that has adverse consequences that really hurts us."*

Converting Palomar from a Design Class B-II to a Design Class C/D-III airport directly in the middle of San Diego County's eleventh (11<sup>th</sup>) and twelfth (12<sup>th</sup>) most affluent zip codes, is definitely contradictory to President Ragan statement and most definitely meets Mr. Jamie Dimon's definition of bad, badly designed public policy that has adverse consequences that really hurts us, the hundreds of thousands of North County Citizens who will be adversely impacted by the pollution, noise and increased health issues a Design Class C/D-III airport is guaranteed to generate. Look no further than the surrounding communities of John Wayne, Long Beach, Santa Monica and many more airports all over the country and see how the lives of the communities surrounding airport serving jet aircraft have and are adversely impacted.

I sincerely hope the above helps in finally allowing the County to address all the issues McClellan-Palomar Airport redesign will create for the cities who are already on record of complaining about aircraft noise - Carlsbad, Del Mar, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach and Vista.

*Graham R. Thorley*  
Graham R. Thorley

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**From:** Stephanie Yackley <stephanie@yackley.net>  
**Sent:** Monday, March 28, 2016 3:29 PM  
**To:** Curtis, Cynthia; PalomarMP@kimley-horn.com  
**Subject:** Palomar Airport Expansion - Feedback

To Whom It May Concern:

We are the homeowners at 7036 Heron Circle, in the Bay Collection off Poinsettia in Carlsbad. We have serious and warranted concerns regarding the proposed airport expansion.

First are the noise and air traffic concerns, secondly the air pollution from increased and heavier weight airplanes and increase of vehicles in proximate neighborhoods and lastly, crime.

In our neighborhood, although we are no where near the flight plan, there are always planes that go off course and end up short-cutting their south/eastern turn directly over our home. Also, throughout the day many flights short-cut over my home rather than turn south/east over the ocean as defined in the Voluntary Noise Abatement Guideline. Especially, the "touch and goes". With future expansion, this issue will grow exponentially from pilots who do not respect or choose to ignore the Voluntary Noise Abatement flight path. With the exception of medical/fire emergency flights, the Noise Abatement Flight patterns MUST be followed and if not, stiff financial penalties should be administered. The penalty monies should be returned to the communities affected by supporting an insulated windows change out program or other noise dampening needs a homeowner may require in the future. The expansion plan highlights the newer jets, however with the longer runways - older jets with the louder engines will be attracted to this airport as well.

Additionally, the amount of particles and overall pollution will increase with the increase in flights, more vehicles, and planes that are older that currently are limited to land or take-off by the length of the runway. When the wind is from the north, I have smelled airplane exhaust at my home as well.

Lastly, with more traffic will come a larger transient population potentially increasing crime and theft.

We ask that you seriously reconsider the airport expansion as we see nothing good happening to our community because of it.

Sincerely,

Stephanie & Larry Yackley  
7036 Heron Circle  
Carlsbad, CA 92011  
858-354-6000



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**From:** Kim Bryant <kimbryant@mac.com>  
**Sent:** Tuesday, March 29, 2016 10:19 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Extension

Dear Cynthia Curtis,

It is my understanding the proposed improvements to the Palomar Airport will cost over 100 million and that doesn't include the cost of lengthening the runways which are projected to cost millions more. The airport expansion benefits private and corporate jet owners, a tiny percent of the local population. The following are my concerns:

1. Increased air pollution, Palomar Airport already exceeds Federal lead limit requirements.
2. Increased noise pollution. There are no curfews or required flight plans for Palomar Airport and this is a problem for local residents, especially at night.
3. Decreased property value, up to 18% by some reports.
4. Increased traffic that adds to the current traffic gridlock.
5. The required vote of the citizens of Carlsbad is ignored. Carlsbad regulates the expansion of the airport via Ordinance 21.53.015, which requires a majority vote of the citizens of Carlsbad.

But most importantly, this expansion benefits only a small percent of the population, the wealthy, and is funded by the taxpayers. I urge you to instead use the funds intended for the runway extension to improve the freeways and surface streets, which would benefit the majority of the citizens of San Diego County.

Respectfully,

Kim Bryant

Carlsbad resident



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**From:** Kim Bryant <kimbryant@mac.com>  
**Sent:** Tuesday, March 29, 2016 10:30 AM  
**To:** Alex, Nicholas  
**Subject:** Palomar Airport Expansion

Dear Mr. Alex,

It is my understanding the proposed improvements to the Palomar Airport will cost over 100 million and that doesn't include the cost of lengthening the runways which are projected to cost millions more. The following are my concerns:

1. Increased air pollution, Palomar Airport already exceeds Federal lead limit requirements.
2. Increased noise pollution. There are no curfews or required flight plans for Palomar Airport and this is a problem for local residents, especially at night.
3. Decreased property value, up to 18% by some reports.
4. Increased traffic that adds to the current traffic gridlock.
5. The required vote of the citizens of Carlsbad is ignored. Carlsbad regulates the expansion of the airport via Ordinance 21.53.015, which requires a majority vote of the citizens of Carlsbad.

But most importantly, this expansion benefits only a small percent of the population, the wealthy, and is funded by the taxpayers. I urge you to instead use the funds intended for the runway extension to improve the freeways and surface streets, which would benefit the majority of the citizens of San Diego County.

Respectfully,

Kim Bryant

Carlsbad resident

Date: March 29, 2016

Comments on McClellan-Palomar Airport Master Plan: Attn Cynthia Curis

From: Laurie Batter and Charles Bruce Macklin, Jr.

1201 Bowsprit Way, Carlsbad, CA 92011

Email contact: [batterup@batterupproductions.com](mailto:batterup@batterupproductions.com), [bruce@macklinappraisal.com](mailto:bruce@macklinappraisal.com)

Phone: 760-518-9304; 760-434-5555

It is hard, if not impossible to make a case that Carlsbad Citizens are being served by this proposed expansion when in fact our quality of life is greatly compromised on a daily basis. As we write this letter, multiple planes have flown overhead, despite the flight path guidelines for our community.

So we ask, what criteria will be used to judge whether the airport expansion is appropriate and/or desirable for the community of Carlsbad?

How has the airport's safety record been?

There have been multiple accidents, and fatalities.

How has adherence to the flight path guidelines been?

We experience many, many flights overhead on a daily basis, as often as one every minute, or less. This is despite guidelines instructing pilots to follow PAR to the ocean before turning.

How often do the pilots observe guidelines on airport departure and landing times.

Not often by our experience. On many days a week, flights take off at 3am, 4am, 5am and as late at night as 11pm, and midnight. We experience a huge spike during periods of special events such as golf and tennis tournaments, and the racing season when corporate jets fly in and out at all hours. We are regularly awakened despite closed windows.

We are offended that we are regularly admonished that we signed paperwork when we purchased our homes advising we were near an airport. Well yes, we did, but that didn't mean we accepted that the pilots could fly in and out at all hours of the day and night, and fly over head instead of following the PAR before turning.

Continuing with this approach of not listening to nor keeping the quality of life for Carlsbad citizens paramount and primary does not bode well for us based on the plans you have for expansion that do not address these very real problems.

How well have existing requirements listing size of aircraft allowed to use the facility been followed?

Apparently, not at all. According to the article in the SD Union, "larger faster planes are already landing there. To accommodate them the airport has to grow, county officials have said..." So, the airport was designed to handle small and mid-size

aircraft but already those guidelines are being ignored. Should we look forward to the date that someone crams a jumbo jet on Carlsbad's modest airstrip and then decide we should build a runway to the sea so we can accommodate them?

The question must be asked, "Just exactly whose interests are being served by this expansion? Since no one can go down to the airport and buy a ticket for a flight to anywhere ... and with a record of multiple experiences of seven airlines finding that it is just not economically feasible to sustain service at PAR... how can anyone make the case that flying larger planes would be viable? If you can't fill the seats on small to midsized planes, what in the world makes anyone think that just because you build it, customers will surge out of the woodwork!

No, sadly, this expansion will not be to serve the interests of any sizeable sector of Carlsbad's citizens. The expansion will stroke the egos of those aviation buffs who think a larger airport would be keen. It will serve the "needs" of a very small group of elite owners of large private jet aircraft. Why should Carlsbad's citizens right to safety, peace and quiet, and a good night's sleep be threatened just for one non-citizen's gamble?

It seems very evident that Carlsbad's City Council has very recently had their wings clipped because they advocated for the building of another non-citizen's business gamble at the expense of their citizens' right to peace and quiet, preservation of open space, and the citizens' right to calm enjoyment of their surroundings.

The parallels between the two proposals are far too strong to ignore. Once again, the citizenry of Carlsbad as a whole is being asked to suffer the daily annoyance of lax restrictions, scant, if any enforcement, and on-going peril from safety lapses... all to benefit a sector that no one can contest is LESS than 1% of Carlsbad's population.. if they are even part of Carlsbad's population at all.

Those who sit in judgment of this proposed expansion need to take a good look at themselves in the mirror and ask: "Am I really serving the interests of the constituents that put me in this position?" Or would such a proposal only be serving the very limited interest of an extremely finite number of privileged individuals, at the expense, disruption, danger and multi-faceted pollution of Carlsbad's electorate as a whole.

Respectfully submitted,

Charles Bruce Macklin, Jr. and Laurie J. Batter

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**From:** wayne cowie <type47fan@gmail.com>  
**Sent:** Tuesday, March 29, 2016 4:55 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion EIR Comment

Dear Ms. Curtis,

**We are not LA!**

There are so many things wrong with even considering changes of the magnitude being considered for McClellan-Palomar Airport (CRQ). The usual concerns by residents of surrounding areas relating to pollution, noise, traffic, safety, and the permanent loss of an intimate coastal environment that we fight for on a daily basis to maintain. We don't have the infrastructure in place, nor is it planned, to support further airport expansion. This single fact alone, needs to be resolved before further airport expansion can be considered.

Over the years, we have watched and studied the over-development of other general aviation airports in southern California, Santa Monica (SMO) and Santa Ana (SNA). In these cases, it is not the residents who have been pushing for the changes we have seen. In fact, the wishes of the residents are generally discounted, over looked, and ignored. Even at CRQ, we have seen the wishes of the residents subordinated to those of large money interests over the past twenty years.

Take for example, the Carlsbad Conditional Use Permit (CUP-172) that has been ignored, leading to the situation we have today with airplanes larger than safely allowed using the airport. The large planes can land, but they cannot take off with a full fuel load because the runway is not long enough. The CUP-172 says that the airport can be expanded only with a vote of the citizens. How is it that the airport has reached its current state without a vote? Leadership failure? These same leaders are pushing for further expansion that should be deemed illegal and stopped. • <http://www.savecarlsbad.com/#!/cup-172-page/ci98>

Communities across California and the country are battling noise and pollution issues caused by the expansion of general aviation airports. Do we think we can escape these same issues? That somehow these negative outcomes will or even can be mitigated? The answer is that if airport expansion is allowed, we won't escape the negative outcomes and they are "too expensive" to be mitigated effectively. It doesn't have to happen here!

It is inexplicable that we should actively promote the introduction of problems into our community and into our homes by agreeing to further expansion of CRQ.

Many will have presented their concerns better than I have, with much more detail, and citation. The bottom line for me is that any further expansion of CRQ must be supported by the residents who live in and around the airport. In particular, further CRQ expansion is contrary to and in conflict with Carlsbad's stated Vision and Core Values guiding growth. These values are supposed to be the basis for decisions made regarding development and growth within the city.

<http://www.carlsbadca.gov/services/depts/planning/update/vision.asp>

The reality is that expanding the airport will introduce a myriad of problems, for many years, that will permeate every part of our lives. There is no cure, as our Santa Monica and Orange County neighbors have proven. The only "cure" for adverse effects is to prevent expansion in the first place. It doesn't have to happen here. **We are not LA!**

--

Wayne Cowie  
[760.458.5076](tel:760.458.5076)

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**From:** Dee Forsberg, Global Hire <Dee@globalhire.org>  
**Sent:** Tuesday, March 29, 2016 1:15 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion

Sent via email: Cynthia.Curtis@SDCounty.ca.gov

March 29, 2016

Hello Cynthia,

My name is Delinda Forsberg and I am a long-term resident of Carlsbad. I know today is the deadline for sending our concerns or comments about the expansion of Palomar Airport and I wanted to elaborate on them. Unfortunately, not many residents know what is happening, because they don't get newspapers or watch the news. Otherwise, I think you would have a greater response.

As you know, Palomar Airport is built on a landfill, which actually caught on fire in early 2000, because of underground gases being released. Airport hangers have required height adjustments, because the land has shifted below. In addition, this landfill was opened back in the 60's before there were any regulations regarding the type of waste that could go into the dump, which produces different types of gases.

I have many concerns regarding any expansion of Palomar Airport. The negative impacts of the airport expansion include safety, decrease in property values, increased traffic, noise, air pollution, climate change, water use, and effects on the social structures of not only Carlsbad, but surrounding communities.

Just within the last year, we have had two accidents involving aircraft from Palomar. Unfortunately, some were fatal. When the airport was initially built, the population of Carlsbad was much smaller, had lots of open space and we didn't have as many schools, homes, etc., in the area.

It is a proven fact that when airports are expanded and air traffic increases, the surrounding properties are adversely impacted. Property values decrease and so does the quality of life for residents. Please refer to the reduced value of properties in Orange County as an example. Airports and aviation generate air pollution through a range of sources:

- Combustion of aviation fuel, which is mostly composed of kerosene. It produces nitrogen oxides, carbon monoxide, Sulphur oxides, hydrocarbons and particulates. It also releases greenhouse gas carbon dioxide.
- Engines that are working inefficiently on approach (as they only use about 30% of the available power) allows a certain amount of unburnt kerosene to be released. These unburnt fuel droplets are a source of volatile organic compounds and give rise to odors.
- As aircraft tires get worn and burnt during take-off and especially landing, they release particulate matter.
- Fuel dumping, which primarily occurs during emergency landings, can occur.
- Increased vehicle travelling to and from the airport, ground service equipment (tugs for planes, vans that transport passengers, etc.) all generate particulates and (indirectly) impact ozone through the burning of petrol and diesel fuel.

- Fuel storage tanks and transfer facilities can lead to the release of VOC's.

Air pollution can affect the health of people, animals and plants. There is also a higher chance of birds and planes colliding, because of our surrounding lagoons, beaches and mild climate.

There has been a significant increase in air traffic noise. Approximately two weeks ago, I called to report a plane flying very low. Come to find out, they were only 500 feet above the ground and continued to fly at that level until they were above the water. A safety violation report was filed with the FAA, but I never heard anything back. Last Monday, a "jet" took off at 5:45AM and after doing some research, I found out there are no quiet times in Carlsbad. The last time it was reviewed by the FAA was in 2006.

It has also been documented that aircraft which exceeds the allowable size, have been flying in/out of Palomar Airport. There has been no repercussions and the FAA and others have turned a blind eye.

Caltrans has no plans to do any expansion of Interstate 5 for several years and we already have enough traffic congestion in our community and on the freeway.

Clearly, I don't have faith in the review process, because current regulations aren't being followed. I also know there are some wealthy individuals who are backing the airport expansion for their convenience and will do whatever it takes to ensure their interests are satisfied.

Sincerely,

Delinda Forsberg  
6571 Paseo Del Norte, Unit E  
Carlsbad, CA 92011



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**From:** Bob <gaiterguy@gmail.com>  
**Sent:** Tuesday, March 29, 2016 1:33 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar airport master plan comments

Hello,

I live in the community of Rancho Dorado off Palomar Airport Road in San Marcos.

I am concerned with air traffic increases and noise level increases with each of the expansion phases. What is the expected traffic increase number with each expansion? Can I find out the noise level statistics from our neighborhood?

Will anything be done to alleviate the noise?

Will the flight pattern change?

Regards,

Bob Mayers

Gaiterguy@gmail.com

Sent from my iPad

---

**From:** Brian McInerny <beyondthemack@yahoo.com>  
**Sent:** Tuesday, March 29, 2016 7:05 PM  
**To:** Curtis, Cynthia  
**Subject:** airport comment

Dear Ms.Curtis,

I am a resident of Carlsbad and I have concerns about the expansion of Palomar Airport.

- ~ it is a facility that benefits very few and is subsidized by taxpayers
- ~ currently pilots regularly ignore the guidelines and fly between 10pm-7am as well as routing outside of the recommended flight path, over homes causing disturbance from noise and pollution
- ~ safety is a concern and more air traffic will only create more exposure for residential neighborhoods
- ~ there is no Palomar EIR
- ~ creates countless problems by digging up a landfill
- ~ air quality will be significantly impacted by toxic jet fuel emissions
- ~ traffic will increase in an already gridlocked area of hwy 5
- ~ municipal code 21.53.015 requires voter approval for this expansion

I respectfully ask that all of these factors and others are considered when moving forward with this very sensitive project.

Kindly,  
Lisa McKethan  
1343 Forest Ave.  
Carlsbad



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**From:** Hope Nelson <hopen51@att.net>  
**Sent:** Wednesday, March 30, 2016 2:10 PM  
**To:** Curtis, Cynthia  
**Cc:** manager@carlsbadca.gov; Council@carlsbadca.gov; Kashak, Jeff; Alex, Nicholas; Ron-Roberts; Jacob, Dianne; Horn, Bill; Roberts, Dave; Cox, Greg  
**Subject:** FW: Comments regarding Palomar Airport  
**Importance:** High

**From:** Hope Nelson [mailto:hopen51@att.net]  
**Sent:** Tuesday, March 29, 2016 4:41 PM  
**To:** 'Cynthia.Curtis@sdcounty.ca.gov'  
**Subject:** Comments regarding Palomar Airport  
**Importance:** High

Dear Ms. Curtis,

We are 16 year residents of Carlsbad. We reside at 1416 Sapphire Dr., Carlsbad 92011. We happen to live in the Marbrisa development, directly across from the PAR runway, south side of Palomar Airport Road.

We find it incredible that anyone is seriously looking at airport expansion for the following reasons:

- Airport operations remain low and, in fact, declined from 2013 to 2014. Note PAR's biggest year for operations was way back in 1999 (15 years ago) with 291,873 operations, way before anyone was talking about bigger aircraft with broader wingspan. Although the surrounding population continues to grow, 2014 operations were less than half at 141,567. It makes us wonder why anyone thinks expansion is needed.
- No fewer than 7 airlines have tried and failed to succeed at PAR. They simply could not fill seats. The last of these airline failures was in 2015.  
How can a case be made for expanding a runway that is in declining use because commercial airlines cannot fill seats at PAR?
- PAR continues to benefit the few who use corporate jets to do their business at the expense of community health, safety and tax dollars.
- Those corporate jets have little to no regard for the communities they impact. History tells us they do not pass muster as "good citizens". They have eroded the Voluntary Noise Abatement program, ignored recommended flight paths, and thus, disregarded the Fly Friendly program.

- Due to the hours of arriving flights, we understand many flights coming in from out of the US are NOT subject to customs inspection or passport verification.
- Further, I see nowhere has the County/PAR respected Carlsbad when asking the FAA to reclassify PAR basic general aviation classification, while Carlsbad's Conditional Use Permit (CUP) 172 required Carlsbad approval.

The only thing we can reasonably assume is the entire issue is to satisfy the desires of the elite private jet users. This begs another question. Ultimately, how will a cost/benefit analysis be determined? On the most recent Master Plan update, it is noted \$117M in local business revenue generated by Airport industries (2008) and 1446 local jobs created indirectly from PAR (2008). We would like to know what backs up these figures.

Regarding the environmental analysis:

- VNAP DOESN'T WORK! Citizen's deserve more consideration. Voluntary does not work! Noise pollution affects our quality of life!
- Same as above applies regarding flight paths. Voluntary does not work! We deserve safe neighborhoods!
- How will methane gas fires under the current runway be handled? This continues to be a dangerous situation.
- Air pollution, ground pollution, noise pollution are all issues, as is runoff.

Please do not continue to pursue expansion of the PAR runway. We do not need it, we do not want it, we do not want our tax dollars to support it!

Respectfully,  
Hope and Vince Nelson

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**From:** susan poser <susanlposer@gmail.com>  
**Sent:** Tuesday, March 29, 2016 6:43 PM  
**To:** Curtis, Cynthia  
**Subject:** Expansion of Runway

Would the expansion of the runway allow commercial airlines such as United to come back? Do you have commitment from them to come back if the runway is expanded as I would be all for it if that was the case!



March 29, 2016

County of San Diego  
Department of Public Works  
Attn: Cynthia Curtis, Environmental Planning Manager  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123  
[Cynthia.Curtis@sdcounty.ca.gov](mailto:Cynthia.Curtis@sdcounty.ca.gov)

RE: Notice of Preparation of Draft Program Environmental Impact Report for the McClellan-Palomar Airport Master Plan

Dear Ms. Curtis:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Notice of Preparation of a Program Environmental Impact Report (EIR) for the McClellan-Palomar Airport Master Plan.

SDG&E is a utility regulated by the California Public Utilities Commission (CPUC) and, as such, the CPUC mandates that SDG&E maintain its utility infrastructure. SDG&E owns and maintains a number of transmission and distribution power lines in and around the proposed project area that could be impacted by the proposed changes to and expansion of airport operations. As an example, the extension of existing runways to accommodate larger aircraft would likely alter existing approach and departure surfaces, as well as airport obstruction layers that are used to determine whether SDG&E's transmission and distribution power lines are considered "airspace obstructions."

The McClellan-Palomar Airport Master Plan Program EIR will need to address the existing transmission and distribution facilities located in and around the proposed project area, including any potential impacts the proposed airside and landside facility improvements may impose on SDG&E land rights and assets included therein. Environmental impacts, including visual impacts, should also be analyzed for any lighting or relocations that would be required of SDG&E facilities, and, appropriate easements or rights of way to accommodate any needed relocations should be included as part of the airport expansion plans and included in the Program EIR project description and assessed accordingly. Please note that, because SDG&E transmission and distribution power lines are typically located in easements, SDG&E does not receive the same notices of proposed projects within the area as a property owner would receive. Therefore, by way of this comment letter please consider SDG&E an interested party in the ongoing development of the Program EIR, and please inform us of any and all developments in this matter.

SDG&E appreciates the opportunity to comment on this NOP. Please feel free to contact me by phone or email, provided below if you have any questions or need information regarding our facilities.

Sincerely,

Chris Terzich  
Principal Environmental Specialist  
Environmental Programs  
San Diego Gas & Electric Company  
Office: 858-654-1228  
Cell-619-838-8772  
Email: [cterzich@semprautilities.com](mailto:cterzich@semprautilities.com)

---

**From:** sonck4@roadrunner.com  
**Sent:** Tuesday, March 29, 2016 7:41 AM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Proposed expansion

Good morning Ms. Curtis,

This email is intended as a formal explanation as to why I am adamantly opposed to the proposed runway extension at McClellan-Palomar Airport in Carlsbad. I have itemized my reasons below:

~The millions of tax dollars that would be spent will only serve a vast minority of private business travelers, and not the general public. If the businesses that are to benefit are so supportive of the runway extension, then let them pay for all of the cost. Not with our tax money!

~The fantasy that the extension will lure major airline carrier(s) again to Palomar is just that: fantasy. American, Delta, America West, and United, to name a few, have all at one time flown out of Palomar. All of them learned quickly that there simply is not the demand in North County to make it a profitable business venture. An extended runway will not increase demand.

~The runway extension will not reduce noise. The jets are not a major noise issue; the prop planes are! A large percentage of private prop pilots refuse to follow the Voluntary Noise abatement Policy whereby they bank north or south at low altitude immediately after take-off, buzzing home owners and businesses. Residents have complained for years to The County and the Palomar Airport Advisory Committee on this issue. Peter Drinkwater and his lackeys on the PAAC do nothing but pay lip service to complaints. Residents have taken the issue to the FFA on multiple occasions where local authority Ian Gregor has constantly reiterated that the VNAP can be made an enforceable mandate, inclusive of fines and flying privilege suspension, but again, Mr. Drinkwater and the PAAC refuse to consider the motion.

~The quiet Hours policy has also been ignored for years. An extended runway will likely increase the number of Quiet Hours violations by said private business travel jets.

That is all. Thank you.

Sincerely,

Don Sonck  
6482 Torreyanna Circle  
Carlsbad, CA 92011  
Mobile: 760.330.0525  
<http://sonckviews.com/>

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**From:** DeAnn Weimer <dweimer318@yahoo.com>  
**Sent:** Tuesday, March 29, 2016 4:59 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Expansion Feedback

March 29, 2016  
Cynthia Curtis  
Environmental Planning Manager  
County of San Diego, Department of Public Works  
5510 Overland Ave., Suite 410  
San Diego, CA 92123

Re: Palomar Airport Expansion Plan

Dear Ms. Curtis:

As a 16-year resident of Carlsbad, I am writing to you regarding the proposal to expand Palomar Airport from a B-II airport to a modified C/D-III, including providing for the extension of the airport's single runway.

My home is near the corner of Poinsettia and Ambrosia Lane. I chose it in part because of its proximity to the Palomar Airport. I began flying in the 90s while living in Florida and hoped to find the time to continue to fly small aircraft. Unfortunately, I spend so much time flying cross country and internationally, I have not logged many hours in the cockpit in California.

But it is with that perspective that I am writing to express my opposition to the proposal and to request additional consideration and review of the following issues:

- The case for expansion should be put to a vote of Carlsbad residents, avoiding Carlsbad municipal Code § 21.53.015, which requires voter approval for certain Palomar Airport expansions, is not acceptable.

- Avoiding the Carlsbad planning process when Carlsbad Conditional Use Permit (CUP) 172 requires Carlsbad approval as part of any effort to change Palomar's basic transport general aviation classification is not acceptable. Asking the FAA to reclassify Palomar as a Part 139 commercial airport is a major change.

- Failing to evaluate the noise pollution from Palomar is unacceptable. Without noise measuring equipment at the end of the runway, there can be no analysis of the noise impact. If one does not have a baseline with which to compare the proposed change, there is no analysis taking place, simply wishful thinking. Carlsbad residents deserve a proper scientific assessment of these proposed changes on our quality of life.

- Noise pollution and increased flights will disadvantage the wildlife, particularly raptors, that reside in the open space surrounding the airport.

- The safety corridor around Palomar should be held to the highest of standards due to its proximity to residences and businesses. Shaving the safety calculations to shoehorn in aircraft that are simply too large for the location is a disservice to the pilots and the residents.

As a member of San Diego's financial community, I understand that my colleagues at Qualcomm, Relational Investors, Brandes Investment Partners, etc., have an economic incentive to hanger their

planes at Palomar. I appreciate the convenience when traveling to and from Asia, as an example, this location affords them. But their convenience is not in the best interest of the existing airport community or the Carlsbad community that surrounds Palomar.

Suggestions that the flight patterns of larger planes would not impact residents is absurd. A longer runway means larger planes and planes carrying more fuel. That means lower climb rates, which equals increased noise pollution. Lengthening the runway means older, less efficient aircraft will be using Palomar not just the newer more efficient craft with lower sound signatures. To date, the proponents of this expansion have been willing to take shortcuts and overlook the rights of Carlsbad residents. Please step back from that approach and consider these issues from the perspective of the whole community. Thank you.

Regards,  
De'Ann Weimer  
6606 Fiona Pl  
Carlsbad, CA 92011  
858-344-0436



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**From:** thomasfwelborn@aol.com  
**Sent:** Tuesday, March 29, 2016 4:58 PM  
**To:** Curtis, Cynthia  
**Subject:** CLD expansion

Ms Curtis,

As a Carlsbad resident, wife of a United 787 pilot and the mother of a pilot in training (18 year old son currently working on his private pilot's license and SJSU professional flight freshman next year), I am all in favor of making the airport safer and more efficient for local use. While it was fabulous to enjoy American, United and America West as well as private access a few years ago, our beautifully, \$\$\$ spent facilities upgrade is now pretty much obsolete. My husband says we need 2,000 more feet added to the runway to bring back commercial flights as well as to increase safety for current and future private flying needs.

Please do what you can to help our community. If 2,000 feet is all that we need, that seems pretty easy!

Thank you for you help and time,  
Nancy Welborn

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**From:** joan bockman <joanbockman@sbcglobal.net>  
**Sent:** Wednesday, March 30, 2016 7:45 PM  
**To:** Curtis, Cynthia  
**Subject:** Palomar Airport Expansion comment

Hello,

Planes fly over my house on Alberta Ave in Oceanside as they approach Palomar to land. There is a definite "falling bombs" sound as they lose altitude. This is very annoying.

A recognizable sound is much more disturbing than a "white noise" type of sound. This happens once a day or so. It lasts for a while. I don't know the exact time but well over 20 seconds.

This is completely unacceptable as a noise we will hear multiple times a day. Provisions must be made to ensure that residents are not asked to live with this.

Regards,  
Joan Bockman  
1017 Alberta Ave  
Oceanside, CA  
92054

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**From:** Hope Nelson <hopen51@att.net>  
**Sent:** Wednesday, March 30, 2016 2:10 PM  
**To:** Curtis, Cynthia  
**Cc:** manager@carlsbadca.gov; Council@carlsbadca.gov; Kashak, Jeff; Alex, Nicholas; Ron-Roberts; Jacob, Dianne; Horn, Bill; Roberts, Dave; Cox, Greg  
**Subject:** FW: Comments regarding Palomar Airport  
**Importance:** High

**From:** Hope Nelson [mailto:hopen51@att.net]  
**Sent:** Tuesday, March 29, 2016 4:41 PM  
**To:** 'Cynthia.Curtis@sdcounty.ca.gov'  
**Subject:** Comments regarding Palomar Airport  
**Importance:** High

Dear Ms. Curtis,

We are 16 year residents of Carlsbad. We reside at 1416 Sapphire Dr., Carlsbad 92011. We happen to live in the Marbrisa development, directly across from the PAR runway, south side of Palomar Airport Road.

We find it incredible that anyone is seriously looking at airport expansion for the following reasons:

- Airport operations remain low and, in fact, declined from 2013 to 2014. Note PAR's biggest year for operations was way back in 1999 (15 years ago) with 291,873 operations, way before anyone was talking about bigger aircraft with broader wingspan. Although the surrounding population continues to grow, 2014 operations were less than half at 141,567. It makes us wonder why anyone thinks expansion is needed.
- No fewer than 7 airlines have tried and failed to succeed at PAR. They simply could not fill seats. The last of these airline failures was in 2015.  
How can a case be made for expanding a runway that is in declining use because commercial airlines cannot fill seats at PAR?
- PAR continues to benefit the few who use corporate jets to do their business at the expense of community health, safety and tax dollars.
- Those corporate jets have little to no regard for the communities they impact. History tells us they do not pass muster as "good citizens". They have eroded the Voluntary Noise Abatement program, ignored recommended flight paths, and thus, disregarded the Fly Friendly program.

- Due to the hours of arriving flights, we understand many flights coming in from out of the US are NOT subject to customs inspection or passport verification.
- Further, I see nowhere has the County/PAR respected Carlsbad when asking the FAA to reclassify PAR basic general aviation classification, while Carlsbad's Conditional Use Permit (CUP) 172 required Carlsbad approval.

The only thing we can reasonably assume is the entire issue is to satisfy the desires of the elite private jet users. This begs another question. Ultimately, how will a cost/benefit analysis be determined? On the most recent Master Plan update, it is noted \$117M in local business revenue generated by Airport industries (2008) and 1446 local jobs created indirectly from PAR (2008). We would like to know what backs up these figures.

Regarding the environmental analysis:

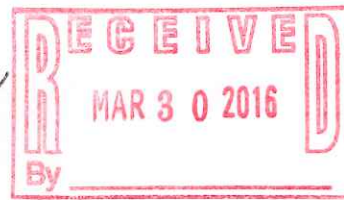
- VNAP DOESN'T WORK! Citizen's deserve more consideration. Voluntary does not work! Noise pollution affects our quality of life!
- Same as above applies regarding flight paths. Voluntary does not work! We deserve safe neighborhoods!
- How will methane gas fires under the current runway be handled? This continues to be a dangerous situation.
- Air pollution, ground pollution, noise pollution are all issues, as is runoff.

Please do not continue to pursue expansion of the PAR runway. We do not need it, we do not want it, we do not want our tax dollars to support it!

Respectfully,  
Hope and Vince Nelson

3/26/16

KIMLEY-HORN & ASSOC. INC.  
PROJECT MGR. VINCE HOURIGAN  
401 B ST., SUITE 600  
SAN DIEGO, CA. 92101



DEAR MR. HOURIGAN,

AS A HOMEOWNER THAT IS AFFECTED BY  
PLANES LANDING AT THE CARLSBAD MCCLELLAN-  
PALOMAR AIRPORT, I OPPOSE THE PROPOSAL  
TO EXPAND THE FACILITY SITE.

THE AIRPORT WAS DESIGNED TO HANDLE SMALL  
TO MID-SIZE AIRCRAFT.

THE NOISE SOMETIMES FROM LOW FLYING CRAFT  
AIRPLANES IS BOTHERSOME — ENOUGH TO  
IMPACT OUR PROPERTY VALUES HERE AT  
OCEAN HILLS COUNTRY CLUB.

**FOR THE RECORD** — I HAVE CALLED THE  
COMPLAINT HOTLINE FOR LOW FLYING / LOUD  
AIRPLANES. BUT ACCORDING TO JESSICA TURNER  
COMMUNITY relations at MCCLELLAN-PALOMAR AIRPT.  
THESE LOW FLYING / LOUD AIRCRAFT COMPLAINTS  
NEVER MAKE IT TO THE AIRCRAFT OWNER, PILOT, ETC.

**WHY?**

Sincerely, *Paul Young*  
PAUL YOUNG  
4021 ARCADIA WAY.  
O'SIDE, CA. 92056

Phone (610) 295-9010

Mr Hourigan,  
Regarding the last paragraph  
(FOR THE RECORD) — you probably  
have nothing to do with  
this issue but I have to  
air my grievances. Thanks

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