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March 16, 2018

Ms. Cynthia Curtis, Environmental Planning Manager
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5510 Overland Avenue, Suite 410
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**Re: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - McCLELLAN-
PALOMAR AIRPORT MASTER PLAN UPDATE - SCH# 2016021105**

Dear Ladies and Gentlemen,

We have reviewed the McClellan Palomar Airport's (the "Airport") Draft Program Environmental Impact Report and related appendices (the "EIR") prepared in connection with its Master Plan Update ("MPU"). After reviewing the EIR, we are very disappointed, **noting numerous significant deficiencies discussed in further detail throughout this letter**. Furthermore, as a result of these significant deficiencies, we do not believe the EIR has been prepared in compliance with the California Environmental Quality Act ("CEQA"). We also do not believe the Airport is currently being operated in accordance with current Federal Aviation Administration ("FAA") airport design standards, significantly negatively impacting unrecognized residential land uses within the Airport's noise impact area.

Summarized below are numerous general and specific deficiencies that must be properly considered, evaluated and addressed in the EIR as mandated by CEQA. These general and specific deficiencies are environmentally significant, and they are applicable to the Airport at both the program and project-specific levels.

AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies

I. Current Updated Airport Operational Information is Not Included, Analyzed and Considered in the EIR

Current updated Airport operational information with significant actual and potential environmental impacts on surrounding land uses is not properly considered and included in the EIR and related technical reports. Instead, outdated inaccurate information has been excessively utilized and relied on in the preparation of the EIR, producing significantly inaccurate and misleading results.

The Airport's flight operations and fleet mix have changed dramatically over the past twenty (20) years. Airport Management, County of San Diego staff, and consultants hired to assist the Airport with its Master Plan Update process and EIR should have recognized the need to obtain **and validate** current airport operational information to properly study and analyze current environmental impacts associated with its new 20-Year Master Plan Update. In addition, inquiry and validation testing of potentially outdated and inaccurate Airport operational information to be relied on should have been initiated at Step 1 in the MPU process (the "MPUP"). **This oversight has resulted in the omission of current accurate airport operating information in the EIR, the failure to recognize negatively impacted residential land uses within the Airport's influence area, and the failure to properly prepare the EIR in compliance with CEQA.**

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AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies (Continued)

**I. Current Updated Airport Operational Information is Not Included, Analyzed and Considered
in the EIR (Continued)**

The outdated and inaccurate Airport operating information included in the Airport's preliminary draft EIR is misleading, and it does not properly document the Airport's current operating environment, and associated flight related conditions and impacts. As a result, numerous significant environmental impacts and effects associated with the implementation of the Airport's Master Plan Update and related improvement projects have not been properly recognized and considered as required by CEQA.

Finally, current accurate airport operational information is also essential to obtain informed public input throughout the update process, to enable elected officials to make proper decisions, and to properly evaluate the reasonable usage of taxpayer funds.

**II. Public Comments Submitted in Response to the Notice of Preparation/Initial Study (281 Pages)
Were Not Properly Considered and Evaluated in the EIR**

The EIR Report does not include a comprehensive professional review of potential environmental impacts associated with the Airport's Master Plan Update. For example, the EIR Report does not properly consider, evaluate and address the two hundred and eighty one pages (281) of timely preliminary written public comments submitted and received by the Airport in connection with its Notice of Preparation/Initial Study "NOP/IS" (see Appendix A - NOP/IS, pages 59 through 340). These public comments are almost completely ignored in the EIR.

Almost every public comment received includes references to significant potential environmental impacts and requests for consideration that are not properly considered and addressed in the EIR, as required by CEQA. Many of these potential impacts and requests for consideration were ignored by the Airport, and improperly omitted from the EIR, and many were improperly considered and addressed in the EIR. As a result, many significant environmental impacts (including noise and air quality impacts and related considerations, among other impacts) were only addressed by the Airport for proposed MPU construction activities, and not for Airport flight and related operational activities, among other matters.

**III. Current Accurate Airport Operational Information Was Disregarded in the MPU Process
Resulting in Biased Airport Preliminary Decision Making and EIR Impact Evaluation**

The EIR's "Project Synopsis (Section S.1)" notes a primary purpose of the MPU is to evaluate proposed improvements and base their constructability on their ability to meet technical, **economic** and environmental considerations. The Public was not informed of accurate planned Airport projections resulting from its MPUP for proposed C-III and D-III aircraft operations (i.e. departures and arrivals) until recent EIR Report public meetings held in February 2018. The Airport is only projecting approximately 1,500 total future operations each year from both classes of these aircraft combined (approximately 4 per day).

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AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies (Continued)

III. Current Accurate Airport Operational Information Was Disregarded in the MPU Process Resulting in Biased Airport Preliminary Decision Making and EIR Impact Evaluation (Continued)

Why is the Airport planning to spend significant taxpayer funds pursuing a financially irresponsible Airport improvement alternative to accommodate these aircraft (the preferred "Modified C/D-III Alternative")? **Projected Airport operations for C-III and D-III aircraft are extremely minimal.** Furthermore, **the minimal future Airport operational projections for these aircraft (i.e. departures and arrivals) do not support spending millions of taxpayer dollars to accommodate them.** The evaluation of planned Airport improvement alternatives appears biased, and this alternative is not in the public's best interest.

Moreover, County Airport staff did not identify this negative cost-benefit relationship in Step 1 of the MPU process, and advise the public and its elected officials accordingly. With proper preliminary disclosure of this important public information, along with the opportunity for related public discussion and debate, elected officials would presumably have directed Airport staff to pursue a different MPU improvement alternative. **The only improvement alternative that meets financial and economic requirements for future Airport development based on the Airport's ability to meet existing and future aviation demand in a cost-effective manner is the Airport's B-II Enhanced Alternative for improvements.**

Finally, the EIR appears conclude an accommodation for these aircraft is required by the Airport. However, an accommodation is not required. This is another biased misrepresentation. FAA safety requirements and design standards are only dictated by the most demanding aircraft (having over 500 annual itinerant operations at the Airport (i.e. C-III and D-III aircraft)) **if it makes economical sense for an airport to choose to construct improvements for these aircraft in the first place.** In this case, it clearly does not make economical sense to fund improvements for these aircraft. Accordingly, the preliminary selection of the preferred "Modified C/D-III Alternative" by the Airport is biased, and not in the public's best interest. The only proposed MPU improvement alternative that meets the economic requirements of the MPUP without bias is the Airport's B-II Enhanced Alternative.

IV. County Management's Excessive Involvement Preparing the EIR Resulted in Airport Bias and a Lack of Independence in the EIR's Content and Conclusions

The preceding sections of this letter describe various EIR deficiencies resulting from inaccurate, omitted and improperly considered and evaluated Airport operational information and processes. Similarly, excessive involvement by County staff preparing and directing the preparation of the Airport's MPU and EIR appears to have contributed to EIR deficiencies, particularly considering the apparent Airport bias towards achieving Airport objectives without properly considering potential reported environmental impacts affecting the public.

We understand County management has drafted most of the Airport's EIR using the information previously referenced, and has also significantly influenced and directed the preparation of the EIR throughout the MPUP, resulting in a lack of independence, and contributing to the general deficiencies previously noted. Specific deficiencies noted in the Airport's EIR that are directly related to the general deficiencies previously described follow.

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AIRPORT MASTER PLAN UPDATE EIR REPORT Specific Deficiencies

1) The Description of the Airport's Environmental Setting in the EIR is Not Accurate

The Airport has failed to recognize and provide an accurate description of existing environmental conditions in the vicinity of the Airport. As a result, significant potential environmental impacts have been overlooked, and not properly considered and addressed in the EIR, as required by CEQA.

Determining and documenting an accurate description of existing physical environmental conditions in the vicinity of the Airport is essential for determining significant program and project related environmental impacts of the Airport's MPU projects, and for complying with CEQA. The Airport's description of surrounding land uses is not accurate. **As a result, significant potential impacts to numerous residential communities in the Airport's impact area that will be impacted by the Airports MPU are not considered in the EIR.** Two hundred and eighty one pages (281) of public comments submitted to the Airport (in connection with its NOP/IS) are from residents of these communities, and the public comments were primarily disregarded by the Airport, and were not properly recognized, considered and addressed in the EIR (see Appendix A - NOP/IS, pages 59 through 340, for public comments received).

2) The Summary of Significant Effects and Mitigation Measures that Reduce or Avoid Significant Effects (Table S-2) is Incomplete, and Does Not Include Aircraft Flight Related Impacts

The summary of significant effects and mitigation measures summarized in Table S-2 to the EIR is incomplete. The table fails to recognize and address many important significant public comments received, and it misrepresents other potentially significant environmental effects and necessary mitigation measures and related conclusions (see Appendix A - NOP/IS, pages 59 through 340). Furthermore, technical studies performed and related underlying data is incomplete.

For example, the "Noise" impact section of Table S-2 in the EIR **only addresses construction noise** associated with the MPU's improvement projects. The EIR **does not address any important potential Airport MPU flight noise and air quality impacts to surrounding residential communities** from new planned aircraft operations, extended runways, relocated runways, etc. Air quality and related environmental considerations from aircraft fumes and engine solvents being released from thousands of small aircraft operations annually has also not been considered.

Required mitigation measures will also need to be considered and developed to address the preceding omitted matters. The negative impacts from these matters are already significant, and the planned MPU projects will increase the significance of these impacts to residents nearby.

3) The Areas of Controversy Section of the EIR is Not in Compliance with CEQA (Section S.3)

The Areas of Controversy section of the EIR is incomplete and biased. Simply referring to the Airport's NOP and public comments received does not satisfy the requirements of CEQA. This section of the EIR does not meaningfully identify, describe or address any specific areas or issues of public controversy known to, or communicated to, the Airport, as required by CEQA. Instead, the EIR

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only refers to the aggregate public communications received, minimizes the significance of the communications, and **does not properly and directly consider and address the 281 pages of important public content and concerns communicated.**

4) The Financially Feasible Objective of Preferred Alternative Modified C/D-III Is Not Addressed

The financial feasibility objective of the Airport's preferred Modified C/D-III alternative is not properly addressed in the EIR. This preferred alternative does not appear to be financially responsible as discussed in General Deficiency III, its future financial implications have not been disclosed to the public, and its near and long-term needs have not been addressed in a manner demonstrating this alternative is financially responsible, financially achievable, and operationally sustainable. Accordingly, it does not appear the preferred alternative is financially reasonable, or should be eligible for FAA grant funding.

5) Chapter 1 – Significant Project Description, Location and Environmental Setting Inaccuracies

In Chapter 1 of the EIR, **the Airport improperly asserts the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the airport attempting to limit its CEQA impact analysis responsibilities, and related mitigation matter considerations.**

Accordingly, the Airport has not analyzed the potential environmental impacts associated with its aircraft flight operations, and it appears to be using this inaccurate assertion to justify this significant omission.

This assertion directly contradicts the Airport's Noise Program outline presented to the general public in February 2018, acknowledging the Airport can implement a voluntary noise abatement program establishing "Where and when pilots should fly". In addition, the Airport is subject to a FAR Part 150 Noise Compatibility Program ("NCP") Agreement that was reviewed and approved by the FAA in December 2006. The Airport's NCP is developed by the Airport, not the FAA, and submitted to the FAA for approval. It includes recommendations regarding its noise abatement operational measures (10), land use planning/management elements (6), and program management measures (16).

Furthermore, the Airport's NCP is a local program, and not a Federal program. **Accordingly, Airport management is responsible for addressing and implementing the Airport's approved NCP recommendations (not the FAA), and it is responsible for doing so. The Airport is also not currently in compliance with many of its own noise abatement recommendations, severely negatively impacting neighboring residential communities.** The Airport also incorrectly implies flight tracks are the sole jurisdiction of the FAA. The Airport does have authority regarding the flight track of an aircraft when matters regarding its Noise Compatibility Program ("NCP") with the FAA are involved, and the Airport needs to recognize its NCP responsibilities to the community.

The FAA does not substitute its judgment for that of the Airport with respect to which NCP measures should be recommended for action, and the FAA's approval of the Airport's recommendations in the NCP is also limited to certain determinations. Subsequent decisions or a request for Federal action to implement specific noise compatibility measures may also be required, and may require an environmental assessment, other procedures or requirements, provided the FAA is made aware of the matter by the Airport.

Upon review, the Airport's current NCP with the FAA was also found to include many deficiencies found during review of the EIR, presumably for similar reasons. Please see the following section for additional

information concerning the Airport's NCP noncompliance, and related EIR impacts requiring further consideration.

The Airport's description of surrounding land uses in the environmental setting section of the EIR is also inaccurate and incomplete, and it does not provide a proper baseline condition to compare MPU project impacts in compliance with CEQA (see Section 1.4.2). The description of residential land uses in the vicinity of the Airport omits many nearby residential land uses that should be included and considered for impacts (e.g. Evans Point, Eagles Canyon, Camino Hills Estates, Heron Bay, Spyglass Hills, etc., etc.).

6) The Project Objectives Section (1.1) of the EIR Implies an Airport Requirement to Accommodate C-III and D-III Aircraft Although Minimal Forecasted Operations Does Not Justify This Alternative

The Airport's initial review of its future forecasted aircraft fleet mix should have ruled out any desired and required improvements for C-III and D-III aircraft because their minimal forecasted operations do not satisfy the financial feasibility objective required for accommodation. Furthermore, the minimal annual forecasted itinerant operations projected for these aircraft, along with the negative financial considerations discussed in General Deficiency III, do not justify the very expensive improvements required to accommodate them.

7) The Project Description Section (1.2) of the EIR Requires Revision for a New Preferred MPU Alternative When it is Ultimately Recognized By the County Board of Supervisors

The public relies on its elected officials to recognize financially irresponsible programs and projects proposed and supported by public employees compensated with taxpayer funds. Our elected officials must recognize the need for revised decisions based on accurate information and data being provided.

8) Environmental Impacts and Necessary Mitigation Associated with the Proposed Relocation and Extension of Runway 06-24 on Multiple Impacted Residential Communities Must Be Considered

Consistent with item 2), the EIR does not properly consider and address important potential flight noise and air quality impacts to surrounding residential communities from relocating and extending runway 06-24., as required by CEQA. Related air quality and related environmental considerations from aircraft fumes and engine solvents being released must also be considered. Once again, the Airport has completely disregarded, or not properly addressed, the important concerns, information and potentially significant environmental impacts previously communicated in 281 pages of public comments received relating to these matters. The Airport is also aware of more than 227 pages of additional public comments received from 3 public meetings held in connection with the preparation of its 2006 Part 150 Noise Compatibility Program Agreement with the FAA (the "NCP") that relate to these matters and must be considered and addressed s required by CEQA.

Surrounding **residential neighborhoods (with hundreds of homes immediately north of the Airport) are significantly negatively impacted by pilots operating loud piston-propeller small aircraft who regularly and continuously disregard the Airport's current recommended air traffic pattern altitudes, voluntary noise abatement procedures and programs (VNAPs), recommended departure tracks and procedures, and aircraft training policies and procedures without consequence.** These residential neighborhoods will be negatively impacted even further by the Airport's runway relocation and extension plans.

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9) Public Comments Submitted in Response to the Notice of Preparation/Initial Study (281 Pages) Were Not Properly Considered and Evaluated in the EIR

Section 1.6.1 of the EIR, "Notice of Preparation", simply refers to a copy of the Notice of Preparation and public comments **with no further discussion or consideration of the large volume of significant important public comments received**. See the discussion of general deficiencies above, section II, for a further discussion of related matters and issues affecting the EIR.

10) The EIR Has Not Been Prepared in Compliance with Section 15151 of the CEQA Guidelines

The EIR has not been prepared in compliance with CEQA guidelines. As communicated previously and hereafter, the EIR has many significant deficiencies, and therefore has not been prepared with a sufficient degree of **proper** analysis to provide decision makers **accurate** information enabling them to make decisions that intelligibly take account of environmental consequences of the Airport's MPU projects. **Currently, the Airport's EIR is inadequate, incomplete, and it significantly lacks a good faith effort at full disclosure of potential environmental impacts and considerations.**

OTHER SIGNIFICANT RELATED MATTERS IMPACTING THE AIRPORT'S EIR

I. The Airport's Noise Impact Technical Report (the "Noise Report" - See NOP/IS Appendix D) Was Not Prepared Using Accurate Assumptions, Sufficient Parameters, Accurate and Complete Information and Data, and Properly Considering Important Public Comments Received

The Airport's Noise Impact Technical Report was prepared using inaccurate assumptions, insufficient parameters, and inaccurate and incomplete information and data. As a result, the Noise Report does not accurately describe and assess current and forecasted long-term noise conditions and potential aircraft noise impacts associated with the Airport' MPUP.

1) Preparers of the Airport's Noise Report improperly and excessively relied on the Airport's outdated and inaccurate Part 150 Noise Compatibility Program Agreement (including related noise exposure maps and other information) to prepare their report.

Other inaccurate Airport operational information (discussed below) was also improperly relied on without being properly tested and validated. Moreover, hundreds of pages of important public comments received in connection with the Airport's NOP/IS and FAR Part 150 Noise Compatibility Program (NCP) Agreement were not properly considered and utilized.

As a result, the Airport and its consultants continue to perpetuate an inaccurate and incomplete environmental assessment of significant noise and hazardous materials impacts affecting residential and other land uses in the vicinity of the Airport. For example, the responsible parties have improperly determined the closest and only impacted noise sensitive residential land use is Bressi Ranch, a residential development located southeast of the Airport. This assertion is unfounded, and it is contradicted by a thorough reading of the hundreds of pages of public comments received from the residents residing within the Airport's northern noise influence area. In fact, the noise sensitive residential land uses most significantly impacted by the Airport's flight operations are those **unrecognized residential developments** immediately north of the airport within 1 to 2 miles of the departure point of runway 06-24 (e.g. Evans Point and numerous other adjacent residential developments).

The residential developments immediately north of the Airport are the most significantly impacted land uses because they receive the “full noise impact” from all Piston-Propeller and other aircraft departing the Airport using runway 06-24. Furthermore, Piston-Propeller aircraft using this runway require full engine power during their ascent, and immediately turn hard right, proceeding directly over these northern neighborhoods. The cumulative noise levels from these Piston-Propeller aircraft are also significant because these aircraft are loud and slow, and they can be heard departing the Airport, and coming and going from miles around. These operations also include significant touch-and-go operations referred to in the Airport’s NITR.

Many of these residential developments were built in the 1990s, but the Airport failed to properly recognize them as significantly impacted noise land uses during 2003-2006 when its Part 150 Noise Compatibility Program (NCP) Agreement with the FAA was prepared and updated (see also discussion of additional Part 150 Noise Compatibility Program information following this section).

2) Preparers of the Airport’s Noise Report did not properly test and validate the outdated Airport noise contours used to prepare their report.

Outdated Airport noise contour information has been improperly carried forward for years from one noise report to another without proper validation testing being performed, and without necessary updates being recognized and proposed. Although an evaluation of certain data was purported to have been performed, the results of the Noise Report do not support a thorough evaluation with related sufficient testing and proper validation of underlying data.

For example, sufficient significant aircraft noise information produced by the Airport’s two remaining noise monitoring stations (and its related Noise and Operations Monitoring System software (“ANOMS”)) was not obtained and utilized by the preparers of the Airport’s noise reports. This fact is troubling, and it was acknowledged by the Airport during its February 2018 public EIR meeting. Moreover, noise program presentation materials from the meeting clearly state, “New Master Plan noise analysis and noise contours were not developed from the two remaining noise monitoring stations”.

The Airport is aware that current proper Airport noise contours should encompass the entire touch-and-go patterns of Piston-Propeller aircraft. The Airport receives hundreds of complaints each year relating to these operations. In addition, these aircraft currently completely disregard the Airport’s VNAPs, and regularly fly low patterns over the many impacted residential land uses that have not been properly recognized to date. Moreover, Piston-Propeller aircraft are loud, slow, low-flying, and they produce CNEL readings at or above 65 CNEL throughout their touch-and-go their flight routes over these residential land uses. Based on Table 2 of the Noise Report, these Piston-Propeller aircraft also generate 108,133 operations per year, or approximately 300 operations per day. Proper Airport noise contours should also include tested and validated B-II jet and multi-propeller aircraft departure and arrival corridors, as specified by the FAA.

3) Preparers of the Airport’s Noise Report did not properly test and validate the outdated Airport CNEL Information used to prepare their report.

Similar to the deficiencies noted above regarding the improper testing and validation the Airport’s outdated noise contours, the preparers of the Airport’s Noise Report improperly relied on outdated and inaccurate Airport Community Noise Equivalent Level (“CNEL”) information to derive current important CNEL information for their report. Moreover, they did not properly test, validate and determine proper accurate current CNEL information, measurements and areas necessary for compliance with CEQA.

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The Airport's two functioning noise monitoring systems collect the most meaningful noise data and information available to quantify noise problems and matters in surrounding neighborhoods, but the noise analysis, noise contours and CNELs were not developed considering this very important and significant data and information. The Airport is also supposed to have four functioning noise systems operating and producing ANOMS information strategically located around the Airport in known aircraft flight paths suspected to be within CNEL 60 noise contours, but it still only has two functioning systems.

The Airport's consultants should understand meaningful CNEL aircraft noise data and information can only be collected directly from specialized noise monitoring equipment. Furthermore, they should have access to portable noise monitoring equipment to properly test, determine and validate critical Airport noise contour and CNEL information.

The Airport's ANOMS system produces multiple noise reports for noise events. These reports include single noise event measurements (e.g. SEL(dB), LMax(dB)) exceeding CNEL(65dB) produced by the two functioning Airport noise monitoring stations from which CNEL(dB) measurements can be validated. There were over 500 single noise events **exceeding 65dB** in January 2018, and over 430 single noise events **exceeding 65dB** in February 2018. Additionally, an ANOMS report providing "Average Aircraft Noise Levels" supports the assertion that the "Mean SEL" and "Max SEL" readings for Piston-Propeller aircraft are very closely comparable with larger aircraft. Moreover, the number of touch-and-go operations is also very high supporting the need for revised Airport noise contours encompassing the entire touch-and-go patterns of Piston-Propeller aircraft currently using the Airport.

II. The Airport's Current FAR Part 150 Noise Compatibility Program (NCP) Agreement with the FAA Was Prepared Using Outdated Information and Data, and Important Public Comments Were Not Considered

The Airport's FAR Part 150 Noise Compatibility Program (NCP) Agreement with the FAA was prepared using outdated and inaccurate information and data, and important public comments submitted were not properly considered and addressed in the NCP. In addition, the NCP contains significant inaccuracies from outdated information being carried forward from prior years that was not properly validated, corrected and revised when the NCP was prepared in 2006. Over 227 pages of public comments and concerns previously received by the Airport were also not properly recognized, considered and included in the NCP. As a result, the NCP does not properly address many important noise impacts and recommendations that should have been addressed previously.

For example, the NCP fails to report accurate information regarding neighboring residential communities surrounding the Airport that were significantly negatively impacted by Airport noise at the time it was prepared (particularly by loud low-flying piston-prop aircraft performing touch-and-go operations and flying directly over these existing communities). Other significant inaccurate information in the NCP includes maps, figures and tables carried forward from before 1995. Similarly, most of this information in the NCP appears to have been simply carried forward from the Airport's previous 1992 NCP without proper correction and revision, and without considering new potential Airport environmental impacts.

Significant Airport noise impacts to numerous existing residential neighborhood communities north of the Airport, and within the immediate vicinity of the Airport, were also simply omitted from being considered at all. Accordingly, accurate Airport operational information was not properly included and considered in the NCP, and communicated to the FAA for approval.

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Existing noise abatement measures and voluntary noise abatement procedures (VNAP) that should have been considered and revised with FAA assistance and guidance were also not addressed. These include revised and updated air traffic patterns and altitudes, voluntary noise abatement procedures and programs (VNAPs), aircraft training policies and procedures, and departure track and procedure revisions.

Title 14, Code of Federal Regulations, Part 150, Noise Compatibility Planning, was not complied with. As a result, meaningful and effective airport operator noise compatibility recommendations were not communicated to the FAA for consideration and approval, and the Airport's current noise abatement programs and procedures are completely ineffective.

The Airport's current FAR Part 150 Noise Compatibility Program Agreement with the FAA should be comprehensively updated before the current Master Plan Update Process is completed to ensure all potential environmental impacts associated with the Airport's Master Plan Update are properly considered in accordance with CEQA. The current NCP is also over eleven (11) years old, and a new NCP is needed to recognize and mitigate significant environmental concerns and considerations previously communicated to the Airport by the general public that have never been properly recognized and addressed.

Please properly consider and address these public comments to the Airport's Draft Program Environmental Impact Report as CEQA requires. Thank you for your assistance. Sincerely,

Giovanni and Anne Bertussi

cc:
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Clerk of the Board of Supervisors
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