



City Comment Letter on McClellan Palomar Airport Master Plan Update and Draft Program EIR

March 13, 2018

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Our firm was asked to:

- Work with City staff to prepare:
 - Comments on Master Plan Update
 - Comments on Draft Program EIR
- Focus:
 - Legal Issues
 - Technical issues
 - Issues of particular concern to Carlsbad and its residents

CEQA Requirements

- Draft Program EIR
- Comments due March 19, 2018
- County must prepare responses to comments
- Recirculation if “significant new information”
- Final EIR = Draft EIR + responses to comments
- EIR Certification
- County decision on Master Plan
 - Findings
 - Mitigation monitoring program

Key Master Plan Comments

- Definition of Airport Property and Airport Boundaries
- Airport Design Issues
- Change in Airport Reference Code to D-III
- Modification of Standards
- Safety v. Business Justification of Runway Extension
- Forecasts

Key Master Plan Comments (cont.)

- Treatment of Runway Protection Zones
 - Requirements
 - Land Acquisition
 - Size and location
- NEPA Documentation for FAA Approvals

County Draft EIR Conclusions

Areas of significant effects:

- Aesthetics
- Biology
- Hazardous Materials
- Construction Noise
- Transportation/Traffic

No significant effects:

- Air Quality
- Aircraft Noise
- Cultural Resources
- Geology
- GHG
- Hydrology
- Land Use/Planning

Draft EIR: General Comments

- Unclear project description
- Clarify alternatives
- Issues with methodology
- Understates impacts by omitting general aviation activities
- Incomplete cumulative impacts analysis
- Incomplete mitigation

Key Draft EIR Comments: Aesthetics

- Better discuss retaining walls
- Add landscaping mitigation measures
- Allow City to approve landscaping and screening

Key Draft EIR Comments: Biological Resources

- Analyze MALSR relocation and impacts on preserve areas
- Analyze cumulative impacts on Diegan coastal sage scrub
- Analyze Coastal Zone Management Act consistency review requirements

Key Draft EIR Comments: Noise

- Evaluate single event noise impacts
- Evaluate 24 hour noise measurements north of airport
- Evaluate noise impacts in light of NextGen
- Evaluate noise impacts for both commercial and noncommercial operations.

Key Draft EIR Comments: Noise (cont.)

- Explain discrepancy between ALUCP and Master Plan forecasts
- Compare present to future conditions
- Reevaluate impacts to nearby noise sensitive land uses
- Mitigation
 - Construction Noise
 - VNAP procedures

Key Draft EIR Comments: Transportation

- Include trips from noncommercial activities
- Include additional projects in cumulative impacts analysis
- Add and/or refine proposed mitigation
 - Site/employer based TDM plan
 - Palomar Airport Road/El Camino
 - Palomar Airport Road/Camino Vida Roble

Key Draft Comments: Air Quality

- Include impacts from general aviation activities
- Consider reliability of future baseline numbers

Key Draft EIR Comments: Greenhouse Gas Emissions

- Correct incorrect and outdated methodologies and thresholds
- Correct improper piecemealing of construction and operational impacts
- Correct insufficient analysis of conflicts with plans
- Add mitigation
- Add energy impact analysis

Key Draft EIR Comments: Land Use

- Omit legal conclusions regarding CUP 172 without analysis
- Analyze consistency with Carlsbad Growth Management Plan
- Analyze how revised ALP would affect current ALUCP
- Clarify inconsistencies in statements regarding local land use authority

Next Steps:

- Finalize letter
- Letter due Monday, March 19
- County must evaluate and prepare responses to all comments before certifying Final EIR