

CLERK OF THE BOARD OF SUPERVISORS

BOARD OF SUPERVISORS MEETING

WEDNESDAY, MAY 20, 2026

Legislative Services Section: (619) 531-5434

REVISED BACKUP:

- 5. GENERAL SERVICES - ADOPT A RESOLUTION TO SUMMARILY VACATE A PORTION OF VINE STREET IN THE LAKESIDE COMMUNITY PLAN AREA AND CEQA FINDING (VAC 2025-0002) (DISTRICT: 2)**

REVISED AGENDA AND BACKUP

- 7. MCCLELLAN-PALOMAR AIRPORT - APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)**

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If approved, the overall proposed fee adjustments will result in additional estimated costs and revenue of \$1,575,247 in DEHQ effective FY 2026-27. The funding source is fees paid by DEHQ customers. There will be no change in net General Fund cost and no additional staff years.

A waiver of Board Policy B-29 is requested because the proposed fees do not cover all operating costs in the food, body art, massage, organized camps, state small water systems, and hazardous materials program fees. The total unrecovered cost, per Board Policy B-29, for permit fees that are not full cost recovery is \$1,223,492, and if approved, will be funded with \$643,531 in restricted General Fund fund balance, \$50,600 in 1991 Health Realignment revenue, and \$529,361 from the Environmental Health Trust Fund.

Additionally, a waiver of Board Policy B-29 is requested to continue to implement Board direction to reduce fees for temporary event permits requested by non-profit organizations and fee waiver for charitable feeding permits, as well as the state-mandated Veteran's fee waiver. These fee waivers benefit communities by enabling non-profit organizations to plan more events or further serve the community by allowing their limited budgets to go further. If these operators are not able to pay an annual permit or registration fee, this could impact their ability to provide food to those in need. The total unrecovered cost per Board Policy B-29 for these fee waivers is approximately \$515,277 in DEHQ for FY 2026-27, and if approved, will be funded with existing General Purpose Revenue in DEHQ. Inclusive of all funding sources and programs, the total unrecovered cost per Board Policy B-29 for DEHQ in FY 2026-27 is \$1,738,769.

Agriculture, Weights and Measures (AWM)

The proposed increases to fees are included in the Fiscal Year (FY) 2026-27 CAO Recommended Operational Plan in Agriculture, Weights and Measures (AWM). If approved, the proposed adjustments will result in additional costs and revenue of \$93,751 in FY 2026-27 in Agricultural Export, Certified Farmers' Market, Industrial Hemp Cultivation, Hazardous Materials Inventory, Price Accuracy, and Weights and Measures Devices programs. The funding source is fees paid by AWM customers. There will be no change in net General Fund costs and no additional staff years.

Additionally, a waiver of Board Policy B-29 is requested since the proposed fees for Agricultural Export, Certified Farmers' Market, and Industrial Hemp Cultivation do not cover all operating costs. The total unrecovered cost per Board Policy B-29 for FY 2026-27 is approximately \$149,591 and if approved, these programs will be partially funded with existing General Purpose Revenue (GPR) in AWM. The existing GPR support serves as required matching funds for State supplemental funding and is consistent with the Board's commitment and support for agriculture in the region, as stated in Board Policy I-133: *Support and Encouragement of Farming in San Diego County*. AWM will return to the Board with any future necessary fee adjustments, including identification of any unrecovered costs and funding reductions. There will be no additional staff years.

In future fiscal years, LUEG departments will return to the Board to identify any unrecovered costs and funding sources.

BUSINESS IMPACT STATEMENT

These recommendations would enable the Department of Planning and Development Services, Department of Public Works, Department of Parks and Recreation, Department of Environmental Health and Quality, and Department of Agriculture Weights and Measures to continue to align fees to the actual costs of services provided to fee payers in each fee category. These fees allow these departments to continue to meet program objectives, provide a level of service expected by stakeholders and customers, and fully recover costs.

- 7. SUBJECT: MCCLELLAN-PALOMAR AIRPORT - APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)**

OVERVIEW

McClellan-Palomar Airport (Palomar Airport), owned and operated by the --County of San Diego's Department of Public Works (DPW) Airports Division (Airports), serves as a critical link in the region's transportation network and economic infrastructure. It is one of seven airports operated by DPW, using funding from the Airport's self-sustaining maintenance and operations Airport Enterprise Fund (AEF), at no cost to the General Fund. This item is a proposed new lease with American Airlines (American) for limited commercial aviation service at Palomar Airport beginning on May 7, 2026. The airport does not require any facilities changes to accommodate the additional flights.

In 2023, American applied for a Commercial Airline Facilities Lease and Operations Agreement to operate four flights per day at Palomar Airport: two departures and two arrivals. American is now proposing to add two new round trip flights per day, resulting in a total of eight flights per day, four departures and four arrivals in addition to ten seasonal departing flights per year. This proposed action requires a change in lease terms. Their current two-year lease was approved by the Board of Supervisors (Board) on January 8, 2025 (4), with an expiration of February 12, 2027. If the Board approves today's recommendations, American's existing lease will be terminated, and a new lease will be awarded providing for up to eight flights per day.

American is proposing scheduled commercial air service at Palomar Airport with new flights beginning in ~~early~~ May with up to four departures and four arrivals per day from Phoenix Sky Harbor International Airport (PHX) on an Embraer 175 (EMB 175) aircraft, and ten seasonal departing flights per year. This destination serves as an American hub, offering passengers from North County convenient, one-stop connections to national and international markets. This lease proposal is consistent with the historical use outlined in the County's Airport Master Plan Update (Master Plan) and Program Environmental Impact Report (PEIR). American intends to use existing County Airport terminal facilities, parking areas, and other facilities. The County has coordinated with American, the Transportation Security Administration (TSA), and the Federal Aviation Administration (FAA) to ensure all operational and lease terms are consistent with applicable federal requirements, federal grant assurances, and the Palomar Airport Master Plan. The County is prohibited by federal law and grant assurances from discriminating against American Airlines and is obligated to negotiate in good faith with the airline for the use of available space.

REVISION 1

The proposed flight schedule includes an arrival at 10:28 pm and a departure at 6:18 am, both of which fall outside the FAA-approved Voluntary Noise Abatement Program (VNAP) quiet hours of 10:00 pm to 7:00 am. Under the Airport Noise and Compatibility Act of 1990 (ANCA), the County lacks the legal authority to impose a mandatory curfew or prohibit these flights, as only the FAA can establish such restrictions. While the County has requested compliance, the airline maintains these flights are necessary to meet regional hub connection.

The Board and County Airports understand there are ongoing noise concerns from area residents. To support our commitment to being a good neighbor, the Board directed County Airports and Airports has expanded its noise monitoring efforts by installing additional noise monitors in local communities, increased our educational outreach to pilots, added staff to support noise complaints, created a public dashboard to track and log concerns, and continue to work with air traffic controllers to encourage compliance with our voluntary noise abatement program. County Airports will continue to engage with pilots, aviation businesses, and the FAA about noise on behalf of area residents and seek voluntary compliance with VNAP hours whenever possible.

This is a request for the Board of Supervisors to authorize the Director of Airports to execute a three-year lease agreement between American and County Airports with two one-year options to extend. This request would result in a new lease superseding the current lease, beginning May ~~21~~7, 2026. As a result of the proposed lease, County Airports anticipate receiving \$1,108,108 in total fees and other revenue to the AEF annually. Fee waivers will not be provided. The lease will generate revenue for the AEF to support maintaining the airport's self-sustaining financial structure and advance the County's strategic goals of improving regional transportation connectivity, supporting economic vitality, and maintaining responsible environmental stewardship. This \$1.1M is guaranteed revenue, with the potential for increased revenue collected from completed seasonal flights. American's service will provide new travel options for residents, visitors, and businesses in northern San Diego County while adhering to the County's high standards for operational safety, environmental compliance, and public transparency.

RECOMMENDATION(S)

CHIEF ADMINISTRATIVE OFFICER

1. Find that the Final Program Environmental Impact Report (PEIR) for the McClellan-Palomar Airport Master Plan, certified by the Board of Supervisors on December 8, 2021 (06), State Clearinghouse #2016021105 on file with the Department of Public Works, was completed in compliance with the California Environmental Quality Act (CEQA) and state CEQA Guidelines, that the decision-making body has reviewed and considered the information contained therein and the Findings thereto dated ~~May 14~~April 7, 2026 (Attachment B) before approving the lease agreement with American Airlines, that the PEIR reflects the independent judgment and analysis of the Board of Supervisors; and

Find that there are no substantial changes in the project or in the circumstances under which it is undertaken which involve significant new environmental impacts that were not considered in the previously certified PEIR, that there is no substantial increase in the severity of previously identified significant effects, and that no new information of substantial importance has become available since said PEIR was prepared in accordance with CEQA Guidelines Section 15168.

2. Authorize the County entering into a new three-year lease with two one-year options to extend with American Airlines, in compliance with FAA regulations, and authorize the Director of Airports to execute, the lease. **(4 VOTES)**

EQUITY IMPACT STATEMENT

The County of San Diego (County) owns and operates seven airports that serve as essential air transportation hubs, emergency response facilities, and regional economic engines. The County strives to deliver services in a fair and equitable manner, actively removing barriers by providing general airport information in the County's threshold languages, encouraging public participation, and creating competitive opportunities for small businesses including those with traditionally less working capital and business owners and managers who may be socially and economically underserved.

SUSTAINABILITY IMPACT STATEMENT

The base monthly rent from this lease helps to support economic sustainability by providing services for the region. The revenue that County Airports will receive from commercial aviation services and continues to receive from other charter and general aviation activities will help operate, maintain, and improve the County Airport System consistent with the County sustainability goal of providing just and equitable access to County services and resources in support of sustainable communities.

FISCAL IMPACT

Funds for this request are included in the Fiscal Year 2025-26 Operational Plan in the Airport Enterprise Fund. If approved, today's recommendation will authorize a lease agreement with American Airlines and County Airports. The County Airports anticipates receiving total annual fees and other revenue from American Airlines in the first year of operations in the amount of \$1,108,108. The funding source is revenue from the commercial aviation lease with American Airlines. There will be no change in net General Fund costs and no additional staff years. Revenue derived from this lease supports the Airport Enterprise Fund allowing the Department of Public Works to operate all airports safely, efficiently, and cost-effectively without the use of General Fund dollars.

BUSINESS IMPACT STATEMENT

Leases at airports benefit the local business community by creating jobs, increasing economic activity, providing business opportunities, and supporting infrastructure development. Commercial airline services attract visitors, generate revenue, support regional economic growth, and improve the quality of life for residents. San Diego County Airports connect individuals to jobs and links local communities to the world. Revenue derived from airport leases allows the Department of Public Works to operate and maintain the seven County airports safely, efficiently, and cost-effectively without the use of general fund dollars. Today's action authorizes the Director of Airports to execute a lease agreement with American Airlines supporting the self-sufficiency and economic viability of the County airport system.

NOTICE OF EXEMPTION

05

TO: County Assessor/Recorder/Clerk-Recorder
Attn: Fish and Wildlife Notices
1600 Pacific Highway, MS A-33
San Diego, CA 92101

FROM: County of San Diego, General Services
Attn: Marcus Lubich
5560 Overland Avenue, Suite 410, MS 0-368
San Diego, CA 92123

State Office of Land Use and Climate Innovation
CEQASubmit.opr.ca.gov

SUBJECT: FILING OF NOTICE OF EXEMPTION IN COMPLIANCE WITH PUBLIC RESOURCES CODE SECTION 21108 OR 21152

Project Name: Vacation of a Portion of Vine Street at the Southeast Corner of its Intersection with Laurel Street in the Lakeside Community Plan Area (VAC NO. 2025-0002)

Project Location: 12541 Laurel Street, Lakeside, CA 92040 (APN 394-064-19-00)

Project Applicant: County of San Diego General Services 5560 Overland Avenue, Suite 410, San Diego, CA 92123

Project Description: The project is adoption of a Resolution to summarily vacate a portion of Vine Street at the southeast corner of Vine Street and Laurel Street located at APN 394-064-19 as part of the Neighborhood Healthcare project. The Neighborhood Healthcare project consists of replacing an existing medical facility. The project involves no excavation, fill of 500 cubic yards and the import of 500 cubic yards of material. The proposed development consists of a new 12,800 square foot, two-story medical building that will provide medical and dental services to the Lakeside community. The project site consists of four parcels totaling approximately 0.955 acres. The site currently has an operating medical facility that will be demolished once the new medical facilities are built out. Throughout the construction process, the aim is to maintain the current level of service and accessibility for patients and staff. Upon completion, the existing buildings will be demolished to make way for the required parking spaces. The new facility will operate Monday to Friday from 8:00 am to 5:00 pm. The project includes two vehicular access points, one from Vine Street and one from Laurel Street, with a capacity of 64 parking spaces, including ADA-compliant and electric vehicle charging (EVC) spaces. The building has two pedestrian access points, one from each street, to facilitate entrance to the building. Eight bicycle spaces are provided, accommodating both short-term and long-term parking.

The portion of Vine Street to be vacated is classified as a 2.2E Light Collector with a designated class IV bike lane with a 37' half width and is located on APN: 394-064-19-00 only. The portion of Vine Street exceeding the 37' half width may be summarily vacated pursuant to Streets and Highway Code Section 8334(b). The County of San Diego Department of Public Works determined this portion of public road is excess right-of-way and not required for public use.

The property has General Plan Designation General Commercial, Regional Category Village, and Zoning Designator Commercial General (C36).

Agency Approving Project: County of San Diego

Date Form Completed: February 24, 2026

County Contact Person: Marcus Lubich

Telephone: 858-414-4593

This is to advise that the County of San Diego Board of Supervisors has approved the above-described project on May 20, 2026 (#), and found the project to be exempt from the CEQA under the following criteria:

Exempt status and applicable section of the CEQA ("C") and/or State CEQA Guidelines ("G"): (check only one)

- Declared Emergency [C 21080(b)(3); G 15269(a)]
- Emergency Project [C 21080(b)(4); G 15269(b)(c)]
- Statutory Exemption. C Section(s):
- Categorical Exemption. G Sections: 15301 Existing Facilities, 15302 Replacement or Reconstruction
- G 15182 – Residential Projects Pursuant to a Specific Plan
- Activity is exempt from the CEQA because it is not a project as defined in Section 15378.
- G 15061(b)(3) - It can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment and the activity is not subject to the CEQA.

**FILING OF NOTICE OF EXEMPTION IN COMPLIANCE WITH PUBLIC RESOURCES CODE SECTION 21108 OR 21152
Vacation of a Portion of Vine Street at the Southeast Corner of its Intersection with Laurel Street in the Lakeside
Community Plan Area (VAC NO. 2025-0002)**

Page 2

Statement of reasons why project is exempt:

The proposed project and adopting of the associated resolution to vacate a portion of Vine Street qualify for a Class 1 Categorical Exemption pursuant to Section 15301 of the California Environmental Quality Act (CEQA) Guidelines, which applies to the minor alteration of existing facilities involving negligible or no expansion of use beyond that which previously existed, and Section 15302 of the CEQA Guidelines, which applies to replacement of existing structures and facilities where the new structure will be located on the same site as the structure to be replaced and will have substantially the same purpose and capacity as the replaced structure. The project involves the construction of a new 12,800-square-foot, two-story medical facility to replace an existing medical office on-site. The existing facility will remain operational during construction to ensure continued service to the community and will be demolished upon completion of the new building. The project occurs on a previously developed site, and the intended use (medical services) will remain the same, with no substantial change in intensity of use. The project site has a General Plan land use designation of General Commercial, is located within the Village Regional Category, and is zoned Commercial General (C36). The proposed development of a two-story, 12,800-square-foot medical office building is consistent with the land use designation and zoning regulations. The existing facility will remain operational during construction to ensure continued service to the community and will be demolished upon completion of the new building. The project site will not result in an increase of more than 50 percent of the floor area of the structures before the addition. The project site is approximately 41,600 square foot (.955 acres). The new structures would total in about 31% of the floor area. In addition, the project occurs on a previously developed site, and the intended use (medical services) will remain the same, with no substantial change in intensity of use. Site improvements include grading limited to 500 cubic yards of fill and import, ADA-compliant access, and minor changes to parking and circulation. The project also aligns with the applicable General Plan policies encouraging infill, reuse, and continued commercial services in established communities. Medical offices are permitted right within the C36 zone, and the project conforms with applicable development standards including setbacks, height, paramedical access requirements. No unusual circumstances exist that would create the potential for significant environmental impacts, and the project is consistent with the site's existing zoning and surrounding development pattern.

The site is fully developed and previously disturbed. It currently supports an existing medical facility, paved surfaces, and ornamental landscaping. No natural habitat remains, and no sensitive biological resources or listed species have been identified on-site. Therefore, the site has no value as habitat for endangered, rare, or threatened species.

The project will generate typical traffic volumes associated with a small medical office and is not expected to result in significant traffic impacts. Based on the traffic analysis prepared for the project, it is considered a locally-serving project and would have a less than significant impact for Vehicle Miles Travelled. Furthermore, the project will generate a net 195 Daily trips and a Local Mobility Analysis (LMA) is not required. Parking and circulation have been designed to meet code requirements, and access is provided from two existing public streets.

Noise associated with the project will be temporary and construction-related, subject to County noise ordinances. Staff has reviewed the Acoustical Compliance Assessment for the Laurel Street Medical Building Development. The project site is located at the intersection of Laurel Street and Vine Street in the community of Lakeside. The Project was evaluated for compliance with the County's Noise Ordinance which regulates operational (Section 36.404) and temporary construction (Sections 36.409) noise associated with the project. Section 36.404 from the County's Noise Ordinance provides exterior noise limits by zoning district. The applicable noise limits for the project are a one-hour average sound level of 60 dBA for boundaries to the south and west, and 57.5 dBA for boundaries to the north and east. No nighttime (10:00 p.m. to 7:00 a.m.) activity is proposed at the project site. Section 36.409 states that construction equipment shall not exceed 75 dBA for an 8-hour period between 7 a.m. to 7 p.m. Project construction and operation would not result in noise levels above the County operation or construction noise significance thresholds when measured at the property project boundary line.

The project will comply with applicable stormwater and water quality regulations. To comply with the ordinance the applicant submitted a Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP) for the project. The PDP SWQMP identifies potential construction and post-construction pollutants that may result from the project and proposed site design, source control, and treatment control BMPs to address the pollutants. In addition, a Drainage Study has been prepared for the proposed grading to support the design and plan set titled Neighborhood Medical Care project. The analyses followed the methodologies outlined in the County of San Diego's 2003 Hydrology Manual and determined that the project will result in a decrease in peak flow. The project is subject to the water quality requirements detailed in the County of San Diego's BMP Design Manual (dated September 2020), and the water quality approach is detailed in the project PDP SWQMP (under separate cover). The proposed project would not substantially alter the existing drainage

**FILING OF NOTICE OF EXEMPTION IN COMPLIANCE WITH PUBLIC RESOURCES CODE SECTION 21108 OR 21152
Vacation of a Portion of Vine Street at the Southeast Corner of its Intersection with Loral Street in the Lakeside
Community Plan Area (VAC NO. 2025-0002)** **Page 3**

pattern of the site, 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. Based on the study, the proposed project results in a reduction in runoff from the project site and would not substantially alter the existing drainage pattern of the site, 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. The preparation of the drainage study also included an analysis of the on-site hydrology to estimate the 100-year peak flow rate in the existing and proposed conditions. Hydrologic results indicate a reduction in runoff from the project site compared to existing conditions. This is attributed to similar imperviousness of the existing and proposed site as well as the lengthened flow path in the proposed condition. It is not anticipated that the proposed improvements will have an adverse impact on downstream stormwater conveyance infrastructure. The site is located in a fully developed area and is currently served by existing infrastructure, including water, sewer, electricity, telecommunications, and emergency services. The new facility will connect to existing utility systems and will not require extension of infrastructure or services beyond those already available. Based on the analysis above, it was determined that no significant impacts related to air quality, water quality, noise, or traffic are anticipated.

Additionally, the project meets all the criteria of CEQA Guidelines Section 15301.e. It is consistent with applicable land use plans and zoning, is located within a developed urban area, contains no sensitive habitat, will not result in significant environmental effects, and is served by all necessary utilities and services. No unusual circumstances exist that would create the potential for significant environmental impacts, and the project is consistent with the site's existing zoning and surrounding development pattern.

The following is to be filled in only upon formal project approval by the appropriate County of San Diego decision-making body.

Signature: _____ Telephone: (858) 414-4593

Name (Print): Marcus Lubich Title: Project Manager

This Notice of Exemption has been signed and filed by the County of San Diego.

This notice must be filed with the Recorder/County Clerk as soon as possible after project approval by the decision-making body. The Recorder/County Clerk must post this notice within 24 hours of receipt and for a period of not less than 30 days. At the termination of the posting period, the Recorder/County Clerk must return this notice to the Department address listed above along with evidence of the posting period. The originating Department must then retain the returned notice for a period of not less than twelve months. Reference: CEQA Guidelines Section 15062.

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COUNTY OF SAN DIEGO

LAND USE AGENDA ITEM

BOARD OF SUPERVISORS

PALOMA AGUIRRE
First District

JOEL ANDERSON
Second District

TERRA LAWSON-REMER
Third District

MONICA MONTGOMERY STEPPE
Fourth District

JIM DESMOND
Fifth District

DATE: May 20, 2026

07

TO: Board of Supervisors

SUBJECT

MCCLELLAN-PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

OVERVIEW

McClellan-Palomar Airport (Palomar Airport), owned and operated by the County of San Diego's Department of Public Works (DPW) Airports Division (Airports), serves as a critical link in the region's transportation network and economic infrastructure. It is one of seven airports operated by DPW, using funding from the Airport's self-sustaining maintenance and operations Airport Enterprise Fund (AEF), at no cost to the General Fund. This item is a proposed new lease with American Airlines (American) for limited commercial aviation service at Palomar Airport beginning on May 21⁷, 2026. The airport does not require any facilities changes to accommodate the additional flights.

In 2023, American applied for a Commercial Airline Facilities Lease and Operations Agreement to operate four flights per day at Palomar Airport: two departures and two arrivals. American is now proposing to add two new round trip flights per day, resulting in a total of eight flights per day, four departures and four arrivals in addition to ten seasonal departing flights per year. This proposed action requires a change in lease terms. Their current two-year lease was approved by the Board of Supervisors (Board) on January 8, 2025 (4), with an expiration of February 12, 2027. If the Board approves today's recommendations, American's existing lease will be terminated, and a new lease will be awarded providing for up to eight flights per day.

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SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

Administration (FAA) to ensure all operational and lease terms are consistent with applicable federal requirements, federal grant assurances, and the Palomar Airport Master Plan. The County is prohibited by federal law and grant assurances from discriminating against American Airlines and is obligated to negotiate in good faith with the airline for the use of available space.

The proposed flight schedule includes an arrival at 10:28 pm and a departure at 6:18 am, both of which fall outside the FAA-approved Voluntary Noise Abatement Program (VNAP) quiet hours of 10:00 pm to 7:00 am. Under the Airport Noise and Compatibility Act of 1990 (ANCA), the County lacks the legal authority to impose a mandatory curfew or prohibit these flights, as only the FAA can establish such restrictions. While the County has requested compliance, the airline maintains these flights are necessary to meet regional hub connection.

The Board and County Airports understand there are ongoing noise concerns from area residents. To support our commitment to being a good neighbor, the Board directed County Airports and Airports has expanded its noise monitoring efforts by installing additional noise monitors in local communities, increased our educational outreach to pilots, added staff to support noise complaints, created a public dashboard to track and log concerns, and continue to work with air traffic controllers to encourage compliance with our voluntary noise abatement program. County Airports will continue to engage with pilots, aviation businesses, and the FAA about noise on behalf of area residents and seek voluntary compliance with VNAP hours whenever possible.

This is a request for the Board of Supervisors to authorize the Director of Airports to execute a three-year lease agreement between American and County Airports with two one-year options to extend. This request would result in a new lease superseding the current lease, beginning May 21, 2026. As a result of the proposed lease, County Airports anticipate receiving \$1,108,108 in total fees and other revenue to the AEF annually. Fee waivers will not be provided. The lease will generate revenue for the AEF to support maintaining the airport's self-sustaining financial structure and advance the County's strategic goals of improving regional transportation connectivity, supporting economic vitality, and maintaining responsible environmental stewardship. This \$1.1M is guaranteed revenue, with the potential for increased revenue collected from completed seasonal flights. American's service will provide new travel options for residents, visitors, and businesses in northern San Diego County while adhering to the County's high standards for operational safety, environmental compliance, and public transparency.

RECOMMENDATION(S)

CHIEF ADMINISTRATIVE OFFICER

1. Find that the Final Program Environmental Impact Report (PEIR) for the McClellan-Palomar Airport Master Plan, certified by the Board of Supervisors on December 8, 2021 (06), State Clearinghouse #2016021105 on file with the Department of Public Works, was completed in compliance with the California Environmental Quality Act (CEQA) and state CEQA Guidelines, that the decision-making body has reviewed and considered the information contained therein and the Findings thereto dated May 14 ~~April 7~~, 2026 (Attachment B) before approving the lease agreement with American Airlines, that the PEIR reflects the independent judgment and analysis of the Board of Supervisors; and

SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

Find that there are no substantial changes in the project or in the circumstances under which it is undertaken which involve significant new environmental impacts that were not considered in the previously certified PEIR, that there is no substantial increase in the severity of previously identified significant effects, and that no new information of substantial importance has become available since said PEIR was prepared in accordance with CEQA Guidelines Section 15168.

2. Authorize the County entering into a new three-year lease with two one-year options to extend with American Airlines, in compliance with FAA regulations, and authorize the Director of Airports to execute, the lease. **(4 VOTES)**

EQUITY IMPACT STATEMENT

The County of San Diego (County) owns and operates seven airports that serve as essential air transportation hubs, emergency response facilities, and regional economic engines. The County strives to deliver services in a fair and equitable manner, actively removing barriers by providing general airport information in the County’s threshold languages, encouraging public participation, and creating competitive opportunities for small businesses including those with traditionally less working capital and business owners and managers who may be socially and economically underserved.

SUSTAINABILITY IMPACT STATEMENT

The base monthly rent from this lease helps to support economic sustainability by providing services for the region. The revenue that County Airports will receive from commercial aviation services and continues to receive from other charter and general aviation activities will help operate, maintain, and improve the County Airport System consistent with the County sustainability goal of providing just and equitable access to County services and resources in support of sustainable communities.

FISCAL IMPACT

Funds for this request are included in the Fiscal Year 2025-26 Operational Plan in the Airport Enterprise Fund. If approved, today’s recommendation will authorize a lease agreement with American Airlines and County Airports. The County Airports anticipates receiving total annual fees and other revenue from American Airlines in the first year of operations in the amount of \$1,108,108. The funding source is revenue from the commercial aviation lease with American Airlines. There will be no change in net General Fund costs and no additional staff years. Revenue derived from this lease supports the Airport Enterprise Fund allowing the Department of Public Works to operate all airports safely, efficiently, and cost-effectively without the use of General Fund dollars.

BUSINESS IMPACT STATEMENT

Leases at airports benefit the local business community by creating jobs, increasing economic activity, providing business opportunities, and supporting infrastructure development. Commercial airline services attract visitors, generate revenue, support regional economic growth,

SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

and improve the quality of life for residents. San Diego County Airports connect individuals to jobs and links local communities to the world. Revenue derived from airport leases allows the Department of Public Works to operate and maintain the seven County airports safely, efficiently, and cost-effectively without the use of general fund dollars. Today’s action authorizes the Director of Airports to execute a lease agreement with American Airlines supporting the self-sufficiency and economic viability of the County airport system.

ADVISORY BOARD STATEMENT

On March 19, 2026, this item was presented to the Palomar Airport Advisory Committee (Committee) for their recommendation. The Committee voted 3 in favor, 3 against, 0 abstained, with 2 absent and 1 vacant seat. The Committee was informed the Board would hear this item on May 20, 2026.

BACKGROUND

The County of San Diego (County) Department of Public Works (DPW) owns and operates seven airports: Borrego Valley Airport, Fallbrook Community Airpark, Gillespie Field, Jacumba Airport, McClellan-Palomar Airport (Palomar Airport), Ocotillo Airport, and Ramona Airport. The County Airport system (County Airports) is operated, maintained, and improved using rents, fees, rates and charges, and federal and state grant funding without the use of County general fund dollars. County Airport infrastructure and facilities include runways, taxiways, air traffic control towers, navigational equipment, airfield lighting systems, parking lot facilities, and roadways. Services available to corporate and general aviation users include hangar and tie-down rentals, aviation fuel sales, aircraft repair, maintenance, parts, pilot supplies, flight training, and out-of-state flights. County Airports serve the public by housing aviation facilities and equipment used by local law enforcement agencies, aerial firefighting, and other emergency services providers, and provide support for flights to the public. County Airports include industrial-zoned land that allows for other airport-compatible uses such as manufacturing, storage, and other commercial uses such as those in Fallbrook Airpark, Gillespie Field, and Palomar Airport industrial/commercial parks. Leasing airport land generates revenue for the Airport Enterprise Fund (AEF), ensuring Airports remain financially self-sufficient without the use of County general fund dollars.

Consistent with the FAA-approved Voluntary Noise Abatement Program (VNAP) quiet hours of 10:00 pm to 7:00 a.m., the County informed American of the VNAP and requested that American comply with it. American believes it cannot meet the VNAP quiet hours requirements for its first or last flight because of the need to timely connect passengers with its regional hub facilities at Phoenix, AZ.

Federal Aviation Administration Compliance

Palomar Airport has been operating in Carlsbad since 1959 and is designated as a Commercial Service Airport. The airport is categorized by the Federal Aviation Administration (FAA) as a non-hub primary airport and is certified as a Class I Part 139 facility to serve commercial service aboard scheduled small aircraft (10-30 seats), scheduled large aircraft (30+ seats), and unscheduled large aircraft. As a certified commercial service airport, Palomar Airport undergoes annual inspections from the FAA and State, requiring the County to meet federal requirements in operational

SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

infrastructure, aircraft rescue and firefighting, staff training, security plans, and associated documentation. The County accepts federal grant funding from the FAA Airport Improvement Program (AIP) and, as a condition of receiving funding from the FAA, the County must comply with a list of Airport Sponsor Assurances. Grant Sponsor Assurance 22 (Grant Assurance 22) prohibits the County from discriminating against any type, kind, or class of aeronautical user. The FAA in Order 5190.6C of the FAA Airport Compliance Manual, explains the reach of Grant Assurance 22:

“[Airport sponsors are required to] make [the] airport available as an airport for public use on reasonable terms, and without unjust discrimination, to all types, kinds, and classes of aeronautical activities including commercial aeronautical activities offering services to the public at the airport.”

Palomar Airport Master Plan

Commercial service at Palomar Airport is supported in the Master Plan (Master Plan), which was initiated by County Airports upon direction from the County Board of Supervisors on December 16, 2015 (6). The Master Plan Update and associated Final Program Environmental Impact Report (PEIR) was adopted and certified by the Board on December 8, 2021 (6). The PEIR considers and discloses potential environmental impacts associated with the implementation of forecasted aviation services and associated infrastructure improvement projects at the airport. The Master Plan creates a new blueprint for the development of the facilities over the next 20-year planning cycle, including a potential increase in commercial air service over the long-term planning period. Long-term infrastructure planning, which includes facility upgrades primarily to the runway and taxiways to enhance safety and efficiency for existing and forecasted users by installing facilities such as Emergency Materials Arresting Systems (EMAS), a runway shift, and a small runway extension was also forecasted in the Master Plan. These facilities changes are not needed to support the current American Airlines proposal, which has been approved by the FAA to operate using the existing B-II facilities at the Airport.

American Airlines Proposed Lease

In 2023, American Airlines, Inc. (American) applied for a Commercial Airline Facilities Lease and Operations Agreement to operate four flights per day: two departures and two arrivals. A two-year lease was approved by the Board of Supervisors on January 8, 2025 (04). In 2026, American approached the County to request a new lease to operate a total of eight flights: four departures and four arrivals per day, to Phoenix on an Embraer 175 (EMB 175) aircraft, with scheduled commercial air service at Palomar Airport, beginning May 21, 2026. The new lease will also provide American with ten seasonal departing flights per year. With today’s action, American’s existing (2024) lease will be terminated, and the new lease will supersede the 2024 existing lease. Phoenix serves as an American hub, offering passengers from North County convenient, one-stop connections to national and international markets. American’s proposal of 111,720 ~~110,960~~ enplanements and after combined with existing airlines is well below the 575,000 annual enplanements contemplated in the Board approved Master Plan and PEIR for Palomar Airport and would not result in a significant environmental impact. As a result of the proposed lease, County Airports anticipate receiving \$1,108,108 in total fees and other revenue to the AEF annually. This

SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

\$1.1M is guaranteed revenue, with the potential for increased revenue collected from completed seasonal flights.

American accommodates commercial passengers using the existing passenger terminal, parking facilities, aircraft ramp space, and infrastructure and would continue to use its existing ticket counter space, a kiosk, and office space at the passenger terminal. No additional facilities would need to be constructed to support the lease as the proposed uses are within the scope of uses the existing facilities were designed and built to accommodate. The proposal is compatible with existing facilities, and within the forecasts analyzed in the Master Plan Update and PEIR approved by the Board.

Both the airline's commercial service operating certificate and Grant Assurance 22 guide the review of American's lease proposal. The service proposed by American is consistent with their rights as a commercial service provider. The County is prohibited by federal law and grant assurances from discriminating against American and is obligated to negotiate in good faith with the airline for the use of available space. If the County were to deny an airline the right to use this commercial facility, the FAA may revoke, deny, or withhold grants to compel compliance. This action would negatively impact the entire County Airport System, making critical infrastructure improvements challenging and would risk depleting the AEF.

Palomar Airport was permitted, developed, and operated as one of only two commercial service airports in San Diego County. The City of Carlsbad issued Conditional Use Permit (CUP) 172 for Palomar Airport in 1980 which specifically authorized "Airlines, scheduled and unscheduled" (i.e., commercial airlines both currently scheduled and/or scheduled at a future date) by right. The City has acknowledged that the CUP does not restrict commercial service operations by weight, seat capacity or other aircraft features. The CUP does require approval from the City Planning Commission for any change in the designation of the Airport from its current B-II facilities standard to something else. No change in the designation of the Airport has been requested by American or will be provided by the County under the proposed lease. American will use the Airport facilities as permitted by the City in the CUP. The proposed lease is consistent with the terms of the CUP and the custom and practice of the City and County in implementing it.

Approving the lease with American is in line with the forecasted economic impact detailed in the 2021 Airport Economic Impact Analysis (Economic Analysis). Based on the 2021 Economic Analysis, Palomar Airport's operational and capital expenditure, tenant activity, and passenger spending supported 2,590 jobs, drives approximately \$82.6 million in industry activity, and generates \$14.9 million in federal, state, and local tax revenue. The economic impact associated with the addition of future commercial services at Palomar Airport will continue to improve Palomar Airport's regional economic impact with most of the airport's economic impact benefiting North County; 69% of the total employment impact and 55% of the total industry activity.

This is a request for the Board of Supervisors to authorize the Director of Airports to execute a three-year lease agreement with two one-year options to extend, in compliance with FAA regulations. The lease will generate revenue for the AEF, help maintain the airport's self-sustaining

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financial structure, and further the County’s strategic goals of improving regional transportation connectivity, supporting economic vitality, and maintaining responsible environmental stewardship. American’s service will provide additional travel options for residents and businesses in northern San Diego County while adhering to the County’s high standards for operational safety, environmental compliance, and public transparency.

ENVIRONMENTAL STATEMENT

On December 8, 2021 (06), the Board of Supervisors certified the Program Environmental Impact Report (PEIR) for the Palomar Airport Master Plan Update (Project), SCH #2016021105 on file with the Department of Public Works. The proposed action consists of the issuance of a commercial airline facilities lease to American Airlines to operate at Palomar Airport.

In accordance with CEQA Guidelines Section 15168(c), an environmental review update checklist was completed on May 21 ~~April 7~~, 2026 (Attachment B), and the analysis concluded that the proposed action would result in no new impacts or mitigation measures, the activity is within the scope of the previously approved project covered by the PEIR, and no new environmental document would be required. Because commercial airline activity was analyzed and considered in the PEIR for the Palomar Airport Master Plan Update and the activities proposed by American, considered individually and cumulatively, are within the scope of what was reviewed in the PEIR, the proposed action is consistent with activities contemplated and analyzed in the PEIR.

The environmental review update checklist was prepared pursuant to CEQA Guidelines Section 15168 and concluded there is no new information of substantial importance, nor any substantial changes to the Project analyzed in the PEIR or circumstances under which the project was undertaken since the PEIR was prepared. Therefore, no additional environmental review or findings are necessary under CEQA Guidelines Sections 15162 and 15168.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today’s proposed action supports the Economic Sustainability Strategic Initiative in the County of San Diego’s 2026-2031 Strategic Plan. Revenue derived from airport leases is placed in the County’s Airport Enterprise Fund, which aligns services to available resources, maintaining fiscal stability, and ensuring long-term solvency by using lease revenue for ongoing maintenance and operation of County Airports. Airports in San Diego County are an important part of the County’s physical infrastructure and the federal transportation system and provide superior service delivery to the local aviation customers and the public which they serve.

Respectfully submitted,



**SUBJECT: MCCLELLAN – PALOMAR AIRPORT – APPROVE LEASE WITH
AMERICAN AIRLINES AND RELATED CEQA FINDING
(DISTRICTS: 3 AND 5)**

**DAHVIA LYNCH
Deputy Chief Administrative Officer**

ATTACHMENT(S)

A: Vicinity Map

B: Environmental Findings



COUNTY OF SAN DIEGO

LAND USE AGENDA ITEM

BOARD OF SUPERVISORS

PALOMA AGUIRRE
First District

JOEL ANDERSON
Second District

TERRA LAWSON-REMER
Third District

MONICA MONTGOMERY STEPPE
Fourth District

JIM DESMOND
Fifth District

DATE: May 20, 2026

07

TO: Board of Supervisors

SUBJECT

MCCLELLAN-PALOMAR AIRPORT – APPROVE LEASE WITH AMERICAN AIRLINES AND RELATED CEQA FINDING (DISTRICTS: 3 AND 5)

OVERVIEW

McClellan-Palomar Airport (Palomar Airport), owned and operated by the County of San Diego's Department of Public Works (DPW) Airports Division (Airports), serves as a critical link in the region's transportation network and economic infrastructure. It is one of seven airports operated by DPW, using funding from the Airport's self-sustaining maintenance and operations Airport Enterprise Fund (AEF), at no cost to the General Fund. This item is a proposed new lease with American Airlines (American) for limited commercial aviation service at Palomar Airport beginning on May 21, 2026. The airport does not require any facilities changes to accommodate the additional flights.

In 2023, American applied for a Commercial Airline Facilities Lease and Operations Agreement to operate four flights per day at Palomar Airport: two departures and two arrivals. American is now proposing to add two new round trip flights per day, resulting in a total of eight flights per day, four departures and four arrivals in addition to ten seasonal departing flights per year. This proposed action requires a change in lease terms. Their current two-year lease was approved by the Board of Supervisors (Board) on January 8, 2025 (4), with an expiration of February 12, 2027. If the Board approves today's recommendations, American's existing lease will be terminated, and a new lease will be awarded providing for up to eight flights per day.

American is proposing scheduled commercial air service at Palomar Airport with new flights beginning in May with up to four departures and four arrivals per day from Phoenix Sky Harbor International Airport (PHX) on an Embraer 175 (EMB 175) aircraft, and ten seasonal departing flights per year. This destination serves as an American hub, offering passengers from North County convenient, one-stop connections to national and international markets. This lease proposal is consistent with the historical use outlined in the County's Airport Master Plan Update (Master Plan) and Program Environmental Impact Report (PEIR). American intends to use existing County Airport terminal facilities, parking areas, and other facilities. The County has coordinated with American, the Transportation Security Administration (TSA), and the Federal Aviation

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Administration (FAA) to ensure all operational and lease terms are consistent with applicable federal requirements, federal grant assurances, and the Palomar Airport Master Plan. The County is prohibited by federal law and grant assurances from discriminating against American Airlines and is obligated to negotiate in good faith with the airline for the use of available space.

The proposed flight schedule includes an arrival at 10:28 pm and a departure at 6:18 am, both of which fall outside the FAA-approved Voluntary Noise Abatement Program (VNAP) quiet hours of 10:00 pm to 7:00 am. Under the Airport Noise and Compatibility Act of 1990 (ANCA), the County lacks the legal authority to impose a mandatory curfew or prohibit these flights, as only the FAA can establish such restrictions. While the County has requested compliance, the airline maintains these flights are necessary to meet regional hub connection.

The Board and County Airports understand there are ongoing noise concerns from area residents. To support our commitment to being a good neighbor, the Board directed County Airports and Airports has expanded its noise monitoring efforts by installing additional noise monitors in local communities, increased our educational outreach to pilots, added staff to support noise complaints, created a public dashboard to track and log concerns, and continue to work with air traffic controllers to encourage compliance with our voluntary noise abatement program. County Airports will continue to engage with pilots, aviation businesses, and the FAA about noise on behalf of area residents and seek voluntary compliance with VNAP hours whenever possible.

This is a request for the Board of Supervisors to authorize the Director of Airports to execute a three-year lease agreement between American and County Airports with two one-year options to extend. This request would result in a new lease superseding the current lease, beginning May 21, 2026. As a result of the proposed lease, County Airports anticipate receiving \$1,108,108 in total fees and other revenue to the AEF annually. Fee waivers will not be provided. The lease will generate revenue for the AEF to support maintaining the airport's self-sustaining financial structure and advance the County's strategic goals of improving regional transportation connectivity, supporting economic vitality, and maintaining responsible environmental stewardship. This \$1.1M is guaranteed revenue, with the potential for increased revenue collected from completed seasonal flights. American's service will provide new travel options for residents, visitors, and businesses in northern San Diego County while adhering to the County's high standards for operational safety, environmental compliance, and public transparency.

RECOMMENDATION(S)

CHIEF ADMINISTRATIVE OFFICER

1. Find that the Final Program Environmental Impact Report (PEIR) for the McClellan-Palomar Airport Master Plan, certified by the Board of Supervisors on December 8, 2021 (06), State Clearinghouse #2016021105 on file with the Department of Public Works, was completed in compliance with the California Environmental Quality Act (CEQA) and state CEQA Guidelines, that the decision-making body has reviewed and considered the information contained therein and the Findings thereto dated May 14, 2026 (Attachment B) before approving the lease agreement with American Airlines, that the PEIR reflects the independent judgment and analysis of the Board of Supervisors; and

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Find that there are no substantial changes in the project or in the circumstances under which it is undertaken which involve significant new environmental impacts that were not considered in the previously certified PEIR, that there is no substantial increase in the severity of previously identified significant effects, and that no new information of substantial importance has become available since said PEIR was prepared in accordance with CEQA Guidelines Section 15168.

2. Authorize the County entering into a new three-year lease with two one-year options to extend with American Airlines, in compliance with FAA regulations, and authorize the Director of Airports to execute, the lease. **(4 VOTES)**

EQUITY IMPACT STATEMENT

The County of San Diego (County) owns and operates seven airports that serve as essential air transportation hubs, emergency response facilities, and regional economic engines. The County strives to deliver services in a fair and equitable manner, actively removing barriers by providing general airport information in the County’s threshold languages, encouraging public participation, and creating competitive opportunities for small businesses including those with traditionally less working capital and business owners and managers who may be socially and economically underserved.

SUSTAINABILITY IMPACT STATEMENT

The base monthly rent from this lease helps to support economic sustainability by providing services for the region. The revenue that County Airports will receive from commercial aviation services and continues to receive from other charter and general aviation activities will help operate, maintain, and improve the County Airport System consistent with the County sustainability goal of providing just and equitable access to County services and resources in support of sustainable communities.

FISCAL IMPACT

Funds for this request are included in the Fiscal Year 2025-26 Operational Plan in the Airport Enterprise Fund. If approved, today’s recommendation will authorize a lease agreement with American Airlines and County Airports. The County Airports anticipates receiving total annual fees and other revenue from American Airlines in the first year of operations in the amount of \$1,108,108. The funding source is revenue from the commercial aviation lease with American Airlines. There will be no change in net General Fund costs and no additional staff years. Revenue derived from this lease supports the Airport Enterprise Fund allowing the Department of Public Works to operate all airports safely, efficiently, and cost-effectively without the use of General Fund dollars.

BUSINESS IMPACT STATEMENT

Leases at airports benefit the local business community by creating jobs, increasing economic activity, providing business opportunities, and supporting infrastructure development. Commercial airline services attract visitors, generate revenue, support regional economic growth,

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and improve the quality of life for residents. San Diego County Airports connect individuals to jobs and links local communities to the world. Revenue derived from airport leases allows the Department of Public Works to operate and maintain the seven County airports safely, efficiently, and cost-effectively without the use of general fund dollars. Today’s action authorizes the Director of Airports to execute a lease agreement with American Airlines supporting the self-sufficiency and economic viability of the County airport system.

ADVISORY BOARD STATEMENT

On March 19, 2026, this item was presented to the Palomar Airport Advisory Committee (Committee) for their recommendation. The Committee voted 3 in favor, 3 against, 0 abstained, with 2 absent and 1 vacant seat. The Committee was informed the Board would hear this item on May 20, 2026.

BACKGROUND

The County of San Diego (County) Department of Public Works (DPW) owns and operates seven airports: Borrego Valley Airport, Fallbrook Community Airpark, Gillespie Field, Jacumba Airport, McClellan-Palomar Airport (Palomar Airport), Ocotillo Airport, and Ramona Airport. The County Airport system (County Airports) is operated, maintained, and improved using rents, fees, rates and charges, and federal and state grant funding without the use of County general fund dollars. County Airport infrastructure and facilities include runways, taxiways, air traffic control towers, navigational equipment, airfield lighting systems, parking lot facilities, and roadways. Services available to corporate and general aviation users include hangar and tie-down rentals, aviation fuel sales, aircraft repair, maintenance, parts, pilot supplies, flight training, and out-of-state flights. County Airports serve the public by housing aviation facilities and equipment used by local law enforcement agencies, aerial firefighting, and other emergency services providers, and provide support for flights to the public. County Airports include industrial-zoned land that allows for other airport-compatible uses such as manufacturing, storage, and other commercial uses such as those in Fallbrook Airpark, Gillespie Field, and Palomar Airport industrial/commercial parks. Leasing airport land generates revenue for the Airport Enterprise Fund (AEF), ensuring Airports remain financially self-sufficient without the use of County general fund dollars.

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Palomar Airport Master Plan

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American Airlines Proposed Lease

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Both the airline's commercial service operating certificate and Grant Assurance 22 guide the review of American's lease proposal. The service proposed by American is consistent with their rights as a commercial service provider. The County is prohibited by federal law and grant assurances from discriminating against American and is obligated to negotiate in good faith with the airline for the use of available space. If the County were to deny an airline the right to use this commercial facility, the FAA may revoke, deny, or withhold grants to compel compliance. This action would negatively impact the entire County Airport System, making critical infrastructure improvements challenging and would risk depleting the AEF.

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Approving the lease with American is in line with the forecasted economic impact detailed in the 2021 Airport Economic Impact Analysis (Economic Analysis). Based on the 2021 Economic Analysis, Palomar Airport's operational and capital expenditure, tenant activity, and passenger spending supported 2,590 jobs, drives approximately \$82.6 million in industry activity, and generates \$14.9 million in federal, state, and local tax revenue. The economic impact associated with the addition of future commercial services at Palomar Airport will continue to improve Palomar Airport's regional economic impact with most of the airport's economic impact benefiting North County; 69% of the total employment impact and 55% of the total industry activity.

This is a request for the Board of Supervisors to authorize the Director of Airports to execute a three-year lease agreement with two one-year options to extend, in compliance with FAA regulations. The lease will generate revenue for the AEF, help maintain the airport's self-sustaining

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financial structure, and further the County’s strategic goals of improving regional transportation connectivity, supporting economic vitality, and maintaining responsible environmental stewardship. American’s service will provide additional travel options for residents and businesses in northern San Diego County while adhering to the County’s high standards for operational safety, environmental compliance, and public transparency.

ENVIRONMENTAL STATEMENT

On December 8, 2021 (06), the Board of Supervisors certified the Program Environmental Impact Report (PEIR) for the Palomar Airport Master Plan Update (Project), SCH #2016021105 on file with the Department of Public Works. The proposed action consists of the issuance of a commercial airline facilities lease to American Airlines to operate at Palomar Airport.

In accordance with CEQA Guidelines Section 15168(c), an environmental review update checklist was completed on May 21, 2026 (Attachment B), and the analysis concluded that the proposed action would result in no new impacts or mitigation measures, the activity is within the scope of the previously approved project covered by the PEIR, and no new environmental document would be required. Because commercial airline activity was analyzed and considered in the PEIR for the Palomar Airport Master Plan Update and the activities proposed by American, considered individually and cumulatively, are within the scope of what was reviewed in the PEIR, the proposed action is consistent with activities contemplated and analyzed in the PEIR.

The environmental review update checklist was prepared pursuant to CEQA Guidelines Section 15168 and concluded there is no new information of substantial importance, nor any substantial changes to the Project analyzed in the PEIR or circumstances under which the project was undertaken since the PEIR was prepared. Therefore, no additional environmental review or findings are necessary under CEQA Guidelines Sections 15162 and 15168.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today’s proposed action supports the Economic Sustainability Strategic Initiative in the County of San Diego’s 2026-2031 Strategic Plan. Revenue derived from airport leases is placed in the County’s Airport Enterprise Fund, which aligns services to available resources, maintaining fiscal stability, and ensuring long-term solvency by using lease revenue for ongoing maintenance and operation of County Airports. Airports in San Diego County are an important part of the County’s physical infrastructure and the federal transportation system and provide superior service delivery to the local aviation customers and the public which they serve.

Respectfully submitted,



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(DISTRICTS: 3 AND 5)**

**DAHVIA LYNCH
Deputy Chief Administrative Officer**

ATTACHMENT(S)

A: Vicinity Map

B: Environmental Findings



PUBLIC WORKS

5510 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CALIFORNIA 92123-1237
(858) 694-2212

MARISA K. BARRIE, PE
DIRECTOR

KATHRYN A. STEWART, PE
ASSISTANT DIRECTOR

May 14, 2026 ~~April 7, 2026~~

**Environmental Review Update Checklist Form
For Projects with Previously Approved Environmental Documents**

**FOR PURPOSES OF CONSIDERATION OF
COMMERCIAL AIRLINE FACILITIES LEASE AND OPERATIONS AGREEMENT
WITH AMERICAN AIRLINES, INC. AT McCLELLAN-PALOMAR AIRPORT**

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15168 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified Environmental Impact Report (EIR) or previously adopted Negative Declaration (ND), covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15168, to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action. Section 15168 provides that later activities in a program be analyzed using Section 15162 criteria to determine if the project is covered by the previous program EIR.

1. Background on the previously certified Program EIR:

A Program EIR (PEIR) for the McClellan-Palomar Airport Master Plan Update (Project; State Clearinghouse No. 2016021105) was certified by the County of San Diego (County) Board of Supervisors on December 8, 2021 (Item #6). The Airport Master Plan Update provides the framework to guide future airport development based on its ability to meet existing and future aviation demand in a safe and cost-effective manner. It evaluated proposed improvements and based their constructability on their ability to meet technical, economic, and environmental considerations. The Master Plan Update is a long-term planning document, and the exact scope, scale, and timing for implementation of each proposed element had not yet been defined because project-specific information had not been fully developed to quantify exact impacts. Therefore, the associated environmental impact for each element, and the Master Plan Update as a whole, was analyzed at a programmatic level for the purpose of environmental analysis. Additional analysis under CEQA was anticipated for projects at the time that they are proposed.

The Master Plan Update is a phased 20-year strategy to prioritize projects at the Airport that meet the objectives described in the PEIR. As such, 16 project elements were identified that are categorized either as airfield or landside based on the nature of each project element. Regarding aircraft activity, the County acknowledges that although it doesn't have discretion or enforcement over non-commercial aviation activity, it does have discretion over the approval of commercial air service leases (i.e., allowing the use of County facilities for the purpose of air carrier service).

In summary, the PEIR analyzed the environmental impacts associated with various airfield and landside improvements as well as aircraft operations through 2036, including commercial air

service. The PEIR found significant effects to Aesthetics, Biological Resources, Hazards and Hazardous Materials, Noise, and Transportation/Traffic. These effects were determined to be mitigable or avoided to a level below significance.

In 2023, American Airlines, Inc. applied for a Commercial Airline Facilities Lease and Operations Agreement to operate two departing flights per day. Accordingly, environmental findings were prepared dated November 24, 2024, and a two-year lease was approved by the Board of Supervisors on January 8, 2025 (Item #4).

2. Lead agency name and address:
County of San Diego, Department of Public Works Airports Division
5510 Overland Avenue, Suite 410
San Diego, CA 92123
 - a. Contact: Jeff Kashak, Environmental Planning Manager
 - b. Phone number: (858) 288-5740
 - c. E-mail: Jeff.Kashak@sdcounty.ca.gov
3. Proposed action's applicant name and address:
American Airlines, Inc.
1 Skyview Drive
MD8E100
Fort Worth, TX 76155
Contact: Mitch Goodman
4. Summary of the present proposed action:

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, Inc. (American Airlines) to use the existing ground facilities at McClellan-Palomar Airport (Airport) and to conduct commercial air carrier service as a tenant of County of San Diego, Department of Public Works Airports Division (County Airports). American Airlines would operate in accordance with the Federal Aviation Administration (FAA) Part 121 Air Carrier Certification operational specifications and adhere to the requirements of FAA's Part 139 Airport Certification at the Airport. County Airports, as the Airport Sponsor, would use revenues generated from the lease to support the County's Airport Enterprise Fund, which is used to fund the maintenance and operations of the Airport system.

American Airlines proposes four departing flights per day using the Embraer 175 aircraft (76 seats plus four onboard crew) plus ten seasonal departing flights per year. American Airlines' existing (2024) lease for two departing flights would be terminated, and a new lease would be issued reflecting a total of four departing flights per day (two existing + two new) and ten seasonal departing flights per year. As accommodated by the existing terminal facilities, American Airlines would utilize the existing ticket counter spaces to check in passengers, and passengers would then await their flight in the terminal's hold room. American Airlines anticipates up to 76 passengers in the hold room and up to four airline crew aboard each flight for commercial air carrier service. Based on American Airlines' schedule, it is estimated the proposed air service will result in approximately 2,940 ~~2,920~~ annual aircraft operations¹ and 111,720 ~~110,960~~ annual enplanements². It is important to note that

¹ Aircraft Operation: aircraft either departing or arriving (i.e., 1 arrival + 1 departure = 2 operations). American Airlines proposes 4 departures + 4 arrivals per day = 8 aircraft operations per day x 365 days = 2,920 annual operations. After including 10 seasonal flights per year (20 operations), this results in a total of 2,940 annual operations.

² Enplanement: fare-paying passenger aboard scheduled flights that originate at an airport. American Airlines proposes 76 passengers x 4 departing flights per day x 365 days = 110,960 annual enplanements. After including 10 seasonal departing flights per year x 76 passengers (760 enplanements), this results in a total of 111,720 annual enplanements.

these enplanement calculations assume 100% load factor (full airplane) despite American Airlines' historic trends and other airlines in the U.S. averaging an approximately 81% load factor³.

The airside and landside ground facilities at the Airport were constructed and are operated in part with federal funds from the FAA's Airport Improvement Program. The County is responsible for the day-to-day management of the Airport's ground facilities.

The acceptance of federal grant funding requires compliance with a list of Airport Sponsor Assurances enforced by the FAA. Assurance 22a states that the County:

"Would make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport."⁴

In 1996, the FAA issued a Part 139 Airport Operating Certificate to County Airports, which was most recently reissued in 2005. As a certificated airport, the Airport was deemed a Class I facility for air carrier service.

As a tenant at the Airport, American Airlines would use the existing vehicle parking facilities, aircraft ramp space, and other infrastructure to accommodate commercial air carrier services. The airline will also use ground support equipment, including an aircraft fueler to refuel, Ground Power Unit to supply energy to the aircraft, and Air Start Unit to start the engines. These services will be provided to American Airlines by the Airport's Fixed Base Operators.

5. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES

NO

The McClellan-Palomar Airport Master Plan Update Program EIR (PEIR), as certified by the County Board of Supervisors on December 8, 2021, included the environmental review of forecasted commercial air passenger service up to 575,000 annual enplanements and 208,004 annual aircraft operations. As explained in this Environmental Review Update Checklist, enplanements are important to understand the potential traffic generated, and aircraft operations are important to understand the potential emissions related to air quality, greenhouse gas emissions, and noise. As shown in the table below, American Airlines' proposed activity, when combined with other previously-approved and ongoing airline activity, would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

³ [U.S. Bureau of Transportation Statistics](#)

⁴ U.S. Department of Transportation, Federal Aviation Administration "Airport Sponsor Assurances," 2011.

Existing + Proposed Airline Activity

Airline	Annual Enplanements	Annual Aircraft Operations
Advanced Airlines LLC (dba Taos Air) [2020]	3,000	3,000
Delux Public Charter LLC (dba JSX Air) [2023]	18,980	1,456
United Airlines, Inc. [2025]	102,200	2,920
American Airlines, Inc. [Proposed Action] *	<u>111,720</u> 110,960	<u>2,940</u> 2,920
Total	<u>235,900</u> 235,140	<u>10,316</u> 10,296
Master Plan Update PEIR Allowance	575,000	208,004
Does the proposed action exceed metrics analyzed by the Master Plan Update PEIR?	No	No

* 111,720 ~~110,960~~ annual enplanements is derived from 4 daily flights + 10 annual seasonal flights. American Airlines' existing (2024) lease for 2 departing flights will be terminated, and a new lease would be issued for a total of 4 departing flights (2 existing + 2 new) and ten seasonal departing flights.

Accordingly, American Airlines' proposal is below the metrics previously evaluated in the PEIR associated with the facility's commercial service as disclosed to the public in the previously approved Project. Pursuant to State CEQA Guidelines Section 15168, the proposed action is within the scope of the Project covered by the PEIR.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this proposed action 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.

NONE

[Aesthetics](#)

[Agriculture and Forestry Resources](#)

[Air Quality](#)

[Biological Resources](#)

[Cultural Resources](#)

[Energy](#)

[Geology & Soils](#)

[Greenhouse Gas Emissions](#)

[Hazards & Hazardous Materials](#)

[Hydrology & Water Quality](#)

[Land Use & Planning](#)

[Mineral Resources](#)

[Noise](#)

[Population & Housing](#)

[Public Services](#)

[Recreation](#)

[Transportation](#)

[Tribal Cultural Resources](#)

[Utilities & Service Systems](#)

[Wildfire](#)

[Mandatory Findings of Significance](#)

DETERMINATION:

On the basis of substantial evidence demonstrated below, the Department of Public Works has determined that:

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous PEIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified PEIR is adequate without modification.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with an EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Signature

Jeff Kashak

Printed Name

5/14/26

Date

Environmental Planning Manager

Title

EVALUATION OF ENVIRONMENTAL IMPACTS

CEQA Guidelines Sections 15162 through 15168 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR for a project.

After a program EIR is certified, CEQA requires later activities in that program to conduct analysis to determine if the project is covered by analysis in the previous program EIR. As defined by CEQA Guidelines Section 15162 and 15168, a project can rely on the program EIR, and does not require a new initial study or environmental documentation, if the lead agency determines the following based on substantial evidence in light of the whole record:

1. No substantial changes are proposed in the project which will require major revisions of the previous program EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous program EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous program EIR was certified as complete, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous program EIR; or
 - b. Significant effects previously examined will be substantially more severe than shown in the previously certified program EIR; or
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous program EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources, except as provided in Public Resources Code Section 21099, including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; public views of the site and its surroundings; existing visual character or quality of the site and its surroundings; applicable zoning and other regulations governing scenic quality; or day or nighttime views in the area?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Aesthetics would occur due to the introduction of a retaining wall along the southern slope at the Airport's east end that would contrast with the existing visual character and quality. This impact would be reduced to less than significant with implementation of mitigation measure M-AE-1. However, the proposed action does not include installing the retaining wall identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to Aesthetics. Therefore, the PEIR's impact related to Aesthetics would not occur under the proposed action and therefore no mitigation is necessary.

The proposed activity by American Airlines would 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. No new permanent structures and no alterations to existing structures are proposed. Accordingly, there would not be a change to the visual landscape. Therefore, the proposed action would not have an adverse effect on a scenic vista.

The proposed action location is within the existing infrastructure of the Airport and consists of densely developed land adjacent to existing aviation use areas. The proposed location does not possess any scenic resources such as trees, rock outcroppings, or historic buildings. Therefore, the proposed action would not have any substantial adverse effect on a scenic resource within a State scenic highway.

The proposed action does not propose discernable changes to the visual environment.

Sources of existing lighting in the vicinity of the proposed action site include existing aviation navigational lighting at the Airport, and lighting associated with commercial and residential development and local roads in the surrounding area. The proposed action would not introduce new lighting sources or change the existing lighting at the Airport. The proposed action does not propose construction or alteration of existing outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Therefore, the proposed action would not create any new sources of light pollution that could contribute to skyglow, light trespass or glare, or adversely affect day or nighttime views in area.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES

NO

The proposed action site (McClellan-Palomar Airport) does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use. The proposed site is zoned manufacturing, which is not considered to be an agricultural zone.

Additionally, the proposed action site is not under a Williamson Act Contract. Therefore, the proposed action does not conflict with existing zoning for agricultural use, or a Williamson Act Contract. The proposed action does not contain forest lands or timberland. The County does not have any existing Timberland Production Zones. In addition, the proposed action is consistent with the existing zoning, and a rezone of the property is not proposed. Therefore, implementation of the proposed action would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones. The proposed action site does not contain any forest lands as defined in Public Resources Code section 12220(g); therefore, implementation of the proposed action would not result in the loss or conversion of forest land to a non-forest use.

Moreover, the proposed action is not located in the vicinity of off-site forest resources. The proposed action site and surrounding area within a radius of 0.25 mile do not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use.

American Airlines' proposed activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for the evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to agriculture and forestry resources.

III. AIR QUALITY -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES

NO

When studying potential environmental impacts of a project, two components must be analyzed: construction and operation. The proposed action includes issuance of a lease to allow for a commercial air carrier (American Airlines) to use the Airport’s ground facilities. The project would not produce construction-related emissions, as American Airlines would use the existing passenger terminal, parking facilities, aircraft ramp space, and infrastructure to accommodate passengers. Thus, no construction-related air quality emissions would be generated.

Regarding operations, the proposed action would result in emissions associated with aircraft operations as well as ground transportation emissions resulting from passengers accessing the Airport (i.e., vehicle trips). It is important to note that ongoing aircraft operations are under the jurisdiction and regulatory authority of FAA; however, because County Airports has discretion over the approval of commercial air carrier services, it has been analyzed pursuant to CEQA. As further explained below, air quality emissions associated with the proposed action were previously anticipated and analyzed in the PEIR.

The number of aircraft operations is important to the environmental analysis due to air criteria pollutants emitted from the combustion of fossil fuels (i.e., jet fuel, Aviation, diesel, gasoline, natural gas, etc.) and are by-products contained in the engine exhausts. The PEIR anticipated an increase in aviation activity at the Airport (including air carrier service) and analyzed up to 208,004 aircraft operations per year using the highest planning scenario, PAL 2. After analyzing air quality emissions of 208,004 annual aircraft operations, the PEIR determined air quality impacts would be less than significant. By comparison, the proposed commercial air carrier service by American Airlines would result in 2,940 ~~2,920~~ aircraft operations per year, which after combined with other permitted airlines at the Airport would result in a total of 10,316 ~~10,296~~ operations per year. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Also, the number of enplanements is important to the environmental analysis due to air criteria pollutants emitted from the fuel combustion of motor vehicles approaching, departing, and operating at the Airport. The PEIR anticipated an increase in aviation activity at the Airport (including air carrier service) and analyzed up to 575,000 enplanements per year using the highest planning scenario, PAL 2. After analyzing air quality emissions of 575,000 enplanements, the PEIR determined air quality impacts would be less than significant. By comparison, the proposed commercial air carrier service by American Airlines would result in 111,720 ~~110,960~~ annual enplanements, which after combined with other permitted airlines at the Airport would result in a total of 235,900 ~~235,140~~ annual enplanements. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Specifically, the PEIR demonstrated that commercial airlines using forecasted activity levels would be below Federal De Minimis threshold levels as summarized in the PEIR’s Table 3.1.2-7 below:

PEIR Table 3.1.2-7. PEIR Project Emissions from Operational Activities

Scenario	Total Emissions (tons per year)						
	CO	VOC	NOX	SOX	PM _{2.5}	PM ₁₀	Pb
Master Plan Update	97.42	3.87	47.13	7.29	2.65	7.63	0
Federal De Minimis Threshold Level	NA	100	100	NA	NA	NA	NA
Impact	No	No	No	No	No	No	No

Regarding sensitive receptors, exhaust emissions from motor vehicles could potentially cause a direct, localized CO “hotspot” impact if located at or near proposed development or sensitive receptors. As

analyzed in the PEIR, no sensitive receptors are located within a quarter mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed action and Airport. Furthermore, neither the Master Plan Update nor the proposed commercial air service includes the major expansion or construction of new stationary sources that could potentially emit TACs and increase long-term public health risks, nor do they involve placing sensitive receptors closer to the Airport.

The proposed action does not include heavy industrial or agricultural uses that are typically associated with odor complaints. The proposed action involves use of the Airport by American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. Commercial airline activity is an ongoing, current use at the Airport. While the proposed action would result in fueling operations at the Airport, all fuel storage, transport, and handling would follow existing protocols as outlined in the Airport Certification Manual, which was mostly recently approved by the FAA in 2022, is reviewed annually, and was last updated in October 2025.

The proposed American Airlines activity would use the existing passenger terminal, parking facilities, aircraft ramp space, and infrastructure as analyzed in the PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to air quality.

IV. BIOLOGICAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Biological Resources would occur due to the relocation and installation of airfield infrastructure affecting sensitive wildlife species and vegetation. This impact would be reduced to less than significant with implementation of mitigation measures M-BI-1 through M-BI-8. However, the proposed action does not include the associated infrastructure improvements identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to Biological Resources. Therefore, the PEIR's impacts related to Biological Resources would not occur under the proposed action and therefore no mitigation is necessary.

The proposed action would not have a substantial adverse effect on any candidate, sensitive, or special status species and would not contribute to cumulative impacts to these designated species. As such, no impacts to riparian or sensitive natural communities are associated with the proposed action. There would be no impacts to state or federal wetlands, including, but not limited to, marsh, vernal pool, stream, lake, river or Waters of the U.S. or State that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development.

Therefore, no impacts would occur to state or federally protected wetlands. No impacts to the movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites would occur. The proposed action would not conflict with local policies or ordinances protecting biological resources, including adopted habitat conservation plans.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to biological resources.

V. CULTURAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource pursuant to State CEQA Guidelines Section 15064.5; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to historic or cultural resources. The proposed action does not include nor is there any reasonable expectation of any subsurface ground disturbing activities. Therefore, there would not be any potential for impacts to archaeological resources. The proposed action would not disturb any human remains because the proposed action site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to historic or cultural resources.

VI. ENERGY -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to energy resources including: causing a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

YES

NO

The proposed action involves use of the Airport by American Airlines, allowing the commercial air carrier to use the Airport's existing ground facilities. The PEIR, which anticipated and analyzed commercial air service among other elements, concluded that the Master Plan Update would be consistent with County plans, including the Strategic Energy Plan, Renewable Energy Plan, and the Comprehensive Strategic Plan to Reduce Waste, and would be consistent with the San Diego Association of Governments San Diego Forward Regional Plan and the SDG&E Long-term Resource Plan. The PEIR concluded that implementation of the Master Plan Update, including commercial air service, would not result in energy

being used in a wasteful manner or conflict with adopted energy conservation plans, and therefore, would result in less than significant impacts.

The proposed American Airlines activity are within the scope of activities previously anticipated in the Master Plan Update and PEIR. American Airlines would use existing infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to energy resources.

VII. GEOLOGY AND SOILS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial direct or indirect risks to life or property; and/or having 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?

YES

NO

The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure. The proposed action does not propose, nor is there any reasonable expectation of, any subsurface ground disturbing activities.

As analyzed in the PEIR, the Airport is not located in the Alquist-Priolo Zone and there are no known active faults near the Airport. The closest active fault to the Airport is the Newport-Inglewood Rose Canyon Fault, located more than four miles west of the Airport. Furthermore, the Airport is not located in a known liquefaction area or landslide susceptibility zone, and although expansive soil classifications are known to be present at the Airport, any future development would comply with California Building Code requirements. As such, the PEIR concluded that impacts to Geology and Soils would be less than significant. Nonetheless, the proposed action does not include any ground disturbing activities, development of structures, or other physical improvements. The proposed action simply allows the use of existing County facilities for the purpose of commercial air carrier service.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to geology and soil resources.

VIII. GREENHOUSE GAS EMISSIONS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with the generation of greenhouse gas emissions, either direct or indirect, or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

YES

NO

The proposed action involves allowing American Airlines to use the Airport’s existing ground facilities. The proposed American Airlines activity are within the scope of activities previously anticipated in the 2021 Master Plan Update and associated PEIR. Due to the evolving nature of establishing GHG thresholds and the County’s Climate Action Plan (CAP), the following includes a brief background of how GHG emissions were analyzed for the Master Plan Update.

On February 14, 2018, the County Board of Supervisors adopted a long-term programmatic CAP that outlined the actions the County would undertake to achieve its proportional share of State GHG emissions reductions. However, as a result of litigation, the Board of Supervisors rescinded and vacated the CAP and associated actions on September 30, 2020. Nonetheless, as discussed in the PEIR and its supporting documents, County Airports did not rely on the CAP for its GHG emissions analysis of the Master Plan Update. The PEIR developed a project-specific GHG threshold for which to compare against the Master Plan Update’s anticipated GHG emissions. The method involved developing a scientifically-based and widely used emissions screening level. For analysis that would exceed the screening level, the PEIR discussed the methodology for applying a Service Population threshold to consider GHG efficiency. Analysis was conducted using a threshold based on guidance from the California Air Resources Board and emissions reduction targets from the Scoping Plan Update (California’s plan to achieve its greenhouse gas emission reduction goals) and using a project- and location-specific approach to determining GHG efficiency, as shown in the table below.

As stated above under Section III. Air Quality, aircraft operations and enplanements are important metrics to consider for air criteria pollutants, including greenhouse gas emissions. After combining with other permitted airlines at the Airport, the proposed action would result in a total of 10,316 ~~10,296~~ annual operations and 235,900 ~~235,140~~ annual enplanements, which is below the 208,004 operations and 575,000 enplanements analyzed under the PEIR, respectively. PEIR Table 3.1.5-7 below summarizes the GHG emissions calculated for the PEIR, which concluded that impacts to greenhouse gas emissions would be less than significant.

PEIR Table 3.1.5-7. Net Increase in Operational Activities GHG Emissions 2036
Between Project vs. No Project

Scenario	Annual Emissions (Net MT CO2e)	2036 SP	Annual Emission (MT CO2e/SP)	2036 Threshold (MT CO2e/SP)	Significant Impact?
PAL1	13,469	1,552,067	0.009	3.01	No
PAL2	24,115		0.016		No

Note: this table presents emissions in 2036 (i.e., full implementation year) with and without the Master Plan Update. While CEQA only requires analysis of the project, the PEIR acknowledges that aircraft operations would naturally grow overtime even without the Master Plan Update. This table reflects only the GHG emissions due to the Master Plan Update.

Regarding applicable plans, policies, or regulations, state and local GHG reduction plans have limited applicability due to the unique nature of aviation activity and aircraft operations. For example, the 2017 Scoping Plan does not contain any measure or goal requirements for aviation-related GHG emissions; thus, the Scoping Plan would achieve the identified statewide goals for 2030 regardless of aviation activity. Similarly, the County’s 2018 CAP did not contain a measure or goal requirements for aviation-related GHG emissions, and it would have achieved the CAP objectives regardless of aviation activity.

Nonetheless, the certified PEIR acknowledged that the CAP identifies strategies that will be implemented system-wide for public projects, including improvements at the Airport and other County-owned airports. The PEIR summarizes County-initiated measures identified in the CAP Chapter 3 (Strategies and Measures) applicable to the Master Plan Update improvements. As individual project

elements are proposed throughout the Airport Master Plan Update's 20-year planning period, each project would incorporate these measures to contribute to meeting the County's emissions reduction targets. However, as stated in the PEIR, while the County is committed to implementing the CAP's reduction measures, they are not mitigation since impacts were found to be less than significant.

Subsequently, the County Board of Supervisors approved a new CAP on September 11, 2024. However, this was after the PEIR was certified in 2021. Therefore, the project-specific analysis is not required to consider the 2024 CAP. Since the Master Plan Update PEIR was certified relying on the project-specific analysis, it is appropriate to continue to rely on the approach in the approved environmental document. Nevertheless, as stated above the Airport is committed to implementing applicable County initiatives and plans that support system-wide CAP emissions reduction targets associated with County-owned facilities.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects related to greenhouse gas emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard or excessive noise to the public or the environment; location 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; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Hazards and Hazardous Materials would occur due to excavation that may disturb an underlying inactive landfill with contaminated soil and groundwater. This impact would be associated with construction activities of certain runway and taxiway improvements over landfill Unit 3, and potential general aviation parking over landfill Unit 1. This impact would be reduced to less than significant with implementation of mitigation measures M-HZ-1 and M-HZ-2. However, the proposed action does not include the aforementioned construction activities over the inactive landfill identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. Therefore, the PEIR's impacts related to Hazards and Hazardous Materials would not occur under the proposed action and therefore no mitigation is necessary.

Since the PEIR was certified, there have not been changes in the circumstances under which the proposed action was undertaken related to Hazards and Hazardous Materials. Fueling and

maintenance of aircraft would occur onsite at the Airport, using current ongoing procedures, as noted in the current Airport Certification Manual and in accordance with the Fire Code adopted by the City of Carlsbad. The proposed action would not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances would be in full compliance with local, State, and Federal regulations.

The proposed action does not propose to demolish any existing structures onsite, nor does it propose construction of structures or other facilities that would require excavation or ground disturbance. Therefore, it would not create a hazard related to the release of asbestos, lead based paint, other hazardous materials from demolition activities, or result in the release of hazardous substances that would create a significant hazard to the public or the environment. Further, the Airport is not located within one-quarter mile of an existing or a proposed school. Therefore, the proposed action would not have any effect on an existing or proposed school.

Additionally, the proposed action does not involve the construction or alteration of structures or other facilities that would require excavation or ground disturbance resulting in the release of hazardous substances that would create a significant hazard to the public or the environment. Nor does the proposed action involve activities that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. The air service would adhere to existing flight patterns under the purview of the FAA and would adhere to all governing regulations regarding overflight. Therefore, the proposed action would not constitute a safety hazard for people residing or working in the proposed action's area. Finally, the proposed action does not involve the construction or alteration of any structures that would constitute a safety hazard to or generate excessive noise from operations for people residing or working in the proposed action's area. The activity associated with this commercial air service are compatible with ongoing Airport operations; no impact would occur. Therefore, the proposed action would not constitute a safety hazard in the proposed action area.

The San Diego County Department of Environmental Health and Quality Hazardous Materials Division (DEHQ HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEHQ HMD is required to regulate the hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Airport maintains a Hazardous Materials Business Plan and Spill Prevention Countermeasures and Control Plan, under the purview of DEHQ HMD. The Hazardous Materials Business Plan (HMBP) is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of onsite. The HMBP also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local jurisdictional Fire Agency. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEHQ HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

The Airport also has an Airport Emergency Plan (AEP), which is reviewed annually; however, for security reasons it is not available for release to the public. The County is required to maintain a FAA-approved AEP, pursuant to FAA Advisory Circular 150/5200-31 and CFR Part 139.325. The AEP discusses the assignment of responsibilities, command and control, communications, and hazard control and response, including aircraft incidents, unlawful interference with operations, power failure, and crowd control. These procedures are central to the training of airport staff in the event of a catastrophic event.

Due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, State, and Federal regulation, the proposed action would not result in potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

The Airport is predominately surrounded by urbanized environments including industrial and commercial complexes, as well as an adjacent golf course. Due to the Airport's commercial airline or commercial air service activity authorized under FAR Part 139, the Airport is required to maintain Aircraft Rescue Fire Fighting (ARFF) service onsite. As such, the Airport Certification Manual identifies the ARFF equipment and facilities retained onsite, as well as response time requirements. The FAA-approved Airport Certification Manual identifies a required response time of 3 minutes by onsite ARFF resources and 6 minutes by City Carlsbad Fire Department, which also supports the Airport. Therefore, through compliance with the FAA-approved Airport Certification Manual conditions, the proposed action is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires.

The proposed American Airlines activity would use the existing air service infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to hazards or hazardous materials.

X. HYDROLOGY AND WATER QUALITY -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements or otherwise substantially degrade surface or groundwater quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff; iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; risk release of pollutants due to project inundation; conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plans?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no ground-disturbing impacts. The proposed action does not involve waste discharges that require waste discharge requirement permits, National Pollutant Discharge Elimination System (NPDES) permits, or water quality certification from the San Diego Regional Water Quality Control Board (SDRWQCB). In addition, the proposed action does not involve any known sources of polluted runoff or land use activities that would require special site design considerations, source control BMPs, or treatment control BMPs under the San Diego Regional Municipal Storm Water Permit (SDRWQCB Order No. R9-2013-0001, amended by R9-2015-0001 and R9-2015-0100).

The proposed action's conformance to the waste discharge requirements listed above ensures the proposed action would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the action would conform to Countywide watershed standards in the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Stormwater Mitigation (SUSMP), derived from State regulation to address human health and water quality concerns. Therefore, the proposed action would not contribute to a cumulatively considerable impact to water quality from waste discharges.

The proposed action site is located within the Carlsbad Hydrologic Unit as defined in the San Diego Basin Water Quality Control Plan, referred to as the Basin Plan. The proposed action is located within two hydrologic areas (HA): Encinas (904.4) and Agua Hedionda (904.3). In accordance with CWA Section 303, Agua Hedionda Creek is classified as a 303(d) listed water body under Category 5 associated with toxicity, pesticides, and nutrients (WBID No. CAR9043100020010924145051). However, the proposed action would not include discharges to Agua Hedionda Creek, which has a downstream confluence with the Agua Hedionda Lagoon and the Pacific Ocean (Regional Board website). Because the proposed action does not propose any known sources of pollutants, or land use activities that might contribute to pollutants in the hydrologic unit, no impact would occur.

Additionally, the proposed action would not create any sources of pollution runoff. The proposed action would not establish new storm water drainage facilities, and there would not be changes to site topography or existing natural drainage features that would exceed water quality objectives or degrade beneficial uses. The proposed action would neither increase the peak discharge nor degrade the quality of storm water runoff discharging from the site.

Further, the Airport obtains its water supply from the Carlsbad Municipal Water District, which gets water from surface reservoirs or other imported water sources. The proposed action would not use any groundwater for any purpose, including irrigation, domestic, or commercial demands. In addition, the proposed action does not involve activities that would interfere substantially with groundwater recharge including but not limited to: the proposed action does not involve regional diversion of water to another groundwater basin or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 1/4 mile). Therefore, no impact to groundwater resources is anticipated.

Moreover, the proposed action does not involve construction of new or expanded development that could alter the 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. The proposed action site is completely developed, and the proposed action would not increase the peak discharge, nor would it result in substantial erosion, surface runoff, flooding on- or off-site, or siltation on- or off-site. Additionally, the proposed action would not alter the course of a stream or a river in a manner which would affect the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The proposed action would not impede or redirect flood flows, nor include structures that could be considered obstacles to flood flows.

Moreover, no new sources of pollution runoff are proposed. The proposed action does not involve construction of new or expanded development. The proposed action site is not located along a shoreline of a lake or reservoir and, therefore, could not be inundated by a seiche. The proposed action site is located more than a mile from the coast and in the event of a tsunami or a flood hazard would not be inundated.

Finally, the proposed action site is located outside of all Federal Emergency Management Agency (FEMA) floodplains. Flood conditions at the site were determined by reviewing Flood Insurance Rate Maps (FIRM) maintained by FEMA. The maps delineate areas that would be inundated by the 100-year

flood, indicating areas potentially at risk for flood-based hazards or damage. The proposed action would not encroach upon the 100-year floodplain, which is designated as Zone X. The closest 100-year floodway is associated with Agua Hedionda Creek, located north and east of the Airport.

The proposed American Airlines' activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to hydrology and water quality resources.

XI. LAND USE AND PLANNING -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

YES

NO

County Airports owns and operates McClellan-Palomar Airport, which is located within the municipal boundaries of the City of Carlsbad. Although the Airport is located in the City of Carlsbad, the County is the owner and operator of ground facilities at this public-use airport. The proposed action site is McClellan-Palomar Airport, which is generally bounded by El Camino Real to the east, Palomar Airport Road to the south, the Crossings at Carlsbad golf course to the west, and commercial and industrial buildings to the north. The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts that would introduce either new infrastructure, such major roadways or water supply systems, or utilities to the area. Therefore, the proposed action would not physically divide the established community.

As discussed in the PEIR, there are several plans, policies, and regulations associated with the Airport, including but not limited to the Airport Land Use Compatibility Plan (ALUCP), County General Plan, Airport Master Plan and Airport Layout Plan, and the City of Carlsbad General Plan. As explained in the following analysis, the PEIR concluded that the Master Plan Update, which includes anticipated commercial airline activity, would not result in a conflict with these plans, policies, and regulations and would result less than significant impacts to land use and planning.

Regarding the ALUCP, the San Diego County Regional Airport Authority (SDCRAA) adopted the McClellan-Palomar Airport ALUCP as amended on December 1, 2011. The ALUCP is the fundamental tool in guiding land use compatibility surrounding the Airport in order to "provide for the orderly growth of each public airport and the area surrounding the airport... [and to] safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general (Public Utilities Code Section 21675)." This proposed action consists of issuance of a lease agreement to facilitate American Airlines' commercial air carrier service at the Airport. No construction is anticipated, and the continuation of commercial air carrier service is consistent with the ALUCP.

Regarding the County General Plan, there are no land use policies that govern commercial airline activities. However, in general, County Airports complies with the County General Plan goals of continuing to effectively serve the evolving needs of the region while minimizing adverse impacts, as well as minimizing safety risks by protecting the public from incompatible land uses and obstructions.

Regarding the Master Plan Update, its aviation activity forecast anticipated a maximum growth planning scenario of 575,000 annual enplanements from commercial airline activity (PAL 2). American Airlines proposes up to 111,720 ~~440,960~~ enplanements each year during the five-year-lease agreement (3-year lease with two 1-year options to extend).

Furthermore, the Master Plan Update anticipated that the existing commercial air carrier service facilities, including public parking at the airline terminal and airline support areas, would be satisfactory to accommodate commercial airline activity. As such, no new construction to the current terminal or associated facilities is necessary to support American Airlines' proposed activity at the Airport, and their activity would not conflict with the adopted Master Plan Update.

Regarding the City of Carlsbad, the Airport is located on County-owned property within the municipal limits of the City and is zoned Industrial (M) pursuant to the Carlsbad Municipal Code (CMC) Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. The City's General Plan also identifies the land use designation of "Public" for the Airport. The proposed action includes commercial air carrier service that would use the existing air service infrastructure at the airport. The proposed action does not include any change to the Airport's infrastructure or its Airport Reference Code.

The Airport has operated under the City of Carlsbad Conditional Use Permit (CUP)-172 since 1980. The CUP allows certain facilities and operations by right. These include air terminal facilities and air carriers, scheduled or nonscheduled. The City has previously acknowledged that flights are consistent with the CUP. In a letter dated April 23, 2013 to a commercial service airline, the City stated, "The designation of the airport in CUP 172 condition Number (11) does not specifically restrict the General Aviation Basic Transport Airport airline service with respect to the weight, seat number, or other similar limitations on air carrier activities... Therefore, a CUP amendment will not be required by the City." The City has also acknowledged that air carrier support facilities such as air terminals and parking facilities may be constructed consistent with CUP-172 (see, for example, letter dated May 3, 1993 from then City Attorney Ron Ball to former Airport manager for Palomar Airport). In *Citizens for a Friendly Airport v. County of San Diego*, San Diego Superior Court Case No. 37-2018-00057624-CU-TT-CTL in a Minute Order dated January 26, 2021 the Court determined that the County cannot change the design status of the Airport from B-II to a higher status without first seeking a CUP amendment from the City. No appeal was taken of this decision. It has become final and was incorporated into the PEIR and Master Plan Update for the Airport. Consistent with this now final determination, American Airlines is required by the proposed lease with the County to operate from the existing B-II facilities. No change in facilities from a B-II classification is promised or included in the proposed lease. It is clear from the terms of CUP-172 and the custom and practice of the City and County that the proposed use of the Airport by American Airlines is consistent with CUP-172.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to land use and planning resources.

XII. MINERAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement with American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure and no earthwork would be conducted. The proposed action site is not designated as a mineral resource recovery site, nor are there any designated locally important mineral recovery sites nearby. Therefore, implementation of the proposed action would not result in the 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. Additionally, the proposed action does not involve ground-disturbing activities and would not affect subsurface mineral resources. Therefore, no potentially significant loss of availability of a known mineral resource from a locally important mineral resource recovery (extraction) site delineated on a local General Plan, Specific Plan, or other land use plan would occur as a result of this proposed action.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to mineral resources.

XIII. NOISE -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to the people residing or working in the project area from noise including: generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; for projects located within the vicinity of a private airstrip or 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?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Noise (construction-related) would occur due to demolition and installation of airfield infrastructure. This impact would be reduced to less than significant with implementation of mitigation measures M-N-1 and M-N-2. However, the proposed action does not include the associated infrastructure improvements identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts related to Noise. Therefore, the PEIR's impacts related to Noise would not occur under the proposed action and therefore no mitigation is necessary.

Regarding aircraft-related noise, the certified PEIR explains that neither the County Guidelines for Determining Significance nor State CEQA Guidelines Appendix G provides a threshold of significance related to changes in aircraft noise levels. As such, the PEIR used the federal threshold according to FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. In accordance with FAA Order 1050.1F, an impact analysis was conducted by comparing noise exposure areas modeled for various scenarios, including existing and future conditions with and without implementation of the Master Plan Update, which studied up to 208,004 annual aircraft operations using the highest planning scenario, PAL 2. After analyzing aircraft noise of 208,004 annual aircraft operations, the PEIR determined aircraft-related noise impacts would be less than significant. By comparison, the proposed commercial air carrier service by American Airlines would result in 2,940 ~~2,920~~ aircraft operations per year, which after

combined with other permitted airlines at the Airport would result in a total of 10,316 ~~40,296~~ operations per year. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Under Future Conditions (2036), assumptions were made to help identify the Airport's future fleet mix. Since each aircraft's useful life is different depending on factors such as type of aircraft, frequency of use, and level of maintenance, it can be challenging to identify which aircraft from the Master Plan Update 2016 baseline fleet mix would still be operating at the Airport under future conditions. For the purposes of the PEIR's noise analysis, it was assumed that any aircraft that ended production prior to 2005 would be replaced with a newer comparable model by 2036. As the FAA continues to phase out older, noisier civil aircraft, some stages of aircraft are no longer flown. According to FAA publications on FAA Noise Levels, Stages, and Phaseouts, by December 31, 2015, all civil jet aircraft, regardless of weight were required to meet Stage 3 or Stage 4 noise standards to fly within the contiguous U.S. Accordingly, the Embraer 175 proposed by American Airlines is a Stage 3 aircraft. In addition, the Embraer 175 is consistent with aircraft modeled in the PEIR's evaluation (Embraer 170) and analysis of aircraft noise. While certain design components can vary by aircraft model, both the Embraer 170 and 175 belong to the same family and share the same or similar specifications (e.g., similar engine, speed, range, width) although the Embraer 175 is approximately six feet longer. Therefore, the variation in specific exact aircraft modeling would not result in a difference in noise studied under the PEIR.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to noise.

XIV. POPULATION AND HOUSING -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including substantial unplanned population growth in an area, either directly or indirectly; displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

YES

NO

The proposed action would not induce substantial population growth in an area because it does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including but limited to new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, Specific Plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. Additionally, the proposed action would not displace any existing housing because the proposed action site is currently and will continue to be used for Airport uses only.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to population and housing.

XV. PUBLIC SERVICES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial

importance" that result in one or more substantial adverse physical impacts associated with the provision of 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 objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES

NO

As a result of the Airport's ongoing commercial airline activity authorized under Federal Aviation Regulation (FAR) Part 139, the Airport is required to maintain Aircraft Rescue and Fire Fighting (ARFF) services onsite, which include facilities and equipment needed for fire suppression and emergency response as defined in FAR Part 139.315(b)(4).

As such, the Airport Certification Manual identifies specific ARFF equipment and facilities retained onsite, as well as emergency response time requirements. Under the current FAA-approved Airport Certification Manual, the required response time is 3 minutes by onsite ARFF resources and 6 minutes by City Carlsbad Fire Department, which also supports the Airport.

Based on these requirements to comply with FAA-approved emergency response protocol, the proposed action would not result in the need for significantly altered services or facilities. In addition, the proposed action does not involve construction of new or physically altered governmental facilities, including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. Therefore, the proposed action would not have an adverse physical effect on the environment because it does not require new or significantly altered services or facilities to be constructed.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to public services.

XVI. RECREATION – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in 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; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES

NO

The proposed action does not propose any residential use, including but not limited to 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. Additionally, the proposed action does not include recreational facilities or require the construction or expansion of recreational facilities and, therefore, cannot have an adverse physical effect on the environment.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes

in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to recreational resources.

XVII. TRANSPORTATION -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b); substantially increase hazards due to geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment); or result in inadequate emergency access?

YES

NO

The certified PEIR for the Master Plan Update concluded that cumulative impacts to Transportation would occur at two intersections near the Airport due to a future increase of commercial air service passengers (i.e., enplanements) and their associated vehicle trips. This impact would be reduced to less than significant with implementation of mitigation measures M-TR-1 and M-TR-2. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. While the proposed action would result in additional enplanements and associated vehicle trips, the PEIR explains that the significant impacts would not occur until specific thresholds are met. As explained in detail below, the proposed action would not exceed the threshold at which the PEIR's impact would occur, and therefore no mitigation is necessary for the proposed action.

American Airlines proposes four departing flights per day (plus ten seasonal departing flights per year). Because each flight could potentially include up to 76 passengers, this would result in a maximum of 304 passengers (i.e., enplanements) per day. As described in the PEIR, the Master Plan Update anticipated an increase in commercial airline activity up to 575,000 annual enplanements (PAL 2). In accordance with City of Carlsbad guidelines, Traffic Impact Study Guidelines, and the project-specific Transportation Impact Analysis, a trip generation rate using Level of Service⁵ was used to estimate the number of vehicle trips associated with the Master Plan Update's anticipated increase in enplanements. The trip generation rate accounts for traffic generated by passengers, employees, and airport operations associated with an increase in enplanements. Project-generated traffic volumes were then distributed and assigned to the street system surrounding the Airport. The resulting traffic volumes were evaluated under three scenarios: existing conditions (2016), near-term conditions (2020), and long-term conditions (2036). Under the existing and near-term conditions, the PEIR concluded that traffic impacts would be less than significant with no mitigation required. However, under long-term conditions, two intersections were found to result in an increased delay resulting in significant impacts: Palomar Airport Road/EI Camino Real and Palomar Airport Road/Camino Vida Roble.

As identified in the PEIR's Transportation Impact Analysis Technical Report, the amount of peak hour traffic that would trigger these impacts was correlated to daily enplanements using trip generation factors. Accordingly, the impact at Palomar Airport Road/EI Camino Real is not estimated to occur until the total commercial airline activity at the Airport reaches 670 daily enplanements or 244,550 annual enplanements. The impact at Palomar Airport Road/Camino Vida Roble is not estimated to occur until the total commercial airline activity at the Airport reaches 1,260 daily enplanements or 459,900 annual enplanements.

⁵ Senate Bill 743 was enacted on September 27, 2013, which created a new metric called Vehicle Miles Traveled (VMT). During the Master Plan Update PEIR's preparation, the State Office of Planning and Research (OPR) was developing revisions to the State's CEQA Guidelines to address VMT. However, when the Master Plan Update PEIR was certified, the VMT metric was not required by the State or County CEQA Guidelines, and LOS was used as the official metric for identifying impacts and mitigation.

When combining the proposed American Airlines activity with other permitted airlines at the Airport, this would result in a total of 235,900 ~~235,140~~ annual enplanements, which equals approximately 646 ~~644~~ daily enplanements. As such, the traffic generated by American Airlines would not trigger either of the traffic impacts discussed above and would not require mitigation.

In addition, the proposed action would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. Therefore, the proposed action would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system, and no mitigation was required.

Furthermore, the proposed action does not involve construction of structures, access roads, or other improvements that would result in roadway hazards. Therefore, the proposed action would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate site distance on a road.

Additionally, the current Airport Certification Manual, Section 10.9, identifies that the Airport maintains an emergency access road and perimeter entryway as designated emergency access roads to the runway, necessary to support ARFF vehicles for all weather conditions. The proposed action site has adequate emergency access. Therefore, the proposed action would not result in inadequate emergency access.

The proposed American Airlines activity would use the existing air service infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to transportation resources.

XVIII. TRIBAL CULTURAL RESOURCES – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to tribal cultural resources including: causing a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resource Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is: a) listed or eligible for listing in the Cal. Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

YES

NO

The proposed action consists of the issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines for commercial air service, allowing American Airlines to use the existing Airport infrastructure. No earthwork is required or proposed for the proposed action. As analyzed in the 2021 Master Plan Update PEIR, a records search was conducted at the SCIC at San Diego State University. No previously recorded historic resources were found within the site. In addition, no resources with the potential for meeting the criteria of eligibility for listing in the California Register of Historical Resources (CRPC Section 5024) are present within the proposed action site. Therefore, because no historic resources are known to exist onsite, there would be no impact to historic resources.

No significant historic or cultural resources were found to be potentially impacted within the proposed action site. No resources with the potential for meeting the criteria of eligibility for listing in the National Register of Historic Places (36 CFR Section 60) or the California Register of Historical Resources (CPRC Section 5024.1) are present within the proposed action site. Therefore, because no historic or cultural resources are known to exist onsite, there would be no impact to these resources.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that causes effects to utilities and service systems including: require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; 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; generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

YES

NO

The proposed action consists of the issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities and infrastructure. American Airlines' proposed use of the ground facilities and passenger terminal are within the existing capacities of the infrastructure. The proposed action would not generate substantial additional water demand or increase in wastewater as compared to current conditions, as both are within the capacities of the existing infrastructure and the projections of the PEIR. Additionally, the proposed action does not include new or expanded water or wastewater treatment facilities, nor does it require the construction or expansion of water or wastewater treatment facilities. Therefore, the proposed action would not require any construction of new or expanded facilities that could cause significant environmental effects.

Further, there would not be a significant increase in the generation of solid waste, as commercial airline activity, such as American Airlines' proposed activity, was anticipated as part of the PEIR for solid waste disposal needs. The proposed activity would result in the continued deposit of all solid waste at a permitted solid waste facility and thus would comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the proposed action's solid waste disposal needs.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for the evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to utilities and service systems.

XX. WILDFIRES – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in: a) substantial impairment of an adopted emergency response plan or emergency evacuation plan; b) due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby exposure of project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; c) requirement of the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or exacerbate fire risk or result in temporary or ongoing impacts to the environment; and/or exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

YES

NO

The proposed action would be located within the active airfield at the Airport and would not be located in or near State responsibility areas or lands classified as a very high fire severity zone. Therefore, the proposed action would not substantially impair the adopted emergency response plan or emergency evacuation plan. Additionally, the proposed action is not within an area of risk due to slope, prevailing winds, and other factors, would not exacerbate wildfire risks, and would not expose occupants to pollutant concentrations from a wildfire or an uncontrolled spread of a wildfire, and would have no impact on these risks. Further, the proposed action does not require the installation or maintenance of associated infrastructure and, therefore, there is no exacerbation of fire risk associated with construction of the proposed action, and no temporary or ongoing impacts to the environment. Finally, the proposed action would not expose people or structures to significant risks due to flooding or landslides, runoff, post-fire slope instability, or drainage changes.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to wildfires.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

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

YES

NO



- a) Per instructions for evaluating environmental impacts pursuant to CEQA Guidelines Sections 15162 through 15168, 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, 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 were considered in the response to each question in sections IV and V of this form. In addition to action-specific impacts, this evaluation considered the proposed action's potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that are affected or associated with this action. Therefore, the proposed action has been determined not to meet this Mandatory Finding of Significance.
- b) Regarding cumulatively considerable effects, the proposed action does not include construction or operational activities that would exacerbate environmental impacts when viewed in connection with the effects of past projects, other current projects, or probable future projects. The proposed action only includes issuance of a Commercial Airline Facilities Lease and Operations Agreement to allow for a commercial air carrier (American Airlines) to use the Airport ground facilities. Nonetheless, cumulative projects were previously analyzed in the PEIR for the Master Plan Update (which included increased commercial airline activity) and were found to be less than significant. The only exception is that cumulative impacts would occur under Transportation in the long-term condition (2036); however, as explained in Section XVII, the traffic volumes that would result in a cumulative impact would not occur under the proposed action. Based on the evaluation of environmental impacts in this Checklist, the potential for adverse cumulative effects were considered in the responses to each question in sections I through XX of this form. In addition to action-specific impacts, this evaluation considered the proposed action's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this proposed action. Therefore, this action has been determined not to meet this Mandatory Finding of Significance.
- c) Based on the evaluation of environmental impacts in this Checklist, the potential for adverse direct or indirect impacts to human beings was considered in responses to questions in sections I. Aesthetics, III. Air Quality, V. Cultural Resources, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, XV. Public Services, XVI. Recreation, XVII. Transportation, and XVIII. Utilities and Service Systems. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with the proposed action. Therefore, the proposed action has been determined not to meet this Mandatory Finding of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW UPDATE CHECKLIST FORM

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. For County regulation refer to www.amlegal.com. All other references are available upon request.

CITATIONS SPECIFIC TO PROPOSED ACTION

- 2021 Final Program Environmental Impact Report: McClellan-Palomar Airport Master Plan, certified by the Board of Supervisors on December 8, 2021.
- 2021 McClellan-Palomar Airport Master Plan Update, approved by the Board of Supervisors on December 8, 2021.
- 2021 *Minute Order, Citizens for a Friendly Airport v. County of San Diego*, No. 37-2018-00057624-CU-TT-CTL (San Diego Superior Court). January 26, 2021
- 2013 City of Carlsbad, City Manager John W. Coates. Letter to California Pacific Airlines, Senior Vice President of Business Development. April 23, 2013.
- 1993 City of Carlsbad, City Attorney Ronald R. Ball. Letter to County of San Diego, Department Public Works, McClellan-Palomar Airport, Airport Manager Robert P. Olislagers. May 3, 1993

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PUBLIC WORKS

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May 14, 2026

**Environmental Review Update Checklist Form
For Projects with Previously Approved Environmental Documents**

**FOR PURPOSES OF CONSIDERATION OF
COMMERCIAL AIRLINE FACILITIES LEASE AND OPERATIONS AGREEMENT
WITH AMERICAN AIRLINES, INC. AT McCLELLAN-PALOMAR AIRPORT**

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15168 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified Environmental Impact Report (EIR) or previously adopted Negative Declaration (ND), covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15168, to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action. Section 15168 provides that later activities in a program be analyzed using Section 15162 criteria to determine if the project is covered by the previous program EIR.

1. Background on the previously certified Program EIR:

A Program EIR (PEIR) for the McClellan-Palomar Airport Master Plan Update (Project; State Clearinghouse No. 2016021105) was certified by the County of San Diego (County) Board of Supervisors on December 8, 2021 (Item #6). The Airport Master Plan Update provides the framework to guide future airport development based on its ability to meet existing and future aviation demand in a safe and cost-effective manner. It evaluated proposed improvements and based their constructability on their ability to meet technical, economic, and environmental considerations. The Master Plan Update is a long-term planning document, and the exact scope, scale, and timing for implementation of each proposed element had not yet been defined because project-specific information had not been fully developed to quantify exact impacts. Therefore, the associated environmental impact for each element, and the Master Plan Update as a whole, was analyzed at a programmatic level for the purpose of environmental analysis. Additional analysis under CEQA was anticipated for projects at the time that they are proposed.

The Master Plan Update is a phased 20-year strategy to prioritize projects at the Airport that meet the objectives described in the PEIR. As such, 16 project elements were identified that are categorized either as airfield or landside based on the nature of each project element. Regarding aircraft activity, the County acknowledges that although it doesn't have discretion or enforcement over non-commercial aviation activity, it does have discretion over the approval of commercial air service leases (i.e., allowing the use of County facilities for the purpose of air carrier service).

In summary, the PEIR analyzed the environmental impacts associated with various airfield and landside improvements as well as aircraft operations through 2036, including commercial air

service. The PEIR found significant effects to Aesthetics, Biological Resources, Hazards and Hazardous Materials, Noise, and Transportation/Traffic. These effects were determined to be mitigable or avoided to a level below significance.

In 2023, American Airlines, Inc. applied for a Commercial Airline Facilities Lease and Operations Agreement to operate two departing flights per day. Accordingly, environmental findings were prepared dated November 24, 2024, and a two-year lease was approved by the Board of Supervisors on January 8, 2025 (Item #4).

2. Lead agency name and address:
County of San Diego, Department of Public Works Airports Division
5510 Overland Avenue, Suite 410
San Diego, CA 92123
 - a. Contact: Jeff Kashak, Environmental Planning Manager
 - b. Phone number: (858) 288-5740
 - c. E-mail: Jeff.Kashak@sdcounty.ca.gov
3. Proposed action's applicant name and address:
American Airlines, Inc.
1 Skyview Drive
MD8E100
Fort Worth, TX 76155
Contact: Mitch Goodman
4. Summary of the present proposed action:

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, Inc. (American Airlines) to use the existing ground facilities at McClellan-Palomar Airport (Airport) and to conduct commercial air carrier service as a tenant of County of San Diego, Department of Public Works Airports Division (County Airports). American Airlines would operate in accordance with the Federal Aviation Administration (FAA) Part 121 Air Carrier Certification operational specifications and adhere to the requirements of FAA's Part 139 Airport Certification at the Airport. County Airports, as the Airport Sponsor, would use revenues generated from the lease to support the County's Airport Enterprise Fund, which is used to fund the maintenance and operations of the Airport system.

American Airlines proposes four departing flights per day using the Embraer 175 aircraft (76 seats plus four onboard crew) plus ten seasonal departing flights per year. American Airlines' existing (2024) lease for two departing flights would be terminated, and a new lease would be issued reflecting a total of four departing flights per day (two existing + two new) and ten seasonal departing flights per year. As accommodated by the existing terminal facilities, American Airlines would utilize the existing ticket counter spaces to check in passengers, and passengers would then await their flight in the terminal's hold room. American Airlines anticipates up to 76 passengers in the hold room and up to four airline crew aboard each flight for commercial air carrier service. Based on American Airlines' schedule, it is estimated the proposed air service will result in approximately 2,940 annual aircraft operations¹ and 111,720 annual enplanements². It is important to note that these

¹ Aircraft Operation: aircraft either departing or arriving (i.e., 1 arrival + 1 departure = 2 operations). American Airlines proposes 4 departures + 4 arrivals per day = 8 aircraft operations per day x 365 days = 2,920 annual operations. After including 10 seasonal flights per year (20 operations), this results in a total of 2,940 annual operations.

² Enplanement: fare-paying passenger aboard scheduled flights that originate at an airport. American Airlines proposes 76 passengers x 4 departing flights per day x 365 days = 110,960 annual enplanements. After including 10 seasonal departing flights per year x 76 passengers (760 enplanements), this results in a total of 111,720 annual enplanements.

enplanement calculations assume 100% load factor (full airplane) despite American Airlines' historic trends and other airlines in the U.S. averaging an approximately 81% load factor³.

The airside and landside ground facilities at the Airport were constructed and are operated in part with federal funds from the FAA's Airport Improvement Program. The County is responsible for the day-to-day management of the Airport's ground facilities.

The acceptance of federal grant funding requires compliance with a list of Airport Sponsor Assurances enforced by the FAA. Assurance 22a states that the County:

"Would make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport."⁴

In 1996, the FAA issued a Part 139 Airport Operating Certificate to County Airports, which was most recently reissued in 2005. As a certificated airport, the Airport was deemed a Class I facility for air carrier service.

As a tenant at the Airport, American Airlines would use the existing vehicle parking facilities, aircraft ramp space, and other infrastructure to accommodate commercial air carrier services. The airline will also use ground support equipment, including an aircraft fueler to refuel, Ground Power Unit to supply energy to the aircraft, and Air Start Unit to start the engines. These services will be provided to American Airlines by the Airport's Fixed Base Operators.

5. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES

NO

The McClellan-Palomar Airport Master Plan Update Program EIR (PEIR), as certified by the County Board of Supervisors on December 8, 2021, included the environmental review of forecasted commercial air passenger service up to 575,000 annual enplanements and 208,004 annual aircraft operations. As explained in this Environmental Review Update Checklist, enplanements are important to understand the potential traffic generated, and aircraft operations are important to understand the potential emissions related to air quality, greenhouse gas emissions, and noise. As shown in the table below, American Airlines' proposed activity, when combined with other previously-approved and ongoing airline activity, would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

³ [U.S. Bureau of Transportation Statistics](#)

⁴ U.S. Department of Transportation, Federal Aviation Administration "Airport Sponsor Assurances," 2011.

Existing + Proposed Airline Activity

Airline	Annual Enplanements	Annual Aircraft Operations
Advanced Airlines LLC (dba Taos Air) [2020]	3,000	3,000
Delux Public Charter LLC (dba JSX Air) [2023]	18,980	1,456
United Airlines, Inc. [2025]	102,200	2,920
American Airlines, Inc. [Proposed Action] *	111,720	2,940
Total	235,900	10,316
Master Plan Update PEIR Allowance	575,000	208,004
Does the proposed action exceed metrics analyzed by the Master Plan Update PEIR?	No	No

* 111,720 annual enplanements is derived from 4 daily flights + 10 annual seasonal flights. American Airlines' existing (2024) lease for 2 departing flights will be terminated, and a new lease would be issued for a total of 4 departing flights (2 existing + 2 new) and ten seasonal departing flights.

Accordingly, American Airlines' proposal is below the metrics previously evaluated in the PEIR associated with the facility's commercial service as disclosed to the public in the previously approved Project. Pursuant to State CEQA Guidelines Section 15168, the proposed action is within the scope of the Project covered by the PEIR.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this proposed action 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.

NONE

[Aesthetics](#)

[Agriculture and Forestry Resources](#)

[Air Quality](#)

[Biological Resources](#)

[Cultural Resources](#)

[Energy](#)

[Geology & Soils](#)

[Greenhouse Gas Emissions](#)

[Hazards & Hazardous Materials](#)

[Hydrology & Water Quality](#)

[Land Use & Planning](#)

[Mineral Resources](#)

[Noise](#)

[Population & Housing](#)

[Public Services](#)

[Recreation](#)

[Transportation](#)

[Tribal Cultural Resources](#)

[Utilities & Service Systems](#)

[Wildfire](#)

[Mandatory Findings of Significance](#)

DETERMINATION:

On the basis of substantial evidence demonstrated below, the Department of Public Works has determined that:

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous PEIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified PEIR is adequate without modification.
- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with an EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.
- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.
- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.



Signature

5/14/26

Date

Jeff Kashak

Printed Name

Environmental Planning Manager

Title

EVALUATION OF ENVIRONMENTAL IMPACTS

CEQA Guidelines Sections 15162 through 15168 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR for a project.

After a program EIR is certified, CEQA requires later activities in that program to conduct analysis to determine if the project is covered by analysis in the previous program EIR. As defined by CEQA Guidelines Section 15162 and 15168, a project can rely on the program EIR, and does not require a new initial study or environmental documentation, if the lead agency determines the following based on substantial evidence in light of the whole record:

1. No substantial changes are proposed in the project which will require major revisions of the previous program EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous program EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous program EIR was certified as complete, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous program EIR; or
 - b. Significant effects previously examined will be substantially more severe than shown in the previously certified program EIR; or
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous program EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources, except as provided in Public Resources Code Section 21099, including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; public views of the site and its surroundings; existing visual character or quality of the site and its surroundings; applicable zoning and other regulations governing scenic quality; or day or nighttime views in the area?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Aesthetics would occur due to the introduction of a retaining wall along the southern slope at the Airport's east end that would contrast with the existing visual character and quality. This impact would be reduced to less than significant with implementation of mitigation measure M-AE-1. However, the proposed action does not include installing the retaining wall identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to Aesthetics. Therefore, the PEIR's impact related to Aesthetics would not occur under the proposed action and therefore no mitigation is necessary.

The proposed activity by American Airlines would 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. No new permanent structures and no alterations to existing structures are proposed. Accordingly, there would not be a change to the visual landscape. Therefore, the proposed action would not have an adverse effect on a scenic vista.

The proposed action location is within the existing infrastructure of the Airport and consists of densely developed land adjacent to existing aviation use areas. The proposed location does not possess any scenic resources such as trees, rock outcroppings, or historic buildings. Therefore, the proposed action would not have any substantial adverse effect on a scenic resource within a State scenic highway.

The proposed action does not propose discernable changes to the visual environment.

Sources of existing lighting in the vicinity of the proposed action site include existing aviation navigational lighting at the Airport, and lighting associated with commercial and residential development and local roads in the surrounding area. The proposed action would not introduce new lighting sources or change the existing lighting at the Airport. The proposed action does not propose construction or alteration of existing outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Therefore, the proposed action would not create any new sources of light pollution that could contribute to skyglow, light trespass or glare, or adversely affect day or nighttime views in area.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES

NO

The proposed action site (McClellan-Palomar Airport) does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use. The proposed site is zoned manufacturing, which is not considered to be an agricultural zone.

Additionally, the proposed action site is not under a Williamson Act Contract. Therefore, the proposed action does not conflict with existing zoning for agricultural use, or a Williamson Act Contract. The proposed action does not contain forest lands or timberland. The County does not have any existing Timberland Production Zones. In addition, the proposed action is consistent with the existing zoning, and a rezone of the property is not proposed. Therefore, implementation of the proposed action would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones. The proposed action site does not contain any forest lands as defined in Public Resources Code section 12220(g); therefore, implementation of the proposed action would not result in the loss or conversion of forest land to a non-forest use.

Moreover, the proposed action is not located in the vicinity of off-site forest resources. The proposed action site and surrounding area within a radius of 0.25 mile do not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use.

American Airlines' proposed activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for the evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to agriculture and forestry resources.

III. AIR QUALITY -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES

NO

When studying potential environmental impacts of a project, two components must be analyzed: construction and operation. The proposed action includes issuance of a lease to allow for a commercial air carrier (American Airlines) to use the Airport's ground facilities. The project would not produce construction-related emissions, as American Airlines would use the existing passenger terminal, parking facilities, aircraft ramp space, and infrastructure to accommodate passengers. Thus, no construction-related air quality emissions would be generated.

Regarding operations, the proposed action would result in emissions associated with aircraft operations as well as ground transportation emissions resulting from passengers accessing the Airport (i.e., vehicle trips). It is important to note that ongoing aircraft operations are under the jurisdiction and regulatory authority of FAA; however, because County Airports has discretion over the approval of commercial air carrier services, it has been analyzed pursuant to CEQA. As further explained below, air quality emissions associated with the proposed action were previously anticipated and analyzed in the PEIR.

The number of aircraft operations is important to the environmental analysis due to air criteria pollutants emitted from the combustion of fossil fuels (i.e., jet fuel, Aviation, diesel, gasoline, natural gas, etc.) and are by-products contained in the engine exhausts. The PEIR anticipated an increase in aviation activity at the Airport (including air carrier service) and analyzed up to 208,004 aircraft operations per year using the highest planning scenario, PAL 2. After analyzing air quality emissions of 208,004 annual aircraft operations, the PEIR determined air quality impacts would be less than significant. By comparison, the proposed commercial air carrier service by American Airlines would result in 2,940 aircraft operations per year, which after combined with other permitted airlines at the Airport would result in a total of 10,316 operations per year. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Also, the number of enplanements is important to the environmental analysis due to air criteria pollutants emitted from the fuel combustion of motor vehicles approaching, departing, and operating at the Airport. The PEIR anticipated an increase in aviation activity at the Airport (including air carrier service) and analyzed up to 575,000 enplanements per year using the highest planning scenario, PAL 2. After analyzing air quality emissions of 575,000 enplanements, the PEIR determined air quality impacts would be less than significant. By comparison, the proposed commercial air carrier service by American Airlines would result in 111,720 annual enplanements, which after combined with other permitted airlines at the Airport would result in a total of 235,900 annual enplanements. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Specifically, the PEIR demonstrated that commercial airlines using forecasted activity levels would be below Federal De Minimis threshold levels as summarized in the PEIR's Table 3.1.2-7 below:

PEIR Table 3.1.2-7. PEIR Project Emissions from Operational Activities

Scenario	Total Emissions (tons per year)						
	CO	VOC	NOX	SOX	PM _{2.5}	PM ₁₀	Pb
Master Plan Update	97.42	3.87	47.13	7.29	2.65	7.63	0
Federal De Minimis Threshold Level	NA	100	100	NA	NA	NA	NA
Impact	No	No	No	No	No	No	No

Regarding sensitive receptors, exhaust emissions from motor vehicles could potentially cause a direct, localized CO "hotspot" impact if located at or near proposed development or sensitive receptors. As analyzed in the PEIR, no sensitive receptors are located within a quarter mile (the radius determined

by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed action and Airport. Furthermore, neither the Master Plan Update nor the proposed commercial air service includes the major expansion or construction of new stationary sources that could potentially emit TACs and increase long-term public health risks, nor do they involve placing sensitive receptors closer to the Airport.

The proposed action does not include heavy industrial or agricultural uses that are typically associated with odor complaints. The proposed action involves use of the Airport by American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. Commercial airline activity is an ongoing, current use at the Airport. While the proposed action would result in fueling operations at the Airport, all fuel storage, transport, and handling would follow existing protocols as outlined in the Airport Certification Manual, which was mostly recently approved by the FAA in 2022, is reviewed annually, and was last updated in October 2025.

The proposed American Airlines activity would use the existing passenger terminal, parking facilities, aircraft ramp space, and infrastructure as analyzed in the PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to air quality.

IV. BIOLOGICAL RESOURCES – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Biological Resources would occur due to the relocation and installation of airfield infrastructure affecting sensitive wildlife species and vegetation. This impact would be reduced to less than significant with implementation of mitigation measures M-BI-1 through M-BI-8. However, the proposed action does not include the associated infrastructure improvements identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to Biological Resources. Therefore, the PEIR's impacts related to Biological Resources would not occur under the proposed action and therefore no mitigation is necessary.

The proposed action would not have a substantial adverse effect on any candidate, sensitive, or special status species and would not contribute to cumulative impacts to these designated species. As such, no impacts to riparian or sensitive natural communities are associated with the proposed action. There would be no impacts to state or federal wetlands, including, but not limited to, marsh, vernal pool, stream, lake, river or Waters of the U.S. or State that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts would occur to state or federally protected wetlands. No impacts to the movement

of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites would occur. The proposed action would not conflict with local policies or ordinances protecting biological resources, including adopted habitat conservation plans.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to biological resources.

V. CULTURAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource pursuant to State CEQA Guidelines Section 15064.5; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts to historic or cultural resources. The proposed action does not include nor is there any reasonable expectation of any subsurface ground disturbing activities. Therefore, there would not be any potential for impacts to archaeological resources. The proposed action would not disturb any human remains because the proposed action site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to historic or cultural resources.

VI. ENERGY-- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to energy resources including: causing a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

YES

NO

The proposed action involves use of the Airport by American Airlines, allowing the commercial air carrier to use the Airport's existing ground facilities. The PEIR, which anticipated and analyzed commercial air service among other elements, concluded that the Master Plan Update would be consistent with County plans, including the Strategic Energy Plan, Renewable Energy Plan, and the Comprehensive Strategic Plan to Reduce Waste, and would be consistent with the San Diego Association of Governments San Diego Forward Regional Plan and the SDG&E Long-term Resource Plan. The PEIR concluded that implementation of the Master Plan Update, including commercial air service, would not result in energy

being used in a wasteful manner or conflict with adopted energy conservation plans, and therefore, would result in less than significant impacts.

The proposed American Airlines activity are within the scope of activities previously anticipated in the Master Plan Update and PEIR. American Airlines would use existing infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to energy resources.

VII. GEOLOGY AND SOILS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial direct or indirect risks to life or property; and/or having 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?

YES

NO

The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure. The proposed action does not propose, nor is there any reasonable expectation of, any subsurface ground disturbing activities.

As analyzed in the PEIR, the Airport is not located in the Alquist-Priolo Zone and there are no known active faults near the Airport. The closest active fault to the Airport is the Newport-Inglewood Rose Canyon Fault, located more than four miles west of the Airport. Furthermore, the Airport is not located in a known liquefaction area or landslide susceptibility zone, and although expansive soil classifications are known to be present at the Airport, any future development would comply with California Building Code requirements. As such, the PEIR concluded that impacts to Geology and Soils would be less than significant. Nonetheless, the proposed action does not include any ground disturbing activities, development of structures, or other physical improvements. The proposed action simply allows the use of existing County facilities for the purpose of commercial air carrier service.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to geology and soil resources.

VIII. GREENHOUSE GAS EMISSIONS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with the generation of greenhouse gas emissions, either direct or indirect, or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

YES

NO

The proposed action involves allowing American Airlines to use the Airport’s existing ground facilities. The proposed American Airlines activity are within the scope of activities previously anticipated in the 2021 Master Plan Update and associated PEIR. Due to the evolving nature of establishing GHG thresholds and the County’s Climate Action Plan (CAP), the following includes a brief background of how GHG emissions were analyzed for the Master Plan Update.

On February 14, 2018, the County Board of Supervisors adopted a long-term programmatic CAP that outlined the actions the County would undertake to achieve its proportional share of State GHG emissions reductions. However, as a result of litigation, the Board of Supervisors rescinded and vacated the CAP and associated actions on September 30, 2020. Nonetheless, as discussed in the PEIR and its supporting documents, County Airports did not rely on the CAP for its GHG emissions analysis of the Master Plan Update. The PEIR developed a project-specific GHG threshold for which to compare against the Master Plan Update’s anticipated GHG emissions. The method involved developing a scientifically-based and widely used emissions screening level. For analysis that would exceed the screening level, the PEIR discussed the methodology for applying a Service Population threshold to consider GHG efficiency. Analysis was conducted using a threshold based on guidance from the California Air Resources Board and emissions reduction targets from the Scoping Plan Update (California’s plan to achieve its greenhouse gas emission reduction goals) and using a project- and location-specific approach to determining GHG efficiency, as shown in the table below.

As stated above under Section III. Air Quality, aircraft operations and enplanements are important metrics to consider for air criteria pollutants, including greenhouse gas emissions. After combining with other permitted airlines at the Airport, the proposed action would result in a total of 10,316 annual operations and 235,900 annual enplanements, which is below the 208,004 operations and 575,000 enplanements analyzed under the PEIR, respectively. PEIR Table 3.1.5-7 below summarizes the GHG emissions calculated for the PEIR, which concluded that impacts to greenhouse gas emissions would be less than significant.

PEIR Table 3.1.5-7. Net Increase in Operational Activities GHG Emissions 2036
Between Project vs. No Project

Scenario	Annual Emissions (Net MT CO2e)	2036 SP	Annual Emission (MT CO2e/SP)	2036 Threshold (MT CO2e/SP)	Significant Impact?
PAL1	13,469	1,552,067	0.009	3.01	No
PAL2	24,115		0.016		No

Note: this table presents emissions in 2036 (i.e., full implementation year) with and without the Master Plan Update. While CEQA only requires analysis of the project, the PEIR acknowledges that aircraft operations would naturally grow overtime even without the Master Plan Update. This table reflects only the GHG emissions due to the Master Plan Update.

Regarding applicable plans, policies, or regulations, state and local GHG reduction plans have limited applicability due to the unique nature of aviation activity and aircraft operations. For example, the 2017 Scoping Plan does not contain any measure or goal requirements for aviation-related GHG emissions; thus, the Scoping Plan would achieve the identified statewide goals for 2030 regardless of aviation activity. Similarly, the County’s 2018 CAP did not contain a measure or goal requirements for aviation-related GHG emissions, and it would have achieved the CAP objectives regardless of aviation activity.

Nonetheless, the certified PEIR acknowledged that the CAP identifies strategies that will be implemented system-wide for public projects, including improvements at the Airport and other County-owned airports. The PEIR summarizes County-initiated measures identified in the CAP Chapter 3 (Strategies and Measures) applicable to the Master Plan Update improvements. As individual project

elements are proposed throughout the Airport Master Plan Update's 20-year planning period, each project would incorporate these measures to contribute to meeting the County's emissions reduction targets. However, as stated in the PEIR, while the County is committed to implementing the CAP's reduction measures, they are not mitigation since impacts were found to be less than significant.

Subsequently, the County Board of Supervisors approved a new CAP on September 11, 2024. However, this was after the PEIR was certified in 2021. Therefore, the project-specific analysis is not required to consider the 2024 CAP. Since the Master Plan Update PEIR was certified relying on the project-specific analysis, it is appropriate to continue to rely on the approach in the approved environmental document. Nevertheless, as stated above the Airport is committed to implementing applicable County initiatives and plans that support system-wide CAP emissions reduction targets associated with County-owned facilities.

The proposed American Airlines activity would use the existing infrastructure at the airport, as analyzed in the PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects related to greenhouse gas emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard or excessive noise to the public or the environment; location 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; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Hazards and Hazardous Materials would occur due to excavation that may disturb an underlying inactive landfill with contaminated soil and groundwater. This impact would be associated with construction activities of certain runway and taxiway improvements over landfill Unit 3, and potential general aviation parking over landfill Unit 1. This impact would be reduced to less than significant with implementation of mitigation measures M-HZ-1 and M-HZ-2. However, the proposed action does not include the aforementioned construction activities over the inactive landfill identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. Therefore, the PEIR's impacts related to Hazards and Hazardous Materials would not occur under the proposed action and therefore no mitigation is necessary.

Since the PEIR was certified, there have not been changes in the circumstances under which the proposed action was undertaken related to Hazards and Hazardous Materials. Fueling and

maintenance of aircraft would occur onsite at the Airport, using current ongoing procedures, as noted in the current Airport Certification Manual and in accordance with the Fire Code adopted by the City of Carlsbad. The proposed action would not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances would be in full compliance with local, State, and Federal regulations.

The proposed action does not propose to demolish any existing structures onsite, nor does it propose construction of structures or other facilities that would require excavation or ground disturbance. Therefore, it would not create a hazard related to the release of asbestos, lead based paint, other hazardous materials from demolition activities, or result in the release of hazardous substances that would create a significant hazard to the public or the environment. Further, the Airport is not located within one-quarter mile of an existing or a proposed school. Therefore, the proposed action would not have any effect on an existing or proposed school.

Additionally, the proposed action does not involve the construction or alteration of structures or other facilities that would require excavation or ground disturbance resulting in the release of hazardous substances that would create a significant hazard to the public or the environment. Nor does the proposed action involve activities that would constitute a safety hazard to aircraft and/or operations from an airport or heliport. The air service would adhere to existing flight patterns under the purview of the FAA and would adhere to all governing regulations regarding overflight. Therefore, the proposed action would not constitute a safety hazard for people residing or working in the proposed action's area. Finally, the proposed action does not involve the construction or alteration of any structures that would constitute a safety hazard to or generate excessive noise from operations for people residing or working in the proposed action's area. The activity associated with this commercial air service are compatible with ongoing Airport operations; no impact would occur. Therefore, the proposed action would not constitute a safety hazard in the proposed action area.

The San Diego County Department of Environmental Health and Quality Hazardous Materials Division (DEHQ HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEHQ HMD is required to regulate the hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Airport maintains a Hazardous Materials Business Plan and Spill Prevention Countermeasures and Control Plan, under the purview of DEHQ HMD. The Hazardous Materials Business Plan (HMBP) is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of onsite. The HMBP also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local jurisdictional Fire Agency. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEHQ HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

The Airport also has an Airport Emergency Plan (AEP), which is reviewed annually; however, for security reasons it is not available for release to the public. The County is required to maintain a FAA-approved AEP, pursuant to FAA Advisory Circular 150/5200-31 and CFR Part 139.325. The AEP discusses the assignment of responsibilities, command and control, communications, and hazard control and response, including aircraft incidents, unlawful interference with operations, power failure, and crowd control. These procedures are central to the training of airport staff in the event of a catastrophic event.

Due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, State, and Federal regulation, the proposed action would not result in potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

The Airport is predominately surrounded by urbanized environments including industrial and commercial complexes, as well as an adjacent golf course. Due to the Airport's commercial airline or commercial air service activity authorized under FAR Part 139, the Airport is required to maintain Aircraft Rescue Fire Fighting (ARFF) service onsite. As such, the Airport Certification Manual identifies the ARFF equipment and facilities retained onsite, as well as response time requirements. The FAA-approved Airport Certification Manual identifies a required response time of 3 minutes by onsite ARFF resources and 6 minutes by City Carlsbad Fire Department, which also supports the Airport. Therefore, through compliance with the FAA-approved Airport Certification Manual conditions, the proposed action is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires.

The proposed American Airlines activity would use the existing air service infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to hazards or hazardous materials.

X. HYDROLOGY AND WATER QUALITY -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements or otherwise substantially degrade surface or groundwater quality; substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff; iii) create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; risk release of pollutants due to project inundation; conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plans?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no ground-disturbing impacts. The proposed action does not involve waste discharges that require waste discharge requirement permits, National Pollutant Discharge Elimination System (NPDES) permits, or water quality certification from the San Diego Regional Water Quality Control Board (SDRWQCB). In addition, the proposed action does not involve any known sources of polluted runoff or land use activities that would require special site design considerations, source control BMPs, or treatment control BMPs under the San Diego Regional Municipal Storm Water Permit (SDRWQCB Order No. R9-2013-0001, amended by R9-2015-0001 and R9-2015-0100).

The proposed action's conformance to the waste discharge requirements listed above ensures the proposed action would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the action would conform to Countywide watershed standards in the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Stormwater Mitigation (SUSMP), derived from State regulation to address human health and water quality concerns. Therefore, the proposed action would not contribute to a cumulatively considerable impact to water quality from waste discharges.

The proposed action site is located within the Carlsbad Hydrologic Unit as defined in the San Diego Basin Water Quality Control Plan, referred to as the Basin Plan. The proposed action is located within two hydrologic areas (HA): Encinas (904.4) and Agua Hedionda (904.3). In accordance with CWA Section 303, Agua Hedionda Creek is classified as a 303(d) listed water body under Category 5 associated with toxicity, pesticides, and nutrients (WBID No. CAR9043100020010924145051). However, the proposed action would not include discharges to Agua Hedionda Creek, which has a downstream confluence with the Agua Hedionda Lagoon and the Pacific Ocean (Regional Board website). Because the proposed action does not propose any known sources of pollutants, or land use activities that might contribute to pollutants in the hydrologic unit, no impact would occur.

Additionally, the proposed action would not create any sources of pollution runoff. The proposed action would not establish new storm water drainage facilities, and there would not be changes to site topography or existing natural drainage features that would exceed water quality objectives or degrade beneficial uses. The proposed action would neither increase the peak discharge nor degrade the quality of storm water runoff discharging from the site.

Further, the Airport obtains its water supply from the Carlsbad Municipal Water District, which gets water from surface reservoirs or other imported water sources. The proposed action would not use any groundwater for any purpose, including irrigation, domestic, or commercial demands. In addition, the proposed action does not involve activities that would interfere substantially with groundwater recharge including but not limited to: the proposed action does not involve regional diversion of water to another groundwater basin or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 1/4 mile). Therefore, no impact to groundwater resources is anticipated.

Moreover, the proposed action does not involve construction of new or expanded development that could alter the 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. The proposed action site is completely developed, and the proposed action would not increase the peak discharge, nor would it result in substantial erosion, surface runoff, flooding on- or off-site, or siltation on- or off-site. Additionally, the proposed action would not alter the course of a stream or a river in a manner which would affect the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The proposed action would not impede or redirect flood flows, nor include structures that could be considered obstacles to flood flows.

Moreover, no new sources of pollution runoff are proposed. The proposed action does not involve construction of new or expanded development. The proposed action site is not located along a shoreline of a lake or reservoir and, therefore, could not be inundated by a seiche. The proposed action site is located more than a mile from the coast and in the event of a tsunami or a flood hazard would not be inundated.

Finally, the proposed action site is located outside of all Federal Emergency Management Agency (FEMA) floodplains. Flood conditions at the site were determined by reviewing Flood Insurance Rate Maps (FIRM) maintained by FEMA. The maps delineate areas that would be inundated by the 100-year

flood, indicating areas potentially at risk for flood-based hazards or damage. The proposed action would not encroach upon the 100-year floodplain, which is designated as Zone X. The closest 100-year floodway is associated with Agua Hedionda Creek, located north and east of the Airport.

The proposed American Airlines' activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to hydrology and water quality resources.

XI. LAND USE AND PLANNING -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

YES

NO

County Airports owns and operates McClellan-Palomar Airport, which is located within the municipal boundaries of the City of Carlsbad. Although the Airport is located in the City of Carlsbad, the County is the owner and operator of ground facilities at this public-use airport. The proposed action site is McClellan-Palomar Airport, which is generally bounded by El Camino Real to the east, Palomar Airport Road to the south, the Crossings at Carlsbad golf course to the west, and commercial and industrial buildings to the north. The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts that would introduce either new infrastructure, such major roadways or water supply systems, or utilities to the area. Therefore, the proposed action would not physically divide the established community.

As discussed in the PEIR, there are several plans, policies, and regulations associated with the Airport, including but not limited to the Airport Land Use Compatibility Plan (ALUCP), County General Plan, Airport Master Plan and Airport Layout Plan, and the City of Carlsbad General Plan. As explained in the following analysis, the PEIR concluded that the Master Plan Update, which includes anticipated commercial airline activity, would not result in a conflict with these plans, policies, and regulations and would result less than significant impacts to land use and planning.

Regarding the ALUCP, the San Diego County Regional Airport Authority (SDCRAA) adopted the McClellan-Palomar Airport ALUCP as amended on December 1, 2011. The ALUCP is the fundamental tool in guiding land use compatibility surrounding the Airport in order to "provide for the orderly growth of each public airport and the area surrounding the airport... [and to] safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general (Public Utilities Code Section 21675)." This proposed action consists of issuance of a lease agreement to facilitate American Airlines' commercial air carrier service at the Airport. No construction is anticipated, and the continuation of commercial air carrier service is consistent with the ALUCP.

Regarding the County General Plan, there are no land use policies that govern commercial airline activities. However, in general, County Airports complies with the County General Plan goals of continuing to effectively serve the evolving needs of the region while minimizing adverse impacts, as well as minimizing safety risks by protecting the public from incompatible land uses and obstructions.

Regarding the Master Plan Update, its aviation activity forecast anticipated a maximum growth planning scenario of 575,000 annual enplanements from commercial airline activity (PAL 2). American Airlines proposes up to 111,720 enplanements each year during the lease agreement (3-year lease with two 1-year options to extend).

Furthermore, the Master Plan Update anticipated that the existing commercial air carrier service facilities, including public parking at the airline terminal and airline support areas, would be satisfactory to accommodate commercial airline activity. As such, no new construction to the current terminal or associated facilities is necessary to support American Airlines' proposed activity at the Airport, and their activity would not conflict with the adopted Master Plan Update.

Regarding the City of Carlsbad, the Airport is located on County-owned property within the municipal limits of the City and is zoned Industrial (M) pursuant to the Carlsbad Municipal Code (CMC) Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. The City's General Plan also identifies the land use designation of "Public" for the Airport. The proposed action includes commercial air carrier service that would use the existing air service infrastructure at the airport. The proposed action does not include any change to the Airport's infrastructure or its Airport Reference Code.

The Airport has operated under the City of Carlsbad Conditional Use Permit (CUP)-172 since 1980. The CUP allows certain facilities and operations by right. These include air terminal facilities and air carriers, scheduled or nonscheduled. The City has previously acknowledged that flights are consistent with the CUP. In a letter dated April 23, 2013 to a commercial service airline, the City stated, "The designation of the airport in CUP 172 condition Number (11) does not specifically restrict the General Aviation Basic Transport Airport airline service with respect to the weight, seat number, or other similar limitations on air carrier activities...Therefore, a CUP amendment will not be required by the City." The City has also acknowledged that air carrier support facilities such as air terminals and parking facilities may be constructed consistent with CUP-172 (see, for example, letter dated May 3, 1993 from then City Attorney Ron Ball to former Airport manager for Palomar Airport). In *Citizens for a Friendly Airport v. County of San Diego*, San Diego Superior Court Case No. 37-2018-00057624-CU-TT-CTL in a Minute Order dated January 26, 2021 the Court determined that the County cannot change the design status of the Airport from B-II to a higher status without first seeking a CUP amendment from the City. No appeal was taken of this decision. It has become final and was incorporated into the PEIR and Master Plan Update for the Airport. Consistent with this now final determination, American Airlines is required by the proposed lease with the County to operate from the existing B-II facilities. No change in facilities from a B-II classification is promised or included in the proposed lease. It is clear from the terms of CUP-172 and the custom and practice of the City and County that the proposed use of the Airport by American Airlines is consistent with CUP-172.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to land use and planning resources.

XII. MINERAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES

NO

The proposed action consists of issuance of a Commercial Airline Facilities Lease and Operations Agreement with American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure and no earthwork would be conducted. The proposed action site is not designated as a mineral resource recovery site, nor are there any designated locally important mineral recovery sites nearby. Therefore, implementation of the proposed action would not result in the 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. Additionally, the proposed action does not involve ground-disturbing activities and would not affect subsurface mineral resources. Therefore, no potentially significant loss of availability of a known mineral resource from a locally important mineral resource recovery (extraction) site delineated on a local General Plan, Specific Plan, or other land use plan would occur as a result of this proposed action.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to mineral resources.

XIII. NOISE -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to the people residing or working in the project area from noise including: generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; for projects located within the vicinity of a private airstrip or 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?

YES

NO

The certified PEIR for the Master Plan Update concluded that significant impacts to Noise (construction-related) would occur due to demolition and installation of airfield infrastructure. This impact would be reduced to less than significant with implementation of mitigation measures M-N-1 and M-N-2. However, the proposed action does not include the associated infrastructure improvements identified in the PEIR. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. American Airlines would operate using existing infrastructure, with no impacts related to Noise. Therefore, the PEIR's impacts related to Noise would not occur under the proposed action and therefore no mitigation is necessary.

Regarding aircraft-related noise, the certified PEIR explains that neither the County Guidelines for Determining Significance nor State CEQA Guidelines Appendix G provides a threshold of significance related to changes in aircraft noise levels. As such, the PEIR used the federal threshold according to FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. In accordance with FAA Order 1050.1F, an impact analysis was conducted by comparing noise exposure areas modeled for various scenarios, including existing and future conditions with and without implementation of the Master Plan Update, which studied up to 208,004 annual aircraft operations using the highest planning scenario, PAL 2. After analyzing aircraft noise of 208,004 annual aircraft operations, the PEIR determined aircraft-related noise impacts would be less than significant. By comparison, the proposed commercial air

carrier service by American Airlines would result in 2,940 aircraft operations per year, which after combined with other permitted airlines at the Airport would result in a total of 10, 316 operations per year. As such, the proposed action would be within the scope and below the levels analyzed by the Master Plan Update PEIR.

Under Future Conditions (2036), assumptions were made to help identify the Airport's future fleet mix. Since each aircraft's useful life is different depending on factors such as type of aircraft, frequency of use, and level of maintenance, it can be challenging to identify which aircraft from the Master Plan Update 2016 baseline fleet mix would still be operating at the Airport under future conditions. For the purposes of the PEIR's noise analysis, it was assumed that any aircraft that ended production prior to 2005 would be replaced with a newer comparable model by 2036. As the FAA continues to phase out older, noisier civil aircraft, some stages of aircraft are no longer flown. According to FAA publications on FAA Noise Levels, Stages, and Phaseouts, by December 31, 2015, all civil jet aircraft, regardless of weight were required to meet Stage 3 or Stage 4 noise standards to fly within the contiguous U.S. Accordingly, the Embraer 175 proposed by American Airlines is a Stage 3 aircraft. In addition, the Embraer 175 is consistent with aircraft modeled in the PEIR's evaluation (Embraer 170) and analysis of aircraft noise. While certain design components can vary by aircraft model, both the Embraer 170 and 175 belong to the same family and share the same or similar specifications (e.g., similar engine, speed, range, width) although the Embraer 175 is approximately six feet longer. Therefore, the variation in specific exact aircraft modeling would not result in a difference in noise studied under the PEIR.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to noise.

XIV. POPULATION AND HOUSING -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including substantial unplanned population growth in an area, either directly or indirectly; displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

YES

NO

The proposed action would not induce substantial population growth in an area because it does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including but limited to new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, Specific Plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. Additionally, the proposed action would not displace any existing housing because the proposed action site is currently and will continue to be used for Airport uses only.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to population and housing.

XV. PUBLIC SERVICES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of 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 objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES

NO

As a result of the Airport's ongoing commercial airline activity authorized under Federal Aviation Regulation (FAR) Part 139, the Airport is required to maintain Aircraft Rescue and Fire Fighting (ARFF) services onsite, which include facilities and equipment needed for fire suppression and emergency response as defined in FAR Part 139.315(b)(4).

As such, the Airport Certification Manual identifies specific ARFF equipment and facilities retained onsite, as well as emergency response time requirements. Under the current FAA-approved Airport Certification Manual, the required response time is 3 minutes by onsite ARFF resources and 6 minutes by City Carlsbad Fire Department, which also supports the Airport.

Based on these requirements to comply with FAA-approved emergency response protocol, the proposed action would not result in the need for significantly altered services or facilities. In addition, the proposed action does not involve construction of new or physically altered governmental facilities, including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. Therefore, the proposed action would not have an adverse physical effect on the environment because it does not require new or significantly altered services or facilities to be constructed.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to public services.

XVI. RECREATION -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in 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; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES

NO

The proposed action does not propose any residential use, including but not limited to 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. Additionally, the proposed action does not include recreational facilities or require the construction or expansion of recreational facilities and, therefore, cannot have an adverse physical effect on the environment.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used

for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to recreational resources.

XVII. TRANSPORTATION -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b); substantially increase hazards due to geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment); or result in inadequate emergency access?

YES

NO

The certified PEIR for the Master Plan Update concluded that cumulative impacts to Transportation would occur at two intersections near the Airport due to a future increase of commercial air service passengers (i.e., enplanements) and their associated vehicle trips. This impact would be reduced to less than significant with implementation of mitigation measures M-TR-1 and M-TR-2. The proposed action consists of issuing a Commercial Airline Facilities Lease and Operations Agreement, allowing a commercial air carrier to use the Airport's existing ground facilities. While the proposed action would result in additional enplanements and associated vehicle trips, the PEIR explains that the significant impacts would not occur until specific thresholds are met. As explained in detail below, the proposed action would not exceed the threshold at which the PEIR's impact would occur, and therefore no mitigation is necessary for the proposed action.

American Airlines proposes four departing flights per day (plus ten seasonal departing flights per year). Because each flight could potentially include up to 76 passengers, this would result in a maximum of 304 passengers (i.e., enplanements) per day. As described in the PEIR, the Master Plan Update anticipated an increase in commercial airline activity up to 575,000 annual enplanements (PAL 2). In accordance with City of Carlsbad guidelines, Traffic Impact Study Guidelines, and the project-specific Transportation Impact Analysis, a trip generation rate using Level of Service⁵ was used to estimate the number of vehicle trips associated with the Master Plan Update's anticipated increase in enplanements. The trip generation rate accounts for traffic generated by passengers, employees, and airport operations associated with an increase in enplanements. Project-generated traffic volumes were then distributed and assigned to the street system surrounding the Airport. The resulting traffic volumes were evaluated under three scenarios: existing conditions (2016), near-term conditions (2020), and long-term conditions (2036). Under the existing and near-term conditions, the PEIR concluded that traffic impacts would be less than significant with no mitigation required. However, under long-term conditions, two intersections were found to result in an increased delay resulting in significant impacts: Palomar Airport Road/El Camino Real and Palomar Airport Road/Camino Vida Roble.

As identified in the PEIR's Transportation Impact Analysis Technical Report, the amount of peak hour traffic that would trigger these impacts was correlated to daily enplanements using trip generation factors. Accordingly, the impact at Palomar Airport Road/El Camino Real is not estimated to occur until the total commercial airline activity at the Airport reaches 670 daily enplanements or 244,550 annual enplanements. The impact at Palomar Airport Road/Camino Vida Roble is not estimated to occur until the total commercial airline activity at the Airport reaches 1,260 daily enplanements or 459,900 annual enplanements.

⁵ Senate Bill 743 was enacted on September 27, 2013, which created a new metric called Vehicle Miles Traveled (VMT). During the Master Plan Update PEIR's preparation, the State Office of Planning and Research (OPR) was developing revisions to the State's CEQA Guidelines to address VMT. However, when the Master Plan Update PEIR was certified, the VMT metric was not required by the State or County CEQA Guidelines, and LOS was used as the official metric for identifying impacts and mitigation.

When combining the proposed American Airlines activity with other permitted airlines at the Airport, this would result in a total of 235,900 annual enplanements, which equals approximately 646 daily enplanements. As such, the traffic generated by American Airlines would not trigger either of the traffic impacts discussed above and would not require mitigation.

In addition, the proposed action would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. Therefore, the proposed action would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system, and no mitigation was required.

Furthermore, the proposed action does not involve construction of structures, access roads, or other improvements that would result in roadway hazards. Therefore, the proposed action would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate site distance on a road.

Additionally, the current Airport Certification Manual, Section 10.9, identifies that the Airport maintains an emergency access road and perimeter entryway as designated emergency access roads to the runway, necessary to support ARFF vehicles for all weather conditions. The proposed action site has adequate emergency access. Therefore, the proposed action would not result in inadequate emergency access.

The proposed American Airlines activity would use the existing air service infrastructure at the airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to transportation resources.

XVIII. TRIBAL CULTURAL RESOURCES -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to tribal cultural resources including: causing a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resource Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is: a) listed or eligible for listing in the Cal. Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

YES

NO

The proposed action consists of the issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines for commercial air service, allowing American Airlines to use the existing Airport infrastructure. No earthwork is required or proposed for the proposed action. As analyzed in the 2021 Master Plan Update PEIR, a records search was conducted at the SCIC at San Diego State University. No previously recorded historic resources were found within the site. In addition, no resources with the potential for meeting the criteria of eligibility for listing in the California Register of Historical Resources (CRPC Section 5024) are present within the proposed action site. Therefore, because no historic resources are known to exist onsite, there would be no impact to historic resources.

No significant historic or cultural resources were found to be potentially impacted within the proposed action site. No resources with the potential for meeting the criteria of eligibility for listing in the National Register of Historic Places (36 CFR Section 60) or the California Register of Historical Resources (CPRC Section 5024.1) are present within the proposed action site. Therefore, because no historic or cultural resources are known to exist onsite, there would be no impact to these resources.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS -- Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that causes effects to utilities and service systems including: require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; 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; generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

YES

NO

The proposed action consists of the issuance of a Commercial Airline Facilities Lease and Operations Agreement to American Airlines, allowing this commercial air carrier to use the Airport's existing ground facilities and infrastructure. American Airlines' proposed use of the ground facilities and passenger terminal are within the existing capacities of the infrastructure. The proposed action would not generate substantial additional water demand or increase in wastewater as compared to current conditions, as both are within the capacities of the existing infrastructure and the projections of the PEIR. Additionally, the proposed action does not include new or expanded water or wastewater treatment facilities, nor does it require the construction or expansion of water or wastewater treatment facilities. Therefore, the proposed action would not require any construction of new or expanded facilities that could cause significant environmental effects.

Further, there would not be a significant increase in the generation of solid waste, as commercial airline activity, such as American Airlines' proposed activity, was anticipated as part of the PEIR for solid waste disposal needs. The proposed activity would result in the continued deposit of all solid waste at a permitted solid waste facility and thus would comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the proposed action's solid waste disposal needs.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for the evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to utilities and service systems.

XX. WILDFIRES – Since the previous PEIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in: a) substantial impairment of an adopted emergency response plan or emergency evacuation plan; b) due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby exposure of project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; c) requirement of the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or exacerbate fire risk or result in temporary or ongoing impacts to the environment; and/or exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

YES

NO

The proposed action would be located within the active airfield at the Airport and would not be located in or near State responsibility areas or lands classified as a very high fire severity zone. Therefore, the proposed action would not substantially impair the adopted emergency response plan or emergency evacuation plan. Additionally, the proposed action is not within an area of risk due to slope, prevailing winds, and other factors, would not exacerbate wildfire risks, and would not expose occupants to pollutant concentrations from a wildfire or an uncontrolled spread of a wildfire, and would have no impact on these risks. Further, the proposed action does not require the installation or maintenance of associated infrastructure and, therefore, there is no exacerbation of fire risk associated with construction of the proposed action, and no temporary or ongoing impacts to the environment. Finally, the proposed action would not expose people or structures to significant risks due to flooding or landslides, runoff, post-fire slope instability, or drainage changes.

The proposed American Airlines activity would use the existing air service infrastructure at the Airport, as analyzed in the 2021 Master Plan Update PEIR, and the activity would be within the forecast used for evaluation of environmental impacts. There would be no substantial changes to the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that would cause one or more effects to wildfires.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

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

YES

NO

- a) Per instructions for evaluating environmental impacts pursuant to CEQA Guidelines Sections 15162 through 15168, 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, 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 were considered in the response to each question in sections IV and V of this form. In addition to action-specific impacts, this evaluation considered the proposed action's potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that are affected or associated with this action. Therefore, the proposed action has been determined not to meet this Mandatory Finding of Significance.
- b) Regarding cumulatively considerable effects, the proposed action does not include construction or operational activities that would exacerbate environmental impacts when viewed in connection with the effects of past projects, other current projects, or probable future projects. The proposed action only includes issuance of a Commercial Airline Facilities Lease and Operations Agreement to allow for a commercial air carrier (American Airlines) to use the Airport ground facilities. Nonetheless, cumulative projects were previously analyzed in the PEIR for the Master Plan Update (which included increased commercial airline activity) and were found to be less than significant. The only exception is that cumulative impacts would occur under Transportation in the long-term condition (2036); however, as explained in Section XVII, the traffic volumes that would result in a cumulative impact would not occur under the proposed action. Based on the evaluation of environmental impacts in this Checklist, the potential for adverse cumulative effects were considered in the responses to each question in sections I through XX of this form. In addition to action-specific impacts, this evaluation considered the proposed action's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this proposed action. Therefore, this action has been determined not to meet this Mandatory Finding of Significance.
- c) Based on the evaluation of environmental impacts in this Checklist, the potential for adverse direct or indirect impacts to human beings was considered in responses to questions in sections I. Aesthetics, III. Air Quality, V. Cultural Resources, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X. Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, XV. Public Services, XVI. Recreation, XVII. Transportation, and XVIII. Utilities and Service Systems. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with the proposed action. Therefore, the proposed action has been determined not to meet this Mandatory Finding of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW UPDATE CHECKLIST FORM

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. For County regulation refer to www.amlegal.com. All other references are available upon request.

CITATIONS SPECIFIC TO PROPOSED ACTION

- 2021 Final Program Environmental Impact Report: McClellan-Palomar Airport Master Plan, certified by the Board of Supervisors on December 8, 2021.
- 2021 McClellan-Palomar Airport Master Plan Update, approved by the Board of Supervisors on December 8, 2021.
- 2021 *Minute Order, Citizens for a Friendly Airport v. County of San Diego*, No. 37-2018-00057624-CU-TT-CTL (San Diego Superior Court), January 26, 2021
- 2013 City of Carlsbad, City Manager John W. Coates. Letter to California Pacific Airlines, Senior Vice President of Business Development. April 23, 2013.
- 1993 City of Carlsbad, City Attorney Ronald R. Ball. Letter to County of San Diego, Department Public Works, McClellan-Palomar Airport, Airport Manager Robert P. Olislagers. May 3, 1993

GENERAL REFERENCES

AESTHETICS

- California Street and Highways Code [California Street and Highways Code, Section 260-283. (<http://www.leginfo.ca.gov/>)
 - California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (<http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm>)
 - County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. (www.co.san-diego.ca.us)
 - County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)
 - County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. (www.co.san-diego.ca.us)
 - County of San Diego. Guidelines for Determining Significance and Report Format and Content Requirements, Visual Resources, Land Use and Environment Group, July 30, 2007.
 - County of San Diego Light Pollution Code, Title 5, Division 9 (Sections 59.101-59.115 of the County Code of Regulatory Ordinances) as added by Ordinance No 6900, effective January 18, 1985, and amended July 17, 1986 by Ordinance No. 7155. (www.amlegal.com)
 - County of San Diego Wireless Communications Ordinance [San Diego County Code of Regulatory Ordinances]. (www.amlegal.com)
 - Design Review Guidelines for the Communities of San Diego County. (Alpine, Bonsall, Fallbrook, Julian, Lakeside, Ramona, Spring Valley, Sweetwater, Valley Center).
 - Federal Communications Commission, Telecommunications Act of 1996 [Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996)]. (<http://www.fcc.gov/Reports/tcom1996.txt>)
 - Institution of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, Warwickshire, UK, 2000 (<http://www.dark-skies.org/file-gd-e.htm>)
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 - U.S. Census Bureau, Census 2000, Urbanized Area Outline Map, San Diego, CA. (<http://www.census.gov/geo/www/maps/ua2kmaps.htm>)
 - U.S. Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System. (www.blm.gov)
 - U.S. Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.
 - U.S. Department of Transportation, National Highway System Act of 1995 [Title III, Section 304. Design Criteria for the National Highway System. (<http://www.fhwa.dot.gov/legsregs/nhsdatoc.html>)
- #### **AGRICULTURE RESOURCES**
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County of San Diego. Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality, Land Use and Environment Group, March 19, 2007.

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