North County Advocates

7668 El Camino Real, Suite 104-258, Carlsbad CA 92009

North County Advocates Support for Citizens for a Friendly Airport's opposition to the new McClellan-Palomar Airport Master Plan Update, dated Oct 2018

I am writing on behalf of North County Advocates, a group of local citizen volunteers whose mission is to preserve and protect the environment of coastal North San Diego County. We support Citizens for a Friendly Airport's opposition to the San Diego County Board of Supervisors approved plan to expand McClellan-Palomar Airport and allow much larger planes to use the airport.

The airport was originally planned to be used as a general aviation airport. 40 years of the City of Carlsbad's Growth Management Plan was predicated on such. Neighborhoods, schools, offices, healthcare centers, were all built around what was supposed to be a small, general aviation airport. Palomar Airport should not be designated as a receiver airport to be used to offload air traffic from San Diego International Airport.

Palomar Airport's FAA designation would change from a B-II airport (small planes) to a D-III airport (larger corporate jets with larger fuel capacity and commercial jets) against the recommendation of County Staff and the Palomar Airport Advisory Committee. The airport is in the middle of upscale Carlsbad communities and there would be no noise curfews and no flight path restrictions!

Furthermore, insufficient environmental studies have been done on nearly all aspects of this change, from the basic "purpose and need" justifications to the impacts of all categories identified under CEQA law. Notably, the County is using its very deficient and inadequate Climate Action Plan and GHG calculations. The Sierra Club has won lawsuits about the methodology of those calculations in both a lower court and on appeal. The McClellan-Palomar Airport expansion had not been approved at the time the County did their Greenhouse Gas inventory; therefore the increased GHG's from the airport expansion are not included.

Consequently, NCA supports Friends of the Airport's litigation to oppose the County's Master Plan Update, dated Oct 2018.

Sincerely,

Howard Krausz

H. Krausz

NCA President