

From: [Kris Wright](#)
To: [Anderson, Joel](#); [Lawson-Remer, Terra](#); [Montgomery/Steppe, Monica](#); [Desmond, Jim](#); [FGG, Public Comment](#)
Subject: [External] McClellan Palomar Airport commercial use
Date: Thursday, January 2, 2025 8:54:33 PM
Attachments: [image.png](#)
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[image.png](#)
[Palomar Airport CUP 172 Planning Commission.png](#)

Dear Members of the Board of Supervisors,





I am a 45 year resident of the City of Carlsbad. I moved here during the time when Palomar Airport was annexed to the City of Carlsbad and have followed the changes of this airport which include a critical document for use, CUP 172 (attached) which was approved by the City of Carlsbad Planning Commission in 1980. McClellan Palomar Airport is designated as a Class B-II airport by the FAA.

As many know, many commercial airlines have existed in the past, all which have been discontinued for a variety of reasons. Now there is a proposal by American Airlines to resume commercial operations starting in February 2025 with scheduled 2x per day operation using the Embraer 175 aircraft.

I oppose the use of the Embraer 175 and any other aircraft that is outside permitted uses of a B-II airport on a regularly scheduled basis which violates the conditions of the BII class airports. I am also opposed to the proposed hours for one of the flights as it violates the agreement with the FAA Record of Approval https://www.faa.gov/sites/faa.gov/files/airports/environmental/airport_noise/part_150/roa_california_120506.pdf and listed on the County of San Diego website <https://www.sandiegocounty.gov/content/sdc/dpw/airports/palomar/noiseinfo.html>

In addition, although the Embraer 175 aircraft is permitted operations under certain conditions, the B-II classification specifically states that aircraft like the Embraer 175 should not operate on a regular basis. I list my concerns with the following information.

1. Scheduled flight occurs earlier than the VNAP, with the earliest flight at 6:15am
2. Palomar Airport runway length is 4897 ft, containing a single runway and can accommodate aircraft with mid sized wingspans and lower approach speeds, general aviation aircraft translating to a maximum wingspan of 65ft. Here is a document taken directly from the San Diego County Master Plan Update https://www.sandiegocounty.gov/content/dam/sdc/dpw/AIRPORTS/palomar/documents/Master-Plan-Update/2021/H-Master_Plan_Update_2021.pdf

Class	Aircraft Type	
Class A	Small Single-Engine (Gross Weight: 12,500 pounds or less)	
Examples		Cessna 172/182 Beech, Bonanza
		Mooney 201 Piper Cherokee/Warrior
Class B	Small Twin-Engine (Gross Weight: 12,500 pounds or less)	
Examples		Beech Baron Cessna 402 Lear 25
		Mitsubishi MU-2 Piper Navajo Cessna Citation I
Class C	Large Aircraft (Gross Weight: 12,500 to 300,000 pounds)	
Examples		Lear 35/55 Embraer 120/135/145/170/175/190/195 Saab 340 BBJ Boeing B737
		Gulfstream (I thru V, G350/450/500/550/650) Canadair CRJ100/200/700/900 CRJ-700 Series McDonald Douglas MD-88/90 Airbus A-318/A-319/A-320
Class D	Large Aircraft (Gross Weight: more than 300,000 pounds)	
Examples		Lockheed L-1011 Boeing B767/B777 Boeing B747
		Airbus A-300/A-310/A-330/A-340/A-350/A-380 Douglas DC-8-60/70 McDonald Douglas MD-11

Note that the Embraer 175 is listed as an example of a Class C aircraft.

3. The Embraer 175 requires a take off runway length of 5289 ft, longer than the current runway length of Palomar Airport.

Performance Specifications

Performance	English	Metric
IFR Range	1750 nm	3241 km
Cruise Speed	481 KTAS	891 km/h
Certified Ceiling	41000 ft	12497 m
Rate of Climb	3300 ft/m <small>Typ</small>	701 m/m
Takeoff Distance	5289 ft	1612 m
Landing Distance	4131 ft	1259 m
Max Takeoff Weight	82673 lbs	37500 kg
Max Landing Weight	74957 lbs	34000 kg
Useful Weight	-	-
Payload with Full Fuel	-	-

4. The wingspan of the Embraer 175 is 94ft 2in. and the requirements of the B-II airport according to FAA classifications for wingspan must be less than 79ft.

EMBRAER E-175

Technical Specifications

Exterior

Exterior Height: 32 ft 4 in
Wing Span: 94 ft 2 in
Length: 98 ft 1 in

Interior

Cabin Height: 6 ft 6 In
Cabin Width: 8 ft 11 In
Cabin Length: 69 ft 6 In

Occupancy

Crew: 2
Passengers: 86

Operating Weights

Max T/O Weight: 82673 Lb
Max Landing Weight: 74957
Lb

Performance

Max Speed: 469 kts
Cost per Hour: \$ N/A

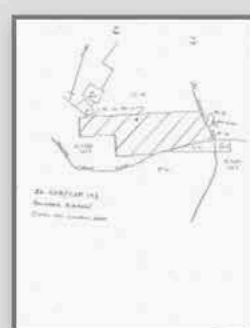
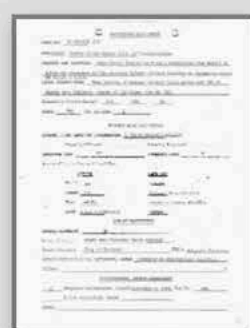
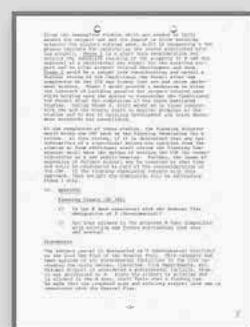
Power Plant

Engines: 2
Engine Mfg: General Electric
Engine Model: CF34 8E

Please do not approve the request by American Airlines to operate any aircraft that does not follow the restrictions required by a B-II airport.

Thank you,
Kris
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Kris Wright





STAFF REPORT

DATE: September 24, 1980

TO: Planning Commission

FROM: Planning Department

SUBJECT: ZC 208/CUP 172 - PALOMAR AIRPORT - Request for a Change of Zone from L-C to M and for a Conditional Use Permit to allow the operation of the existing Palomar Airport facility located on the northwest corner of Palomar Airport Road and El Camino Real.

I. PROJECT DESCRIPTION AND BACKGROUND

The applicant is requesting a Zone Change from L-C (Limited Control) to M (Industrial) and a Conditional Use Permit to operate the existing Palomar Airport facility at the above described location. The request for the Zone Change is made subsequent to the annexation of Palomar Airport from the County of San Diego to the City of Carlsbad. The Conditional Use Permit is to allow the operation of the existing airport and additional development as defined in this permit. This application does not apply to any future expansion of the airport facility. If such expansion is proposed, an application for same must be approved by both the Planning Commission and City Council and the Conditional Use Permit must be amended.

These applications were originally submitted in Decem-

Metadata Annotations

Entry Properties

Modified 12/10/2020 8:39:35 PM

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Path [\Public Records\Staff Reports\Planning Commission\1980\1980-09-24; Planning Commission;; ZC 208| CUP 172 - PALOMAR AIRPORT](#)

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Staff Reports

Fields

Department Planning

Governing Body Planning Commission

Meeting Date 1980-09-24

Project ID ZC 208

Related Projects CUP 172

Subject ZC 208| CUP 172 - PALOMAR AIRPORT

Document Relationships

[1980-09-24; Planning Commission; Resolution 1698](#)
(Related)

From: henkinp@earthlink.net
To: [Desmond, Jim](#); [Anderson, Joel](#); [MontgomerySteppe, Monica](#); [Vargas, Nora \(BOS\)](#); [Lawson-Remer, Terra](#)
Cc: [FGG, Public Comment](#)
Subject: [External] MCCLELLAN - PALOMAR AIRPORT AMERICAN AIR LEASE (PLEASE INCLUDE WITH DOCS FOR LAND USE SESSION AGENDA #4)
Date: Thursday, January 2, 2025 7:44:30 PM

Hi Supervisors,

There are two issues: Board policy F-44, and the lease itself.

The Board Policy – I do not think that restricting the number of seats is “discrimination between any type, kind, or class of aeronautical activity.“ After all, do we want a 100-seater at the airport. No, and the reason is safety. Right now, there is a weight restriction, but the Board wants no weight limit, and no seat limit. Crazy. Keep the restriction. Or you will have to keep repaving the runway when the big planes break it or overshoot it and break fences or the neighbors houses and stuff.

The lease. the main issue is flying in planes at 6:15 AM. That is totally ridiculous in a small city. People need their sleep. If American Air can’t understand this, it needs to change the hub where the flights connect. And to me, service just to Phoenix (which is apparently the plan) is weird.

And I resent the way the Board Letter says the first year it will bring in \$606K the first year when it will have waivers which bring the total down to \$255K. From big peanuts to little peanuts if you ask me.

Please do not change the board policy and do not approve the lease.

Regards,

Paul Henkin



January 3, 2025

County of San Diego Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, California 92101

SUBJECT: Jan. 8, 2025 - Land Use Agenda Item 4 - McClellan-Palomar Airport – American Airlines Lease and Board Policy F-44

Dear Members of the Board,

On behalf of the City of Carlsbad, I am writing once again to express our concerns regarding the proposed lease agreement with American Airlines for operations at McClellan-Palomar Airport and the proposed change to Board Policy F-44.

As the airport's host jurisdiction, the City of Carlsbad has consistently documented its role and jurisdiction in making final land use decisions, including new or expanded airport land uses. We are concerned that American Airlines' plans to provide service at McClellan-Palomar Airport irreversibly commits the County to implementing larger runway protection zones or safety areas as compared with the current B-II classification. County approval of the lease agreement and changes to Board Policy F-44 may undermine efforts for the city to make land use decisions within its purview, to promote compatibility between the airport and the local community, to preclude incompatible land uses near the airport, and to reduce or eliminate hazards to or from aircraft to safeguard the health, safety, and welfare of our shared constituents.

While the Board Letter asserts that approving the lease is consistent with FAA grant assurances and the County's Airport Master Plan, we have significant concerns regarding American Airlines' proposed use of the Embraer 175 aircraft. The use of this dual-engine jet, with a maximum of 76 seats, appears to exceed the operational parameters deemed suitable for the airport's B-II classification. The use of this jet and its attendant environmental impacts also appear to be outside the scope of the environmental review conducted for the Airport Master Plan.

Further, the determination of whether any facility improvements needed to implement the proposed operations comply with the existing Conditional Use Permit (CUP 172) remains unresolved. As the issuing authority, the City of Carlsbad has not been formally consulted or asked to make this land use determination. This oversight is troubling, given the County's statement in its Airport Master Plan that it will "seek a use permit amendment prior to seeking grant funds, **awarding a contract**, or taking other action to implement facility improvements needed to implement an ultimate ARC greater than B-II" (emphasis added).

City of Carlsbad City Council

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Moreover, American Airlines' proposal to operate flights as early as 6:15 a.m. directly conflicts with the airport's recommended quiet hours under the Voluntary Noise Abatement Procedures (VNAP). While the County cites FAA restrictions under the Airport Noise and Compatibility Act that prevent the imposition of mandatory curfews, voluntary compliance with the VNAP is essential for addressing community concerns. If American Airlines cannot adhere to the VNAP due to operational constraints, it raises serious questions about the suitability of McClellan-Palomar Airport for the airline's services.

As the FAA considers certifying the Embraer 175 for operations at Palomar, we believe the County should continue good-faith negotiations to prioritize adherence to the VNAP. Doing so would not conflict with the County's obligations under federal law to provide reasonable and non-discriminatory access to the airport. Ensuring compliance with the VNAP would demonstrate the County's commitment to being a good neighbor and to addressing legitimate community concerns.

Additionally, the proposed repeal or amendment of Board Policy F-44 would remove a key safeguard that has historically protected the community's interests in airport-related decisions. The proposed change to this policy amplifies the need for heightened scrutiny of the proposed lease and its implications.

The City of Carlsbad remains committed to collaborating with the County on airport related issues and ensuring balanced airport operations that respect the needs of all stakeholders. We urge the County to condition this agreement or postpone its approval to allow for greater dialogue between the city and the County.

Thank you for your attention to this matter and your consideration of our concerns.

Sincerely,



Keith Blackburn
Mayor

cc: Members of the City Council
Geoff Patnoe, City Manager
Sheila Cobian, Assistant City Manager
Cindie McMahan, City Attorney