

I have serious concerns regarding the proposed lease approval for weekly flights by American Airlines at the McLellan-Palomar airport. The County has taken many steps in making this a reality (fees, rent, flight schedules, terminal and kiosk improvements, etc.). To my knowledge, these actions have been taking without conducting appropriate environmental reviews. This is a violation of CEQA.

The County has tried to change the airport's designation from B-II to D-III. American Airlines plans to cover the McLellan-Palomar route with Embraer 175 aircraft which seats 76 passengers. This exceeds the limits of the current B-II status and what is allowed the current policy F-44. The County is attempting to amend F-44 by removing "General Aviation" and replacing it with "General and Commercial aviation." If this amendment is not approved by the Planning Commission, the County will violate the Court's order. The Master Plan Update anticipated airline trip through 2036 using aircraft no larger than 64-seat. Even worse, the County is giving the appearance of incentivizing the deal by waiving over half of the money owed by American for fees and rent.

The County is applying the original EIR from 2021 to a new reality with close to 3,000 new flights over the two-year lease and using a much larger aircraft than the original proposal. This is entirely unacceptable. There are significant health and safety risks in accepting flights of aircraft larger than what the airport is allowed to handle, as defined by its designation (B-II and the F-44 seating limit).

The current status is already causing significant burden to the surrounding communities via noise, air pollution, lack of strict adherence to FAA recommended flight pathways, as examples. We understand the value of the airport to the region it serves and have learned to accommodate its current status.

I ask the Board to vote against the proposed lease (Agenda Item #10) and demand a comprehensive review prior to further consideration of this matter.



December 10, 2024

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

SUBJECT: Land Use Agenda Item 10 - McClellan-Palomar Airport - American Airlines Lease and Board Policy F-44

Dear Chair Vargas and Members of the Board,

On behalf of the City of Carlsbad, I am writing 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  
Scott Chadwick, City Manager  
Geoff Patnoe, Assistant City Manager  
Cindie McMahan, City Attorney

**From:** [Ronald Byrd](#)  
**To:** [FGG, Public Comment](#)  
**Cc:** [Terry B](#)  
**Subject:** [External] Item 10 petition opposing AS contract  
**Date:** Wednesday, December 11, 2024 7:46:08 AM

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Please find attached Palomar Estates West petition with 80 signatures. Opposing the AA contract.

**Palomar Estates West Residents against American Airlines contract at Palomar Airport.** The existing planes fly over our homes dropping lead fuel, (dust), flying low and loud and at all hours. Adding louder, larger commercial planes and even higher volume of planes is dangerous, harmful to our health both from carcinogens, ability to sleep uninterrupted, and general well-being/quality of life. Our home values will surely be reduced also. By signing below we strongly encourage the Board of Supervisors to reject the American Airlines Contract and protect the senior citizens unfortunate to live in the Palomar Airport flight path unprotected from clear and obvious harm.

2 sheets

1. Sheron Sepade #129
2. Neil Sepade #129
3. Anthony Tippet #71
4. Ann Catten #71
5. Susan Batog #51
6. Brenda Clark
7. Steve Blain
8. Cita
9. Wayne
10. Maria Jacques
11. Judy DiGiovanni 283
12. Robert Ferro 110
13. JOE CORRIGA SP #176
14. LISA CORRIGAN #176
15. Chip Anderson 236
16. Terry Powers PEE
17. MERLIN CHANCELLOR #191
18. Nora Dewey #415
19. Lenz Brady
20. Craig Withers
21. Deb Stevenson #55
22. Bob #
23. Trish Blalock #32
24. Andrea Hehn #39
25. Marlene Postell #374
26. Alice Eads #349
27. Billie Page sp 93
28. Jim Page sp 93
29. DANA FADSS SR 319
30. Roger Trichette
31. DEB STRUCK
32. Jacqueline Vo
33. Lorraine Lydon
34. Michael Withers 375
35. Lynn Thomas
36. Jerry Muff 4
37. Dan Muff 4
38. Jim Balog 51
39. Catherine Schechter 246
40. ~~Hertina~~ Margaret Scott



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1. Mircea Brown #254
2. Larry Brown #254
3. ROBERT ROSENBERG #143
4. Cindy Palermo #188A
5. Terry Mugg #4
6. Sherry Keuse #249
7. Doug Kellman #295
8. Sylvia Hellman #298
9. Dana Primed #288
10. CHERI CARRY } 259B
11. ALLAN PEARSON }
12. Robert Fierro #110
13. OPAHY GILLIN #321
14. Maria Jacques
15. Elaine Hawlin
16. Herinda Mahler
17. Kim Stevenson
18. Lynn Wicksen
19. Deborah McQuillan #435
20. Ann & Roger (Kneile)
21. Robin Green 356
22. Leslie Williams #109
23. Jim & Maureen Gates #95
24. Bent Kai Fris #94
25. Nora Dewey #415
26. Ansh Ffrote #211
27. SHARON WILLIAMSON #295
28. Fran Miller #101
29. Alveca Hall #201
30. Chuck Thomas
31. Debi Gilgen #92
32. Wendy Jones #205
33. LARRY JONES #205
34. Jo Gehringer #223
35. JOSSA NIETO
36. PAT CAMPBELL #200
37. Pharo McElliff #452
38. Denise Hickey #139
39. Will Schlofer 59
40. Arlen M. Schlofer 59