Montgomery-Gibbs Environmental Coalition

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April 12, 2019

Re: Montgomery-Gibbs Master Plan Advisory Committee Imbalance

Honorable Mayor Kevin L. Faulconer City Administration Building 202 C Street, 11th Floor San Diego, CA 92101

The California Environmental Quality Act (CEQA) requires a protocol of analysis and public disclosure of environmental impacts of proposed projects, and in a departure from the National Environmental Policy Act all feasible measures must be adopted to mitigate those impacts. To date all feasible measures have not been adopted, and it appears there is no plan to do so.

Thus far the community at large and environmental groups have not been fairly represented in the process of adopting the Montgomery-Gibbs Executive Airport Master Plan. There was no public outreach for volunteers from the community for the Master Plan Advisory Committee; the only recruiting was within the confines of the Airports Advisory Committee, except for one person who was directly recruited from the Clairemont Town Council by the Airports Program Manager.

There were only four community representatives on the Montgomery-Gibbs Master Plan Advisory Committee, three of whom are on the Airport Advisory Committee and those members are appointed by the Mayor. The remainder of the 19 Advisory Committee members were city officials and individuals who have a vested interest in the airport such as tenants and flight school operators.

According to city documents regarding the Montgomery-Gibbs Executive Airport Master Plan Advisory Committee, "Representation Committee members will be chosen by identifying organizations and agencies that represent the various elements that will be considered in the Montgomery-Gibbs Executive Airport Master Plan. Identified organizations will then be asked to choose individuals to represent them on the Committee." Environmental elements are being considered in adoption of the Master Plan, but no environmental groups are included in the process.

Because there were no environmental group representatives on the Montgomery-Gibbs Executive Airport Master Plan Advisory Committee, the process has so far been more heavily weighted towards persons who have a vested interest in General Aviation rather than giving a balance as to how it will affect the environment on site, as well as that in the surrounding communities. In addition, there are only two environmental organizations listed in the city's Public Involvement Plan: San Diego Audubon Society and The San Diego Foundation. No members of either organization were members of the Master Plan Advisory Committee.

In addition, The San Diego Foundation is a non-profit funding organization that gives grants to environmental groups and other types of civic minded groups, rather than being actively involved in being a gatekeeper to protect the environment; therefore their inclusion in the Public Involvement Plan appears to only be a token effort by the city to take community environmental concerns seriously, and as noted previously The San Diego Foundation was not included as a member of the Master Plan Advisory Committee.

Regardless of whether the Audubon Society and the San Diego Foundation were not asked to participate or they both declined, there are many other local environmental groups that were ignored and are not listed on the city's Public Involvement Plan, and also not included in the Master Plan process thus far, such as The Sierra Club, The Endangered Habitats League, San Diego Democrats for Environmental Action, San Diego EarthWorks, ECOLIFE Foundation, The Chaparral Institute, and The League of Conservation Voters San Diego, among others that apparently were not even considered as participants.

As a result, the Montgomery-Gibbs Environmental Coalition is adjuring that a representative from at least two local environmental groups and two members of the community at large who live in the areas surrounding the airport be selected to be involved in the final process of approving the Master Plan, so as to more evenly weigh the balance between those who have a vested interest in airport operations, and community members and others concerned about the environmental impact of the Master Plan.

It would have been more fairly balanced to have half of the 19 Master Plan Advisory Committee members be selected outside the arena of dominant connection to the airport. Even though there are no more meetings scheduled for the Master Plan Advisory Committee, adding two more community members plus two representing local environmental groups to the final process of approval will correct that imbalance.

Respectfully, Sandra Stahl MGEC Executive Director

cc: Council President Pro Tem Barbara Bry; Councilmember Jennifer Campbell; Councilmember Chris Ward; Councilmember Monica Montgomery; Councilmember Mark Kersey; Councilmember Chris Cate; Councilmember Scott Sherman; Councilmember Vivian Moreno; Council President Georgette Gómez; Ronald H. Villa, Deputy Chief Operating Officer; Cybele L. Thompson, Director, Real Estate Assets; Rod Propst, Deputy Director, Airports Division; The Sierra Club; The Endangered Habitats League; San Diego Democrats for Environmental Action; San Diego EarthWorks; ECOLIFE Foundation; The Chaparral Institute; The League of Conservation Voters San Diego