

Montgomery-Gibbs Community Committee

Committee of Serra Mesa Community Council

Post Office Box 23315, San Diego, CA 92193

communitycouncil@serramesa.org

Website: www.serramesa.org

December 6, 2025

RE: Montgomery Gibbs Executive Airport Master Plan Program EIR

Greg Johansen
Environmental Planner, City of San Diego Planning Department
202 C Street, 5th floor M.S. 413
San Diego, CA 92101

Dear Mr. Johansen:

Thank you for the opportunity to respond to the PEIR and for the 14-day deadline extension. Please take into account these comments from the Montgomery-Gibbs Community Committee.

The Montgomery-Gibbs Community Committee consists of representatives from Serra Mesa, Allied Gardens, Navajo, Clairemont, Tierrasanta, and the Sierra Club.

- The Committee is for the 'no action option' presented in Deputy Director of Airports Jorge Rubio's presentation to the SMPG based on how the current AMP and PEIR is written.
- The Committee is against the removal of the displaced threshold.
- Where possible, the AMP must comply with the Climate Action Plan and storm drain mitigation.
- The Committee is against the expansion of terminals and fleet mix.
- The Committee supports refurbishment of paved surfaces (taxiways/lanes/runways) and installation of run up area on Taxiway C and H.
- The Committee asks for a revision of the EIR to accurately model flight paths, noise contours, environmental approvals, and updated data as the Master Plan was compiled in 2017 and the number of flights have already exceeded what was forecast for 2037.

The Committee is for fixing the following safety issues addressed in the MYF Master Plan:

- 1-1 Runway 10L/28R Grooving and Marking Runway 10L/28R will be grooved and re-marked.
- 1-2 Runway 10R/28L, Taxiways B, C, and F and Taxilane A Rehab, Taxiway E Demolition, and Compass Calibration Pad Construction The Runway 10R/28L pavement, Taxiways B, C, and F pavements, and Taxilane A pavement will be rehabilitated as identified in the PMMP (see Appendix H). Taxiway E will be demolished for runway incursion mitigation purposes. A compass calibration pad will be constructed that will also serve as a run-up apron for Runway 23.

- 1-3 Taxiways H, A, J, B Rehab and Runway 28L Run Up Improvements Rehabilitate Taxiways H, A, J, and B as identified in the PMMP (see Appendix H). Construct run up area adjacent to the Runway 28L end. The portion of Taxiway B south of Taxiway H and leading to the apron area will be reconstructed east of its existing location in order to prevent direct access from the apron to the runway.
- 1-4 Taxiway K, Terminal Apron Rehab, and “No-Taxi” Island Rehabilitate Taxiway J and terminal apron as identified in the PMMP (see Appendix H). Paint “No Taxi” island to prevent direct access from terminal apron to Runway 10R/28L on Taxiway D. The Taxiway K separation will be increased to meet ADG II separation requirements.
- 1-8 San Diego Fire Department development to include large box hangar and apron Expansion of the existing SDFD site on the north side of the airfield. New hangar construction and apron expansion to accommodate the change in helicopters currently in use by the SDFD.
- 1-10 Relocate segmented circle and wind cones out of safety areas 2 Montgomery-Gibbs Executive Airport Master Plan Section 6 Airport Layout Plan and Implementation The existing location of the segmented circle and wind cone is within the Runway 10L/28R ROFA and is not compliant with FAA design standards. These NAVAIDS will be relocated out of the ROFA. Additional wind cones will be installed in order to provide better wind information to pilots. The exact locations are depicted in Figure 6.1.
- 2-1 Preventative Maintenance on Section of Runway 10L/28R Rehabilitate sections of Runway 10L/28R as identified in the PMMP (see Appendix H).
- 2-2 Hangar Area Pavement Rehabilitate the hangar area pavement as identified in the PMMP (see Appendix H).
- 2-4 Construct Additional Tie-downs North of Gibbs Leasehold Construction of 23 tie-downs.
- 2-6 Perimeter Fencing Improvements Ongoing preventative maintenance to various portion of the fence will lower the risk of unwanted access to the airfield by both wildlife and pedestrians.

The following main bullet points are the Master Plan Goals according to the presentation given to the SMPG on Nov 20th by Deputy Director of Airports, Jorge Rubio. The goals are stated on Slide 10 on his [PowerPoint presentation](#). The sub bullet points are the Montgomery-Gibbs Community Committee’s comments on each of these goals.

- Improve airfield safety and meet FAA design standards
 - Existing buildings on both ends of 10L/28R will penetrate the ultimate Airport Layout Plan (ALP), Threshold Siting Surfaces (TSS) for both precision and non-precision Instrument Flight Rules (IFR) approaches and departures and will endanger people and properties surrounding the airport. (figure 3-2)
 - The current ALP is FAA approved.

- Modernize outdated and insufficient infrastructure
 - MYF as it is today meets all the FAA's required standards. [* See Appendix on Page 4*](#)
 - None of the project proposals in the AMP are required by the FAA the projects proposed are only recommended by the FAA.
 - MYF is a regionally important training airport, and is sufficient for projected needs.
- Accommodate projected aviation demand
 - Airport traffic already exceeds 2037 estimates by 74%.
 - Airport expansion is not necessary.
 - Increases in traffic beyond the current amount is not wanted by the community.
 - The model used for projections has proven to be unreliable and fails to accurately growth or recession in traffic. Traffic in 1977 was only ~12% lower than present traffic volume. (3.2.3.1)
- Support compatible private development
 - Additional private development is not compatible with the community as noise and pollution are already causing issues in surrounding neighborhood via private flight schools at MYF.
 - The whole point of R-280194 was to keep development of the airport at its current level.
 - Citizens of the surrounding communities have the right to decide what happens at MYF.
- Preserve and protect historic airport features
- Maintain Airport Layout Plan (ALP) eligibility for FAA funding
 - MYF currently meets all the FAA's required standards for continued funding.

Appendix:

- No Project alternative . . . **may** result in decreased operational safety associated with future aircraft operations. (S.4.5)
- Non-FAA Compliant Design features – pertain to taxi lanes and potential fencing vulnerabilities. (2.3.2)
- ALP approval makes the airport eligible to receive federal funding for airport improvements and maintenance under the FAA’s AIP. (3.1)
- MYF currently has adequate runway and taxiway capacity and does not have a need for capacity enhancing runway and taxiway projects within the 2017 to 2037 planning horizon and thus improvements that enhance the capacity of the runway or taxiways are not included as part of the AMP.(3.2.1.1)
- FAA's concern is obstructions, impact on electronic aids or adverse, is controller view of aircraft approach and ground movement areas, which could adversely affect safety efficiency or utility of the airport. (figure 3-2)
- Taxiways B, E, and F. In addition to the three existing hotspots, a fourth area at the intersection of Taxiway A and Runway 28R has been identified by the FAA as having a high rate of runway incursion incidents. (2.3.1)
 - Hot Spot 1 “not considered optimal”; Hot spots 2 & 3 are a result of pilots not getting clearance from tower to enter or cross the active runway; Taxiway “A” not recognized as a hot spot; Taxi way fillets do not meet **current** design standard; run up areas are not optimal but are approved. (3.2.2.1)
 - General aviation airports often do not meet the full FAA design standards regarding taxilane safety areas . . . the FAA will allow non-compliant taxilanes to remain. (3.2.2.2)