

Serra Mesa Community Council

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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. Unfortunately, the appendices weren't available after removal from the website on the official November 23rd date. The PEIR, but not the appendices, was placed at <https://www.sandiego.gov/airports/planning>.

The Serra Mesa Community Council formed a committee, Montgomery Gibbs Community Committee, with representatives from the community and our neighboring communities, including Allied Gardens, Clairemont, and Tierrasanta, and environmental organizations. The deadline extension allowed for more meaningful discussion and responses.

The comments/questions included in this letter are based on the committee's analysis and discussion. The "Review from Clairemont Representatives" in this document is, also, applicable to the Navajo communities of Allied Gardens and Grantville.

Please carefully consider these comments/questions.

Joe Konieczka
President
Serra Mesa Community Council



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Notice of Availability Draft Program Environmental Impact Report, Montgomery Gibbs Executive Airport Master Plan

Errors in NOA

- NOA states that the document has been placed on the City’s Airports webpage at <https://www.sandiego.gov/airports/planning>. It wasn’t placed there until after SMCC sent an email on November 12.
- NOA states “Airside improvements proposed at Brown Field include a new runup pad (which is currently lacking for the smaller runway), and would reconfigure several taxiways to bring them into compliance with current FAA design standards.” Note: Brown Field is mentioned.

Public Review Distribution

Since the PEIR was released on October 9 during the federal government shutdown, there may have been inadequate time for federal agencies to respond, including our neighbor, MCAS Miramar (not on PEIR distribution list).

Question: Did you receive a response from MCAS?

S.2 Project Objectives (p. S-2)

1. *Implement safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria*

Airport Safety: Maximum weight for aircraft

Project Objective 1 (S-2) indicates safety improvements to the airport into FAA standards. The published* maximum weight limit for all 3 MYF runways is listed at 12,000 lbs for a single wheel and each runway has an individual Pavement Classification Number.

Compared to Brown Field which indicates weights for single, double, and tandem (wheel configurations) maximum weights, Montgomery-Gibbs is lacking in weight limit documentation in FAA publications, San Diego County websites, and several air mission planning resources.

The lack of easy to read and understandable weight limits pose safety concerns that larger aircraft would utilize the airfield and not be able to safely operate. Such as NTSB incident WPR21LA110 in which an overweight A/C departed the runway in Feb 2021.

Question:

- *Does the EIR or Airport Master Plan (AMP) address updating the FAA published documentation and San Diego County information?*
- *What is the plan for notifying associated air mission planning publications, websites, applications, or other tools of these updates to the airfield?*

* FAA Aeronautical Information Services Montgomery Gibbs,

<https://nfdc.faa.gov/nfdcApps/services/ajv5/airportDisplay.jsp?airportId=MYF>

San Diego County Airports

Montgomery-Gibbs, <https://www.sandiego.gov/airports/montgomery>

Brown Field <https://www.sandiego.gov/airports/brown>,

<https://www.sandiego.gov/airports/brown/brownfaq>

AirNav <https://www.airnav.com/airport/KMYF>

FAA AIS Brown Field,

<https://nfdc.faa.gov/nfdcApps/services/ajv5/airportDisplay.jsp?airportId=sdm>

4. *Maintain a balance between the airport users and the surrounding community while encouraging airport business growth and opportunities.*

Question, If the project is approved:

- *Who is the anticipated market?*
- *What business growth will be encouraged?*
- *What opportunities would be pursued?*
- *How much more income is the airport expecting from each function (e.g, hangars, landings, terminal expansion, etc.)?*
- *What is the target revenue?*

Table S-2 Summary of Cumulative Impacts, 5.1 Air Quality & 5.1 Air Quality

Air quality findings in the PEIR are incomplete and inaccurately characterize impacts. In 2019 the San Diego Air Pollution Control District (SDAPCD) measured Particulate Matter (specifically PM10) in the SDAB at such high levels it triggered mandated installation of up to 10 additional air quality monitors – up from three since 2017. As of July 2025, there are now 9 continuous sampling PM2.5-10 monitors now in place. The PEIR states there was no contemporary PM10 data reported/available for the PEIR for the last three years.

Question: Will the PEIR be updated to reflect the current situation of 9 continuous monitors? If not, why won't the data be updated?

1.3.1 Type of EIR

The combined actions can be characterized as one large project for the purpose of environmental review in this PEIR and are herein collectively referred to as the "project." (p. 1.4)

Comment/Question: The study is characterized as one large project. If that is the case, why isn't there more analysis of the individual actions for this large project? There's been very little analysis of each individual action.

1.3.2 PEIR Scope and Content (p. 1-4)

For the purposes of the analysis in this PEIR, the baseline year is 2018 (unless otherwise noted), and the horizon year representing future buildout conditions under the proposed AMP is 2037. In cases where current data is not available, the most recent known data is used to depict existing conditions. The horizon year of 2037 represents the target year of the proposed AMP when projects and programs are anticipated to be fully implemented. However, full implementation of the proposed AMP may take more or less than 20 years.

Release of PEIR is **6-year 8months after the NOP release in February 2019**. Data from 2017 is being used as a basis for determining forecasts and conducting studies – Air Quality, Noise, Biology, Greenhouse Gases, Hazardous Materials, and Transportation.

Question: Will studies be updated and analyses be conducted using current data?

2.2.1.3 28R Displaced Threshold

According to City Resolution R-280194, keeping the landing threshold at the current location would allow the Airport to continue to fully accommodate all but two of the existing aircraft fleet mix while limiting the use of larger aircraft that may not comply with previously established noise and weight limitations. Removing the threshold introduces safety concerns.

Question:

- Are there planes that are violating the weight limit described in Resolution R-280194?

- List the articles in the resolution that would require revising if this PEIR is approved.
- What need drives removal of the threshold?

2.5.1.4 Existing Air Quality

There are 926 multifamily housing units, built or in construction or planned for Aero Drive; and many units are planned for Convoy in Kearny Mesa. Additionally, it appears that the studies didn't include at least two other Serra Mesa schools (e.g., Angier and Cubberly), a Clairemont school, and perhaps 1-2 Tierrasanta schools in Review Area 1 of the AIA. (Not all of the streets are identified on the map so it's difficult to determine the schools located within the Review Area 1 boundary.) Also, there are other nearby sensitive receptors (including Sharp Hospital, Rady's Children Hospital, and Kaiser Hospital).

Question: Will new studies be conducted to comprehensively assess the air quality on the sensitive receptors located in this area and the nearby area of the hospital complex?

2.5.8 Land Use

Airport Influence Area for Montgomery Field affects the Linda Vista Community Plan (Linda Vista Community Plan, p. 124). Additionally, Linda Vista lies within the Airport Land Use Compatibility Plan Safety Zone.

Question: Will the PEIR be updated to include Linda Vista? If not, what is the justification for not including it?

Airport Influence Area for Montgomery Field shows other areas that are affected by MFY, e.g., Allied Gardens, Grantville, and Tierrasanta.

Comment/Question:

- Identify all of the areas located in the AIA. Please provide an explanation if any of these areas were not included in the environmental studies.
- Since numerous Noise Sensitive Land Uses exist within the traffic and sub-traffic patterns of the airport (hospitals, schools, elder care facilities), what additional measures can be taken to ensure noise thresholds for these facilities and for existing and potential new fleet mixes are not being exceeded?

- What additional voluntary noise abatement procedures can be initiated for these areas?
- What additional enforcement measures will be taken to ensure violations of FAA traffic pattern minimums are being enforced?

3.2.2.1 Airside Capacity (p. 3-3)

Based upon the FAA guidance and formula for calculating capacity, 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.

Comment/Question: Provide the capacity for the runway and taxiway.

Hotspots: *As shown on Figure 2-6, there are three existing taxiway hotspots within MYF:...*
(p. 3.3)

Comment:

- Provide the documentation for the determination of these Hotspots, e.g., who determined them, what criteria were used, etc.
- What alternatives are being considered for fixing the existing hotspots?

Taxiway A: *...this location has been identified by the FAA as an area of high incidence of runway incursions at MYF.* (p. 3-3)

Comment: Provide FAA reference.

Taxiway Fillet: *...The fillets at taxiway/runway and taxiway/ taxiway intersections at MYF do not meet the current FAA design standard.* (p. 3-4)

Comment: Provide FAA reference.

Run Up Areas: *...There are several deficiencies within the existing run-up areas at MYF...* (p. 3-4)

Comment: Provide documentation to support the assertions.

Airfield Pavement: *...A Pavement Maintenance Management Plan was prepared for MYF in February 2018. The results concluded that portions of Runway 10R/28L have a poor*

Pavement Condition Index (PCI) and the following taxiway segments and apron areas were also classified as having a poor PCI...(p. 3-4)

Question

- *Where can the plan be accessed?*
- *Discuss the timeline for addressing the poor PCI of the taxiways and aprons identified in the Management Plan.*
- *What is the weight limit of each runway?*

3.2.3 Facility Demand Forecasts

In 2021 upgrades (e.g., addition of hangars, fueling facility, new building to house flight school, and executive lounge) were made to MYF.

Question: Were the impacts from these upgrades included in the environmental studies that have been conducted? If not, what would be the impact if they were included?

3.2.3.1 Aircraft Projections (p. 3-6)

The PEIR indicates that the 2037 demand forecast for operations is 221,896.

“Over the past 12 months, Montgomery-Gibbs Executive Airport has seen more than 386,000 takeoffs and landings.” (Operations Overview of Montgomery-Gibbs Executive Airport, May 23, 2025, <https://www.insidesandiego.org/operations-overview-montgomery-gibbs-executive-airport>)

The current operations of the airport have already exceeded the 2037 projection.

The actual operations exceed the 2037 projection by 74%. The 2025 existing conditions aren't being adequately described by using a 2017 baseline.

Question:

- *What is the justification for using this data, which is almost 8-years old, and not using more current data?*
- *Will studies be updated and analyses be conducted using the current data?*

If the project is approved, larger and more planes will land at the airport and this will increase the current operations, that already exceeds the 2037 projection by 74%. and will have additional impacts on the environment. An invalid projection misrepresents

the potential impacts and could lead to less than significant findings. The decision-makers are not being given an accurate projection and description of potential impacts.

Question: Would using the current conditions as a baseline in the PEIR impact the findings and give the decision-makers a fuller picture of the environmental impacts of the project?

The Operations Count has been steadily increasing, averaging around 8%/year.

Montgomery-Gibbs Executive Airport – Operations Count by Year (downloaded from City of San Diego’s website):

2017	207,103
2018	226,588
2019	253,090
2020	276,208
2021	292,805

The total number of operations for Calendar year 2022 is 307,191, which excludes overflights. (<https://www.sandiego.gov/sites/default/files/aac-minutes230110.pdf>)

Data for 2023 and 2024 wasn’t available. April 2024-May 2025: 386,000. Since there has been a steady increase, the current operations of 386,000 aren’t an anomaly.

Question: What is the operational capacity of MYF?

The EIR is using data and projections from 2017 (refer to presentation at Airport Advisory Committee in 2017, <http://www.sdairportplans.com/documents/>, specifically Slide 25, <http://www.sdairportplans.com/wp-content/uploads/2017/11/MYF-Public-Meeting-2-Final-PPT-Presentation.pdf>). Noting the annual service volume of 377k per year was used to forecast the future growth of annual operational to 221K or 58% by year 2037 and the annual operations in 2024 exceeded that base line to 385K.

Question: Are the assumptions and estimates made in 2017 still accurate in 2025 and should be utilized for decision making?

3.2.3.2 Hangars (p. 3-7)

Question: Provide the size of the hangars and, if different sizes, the quantity for each size.

3.4.1 Airside Components & 2.2.1.3 Displaced Threshold

Comment/Question:

- Which aircraft in the present fleet mix exceed the landing distance available for 28R at their max takeoff weight?
- Do any of those aircraft exceed the 20K pound weight limit (described in 1992 Resolution R-280194, Article 3)?
- The pavement management plan describes surface weight limits likely exceeding a minimum of 12K Lbs for single wheel aircraft, but does not provide actual weight limits for each runway and taxiway anywhere in the PEIR. What precautions are being taken to ensure safe operation of aircraft presently exceeding weight limits given in R-280194?
- What is the cost for the 28R improvement?
- How many planes would be impacted by this 28R improvement?
- What would be the cost/benefit ratio?

3.4.1 Airside Components

Question:

- Will mitigations that change approach and departure angles (making them steeper) impact IFR weather minimums?
- If so, will this reduce the airport's IFR usability?

5.2.4.1 Sensitive Species & 5.2.4.2 Sensitive Species

PEIR has identified numerous sensitive plant and wildlife species that will be impacted by the proposed projects (e.g., hangars, MALSR lighting).

These impacts would be considered significant and would require mitigation at ratios prescribed by the City's Biology Guidelines. Significant impacts also could occur if the project were to impact lands outside of the approved impact footprint, either directly through habitat removal, or indirectly through runoff, sedimentation, fugitive dust, or other edge effects. (P. 238 or 408)

Comment/Question: Reference - City's Vernal Pool Management and Monitoring Plan (<https://www.sandiego.gov/sites/default/files/vp-mmp.pdf>)

- *Explain how the impacts from the proposed project will meet the standards described in the City’s Vernal Pool Management and Monitoring Plan.*
- *When will a plan be submitted as required “...to the City (Development Services Environmental Analysis Section and Planning Department MSCP Staff) and Wildlife Agencies for approval as part of the development review process and the plan shall be included as an attachment to the project’s CEQA document”?*
- *“The management goal for this complex is to maintain existing habitat conditions and existing focal species population status” (p. 234 of 314). How do the projects proposed for MYF meet this goal to maintain existing conditions?*

5.2.4.3 Wetlands

“The pool to be impacted by the new hold bay at Taxiway A improvements is a mitigation pool (HELIX 2009) that is part of a larger restoration project undertaken at the Airport for previous project impacts. However, this pool was not used as mitigation as it was never signed off and the airport still has outstanding mitigation needs for that previous impact.” (p. 242 of 408)

Question: If a vernal pool mitigation is still pending from 2009, why should we expect any future mitigations to be implemented?

5.2.4.5 Conservation Planning & 5.2-34

In addition, to complete a BLA the project proponent must have concurrence from the Wildlife Agencies. (p. 236 of 408)

All proposed MHPA boundary adjustments require approval from the Wildlife Agencies. Approval is required prior to the release of the environmental documentation for the project. Early consultation with the Wildlife Agencies shall be required for any proposed MHPA boundary adjustment. (p. 266 of 408)

Question:

- *Wildlife Agencies response could greatly impact the AMP. Was early consultation made with the Wildlife Agencies for the boundary adjustment?*
- *Was the required approval from the Wildlife Agencies obtained?*

5.9.1 Noise, Existing Conditions

Question:

- *Does the displaced threshold act as a noise barrier?*
- *Will removing the displaced threshold lead to increased noise in surrounding communities?*

5.9 Noise Appendix C & I used the 2037 Forecast Noise (p. 5.9-1)

The PEIR indicates that the 2037 demand forecast for operations is 221,896.

Over the past 12 months, Montgomery-Gibbs Executive Airport has seen more than 386,000 takeoffs and landings. (Operations Overview of Montgomery-Gibbs Executive Airport, May 23, 2025, <https://www.insidesandiego.org/operations-overview-montgomery-gibbs-executive-airport>)

Comment/Question: Consequently, a noise forecast based on the 2037 Forecast Noise is not a forecast. Will this study be conducted again using the current situation for forecast calculations?

5.9.4. Issue 1: Ambient Noise (p. 5.9-4)

Existing daily traffic volumes along the segment of Aero Drive adjacent to the Airport exceed 15,000 vehicles (SANDAG 2025).

Question:

- *Does the SANDAG data include the 926 multi-family units (Aero Drive Apartments, AMLI Aero, and Ion Aero) that have been constructed or are in the process of being constructed on Aero Dr. If not, what is the impact of 926 multi-family units on ambient noise?*
- *If a projection were used based on the existing conditions in 2025 (rather than the 221,896 which is less than the current operation of 386,000), what would be the ambient noise level? Would it be significant?*
- *If the project is approved, what size of passenger jet would be allowed to use MYF? If so, what would be the ambient noise level? Would it be significant?*

5.12.2.2 Trip Generation Analysis (p. 5.12-3) & **5.12.4 Impact Analysis** (p. 5.12.4)

The estimated increase in annual flight operations for the Airport between 2017 and 2037 is 20,265 operations (refer to Table 3-1 in Chapter 3.0), which equals 56 daily flight operations.

“Over the past 12 months, Montgomery-Gibbs Executive Airport has seen more than 386,000 takeoffs and landings.” (Operations Overview of Montgomery-Gibbs Executive Airport, May 23, 2025, <https://www.insidesandiego.org/operations-overview-montgomery-gibbs-executive-airport>)

The analysis is using 2037 projection of 201,631 while the current operation is 386,000. Using the difference of 184,379 the daily flights for current operation would equal 505, 9 times more than 56.

Question:

- *If the current operation data was used to develop projections, how would this impact the analysis? Would the impacts be significant?*
- *Will studies be updated and analyses be conducted using the current data?*

The Department of Transportation letter dated 2019, located at the State Clearinghouse, <https://ceqanet.lci.ca.gov/2019029034>, stated that

“Any increase in good movement operations and its impacts to State highway facilities should be addressed in the TIS.”

“Please include ramp intersections at I-163/Balboa Avenue and I-805/Mesa College Drive. The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that 50 to 100 peak hour trips.”

“State highway facilities that are experiencing noticeable delays should be analyzed.

“The data used in the TIS should not be more than 2 years old.”

Comment/Question:

- *The data being used for the studies is more than 2 years old. Will new studies be conducted to meet the DOT’s request?*

- *Was I-163/Balboa Avenue and I-805/Mesa College Drive and regionally significant arterial system segments and intersections included in the study? (Appendix J, Transportation Impact Analysis and Local Mobility Analysis, wasn't available online and at the library for review.)*

8.7 Reduced project (No Removal of Displaced Threshold Alternative) (p. 8-13)

Under the Reduced Project Alternative, the removal of the displaced threshold at Runway 28R would not occur, and the corresponding related improvements would not be constructed, including the hold bay at Taxiway A, the MALSR lighting, and the PAPI.

Question: If the displaced threshold isn't removed, is the MALSR lighting and the PAPI needed?

Objective 1: *Implementing safety improvements necessary to bring the airport into compliance with FAA regulations and design criteria; (p. 8.16)*

Comment/Question

- *Describe the FAA regulations and design criteria that are needed for compliance.*
- *Why can't the safety improvements that are needed be added to this alternative to bring the airport into compliance?*

Objective 2: *Adapting to the transformational changes that have occurred in the aviation industry to ensure alignment with current federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies. (p. 8.16)*

Comment/Question

- *Describe the transformational changes that have occurred in the industry.*
- *Cite the federal regulations, design standards, fleet mix, aircraft operational characteristics, and airport land use policies referenced in Objective 2.*

Phasing

3.5 Airport Master Plan Phasing (p. 3.5-13)

- *Phase I Near-Term (0-5 years) generally involves runway improvements and rehabilitation, reconfiguration of taxiways as described in Section 3.4.1.3, the new*

compass rose/run-up area, the unleaded avgas fuel tank, and the apron adjacent to the SDFD station. (PEIR, 3-13)

- *Phase III Long-Term (11-20 years) includes several larger capital improvement projects such as the terminal expansion, new large box hangars north of the hotel, the public viewing area, the Runway 5 end demolition, and the removal of the Runway 28R Displaced Threshold and associated navigation improvements. (PEIR, 3-13)*

5.13.4.2 Neighborhood Character (p. 5.13-2)

The first phase would consist of the runway and taxiway improvements and reconfigurations, which would improve airside operations to meet FAA criteria. The second phase would involve new pavement and preventative maintenance in the existing hangars area, and the addition of hangars, tie-down areas, fencing, lighting, and electrical upgrades. The last phase would include larger capital improvement projects such as the terminal expansion, new large box hangars north of the hotel, the public viewing area, the self-service fuel farm and aircraft wash rack improvements, as well as associated roadway demolition and realignment. (PEIR, 5.13-3)

Comment/Question

- *Unleaded avgas fuel tank listed in Phase 1, 3.5 and self-service fuel farm listed in Phase III. Explain the difference between the fuel tank and the self-service fuel farm.*
 - *If these two are referring to different items, why isn't the "Self-service fuel farm" included in 3.5 Airport Master Plan Phasing?*
 - *If they're the same, why is it listed Phase 1 in 3.5, and Last Phase in 5.13.4.2?*
- *Runway 5 end relocation and new connector runways occur in Phase III according to 3.5. Clarify that this is the case in 5.13.4.2.*
- *Runway 28R threshold relocation...occur in Phase III according to 3.5. Clarify that this is the case in 5.13.4.2.*

Documentation

Operations:

Airports Advisory Committee Minutes, Meeting of January 10, 2023 -

<https://www.sandiego.gov/sites/default/files/aac-minutes230110.pdf>

Montgomery-Gibbs Executive Airport, Operations Count by Year -

https://www.sandiego.gov/sites/default/files/operations_count_2021_2_0_20.pdf

Operations Overview of Montgomery-Gibbs Executive Airport, May 23, 2025 -

<https://www.insidesandiego.org/operations-overview-montgomery-gibbs-executive-airport>.

Screenshot:

The screenshot shows a web browser displaying the article "Operations Overview of Montgomery-Gibbs Executive Airport" on the "INSIDE SAN DIEGO" website. The page features a blue header with the site's logo and navigation menu. The main content area includes a large photograph of two small aircraft on a runway. Below the photo, the article text begins with the date "MAY 23, 2025, 12:41 PM" and describes a Cessna Citation 550 jet aircraft crash on May 22, 2025, at 3:45 a.m. The article also includes a section titled "How many operations occur at Montgomery-Gibbs Executive Airport annually?" which states that over the past 12 months, the airport has seen more than 386,000 takeoffs and landings. On the right side of the article, there is a "Sign up to receive news updates from the City of San Diego" button and social media sharing options.

Review from Clairemont Representatives: Key Comments & Concerns

Purpose and Scope

This section presents comprehensive feedback on the Environmental Impact Report (EIR) for the Montgomery-Gibbs Airport expansion, focusing on areas where the report's modeling does not reflect the significant real-life impacts experienced by the community. The primary objective is to highlight the actual effects on East Clairemont, with particular attention to flight traffic generated by circuit and training flights. Site visits are strongly recommended for a firsthand understanding of these impacts. Notably, the report seems to exclude the residential areas west of the 805 freeway, which suffer the most from circuit flying and the noise nuisance resulting from it – This ignored neighborhood also contains a high concentration of schools and Noise Sensitive Land Use (NSLU) designated facilities.

To ensure local residents' interests are properly addressed, the EIR should broaden its evaluation to include the impacts of flight training schools and circuit flights on the greater Clairemont area. The current presence of flight training schools already creates major nuisances for surrounding communities, and the proposed expansion will exacerbate these issues. The City and the EIR should consider several protective measures:

- Rerouting circuit flights to other, more remote regional airports
- Imposing a freeze or cap on the number of flight schools operating out of Montgomery-Gibbs
- Limiting the number of circuit flights daily, both in total and per training school
- Requiring revised flight patterns to reduce noise in surrounding communities
- Establishing an enforceable mechanism to ensure compliance with these measures

Proximity to the airport should not be interpreted as perpetual consent to disruptive operations. Residents have a reasonable expectation that airports will operate responsibly and adapt to changing conditions, just as cities do in response to growth and evolving environmental standards. Living near an airport does not imply consent to unlimited noise or environmental harm. Occasional flights differ greatly from hundreds of daily touch-and-go circuits over schools and homes. Communities deserve balanced operations that protect health and quality of life.

To date, the City has not effectively addressed the excessive and noisy single-propeller airplane circuit flying over Clairemont, which occurs hundreds of times a day and allows a small number of individuals to disrupt the lives of thousands of residents. The expansion will only worsen this situation. Currently, roughly six flight training schools operate at Montgomery-Gibbs, and this number is expected to grow. This challenge is not unique to San Diego; similar issues have been reported in Mesa, Arizona, and at Zamperini Field in Torrance, CA, where training flights have been restricted due to community impact. The EIR should specifically address the operational characteristics of training schools and their use of local airspace.

It is important to clarify that these comments do not oppose the airport itself. Rather, they highlight the need for responsible flying and proper impact assessment. The current report lacks awareness of environmental factors, noise, and safety concerns for the thousands of Clairemont residents affected by the airport's operations related to training flights.

Main Areas of Concern

- Inaccurate CNEL Master Plan Contour Decibel Level Evaluation
- Inaccurate Circuit Flight Modeling and Assessment of Actual Flight Paths
- Incorrect Assumptions Regarding Mixing Level Height for Sound and Particulate Exhaust
- Insufficient Evaluation of Impacts on Residential and Educational Facilities West of the 805 Freeway
- Ineffective Noise Abatement Procedures by the City of San Diego Airports
- Volume of Circuit Flights and the Need for Re-Routing to Other Airports

Detailed Discussion

1. CNEL Master Plan Contour Decibel Level Evaluation and Noise Assessment

The report's noise modeling fails to capture actual flight patterns, leading to inaccurate noise assessments. The CNEL contour forecast stops well east of the 805 freeway, neglecting areas that are heavily impacted. Historical data, such as the 1992 Kearny Mesa Community Plan, shows the 60-decibel contour extending far west of the 805, which

contradicts the current analysis. The densely populated residential zone west of the 805, appears to be intentionally overlooked.

Visual evidence from historical and current contour maps reveals discrepancies in coverage west of the 805 freeway. According to the Draft EIR's analysis, the most intense noise zones from airport operations are confined to airport property. The 70–75 dB CNEL contour remains mostly on the airport grounds, while the 65 dB CNEL contour extends off-site only in limited directions, including a lobe stretching northwest past Balboa Avenue and Ruffner Street. This area, on the eastern edge of Clairemont Mesa, is within the 65 CNEL line. The broader 60 dB CNEL contour spreads even further, reaching into Clairemont and Stonecrest, affecting areas near Lafayette Elementary.

East Clairemont is assumed to be outside the 65 CNEL boundary, likely within the 60–65 CNEL band. By treating this area as part of the surrounding residential community, the EIR incorrectly assumes compatibility with current noise guidelines. In reality, East Clairemont is a noise-sensitive area, but the EIR has not deployed noise monitoring equipment there and relies on flawed modeling rather than empirical data.

Kearny Mesa Community Plan



Current Evaluation



2. Circuit Flight Modeling

The modeled flight paths for training flights do not reflect actual conditions. Real flight turns occur further west, directly over residential neighborhoods and schools, including Madison High School and areas west of the 805 freeway—not just west of Convoy Street. This misrepresentation leads to incorrect assessments of noise impacts.

Visual and recorded evidence indicates that on a typical day, approximately two planes fly over East Clairemont each minute, at altitudes between 800 and 1,200 feet—well below acceptable standards. Comparisons between estimated and actual flight paths underscore significant differences.

Actual - Red



The modeled flight paths from the EIR and shown in black above have the aircraft turning at Convoy street. This is not occurring, and they are overflying the local neighborhood (red line). Operational requirements are addressed in the Noise Abatement Procedures for Montgomery-Gibbs. Below is an excerpt. **Training aircraft are not currently following the rules, and nobody is around to enforce them. Montgomery-Gibbs has become the Wild-West for flying. The EIR must address Safety and Operational Issues more thoroughly.**

PROHIBITED OPERATIONS: Touch and go operations are prohibited between 2100 and 0630 (local). Intersection takeoffs and stop and go operations are prohibited at all times. Practice low approaches are prohibited between 2330 and 0630. Simulated engine failures are prohibited over residential areas at all times.

The pilot should be doing that procedure over the runway only.

Visual Flight Rules - takeoffs: maintain runway centerline after departure, climb using best rate of climb, reduce takeoff power to climb power before overflying residential areas, and reach 1200' MSL (2000' for twins) **before turning crosswind**. IFR departures: climb to at least 400' AGL on runway centerline before turning to assigned heading. Reduce takeoff power to climb power **before overflying residential areas**. VFR arrivals: maintain pattern altitudes (S. of airport 1400' MSL singles, 2000' MSL twins, N. of airport 1200' MSL singles, 1600' MSL twins) **until turning base**.

These rules are not being followed.

3. Mixing Level Height Assumptions

The EIR's assumption of a 3,000-foot mixing level for sound and particulate matter does not match reality. Circuit flights routinely operate at altitudes of 800–1,000 feet over areas west of the 805 freeway, resulting in higher concentrations of noise and particulate matter (including lead) over residential and school zones. The city must comply with environmental laws (CEQA) and community plans mandating mitigation for noise and emissions.

The report inadequately evaluates both noise and particulate impacts, failing to account for frequent flights at low altitudes over residential areas west of the 805 freeway.

4. Impacts on Residential and Educational Facilities West of the 805 Freeway

The EIR insufficiently assesses the neighborhood west of the 805 freeway. While it refers to other residential areas, it does not recognize East Clairemont as a Noise Sensitive Land Use (NSLU) area, despite its similarities to neighborhoods near Aero Drive. NSLUs include residences, hospitals, nursing facilities, educational facilities, libraries, museums, places of worship, childcare centers, and certain passive recreational parks and open spaces.

East Clairemont, particularly the area between Balboa Avenue and Clairemont Drive, contains a library, several schools, residential daycare facilities, churches, a mosque, and multiple public parks. The exclusion of this area from NSLU designation is unjustified.

Lafayette Elementary, serving deaf and hard of hearing students in the San Diego Unified School District, is directly affected by low-flying propeller aircraft. The report highlights the number and impact of daily circuit flights over this area (upwards of 300 flights daily). Intense, low-frequency noise from these flights can disrupt cochlear implants used by students, and teachers and students report significant classroom disruptions. The Kearny Mesa Community Plan requires acoustical studies for schools within the CNEL 60–65 contour, yet the current report omits key schools west of the 805.

Acoustic studies and retrofitting, such as window replacement for impacted homes, should be conducted to ensure safe learning environments, funded by the airport or city. Further studies on lead levels and acoustics are also needed in residential areas west of the 805 freeway.

5. Ineffective Noise Abatement Procedures

The City of San Diego Airports Division has introduced procedures to reduce noise over residential and school areas. The EIR states that Montgomery-Gibbs (MYG) has voluntarily adopted noise abatement measures, including:

- Runway use preferences to route louder aircraft away from noise-sensitive areas
- Operational changes such as steeper climb-outs and avoiding low-altitude turns over communities
- Time-of-day restrictions, with touch-and-go practice and low approaches prohibited between 11:30 p.m. and 6:30 a.m.
- Preferential flight tracks to minimize overflights of schools and homes

Despite these measures, none are regularly enforced in practice. Limiting noisy activities only during late-night hours is inadequate, and deflecting responsibility to the FAA is unacceptable. The City and Airport must take active responsibility for the well-being of the majority of citizens, rather than prioritizing a handful of private plane owners and profit-driven flight schools.

6. Need for Re-Routing or Banning Circuit Flights

San Diego County has multiple general aviation airports, such as Gillespie Field, Ramona Airport, Fallbrook Airpark, Oceanside Municipal, and McClellan-Palomar, which have lower residential density and greater buffer zones. These facilities can accommodate training operations without imposing the same environmental and social costs, while still offering diverse airspace for pilot education. Restricting touch-and-go operations at Montgomery-Gibbs is an effective way to reduce community impacts while maintaining essential airport functions.

Rerouting training flights from Montgomery-Gibbs to other regional airports would:

- Reduce noise and health impacts on vulnerable populations
- Improve compliance with environmental standards and community plans
- Enhance safety by reducing risks in congested urban airspace
- Distribute training activity across airports better suited for high-volume circuits

Other California airports have successfully curbed training and circuit flights—such as Zamperini Field in Torrance—by prioritizing community interests over flight school demands. While the FAA does regulate certain flying activities, the City is responsible for ensuring a safe environment and mitigating incessant noise from flight schools that impact thousands of residents.

Many residents purchased homes when flight activity was much lower, but operations have since expanded - especially repetitive training flights - resulting in impacts far beyond original expectations. Airports and communities both evolve, and outdated assumptions should not prevail when conditions change significantly.

Living near an airport does not imply consent to unlimited noise or environmental harm. Occasional flights differ greatly from hundreds of daily touch-and-go circuits over schools and homes. Communities deserve balanced operations that protect health and quality of life.

Conclusion and Recommendations

These comments advocate for responsible airport operations and accurate assessment of environmental impacts—not opposition to the airport itself.

- Revise the EIR to accurately model flight paths and noise contours
- Include analysis of all affected residential and school areas west of the 805 freeway
- Conduct required acoustical and environmental studies (including lead testing) at schools and neighborhoods west of the 805 freeway
- Implement mitigation measures to protect vulnerable populations
- Enforce circuit flying requirements to ensure flight turns occur before reaching the 805 freeway
- Provide a thorough evaluation of circuit training flights and consider measures to limit the nuisance caused by a minority to the detriment of the majority