

Serra Mesa Planning Group

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December 4, 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:

The Serra Mesa Planning Group board has compiled detailed comments and questions on various topics in the Montgomery-Gibbs AMP Draft PEIR from the board and other community members below. Each relevant section of the PEIR is excerpted followed by related comments and questions. We are requesting a written response for each comment to be included in the final PEIR and replied back to us. Thank you for taking time to consider our feedback.

Sincerely,
Chris Rosemond, Serra Mesa Planning Group Chair

Environmental Setting – Aircraft Operations Data

1.3.2 PEIR Scope and Content (p. 1-5)

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.

Comment: Release of PEIR is **6-year 8 months 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 the more current data?

3.2.1.1 Airside Capacity (p. 3-2)

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: The calculated capacity for the runway and taxiway are not included.

Question: What is the calculated capacity for current infrastructure and what percentage of capacity is reached by current operations?

3.2.3.1 Aircraft Projections (p. 3-6)

Table 3-1, Aircraft Operation Demand Forecast Summary, provides data for both the baseline (2017) and forecasted number of aircraft based at the airport and the number of annual operations. Since an airport's operations comprise the total number of take-offs and landings for a 12-month period, this data provides an overall picture of airport use.

Table 3-1
AIRCRAFT OPERATION DEMAND FORECAST SUMMARY

	2017 (Baseline)	2022	2027	2032	2037
Based Aircraft	605	608	611	614	617
Annual Operations	201,631	206,517	211,521	216,647	221,896

Source: C&S Engineers, Inc. 2019

Comment: “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.

Questions:

- 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, an increased frequency of more and larger planes will likely land at the airport and this will increase the current operations, which 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.

Environmental Analysis – Human Health, Public Safety

3.6.2.2 Serra Mesa Community Plan (page 3-17)

While MYF does not fall within the limits of the Serra Mesa community planning area, arriving and departing aircraft pass overhead and thus the airport is discussed in the

community plan. The concerns stated in the community plan include noise, approach patterns, and crash hazards.

(<https://www.sandiego.gov/planning/community-plans/serra-mesa>)

Comment: Excerpt from Serra Mesa Community Plan, Montgomery Airfield objective, (p. 31) “To mitigate adverse environmental impacts of noise, crash hazards and visual appearance affecting adjacent areas.”

Questions:

- What new or additional type of planes (size, number and type of engine, weight), percentage, and frequency of planes are anticipated to use the airport if the displaced threshold is removed?
- Is the project being proposed as an alternative for commuter jets landing at San Diego International Airport? Will it be proposed that commuter jets be directed to Montgomery-Gibbs? What effect will this activity have on increased risk of environmental noise or crash hazards?

Comment: If the displaced threshold is removed, it’s anticipated that there will be more jets using the airport. Address the impacts and concerns created by light aircraft and jets using the same airport. These concerns include, but are not limited to, turbulence, jet blast, different speeds, etc.

Questions

- What safety procedures will be implemented to maintain safety with both light aircraft and jets using the airport?
- Will there be air traffic control separation procedures established?
- Will pilots of light aircraft be offered additional training on recognizing and avoiding wake turbulence and jet blast?
- Will designated landing and takeoff times be established?
- What are the ground hazards with light aircraft and jets sharing the same space? How will these hazards be mitigated?

3.6.2.1 Kearny Mesa Community Plan (page 3-17)

This community plan requires that any proposed development be reviewed for compatibility with both MYF and the Marine Corps Air Station Miramar, per the specifications in the ALUCP.

Comments: Airspace requirements of Marine Corps Air Station (MCAS) Miramar must be considered in expansion plans or operating procedure changes. (excerpt from Serra Mesa Community Plan, Problems and Issues, p. 31)

Questions

- Were the airspace requirements of Marine Corps Air Station (MCAS) identified and determined to be compatible? If so, what are the requirements? If not, will they be identified?
- Address MCAS's airspace requirements.

5.6.4.7 Aircraft Hazards (page 5.6-8)

MYF has a designated AIA, which is shown on Figure 2-14 of this PEIR. Implementation of the project would not result in an increase in aircraft activity at MYF that would result in new safety hazards for people residing or working within the AIA, outside of the Airport.

Question: Does this statement mean safety hazards are already known and the increases in air traffic will not contribute to additional safety hazards?

Comment: A parallel issue is potential crash hazard. Although serious incidents have occurred, crash hazard would increase with heavier usage. Airport safety, noise, overflight, and airspace issues are considered in the Montgomery Field Airport Land Use Compatibility Plan, which discusses airport premises as well as surrounding areas within the airport's "influence area." (excerpt from Serra Mesa Community Plan, Problems and Issues, p. 31)

Comment: Upgraded Points analyzed the FAA data from 2021-2024 and reported in September 2025 that MYF recorded 67 runway incursions with 3 high-risks ones and tied for the highest number of high-risk runway incursion among U.S. airports. (<https://upgradedpoints.com/news/us-airports-highest-near-miss-rates/>)

Question: The SMCC plan mentions an increase in crash hazard with heavier usage and Updated Point documented the increased incidents. Is an increase in incidents associated with heavier usage?

Environmental Analysis – Air Quality

5.1.4.1 Issue 1: Conflict with Air Quality Plan (page 5.1-10)

It is not anticipated that the proposed project would result in an increase in demand for use of the Airport airside or landside facilities beyond the forecast growth in aviation and aviation related services in the San Diego region.

Comment: What is this assumption based on? Has the city looked at changes in demand resulting from similar airports following similar extents of capacity and safety improvements? This conclusion seems to be key to the less than significant conclusions for key air quality thresholds, but it's not based on substantial evidence.

Environmental Analysis – Biological resources

4.2.3.3 City of San Diego Environmentally Sensitive Lands Regulations (page 4-9)

The regulations require that development avoid impacts to certain sensitive biological resources as much as possible, including, but not limited to: MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and state listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable.

4.2.3.5 City of San Diego General Plan (page 4-9)

The General Plan presents goals and policies for biological resources in the Conservation Element, which aims to: protect and conserve the landforms, canyon lands, and open spaces; limit development of floodplains and sensitive biological areas, including wetlands, steep hillsides, canyons, and coastal lands; manage and/or minimize runoff, sedimentation, and erosion due to construction activity, in order to improve watershed management and water quality; manage wetland areas for natural flood control and preserve wetland areas; preserve areas within the MSCP.

5.2.4.1 Sensitive Species (page 5.2-7)

Sensitive Wildlife Species

Impacts would occur in eight locations where San Diego fairy shrimp have been documented on site, consisting of seven locations outside the MHPA in the southwestern portion of the site, and one location in the MHPA in the eastern portion of the site. The

impacted pool in the MHPA may be removed from the MHPA by a Boundary Line Adjustment (BLA), as discussed in Section 5.2.4.5. Additional San Diego fairy shrimp individuals could be impacted as well if the species is found to occupy more locations on site in the future. Impacts to San Diego fairy shrimp are therefore considered potentially significant.

Impacts would occur to Diegan coastal sage scrub where coastal California gnatcatcher has been observed in the eastern portion of the AMP area. Impacts to suitable habitat total 0.5 acre, composed of 0.1 acre of permanent impact to Diegan coastal sage scrub, less than 0.1 acre permanent impact to baccharis scrub, 0.4 acre of temporary impact to Diegan coastal sage scrub, and less than 0.1 acre temporary impact to baccharis scrub. Impacts to coastal California gnatcatcher are therefore considered potentially significant.

5.2.4.2 Sensitive Habitats (page 5.2-9)

Total impacts (temporary and permanent) to sensitive vegetation communities (wetlands and uplands) is 25.7 acres, composed of 0.54 acre of vernal pool, 0.5 acre of sage scrub, less than 0.1 acre of baccharis scrub, less than 0.1 acre of chamise chaparral, and 24.7 acres of non-native grassland (Table 5.2-1). 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.

5.2.4.3 Wetlands (page 5.2-11)

Implementation of future projects under the AMP would result in direct impacts to vernal pools and potential non-wetland waters/streambed. Vernal pool impacts total 0.541 acre, consisting of 0.47 acre of permanent impact and 0.073 acre of temporary impact (Figure 5.2-2, Project Impacts/Potential Jurisdictional Waters and Wetlands). Based on a 2008 delineation, approximately 133 linear feet of non-wetland waters/streambed in the western portion of the AMP area would be impacted. Acreage for this area was not available but is expected to be minimal (less than 0.05 acre). An additional 1,704 linear feet of potential non-wetland waters/streambed/swales identified by the City's Airport Biologist could also be impacted; these features have not been formally delineated. An updated jurisdictional delineation would determine the acreage of impact to non-vernal pool waters at the time of future project implementation. Vernal pools may be considered wetland waters of the U.S. by the USACE/RWQCB and wetlands by the City.

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.

5.2.4.5 Conservation Planning (page 5.2-21)

Vernal Pool Habitat Conservation Plan ... Avoidance and Minimization Measures ... Project compliance: Routine dust control via watering truck would be implemented throughout ground disturbing activities.

Comments on preceding sections: The City of San Diego's Airport Division would like to expand Montgomery-Gibbs Executive Airport. Unfortunately, they don't have the space to meet all of their desires. In 2017 the City published "City of San Diego Vernal Pool Habitat Conservation Plan" to much fan fair. This plan, which is referenced in the PEIR, is a 400-page document that references Federal (United States Fish and Game) and State (California Department of Fish and Wildlife) recommendations and none of it allowed for the planned destruction of Vernal Pool Habitat and the life forms that require them for survival.

There is a contingency for "Incidental Take", and the City has stated that they have obtained an Incidental Take Permit, but paving over a field that has been preserved in its natural state for decades is hardly incidental. This refers to the south west area that is planned for 58 Hangers and 48 Tiedowns and a wash station, an area currently populated by many vernal pools that provide for San Diego Fairy Shrimp and other endangered species.

There has been discussion regarding the relocation of vernal pools, but the relocation is not allowed under existing guidelines, and it is only possible to relocate a maximum of 10% of a healthy Vernal pool to help revitalize a Vernal pool in close proximity.

In 1992, by way of Resolution 280194, the San Diego City Council declared the City would not develop then Montgomery Field for the full range of general aviation. At that time, they asked for a threshold to accommodate safer takeoffs on 28R, a threshold that would not accept the heavy punishments of larger aircraft at touchdown. But we have been told that the FAA tower has chosen to allow those heavier aircraft to circle the airport and land on the opposite end of the runway, approaching from the west and heading east. That suggests this is a safe approach and there is no need to violate resolution 280194, no need to dig up the threshold and repour to make the runway longer. This would eliminate the need to disturb the

sensitive habitat at the east end of the runways, and The City of San Diego can stand firm that they intend to “protect, enhance, and restore vernal pool resources.”

It’s interesting to note that under section 5.2.4.1 Sensitive Species the question is asked “Would the proposed project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS?” It is clear that YES, there would be grave adverse impact.

5.2.4.5 Conservation Planning (page 5.2-14)

In addition, to complete a (MHPA boundary line adjustment) BLA the project proponent must have concurrence from the Wildlife Agencies. Because it cannot be guaranteed at this point in the planning process whether the BLA would be approved by the Wildlife Agencies, impacts associated with the new hold bay at Taxiway A in the MHPA are considered significant and unavoidable.

Comment: The EIR and analysis (particularly for biological resources) function more like a project EIR as opposed to the city’s classification as a programmatic EIR, as there is specific information on anticipated development footprint and vegetation community acreages of impacts. Considering this level of specificity on the development footprint, there is additional feasible mitigation for impacts to the MHPA.

In addition to mitigation measure MM Bio-9 (and adherence to the requirements of MM Bio-9, which are in part connected to unmet requirements for this EIR), the city must actually disclose the replacement area proposed to be added to the MHPA, analyze the replacement area in terms of meeting the BLA requirements, receive Wildlife Agency approval, and commit to the BLA.

5.2.6.4 Conservation Planning (page 5.2-34)

MM Bio-9 ... 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. Any proposed boundary adjustment shall also be disclosed in the environmental document (i.e., CEQA) for the project.

Comment: Per this mitigation measure, this EIR must disclose the proposed BLA and the approval of the Wildlife Agencies. There is not even mention of options for the replacement area. Simply noting one will be needed is not satisfying this condition, particularly the timing called for in it, connected to release of the CEQA document. Addressing this in a separate subsequent CEQA document would constitute prohibited CEQA piecemealing, considering the project description and level of specificity on proposed development footprint disclosed in the EIR.

Environmental Analysis – Land use

5.8.4.3 Issue 3: Consistency with Adopted Airport Land Use Compatibility Plans (page 5.8-10)

Modifications to the runways and taxiways as well as other facilities would require an update to the ALUCP for changes in noise contours, safety zones, and/or land use type or density policies within the ALUC jurisdiction for MYF. Processing an update to the ACLUP would ensure consistency and reduce levels to less than significant.

Comment: Refer to the Airport Influence Area Appendix for additional discussion of the Airport Land Use Compatibility Plan. A related plan, which only addresses the airport premises, is the Montgomery Field Airport Master Plan. (excerpt from Serra Mesa Community Plan, Problems and Issues, p. 31)

Question: Will the ACLUP automatically be updated if this project is approved? Or is there a separate public review process for the ACLUP?

Environmental Analysis - Noise

5.9.4.2 Issue 2: Noise – Land Use Compatibility (page 5.9-5)

Land uses outside the AMP area that are within the 65 CNEL contour include industrial, commercial, and office use. Industrial uses are considered compatible with noise levels up to 75 CNEL. Commercial and office uses are considered conditionally compatible with noise levels between 65 and 75 CNEL, with the requirement that interior noise levels for occupied area be attenuated to 50 CNEL.

Comment: Multifamily housing projects are being built or are planned for Kearny Mesa. Will there be any housing under the 65-70 db CNEL area? How might that be affected

Question: 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 noise contour? Would noise be significant?

Comment: The effects of noise should be mitigated by: controlling flight patterns (especially Montgomery Field), discouraging residential uses in areas impacted by environmental noise exceeding 65dB CNEL, using noise-buffering material in all new construction, retaining noise-absorbing native vegetation in open space areas and rigorously enforcing all local, state and federal laws relating to noise abatement. The Airport Land Use Compatibility Plan should be incorporated into the environmental review process. (excerpt from Serra Mesa Community Plan, Proposals, p. 51)

Questions:

- What is the dB range of the planes that will use the airport?
- If the project is approved, what percentage of the planes are projected to have 65 or greater dcb CNEL airport noise contour?
- Does the topography of Montgomery amplify the noise from aircraft?
- What percentage of time does the weather conditions at Montgomery increase an aircraft's noise level?

5.9.6.1 San Diego Municipal Code – On-Site Generated Noise (page 5.9-11)

*MM NOI-1 **Operational Property Line Limits.** Noise levels from operational noise generated by the other aeronautical land uses adjacent to Aero Drive and Glenn H. Curtis Road shall meet the City Noise Abatement and Control Ordinance standards for multi-family residential uses at the southern boundary of the AMP area. These standards are 55 dBA LEQ during the hours between 7:00 a.m. and 7:00 p.m., 50 dBA LEQ during the hours between 7:00 p.m. and 10:00 p.m., and 45 dBA LEQ during the hours between 10:00 p.m. and 7:00 a.m.*

Question: This is an important mitigation for assuring noise limitation. Thanks for including it! Do these standards also apply to flight school aircraft operating at low altitude in the surrounding communities?

Environmental Analysis – Transportation

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).

Questions:

- 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 cumulative impact of 926 multi-family units on ambient noise in addition to the increased daily traffic from the AMP?
- 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?

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.

Comment: “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 increase in daily flights for current operation would equal 505, 9 times more than 56.

Questions:

- 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?

5.12.4.1 Issue 1: Conflict with Plans/Policies (page 5.12-4)

During operations, the project is anticipated to generate 151 daily trips above existing conditions. Because the project would generate fewer than 1,000 daily trips and is consistent with the community plan and zoning designation, the project is screened out from having to conduct a local mobility analysis per the City TSM.

Question: If the current operation data was used in the study, would the project generate in excess of 1,000 daily trips (151x9)?

5.12.4.2 Issue 2: Vehicle Miles Traveled (page 5.12-4)

The project is anticipated to generate 151 daily unadjusted driveway vehicle trips under future year 2037 conditions, which is less than the 300 daily unadjusted driveway trips specified under the Small Project criterion. Therefore, the project would have a less-than-significant VMT-related impact under CEQA.

Question: If the current operation data was used in the study, would the project generate 300 daily unadjusted driveway trips (151x9)?

Environmental Analysis – Neighborhood Character

3.5 Airport Master Plan Phasing (p. 3-13)

- *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 Issue 2: Neighborhood Character (p. 5.13-3)

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.

Questions:

- 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. Runway 28R threshold relocation...occur in Phase III according to 3.5. Clarify that this is the case in 5.13.4.2.