



SIERRA CLUB

SAN DIEGO CHAPTER

December 8, 2025

RE: Montgomery Gibbs Executive Airport Master Plan Program EIR

Greg Johansen, (PlanningCEQA@sandiego.gov)
Environmental Planner, City of San Diego Planning Department
202 C Street, 5th floor M.S. 413 San Diego, CA 92101

Dear Mr. Johansen,

The Sierra Club is dedicated to preserving biological resources, promoting biodiversity, and protecting the environment. We welcome the opportunity to review and comment on this complex proposal to expand the aviation capabilities of this airport.

Sierra Club San Diego opposes the expansion of Montgomery Gibbs Airport. The Montgomery Gibbs Airport (MYF) is surrounded by a biological treasure of native vernal pools which will be harmed, some to extinction, with the placement of new hangers and facilities on surrounding areas. The EIR states: “the eastern portion of the property still contains native habitat, such as Diegan coastal sage scrub, and an extensive vernal pool complex.” The EIR identifies 333 vernal pools within the airport boundary. Pollution and runoff from land disturbed in renovation and relocation efforts also threaten the health and survival of sensitive land that would be developed. The EIR reports that a number of these pools would be impacted and require mitigation. This expansion proposal strongly conflicts with the goals of the Natural Communities Conservation Planning to protect these ecosystems.

The EIR reports that: “The baseline data was supplemented with a single site reconnaissance conducted by HELIX on June 8, 2017, to verify and update previous vegetation mapping, note the presence of any additional sensitive species observed, and conduct habitat assessments for sensitive species.” Sierra Club believes that an eight-year old survey is inadequate and respectfully requests and current update on the biological resources that would be impacted by the project.

Additionally, even in 2017 the biological survey was inadequate. The EIR states: “HELIX’s fieldwork conducted for the AMP was limited to a single day general biological survey. Focused plant and animal surveys were not conducted for this project...” Sierra Club respectfully requests that a more thorough and focused survey is required before any project development can be approved. Even with this inadequate biological survey, the EIR states that: “A total of 11

vegetation communities (including land cover types) were recorded within the AMP area, covering approximately 487.3 acres.” Additionally, the EIR states: “Approximately 64.4 acres would be directly impacted by future implementation of individual projects under the AMP.” Sierra club requests a more detailed report on the impact on these species.

In our scrutiny of the overall presentation of the PEIR, many questions arise and we seek some clarification on some key issues that undermine the need for an airport expansion.

- There is a central point of confusion when stating the need to bring the airport into compliance with “FAA regulations, design standards, fleet mix, airport operational characteristics and airport land use policies.”
How out of date is the current state of the airport?
Is the airport in violation and under sanction by the FAA?
Shouldn't a phase of construction be clearly defined for the work to bring the current use and state of the airport up to today's standards before longer range plans are agreed to?
- The discussions involving the purpose and the need for expansion cannot be fully be justified in a general category of need to “accommodate regional demand....”
What types of aircraft and services are regionally demanded?
Has Montgomery Gibbs Field reached the limits of its capabilities in maintaining a balance with the surrounding communities and also offering local business growth? Is it necessary to impact local communities with such an airport expansion?
- It is unclear what the future needs are that mandate such an airport expansion. *Is this a public or a private need? Is it needed for recreation or commerce? Could there be future plans of expansion to accommodate larger jets needing longer runways after this expansion? Could not some of San Diego's numerous airfields provide for increasing regional and interstate demand? Is the environment at this airfield being sacrificed for a wider sphere of national and international users to boost economic opportunities from tourism and corporate use?*
- In the “Environmentally Superior Alternative”, it states, “Safety improvements associated with bringing the airport into compliance with current FAA regulations would not occur, which may result in decreased operational safety associated with future aircraft operations.” If the airport is unsafe it should be closed down. If it is safe, it does not seem that these improvements are needed.

Safety in aviation and airport operation is a top priority and will contribute to a healthy environment. Accidents, fuel spills and burns have their negative repercussions in a sensitive habitat area. Efforts to reduce Green House Gas (GHG) in the aviation industry by transitioning to unleaded fuel is a positive step in this direction.

Within a very constrained boundary in a bustling urban environment, MYF has maintained a harmonious balance of diverse needs and industry requirements for decades and the environment.

We believe that the proposed improvements at MYF have less to do with safety than a move to bring in larger jets that will adversely affect the surrounding environment. The last major

decision for airport expansion was made in 1995 when runway 28R was extended to the east to a total of 4,577 feet. Continuing to lengthen the runway will bring larger jet airplanes that will diminish the character and aesthetics of this historic airfield and the neighborhoods encompassing it.

We support safety improvement to the existing runways and lighting systems. But we do not favor expansion of the airfield beyond its current boundaries.

The Alternatives show a wide range of diverse choices but they should not be considered complete solutions on their own.. In recognizing the potential destruction to ecosystems, a step by step process would be much more constructive where the completion of one stage can inform the decisions for the next with much less chaos in the decision-making process.

If this plan were fully implemented, as the first major expansion since 1995, the cumulative impacts would be adverse with harmful consequences to the community and the native environment.

Sierra Club supports the “No Project Alternative”.

Respectfully,

Preston Brown, Member
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