

## COMMENTS

## RESPONSES



UNITED STATES MARINE CORPS  
MARINE CORPS AIR STATION  
P.O. BOX 452000  
SAN DIEGO, CA 92145-2000

11103  
CP&L/104495  
June 11, 2007

CITY OF SAN DIEGO  
DEVELOPMENT SERVICES DEPARTMENT  
ATTN: MS. MARILYN MIRRASOUL  
1222 FIRST AVENUE, MS 501  
SAN DIEGO CA 92101

A-1

RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, CITY OF SAN DIEGO  
DRAFT GENERAL PLAN; PN 104495, SCH NO. 2006091032

Dear Ms. Mirrasoul,

Thank you for the opportunity to provide comment on the City of San Diego Draft Program Environmental Impact Report for the City of San Diego Draft General Plan Update. As a member of this community, Marine Corps Air Station (MCAS) Miramar shares your concerns on all quality of life issues.

The Station continues to manage its resources in full compliance with the law and will continue to do so in the future. Such compliance, however, has created significant limitations. Constraints on MCAS Miramar include, but are not limited to, sensitive resources or habitat, regional transportation and infrastructure requirements and most important, the United States Marine Corps (USMC) mission essential training and readiness requirements to meet national security objectives.

In 2002, the State of California enacted legislation that requires General Plans of local jurisdictions to provide for compatible land use planning in surrounding communities affected by military operations. This was codified into law within the Public Utilities Code (Section 21675) as: "...land use guidelines will be consistent with the Air Installations Compatible Use Zones (AICUZ) recommendations of that military airport". As such, it is critical that these recommendations be incorporated into the revised General Plan as quickly as possible once the update of the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) is completed.

For the USMC to lose additional land or flexibility in the San Diego region would be highly detrimental to the current

A-1 Public Utilities Code (PUC) Section 21675 (b) states:

*The (airport land use) commission shall include, within its airport land use compatibility plan formulated pursuant to subdivision (a), the area within the jurisdiction of the commission surrounding any military airport for all of the purposes specified in subdivision (a). The airport land use compatibility plan shall be consistent with the safety and noise standards in the Air Installation Compatible Use Zone prepared for that military airport. This subdivision does not give the commission any jurisdiction or authority over the territory or operations of any military airport.*

The San Diego County Regional Airport Authority, as the Airport Land Use Commission (ALUC) for San Diego County, is in the process of preparing a comprehensive update to the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP). The ALUC is preparing the draft ALUCP update for MCAS Miramar consistent with the safety and noise standards published in the 2005 Air Installation Compatible Use Zone (AICUZ) study for MCAS Miramar as required by PUC sec 21675(b) and as commented in your letter.

As addressed by the PEIR in Sections 3.5 and 3.10, once the ALUC adopts the ALUCP consistent with the AICUZ study for MCAS Miramar, the City will submit the General Plan and affected community plans and specific plans to the ALUC for a consistency determination with the updated ALUCP as required by the PUC. As dictated by state law, the City will take steps to amend its land use plans and zoning ordinances to implement the ALUCP as recommended by the ALUC or the City Council can overrule ALUC determination by making the required findings with a 2/3rds vote.

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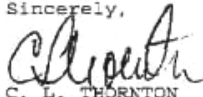
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operational tempo and future training. In view of the unique and irreplaceable nature of the Station and the unknowns of future requirements, maximum flexibility on land use must be maintained. Comments on sections relevant to MCAS Miramar have been provided for your reference purposes (Enclosure (1)).

Thank you for the opportunity to review this environmental impact report. If we may be of any further assistance, please contact Mr. Juan Lias at (858) 577-6603.

Sincerely,



C. L. THORNTON  
Community Plans and Liaison Officer  
By direction of the Commanding Officer

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### GENERAL COMMENTS

#### 1. Health and Safety (Section 3.5)

A-2 a. General Comment: This section fails to mention that all AICUZ documents also include a safety/land use compatibility matrix (Table 3). This matrix is used by the USMC to determine the land use compatibility of projects within MCAS Miramar Accident Potential Zones (APZ). While the majority of uses are typically consistent, there have been development projects in the past that were deemed consistent by the City of San Diego and considered inconsistent by the USMC. We would appreciate if staff could somehow address this issue in this section's text.

#### 2. Noise (Section 3.10)

A-3 a. General Comment: This section fails to mention that all AICUZ documents also include a noise/land use compatibility matrix (Table 2). This matrix is used by the USMC to determine the noise compatibility of projects in the vicinity of MCAS Miramar. While the majority of uses are typically consistent, there have been development projects in the past that were deemed consistent by the City of San Diego and considered inconsistent by the USMC. We would appreciate if staff could somehow address this issue in this section's text.

### ITEMIZED COMMENTS

#### 1. Health and Safety (Section 3.5)

A-4 a. Page 3.5-7, 5<sup>th</sup> paragraph, 3<sup>rd</sup> sentence: The 1977 AICUZ document was the first AICUZ published for this facility, but the current APZ boundaries are taken from the 1992 update which was published by the Department of Navy and are currently being used by the City of San Diego and Airport Land Use Commission (ALUC). Please change the sentence to reflect these comments.

A-5 b. Page 3.5-7, 5<sup>th</sup> paragraph, 4<sup>th</sup> sentence: Recommend that you insert the criteria in parenthesis at the end of the sentence (as of December 2002 OPNAV INSTRUCTIONS 11010.36B).

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A-2 The City has added the following sentence in PEIR Section 3.5:  
The matrix in the AICUZ study shows the land use compatibility for proposed development projects within APZs.

A-3 The City has added the following discussion to PEIR Section 3.10:

The Airport Authority will be including the projected noise contours shown on Figures 3.10-5 3.10-6 and 3.10-7 for SDIA, Montgomery Field, Brown Field, and MCAS Miramar respectively in the updated ALUCPs. The projected noise contour data for MCAS Miramar is from the 2005 Air Installation Compatible Use Zone (AICUZ) Study for MCAS Miramar. The projected noise data for NAS North Island is from the published 1984 AICUZ study. For NOLF Imperial Beach, the projected noise data is from the 1989 AICUZ study. The U.S. Navy is in the process of preparing updated AICUZ studies with updated noise contours for NAS North Island and NOLF Imperial Beach, which are currently not available.

The AICUZ studies for all the installations contain noise - land use compatibility matrices. The military uses the AICUZ study matrix to determine the noise compatibility of proposed development projects AICUZ study area for each air installation. The Airport Authority will be incorporating the noise contours and the noise - land use compatibility matrix criteria from the published 2005 MCAS Miramar AICUZ study and the updated AICUZ studies for NAS North Island and NOLF Imperial Beach when published into the updated and new ALUCPs for those military air installations.

A-4 The PEIR Section 3.5 states the following: For MCAS Miramar, the APZs are incorporated in the adopted ALUCP from the Air Installation Compatible Use Zone (AICUZ) study published by the Navy in 1977. At the end of this sentence, the City has added the following: "*and updated in 1992.*" The PEIR states the following: The adopted ALUCP for MCAS Miramar identifies compatible uses and provides criteria for future uses proposed in the APZs. Before criteria, the City has added the following: "a safety land

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use/compatibility matrix.” The City has added the following: *The City uses the APZ boundaries to implement the safety land use/compatibility matrix criteria in the community plans for Mira Mesa, Torrey Pines, and University and the AEOZ.*

- A-5 The City has placed the recommended reference in the notes and references at the end of PEIR Section 3.5.

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- A-6 c. Page 3.5-8, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence: Change Marine Corps to United States Marine Corps.
- A-7 d. Page 3.5-8, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: The Federal Aviation Administration (FAA) project evaluation process also examines Terminal Instrument Procedures (TERPS) surfaces for obstruction and safety issues. Recommend that the sentence read: "...Part 77 and TERPS obstruction standards..."
- A-8 e. Page 3.5-14, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> and 4<sup>th</sup> sentences: Recommend that the word "TERPS" be added after imaginary and before surfaces.
- A-9 f. Figure 3.5-5: Recommend that the March 2005 MCAS Miramar AICUZ APZs be placed on this figure or that the text references them in some fashion to avoid confusion between present and future APZs.
- A-10 g. Figure 3.8-4: Recommend that all Restrictive Use Easements (RUE) areas be shown on this figure. These areas are purchased easement rights that belong to the federal government and are administered locally by the USMC. Any proposed development requires adherence to specific RUE development conditions and should not be undertaken without concurrence from the USMC. For these reasons, we believe it is appropriate to depict these areas on this map.
2. Noise (Section 3.10)
- A-11 a. Figure 3.10-3: This map shows the incorrect noise contours from the draft 2005 MCAS Miramar ALUCP. Request that the noise contours currently used by the City of San Diego and ALUC for project determinations be shown instead. Figure 3.10-6 shows the correct current noise contours which are consistent with the 2005 MCAS Miramar AICUZ.

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ENCLOSURE (7)

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- A-6 The City has added "United States" before Marine Corps in the sentence in PEIR Section 3.5 as referenced by the comment letter.
- A-7 The City has added "Terminal Instrument Procedures (TERPS)" after Part 77 in the following sentence in PEIR Section 3.5: The FAA uses Part 77 and obstruction standards as elevations above which structures may constitute a safety problem. The City has also added the following sentence to the paragraph referenced: *The FAA examines the TERPS surfaces for obstructions and safety issues as part of the obstruction evaluation for a proposed project.*
- A-8 The City has added "TERPS" after the words "imaginary" and before the word surfaces in the sentences in PEIR Section 3.5 as referenced by the comment letter.
- A-9 The City has added "used by the adopted ALUCP currently in place" after "APZs" in the following sentence in PEIR Section 3.5: The APZs affect property located off the MCAS Miramar property in the Mira Mesa, Torrey Pines and University communities as shown on Figure 3.5-6.
- A-10 The City has added the following discussion of the restrictive use easements as addressed by the AICUZ study in Section 3.5: *"The federal government has Restrictive Use Easements (RUE) on property adjacent to MCAS Miramar that serve to limit the type and intensity of development as shown on Figure 3.5-6. Any proposed development requires adherence to specific RUE development conditions and should not be undertaken without concurrence from the United States Marine Corps."* The City has also added the RUE areas to Figure 3.5-6.
- A-11 The City has added "Existing" to the title for Figure 3.10-3 in PEIR Section 3.10. The City has also added the following note on Figure 3.10-3: *The Community Noise Equivalent Level (CNEL) contours represent average annual day flight operations for 2001. The source of this data as noted on the Figure is from the MCAS Miramar Noise Study (Nov 2004) for the 2005 Air Installation Compatible Use Zone Study.*