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February 26, 2009

Jeff Kashak
County of San Diego
Department of Public Works
Environmental Services Unit
5469 Kearny Villa Road, Suite 305
San Diego, CA 92123

SUBJECT: City of Santee's Response to the Revised Notice of Preparation (NOP) for a Program Environmental Impact Report/Environmental Assessment for Redevelopment of 70 acres, including Land Acquisition and/or Aviation Easements for Gillespie Field General Aviation Airport (SCH#2005111092)

Dear Mr. Kashak:

In December 2005, the City of Santee submitted a letter in response to a Notice of Preparation for the above-referenced Project. This letter serves as the City of Santee's response to the *revised* January 28, 2009 Notice of Preparation of a Program Environmental Impact Report/Environmental Assessment for this Project. As stated in the revised NOP, the draft Program EIR/EA will analyze the proposed redevelopment of currently undeveloped 70 acres within the airport and the potential development of aviation uses thereon by private developers in accordance with Federal Aviation Administration (FAA) guidelines. The Project Description includes identification of properties proposed for acquisition and/or those for which aviation easements would be acquired. The 1986 Gillespie Field Master Plan would be amended by the Project.

The Gillespie Field Airport Layout Plan identifies the 70-acre project site for aviation-related development in order to accommodate the proposed number of based aircraft by 2025. The NOP identifies 10 properties for fee acquisition, and 19 properties for which aviation easements would be sought in the City of Santee.

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The NOP identifies potential environmental impacts in the following environmental areas with Project implementation: Air Quality, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Flooding, Land Use, Noise, and Traffic/Transportation Circulation. The City provides the following comments for your consideration in preparing the draft EIR/EA:

Air Quality

In 2006 the Legislature passed AB32 – The Global Warming Solutions Act of 2006, which requires the State of California to reduce greenhouse gas emissions to 1990 levels no later than 2020. Civil aviation is a significant contributor of greenhouse gas emissions, accounting for 5% of San Diego County's greenhouse gas emissions (source: www.sandiego.edu/epic/ghginventory). The draft Program EIR/EA must not only evaluate the potential impacts to air quality and greenhouse gas emissions, it must also identify and implement measures that do not jeopardize the efforts of both Cities to meet the targets. Measures to offset greenhouse gas emissions should not be limited to landscaping and other physical improvements, but should also include analysis of airport operational measures, and prohibitions on aging aircraft based at the airport that do not use low carbon fuel to the extent provided by law.

Biology

Project implementation necessitates the relocation of an existing 1.1-acre Ambrosia mitigation site, located within the western center of the site. Should the relocation site be in the City of Santee, the draft Program EIR/EA must provide justification for this location, and disclose the requirement for a Conditional Use Permit to establish a biological habitat preserve (City of Santee Municipal Code Section 17.14.030-A, subsection D.2.b). Relocation of the mitigation site within Santee would also require a consistency analysis with the Multiple Species Conservation Program - Framework Management Plan, and the City of Santee's draft Subarea Plan. If intended to be a permanent preserve, General Plan and Zone Code Amendments would also be required.

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Noise

The City is directly affected by aircraft that fly over Santee, and noise complaints are common. The draft Program EIR/EA must take into account the Noise Element and Municipal Code standards of the City of Santee.

As stated in the City of Santee, General Plan 2020 - Noise Element, the City "*shall discourage any future expansion of the facilities of Gillespie Field or intensification of operation, other than what has been already planned in the airport's master plan that would result in greater noise impacts.*" (Policy 1.7). As such, the draft Program EIR/EA should fully analyze noise impacts and require mitigation measures to address these impacts. Consideration should be given to average daily noise and single-noise event issues.

The reliance on the Gillespie Field Airport Layout Plan and Update Narrative (see NOP – Master Plan Amendment) to establish the aircraft operations to year 2025, is flawed because no CEQA analysis was conducted when the Airport Layout Plan and Update Narrative (hereinafter the "ALP") was approved by the FAA. The City of Santee continues to maintain that the ALP required CEQA analysis and therefore any statements that imply the proposed project is not expanding the number of aircraft that use Gillespie Field is not valid. The redevelopment of the 70-acre parcel is intended for aircraft hangers and aircraft tie-downs which will result in an increase in the number of aircraft based at Gillespie Field. The Draft Program EIR/EA must disclose and fully analyze the impacts associated with an increase in airport operations.

Helicopters produce a distinctive noise which is disruptive to residents in particular. Helicopters have been observed flying over the Magnolia Avenue/Summit Avenue area, to land on private property (Fanita Ranch). The property owner has not given permission to land helicopters, and, in fact, this activity has been identified by Wildlife Agency personnel as destructive to sensitive plants observed in the favored landing spot. If these helicopters, or any in the future, are based at Gillespie Field, then the draft Program EIR/EA must address how this unauthorized activity is prevented. Similarly, all night and evening noise events from all sources associated with the project should be separately considered.

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Land Use and Community Character

The draft Program EIR/EA must include analysis on the effect the project would have on the City of Santee's ability to conduct land use planning and implementation as set forth in its General Plan and Zoning Ordinance. The draft Program EIR/EA should specifically identify Santee as a jurisdiction that would be affected because the project scope includes the acquisition of property in fee (10 parcels totaling 4.78 acres) and avigation easement acquisition (19 parcels) within the boundaries of Santee.

The draft Program EIR/EA must assess the project's effect on the existing and planned community character within the City of Santee. Specifically, the acquisition of properties in Santee north of Prospect, between Cottonwood Avenue, Railroad Avenue and south of the proposed SR 52 would result in 4.78 acres of land being removed from the redevelopment area within the Light Industrial Zone.

This will establish a noticeable undeveloped area, unless well maintained. The draft Program EIR/EA should disclose and analyze the effect of nearly 5 acres of undeveloped land along a major industrial street, and identify measures that deter these sites from becoming public nuisances. As previously stated in the City of Santee's previous response to the first NOP, the draft Program EIR/EA should discuss property maintenance and explore the feasibility of creating a visual amenity with attractive fencing.

Traffic Circulation

The traffic analysis should analyze the potential impacts to the Cuyamaca Street and Magnolia Avenue intersections with Prospect Avenue, in the City of Santee. The City of Santee encourages a Level of Service "C" on street segments and intersections throughout the circulation network (Circulation Element, Policy 1-8). Development that results in a drop in the level of service at an intersection to Level of Service "E" or "F", after mitigation, may only be approved with specific findings made by the City Council. In consideration of this, declining levels of service on nearby streets and intersections (beyond Kenney Street and Airport Drive) must be analyzed and mitigation measures proposed that maintain current levels of service. Mitigation measures for street improvements may include any necessary right-of-way acquisition on Magnolia Avenue within the City of Santee, and re-surfacing, as necessary to improve the impacts to a level that is below significant.

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Light Emissions

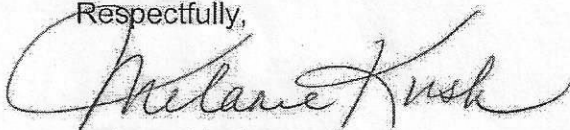
The draft Program EIR/EA must analyze the effect of project implementation on light emissions in Santee.

Social and Socioeconomic Impacts

The draft Program EIR/EA must identify any social or socioeconomic impacts to the City of Santee related to the purchase of properties in fee, or from the acquisition of avigation easements. Specifically, the proposed changes to the environment that could result from these acquisitions must be addressed and mitigated, if feasible. In some cases businesses and/or residents would be displaced. The draft Program EIR/EA must identify and map these properties, and include information on current land uses. The draft Program EIR/EA should explain the process by which the County of San Diego will acquire the avigation easements over 19 properties in the City of Santee. The discussion should also include the funding source, and what will trigger the purchase of the easements.

Thank you for the opportunity to comment on the revised NOP. Once the draft Program EIR/EA is released, Santee reserves the right to raise additional concerns as more information about the Project is made available.

Respectfully,



Melanie Kush, AICP
City Planner

Cc: Keith Till, City Manager
Jim O'Grady, Interim Director of the Department of Development Services
Shawn Hagerty, City Attorney, City of Santee
Peter Drinkwater, County Airports Manager