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Date: June 19, 2026

To: COMMISSIONERS AND INTERESTED PERSONS

From: KARL SCHWING, DEPUTY DIRECTOR, SAN DIEGO COAST DISTRICT
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Subject: STAFF RECOMMENDATION ON CITY OF CARLSBAD MAJOR AMENDMENT NO. LCP-6-CAR-25-0007-1 (Airport Uses) for Commission Meeting of July 8-10, 2026

STAFF NOTE

This item was previously scheduled for the Commission hearing on March 11, 2026. However, on March 6, 2026, the County of San Diego submitted a comment letter citing concerns related to the City's redefinitions and permit-review structure and claimed that certification of the submittal would hinder necessary safety and operational improvements. The County also asserted a vested rights claim unrelated to the Coastal Act; and cited additional concerns outlined in the staff report below (Exhibit 4). The item was postponed in order to work with City staff regarding the County's comments and concerns. The City of Carlsbad submitted written correspondence responding to the County of San Diego's comment letter on April 27, 2026 (Exhibit 5). Nevertheless, Staff's recommendation to certify as submitted remains the same. This report differs from the March staff report in that it makes minor updates.

The subject LCP implementation plan amendment was submitted and filed as complete on November 3, 2025. The date by which the Commission was to take action, absent an extension of the time limits by the Commission, was February 3, 2026. A one-year time extension was granted on December 11, 2025. As such, the last date for Commission action on this item is at the December 2026 hearing. This amendment affects the City's certified Implementation Plan only, and this report addresses the entire submittal.

SUMMARY OF AMENDMENT REQUEST

The City of Carlsbad is requesting an amendment to the City's Zoning Ordinance, part of the certified LCP Implementation Plan, to update regulations related to the requirements and review procedures for future expanded airport uses associated with the McClellan-Palomar Airport. Specifically, creating or updating definitions for "Airport" and "airport expansion"; removing Airport as an allowable land use in the EA Exclusive Agriculture, CT Commercial Tourist, and CM Heavy Commercial – Limited Industrial zones; adding

Airports as an allowable land use in PM Planned Industrial and the M Industrial zones; removing Air courier services from the PM zone (except with a CUP within the boundary of the McClellan-Palomar Airport); updating code references; and clarifying permit process policies.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending approval of the Implementation Plan (IP) amendment as submitted.

The amendment addresses definitions, specific land use types, and review procedures for future expanded airport uses. The proposed amendment removes airports as an allowable land use in the EA Exclusive Agriculture, CT Commercial Tourist, and CM Heavy Commercial – Limited Industrial zones, which currently allow such uses with a conditional use permit. The proposed amendment also removes air courier services as an allowable land use in PM Planned Industrial zones. In addition, the proposed amendment adds airports as an allowable land use in M Industrial and PM Planned Industrial zones. These land uses still require a conditional use permit, and the majority of these zones are located outside of the Coastal Zone. Consolidation and clarification of such uses from these zones will not affect coastal resources. For parcels within the Coastal Zone, the proposed amendment does not change the requirements to obtain a coastal development permit.

Lastly, the proposed amendment updates the permit process policies to clarify that the City Council continues to retain authority over permits for airport uses. The proposed amendment clarifies the City's code requirements and permit review procedures to provide orderly development of the airport , which is located outside of the Coastal Zone Boundary. None of the proposed revisions will have an adverse impact on public access, public recreation, or any other coastal resources.

Therefore, staff recommends that the Commission find that the City's proposed amendment to modify the Zoning Ordinance conforms with and is adequate to carry out the certified Land Use Plans. Staff is therefore recommending that the amendment be approved as submitted by the City.

The appropriate motions and resolutions begin on page 4. The findings for approval of the Implementation Plan Amendment as submitted begin on page 6.

BACKGROUND

There are six geographic segments in the City's LCP. The City's LCP has a unique history in that special legislation directed the Commission to draft the initial LCP. One segment, the Village Redevelopment Area LCP, was certified in 1988 and the City has been issuing coastal development permits there since that time. On October 21, 1997, the City assumed permit jurisdiction and has been issuing coastal development permits for all of the remaining segments, except Agua Hedionda. The Agua Hedionda Lagoon LCP segment is a deferred certification area until an implementation plan for that segment is certified.

ADDITIONAL INFORMATION

Further information on the City of Carlsbad LCP amendment LCP-6-CAR-25-0007-1 (Airport Uses) may be obtained from Chelsea Jander, Coastal Planner, at (619) 767-2370 or SanDiegoCoast@coastal.ca.gov.

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EXHIBITS

Exhibit 1 – Proposed Amendments
Exhibit 2 – City Council Ordinance CS-479
Exhibit 3 – Coastal Zone Boundary and Airport Figure
Exhibit 4 – County of San Diego Correspondence
Exhibit 5 – City of Carlsbad Correspondence

I. OVERVIEW

A. LCP HISTORY

The City of Carlsbad's certified LCP contains six geographic segments as follows: Agua Hedionda, Mello I, Mello II, West Batiquitos Lagoon/Sammis Properties, East Batiquitos Lagoon/Hunt Properties, and Village-Barrio. Pursuant to Sections 30170(f) and 30171 of the Public Resources Code, the Coastal Commission prepared and approved two portions of the LCP, the Mello I and II segments, in 1980 and 1981 respectively. The West Batiquitos Lagoon/Sammis Properties segment was certified in 1985. The East Batiquitos Lagoon/Hunt Properties segment was certified in 1988. The Village Redevelopment Area LCP was certified in 1988; the City has been issuing coastal development permits there since that time. The Village LCP segment was expanded and renamed the Village-Barrio in 2019. On October 21, 1997, the City assumed permit jurisdiction and has been issuing coastal development permits for all segments except Agua Hedionda. The Agua Hedionda Lagoon LCP segment is a deferred certification area until an implementation plan for that segment is certified. This amendment solely addresses the City's implementation plan.

The McClellan-Palomar Airport is a general aviation airport owned and operated by the County of San Diego and located within the City of Carlsbad, but entirely outside of the Coastal Zone Boundary. The airport currently meets the design criteria for mid-sized corporate and commercial aviation services.

B. STANDARD OF REVIEW

Pursuant to Section 30513 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

C. PUBLIC PARTICIPATION

The City has held Planning Commission and City Council meetings with regard to the subject amendment request. All of those local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

II. MOTION AND RESOLUTION

MOTION:

> I move that the Commission reject the Implementation Program Amendment No. LCP-6-CAR-25-0007-1 as submitted.

STAFF RECOMMENDATION OF CERTIFICATION AS SUBMITTED:

Staff recommends a **NO** vote. Failure of this motion will result in certification of the Implementation Program Amendment as submitted and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

RESOLUTION TO CERTIFY IMPLEMENTATION PROGRAM AMENDMENT AS SUBMITTED:

The Commission hereby certifies the Implementation Program Amendment for the City of Carlsbad as submitted and adopts the findings set forth below on grounds that the Implementation Program Amendment conforms with, and is adequate to carry out, the provisions of the certified Land Use Plans, and certification of the Implementation Program Amendment will meet the requirements of the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Program Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts on the environment that will result from certification of the Implementation Program.

III. FINDINGS FOR APPROVAL OF THE CITY OF CARLSBAD IMPLEMENTATION PLAN AMENDMENT, AS SUBMITTED

A. AMENDMENT DESCRIPTION

The City of Carlsbad is requesting an amendment to the City's Zoning Ordinance, part of the certified LCP Implementation Plan, to update regulations related to the requirements and review procedures for future expanded airport uses. Specifically, creating or updating definitions for "Airport" and "airport expansion"; removing Airport as an allowable land use in the EA Exclusive Agriculture, CT Commercial Tourist, and CM Heavy Commercial – Limited Industrial zones; adding Airports as an allowable land use in PM Planned Industrial and the M Industrial zones; removing Air courier services from the PM zone (except with a Conditional Use Permit ("CUP") within the boundary of the McClellan-Palomar Airport); updating code references; and clarifying permit process policies.

The McClellan-Palomar Airport is located at the intersection of Palomar Airport Rd and El Camino Real, within the City of Carlsbad municipal boundary, but outside the boundaries of the Coastal Zone (Exhibit 3). Part of the proposed amendment solely impacts a permit procedure process for the Airport which, since it is outside the Coastal Zone, has already taken effect. The policy for development permits clarifies that City Council shall retain decision-making authority for new or expanded airport uses, and this policy is contained within the certified LCP Implementation Plan and therefore must be included in the amendment request even though it impacts areas outside of the Commission's jurisdiction.

The only impact the proposed amendment has to the areas within the Coastal Zone are zoning and land use related changes as outlined below.

The amendment before the Commission includes changes within the Implementation Plan with various text changes to the City's Zoning Ordinance. The amendment addresses definitions, specific land use types, and review procedures for future expanded airport uses. The proposed amendment includes creating a definition for "airports" and updates a definition for "expansion" that references Public Utilities Code sections. In addition, the proposed amendment removes airports as an allowable land use in the EA Exclusive Agriculture, CT Commercial Tourist, and CM Heavy Commercial – Limited Industrial zones. The proposed amendment also removes air courier services as an allowable land use in PM Planned Industrial zones. Currently, these zones allow such uses with a conditional use permit. The proposed amendment adds airports as an allowable land use in M Industrial and PM Planned Industrial zones. These uses still require a conditional use permit, and a majority of these zones are located outside of the Coastal Zone. Consolidation and clarification of such uses from these zones will not affect coastal resources. For parcels within the Coastal Zone, the proposed amendment does not change the requirements to obtain coastal development permit. The proposed amendment also updates a code reference, since the existing code reference no longer exists.

Please see Exhibit 1 for the proposed IP amendment text.

B. CONFORMANCE WITH THE CERTIFIED LAND USE PLAN

The standard of review for LCP implementation plan submittals or amendments is their consistency with and ability to carry out the provisions of the certified LUP. The certified LUP has a number of goals and policies relevant to the proposed amendment; the most applicable LUP standards are as follows:

The City of Carlsbad's certified LUP Mello II section states:

> Policy 1-1 Allowable Land Uses
> Allowable uses are those that are consistent with both the General Plan and the Local Coastal Program.

The City of Carlsbad's certified LUP concludes with the following policy:

> III. IMPLEMENTATION: The Policy/Implementation Connection
> The Local Coastal Program Land Use Element is the long range guide for the City, its citizens and property owners, and other regulatory agencies relative to conservation, management, and development within the Carlsbad Coastal zone. The City assumes primary responsibility for implementing the plan as it affects private land use. The LCP will be used as the standard for evaluating and making decisions on land use proposals in the Coastal zone. The policies of the Land Use Element are implemented by the City's codes, policies and procedures.

C. FINDINGS FOR APPROVAL

As described above, the LCP has limited applicability within the Coastal Zone. The amendment does not change any requirements related to coastal development permits or the protection of natural resources. Removing airports as an allowable land use in the EA Exclusive Agriculture and CT Commercial Tourist zones is appropriately protective of these high-priority land uses, and will not impact the operations of the existing airport, which is located outside of the Coastal Zone and surrounded by industrial zones.

The County of San Diego, which owns and operates the McClellan-Palomar Airport, submitted a letter in opposition to the proposed amendment. In its March 6, 2026, comment letter (Exhibit 4), the County argues that the City's redefinitions and permit-review structure would hinder necessary safety and operational improvements, including FAA-required elements such as EMAS (Engineered Materials Arresting System) installation, Runway Protection Zone acquisition, and runway modifications. The County asserts the changes conflict with Coastal Act public access, recreation, and development policies; interfere with its vested rights under Conditional Use Permit (CUP) 172, (which is the currently valid City permit that covers the Airport); are preempted by federal law governing airport operations; and infringe on governmental immunities. It also argues the City's interpretation of "expansion" contradicts a meaning upheld in case law.

In response, the City of Carlsbad submitted a letter dated April 27, 2026, stating that the County has not submitted any airport-expansion proposal and that the 2021 Airport Master Plan and conditional FAA approval of a future Airport Layout Plan do not constitute approved expansion (Exhibit 5). The City notes that the airport was annexed into Carlsbad in the late 1970s, that the County voluntarily accepted zoning and permit requirements at that time, and that CUP-172 has long governed airport improvements. The City maintains that the LCPA is consistent with its certified LCP and that disputes over vested rights or airport-expansion standards are not within the CCC's jurisdiction for this item, particularly because the airport lies outside the Coastal Zone and the CCC's review of Implementation Plan amendments is limited to consistency with the City's Land Use Plan.

The City correctly notes that Commission's jurisdiction in this matter is limited to determining whether the City's proposed Implementation Plan amendment is consistent with the certified Land Use Plan, and does not extend to adjudicating disputes over airport operations, permitting authority, or federal aviation requirements, particularly given that McClellan-Palomar Airport lies outside the Coastal Zone. Counsel for staff sent a letter to the County of San Diego on June 1, 2026 clarifying that staff supports the City's understanding of the Commission's role (Exhibit 6). The proposed amendment does not authorize physical development or result in any zoning changes that could adversely affect coastal resources. As proposed, the amendment will not result in any adverse coastal resource impacts and therefore is consistent with the LUP.

IV. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 21080.9 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. Instead, the Coastal Commission acts as lead agency for the purposes of fulfilling CEQA. The Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP submission.

The City determined that the subject LCP amendment required an addendum to the Final EIR under Section 15164 of the CEQA Guidelines (Cal. Code of Regs., tit. 14) because only minor changes and additions to the Final EIR are necessary to address the changes of the project. The Addendum concluded that there are no substantial changes to the circumstances under which the LCP amendment is undertaken that would require major revisions to the Final EIR. The City determined that the LCP amendment would not result in new or more severe impacts beyond those addressed in the Final EIR and would not meet any other standards requiring further environmental review under CEQA Guidelines Section 15162 and Section 15163 (addressing subsequent and supplemental EIRs, respectively). Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP does conform with CEQA provisions. In this particular case, the LCP amendment as proposed will not have any significant adverse effects on the environment and no significant coastal resource impacts are anticipated. Therefore, the Commission finds that the subject IP conforms with the CEQA provisions.