

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT 627

John Wayne Airport General Aviation Improvement Program

Responses to Comments Volume 1A—Comments Received

SCH No. 2017031072

COUNTY OF ORANGE
John Wayne Airport
3160 Airway Avenue
Costa Mesa, California 92626
Contact: Lea Choum

April 2019



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REPORT 627**

**John Wayne Airport
General Aviation Improvement Program
(IP#16-432)
SCH No. 2017031072**

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Volume 1A—Comments Received**

April 2019

Prepared for:

**COUNTY OF ORANGE
John Wayne Airport
3160 Airway Avenue
Costa Mesa, California 92626**

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ATTACHMENTS

Volume 2A

Attachment A: Health Risk Assessment

Volume 2B

**APPENDICES
(To the Health Risk Assessment)**

Appendix

Appendix A: Aircraft Emissions

Appendix B: Air Dispersion Model Files (Electronic)

Appendix C: Speciated Chemicals of Potential Concern

Appendix D: HARP2 Model Files (Electronic)

Appendix E: Health Risk Assessment Results

1.0 INTRODUCTION AND SUMMARY

1.1 FINAL ENVIRONMENTAL IMPACT REPORT REQUIREMENTS

Before approving a Project, the California Environmental Quality Act (“CEQA” or *California Public Resources Code*, Sections 21000 *et seq.*) requires the Lead Agency (here, the County of Orange [“County”], in its capacity as the proprietor of John Wayne Airport [“JWA” or “Airport”]) to prepare an environmental document that assesses the potential environmental effects of the Project. For the John Wayne Airport General Aviation Improvement Program (“GAIP” or “Project”), the County has prepared a Program Environmental Impact Report (“Program EIR”) pursuant to CEQA and the State CEQA Guidelines (California Code of Regulations [“CCR”], Title 14, Chapter 3, Sections 15000, *et seq.*). This document and the documents referenced below represent the Final Program EIR for the GAIP. This Final Program EIR has been prepared in accordance with Section 15132 of the State CEQA Guidelines, and consists of the following:

- The Draft Program EIR or a revision of the draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

1.2 CEQA COMPLIANCE AND EIR REVIEW PROCESS

In accordance with Section 15063 of the State CEQA Guidelines, the County prepared an Initial Study/Environmental Checklist for the GAIP and distributed it along with the Notice of Preparation (“NOP”) to responsible and interested agencies and key interest groups. The NOP was distributed to 75 individuals and agencies for a 30-day review period beginning on March 30, 2017. In addition, email notices regarding the availability of the NOP on the JWA website were sent to all the lessees at the Airport, and the NOP was posted on the JWA website.

A Scoping Meeting was held on April 12, 2017, from 6:00 to 8:00 PM at the JWA Administrative Office in the Airport Commission Meeting Room to facilitate agency and public review and comment on the NOP. Approximately 30 people attended the Scoping Meeting (28 people signed the sign-in sheet). A total of 13 comment letters were received during the 30-day NOP review period. The NOP, distribution list, and all comments received on the NOP have been included in Appendix A of the Draft Program EIR.

In compliance with Section 15087 of the State CEQA Guidelines, the County of Orange circulated a Notice of Completion and copies of Draft Program EIR 627 (State Clearinghouse No. 2017031072) to the State Clearinghouse, responsible and trustee agencies, local agencies, and any other interested parties for a 45-day public review period. The public review period began on September 20, 2018, and ended November 6, 2018.

A Notice of Availability of the Draft Program EIR and for the September 26, 2018 public meeting was published in The Orange County Register, on September 20, 2018, as well as posted on the John Wayne Airport website. Notices were also sent (via U.S. mail or email, dependent on the contact information provided) to attendees of the public scoping meeting or parties that had requested the Airport add their contact information to the mailing list. A total of 756 notices were sent to various agencies, elected officials, organizations, businesses, and individuals.

Copies of the Draft Program EIR, supporting technical appendices, and cited or referenced studies or reports were made available for review at the JWA Administrative Offices located at 3160 Airway Avenue in Costa Mesa, California 92626. The Draft Program EIR and technical appendices were also available online at www.ocair.com/DEIR627 and at the following libraries:

Costa Mesa/Donald Dungan 1855 Park Avenue Costa Mesa, California 92627	Costa Mesa/Mesa Verde 2969 Mesa Verde Drive Costa Mesa, California 92626	El Modena 380 South Hewes Street Orange, California 92869
Irvine/Heritage Park 14361 Yale Avenue Irvine, California 92604	Irvine/University Park 4512 Sandburg Way Irvine, California 92612	Laguna Beach 363 Glenneyre Street Laguna Beach, California 92651
Newport Beach 1000 Avocado Avenue Newport Beach, California 92660	Orange 407 East Chapman Avenue Orange, California 92866	Santa Ana 26 Civic Center Plaza Santa Ana, California 92701
Tustin 345 East Main Street Tustin, California 92780	University of California, Irvine Langson Library UCI Building 102 Irvine, CA 92623	

A public meeting was held on September 26, 2018 at the JWA Administrative Offices in Costa Mesa. The presentation at the public meeting provided an overview of the GAIP and the findings of the Draft Program EIR. The public was also given an opportunity to provide input on the Draft Program EIR and to ask questions about the Project. Eight individuals provided public comments at the meeting during the public comment period of the meeting; however, additional comments were made during the public presentation portion of the meeting. A transcript of the September 26, 2018 public meeting was prepared and is included as part of the Final Program EIR (see Volume 1B, of the Responses to Comments).

Prior to the end of the public review period, the County received requests for a time extension. The County extended the review period until November 21, 2018, resulting in a 60-day public review period.¹ A total of 288 comment letters/cards/e-mails were received during the 60-day review period. Of these, 150 letters were a standardized form letter. Additionally, a number of the commenters submitted the same set of comments more than once or in multiple formats (i.e., electronically and hard copy). In these cases, each version has been included and has been logged as a separate comment letter; however, the responses reference back to the initial submittal. In addition, 28 comment letters/cards/e-mails were received after the end of the public review period, 10 of which are the standardized form letter. Although the County is not required to

¹ The County of Orange sent letters on November 1, 2018 to all the original recipients of the Draft Program EIR and the Notice of Availability to inform them of the time extension. In addition, a notice of time extension was published in the Orange County Register. The notice was also posted on the JWA website.

respond to late comments, written responses to these comments have been prepared and are provided in Section 3.8 of this Response to Comments document, which will become part of the Final Program EIR. An additional letter commenting on the Draft Program EIR was sent during the public review period to Supervisor Bartlett rather than submitted to the Airport. The Supervisor forwarded this letter to the Airport for inclusion in the Final Program EIR. The comments in the letter have been responded to in Section 3.9 of these Responses to Comments.

As required by Section 15132(d) of the CEQA Guidelines, this Final Program EIR responds to comments regarding “significant environmental points raised in the review and consultation process.” Many of the comments received do not identify any environmental issues or questions on the adequacy of the Draft Program EIR; therefore, pursuant to CEQA, no response is required. However, as part of these Responses to Comments, information is provided to enhance the commenters’ understanding of the GAIP and the demand it would serve. The majority of this information is contained in the Draft Program EIR. The page numbers or section numbers have been included in a number of the responses should the reader desire additional detail on the topics.

This Response to Comments document, contained in two electronic volumes, provides revisions and clarifications to the Draft Program EIR, as appropriate.² In keeping with the requirements of Section 21092.5 of CEQA, which requires the Lead Agency to provide a copy of the written response to each public agency that commented on the Draft Program EIR, the County of Orange provided an electronic copy of the Responses to Comments to the public agencies that commented. In addition, the County sent a notification of the availability of the Responses to Comments to all parties that commented on the Draft Program EIR. The notice, also provided detail on the hearing dates before the Orange County Airport Commission and the Board of Supervisors. The notices were sent at least ten days prior to the Board of Supervisors certifying the Final Program EIR.

1.3 CONTENTS OF THE FINAL EIR

The Final Program EIR, which has been prepared electronically, consists of three folders. This includes (1) the Draft Program EIR; (2) the Technical Appendices (Appendices A through I); and (3) the Responses to Comments document, which contains two volumes. Volume 1 of the Responses to Comments document contains copies of all the comments received, including the transcript of the September 26, 2018 public meeting. Due to the size of Volume 1, it is provided in two electronic files—Volume 1A and Volume 1B.³ This is to facilitate file downloading from the Internet. Volume 2 provides the responses to comments. Volume 2 is also divided into two electronic files. Volume 2A includes all the Responses to Comments and Attachment A (Health Risk Assessment [“HRA”]). Volume 2B provides the technical appendices to the HRA. The HRA appendices are included in a separate file due to the large file size.

² The clarifications and revision to the Draft Program EIR are contained in Section 4 of Volume 2 of the Responses to Comments.

³ Volume 1A includes all the comments from (1) State Agencies; (2) Local and Regional Agencies; (3) Organizations; and (4) Individuals and Businesses, less those that submitted the standardized letter. Volume 1B includes (1) the bracketed standardized letter; (2) the copies of the standardized letter that were received, including those with supplemental comments; (3) the transcript of the Public Meeting (4) Comments Received After the Public Review Period; and (5) Comments Submitted to Others.

Volume 1 of the Responses to Comments is organized in the following three sections:

- **Section 1.0 (Introduction):** This section provides a brief introduction to the Final Program EIR and its contents.
- **Section 2.0 (Organization of Comments):** This section includes a list of commenters on the Draft Program EIR, including a table with the page number where the comment letter can be found.
- **Section 3.0 (Comments Received):** This section includes the comments submitted by both public agencies and interested parties. The comments within each letter have been bracketed and designated with a letter and number identifier. For those commenters that submitted the same comment letter multiple times, only the first copy of the comment letter has been bracketed; however, each letter is numbered separately.

As noted above, to facilitate downloading, the comments have been broken into two electronic files. Volume 1A includes all the comments from (1) State Agencies; (2) Local and Regional Agencies; (3) Organizations; and (4) Individuals and Businesses, less those that submitted the standardized letter. Volume 1B includes (1) the bracketed standardized letter; (2) the copies of the standardized letter that were received, including those with supplemental comments; (3) the transcript of the Public Meeting (4) Comments Received After the Public Review Period; and (5) Comments Submitted to Others. These numbers are cross referenced to the responses provided in Volume 2A.

2.0 ORGANIZATION OF COMMENTS

2.1 ORGANIZATION OF RESPONSES TO COMMENTS

The Draft Program Environmental Impact Report (“EIR”) public review period for the John Wayne Airport General Aviation Improvement Program (“GAIP”) began on Thursday, September 20, 2018, and ended on Tuesday, November 21, 2018. During the 60-day public review period, the County of Orange received a total of 288 comment letters/cards/e-mails from State, regional and local agencies, organizations, and individuals on the Draft Program EIR. Of these, 150 letters were a standardized form letter. An additional 28 comment letters were received after the public review period was closed, of which 10 were the standardized letter. It should be noted, a number of the commenters submitted the same set of comments more than once or in multiple formats (i.e., electronically and hard copy). In these cases, each version has been included and has been logged as a separate comment letter; however, the responses reference back to the initial submittal. An additional letter commenting on the Draft Program EIR was sent during the public review period to Supervisor Bartlett rather than submitted to the Airport. The Supervisor forwarded this letter to the Airport for inclusion in the Final Program EIR.

The comments letters in their entirety are included in Volume 1A and 1B. Each comment letter is numbered. The comment letters are organized in the following categories:

- State Agencies
- Regional and Local Agencies
- Organizations
- Individuals and Businesses
- Standardized Form Letter
- Comments Made at the September 26, 2018 Public Meeting
- Comments Received After the Public Review Period
- Comments on the Draft Program EIR sent to Others

Consistent with Section 15088 of the State CEQA Guidelines, the County has prepared responses to the comments received. For ease of reference, the letters are bracketed per issues discussed and the letters and numbers assigned to each bracketed comment correspond to the response provided in Section 3 of Volume 2A of the Responses to Comments.

2.2 LIST OF COMMENTERS

In accordance with the State CEQA Guidelines Section 15132, Table 1 below includes the list of persons, organizations, and public agencies that submitted written comments on the Draft Program EIR 627. The comments included letters, e-mail correspondence, and comment cards, which are contained in Volume 1 (files for Volume 1A and Volume 1B) of the Responses to Comments.⁴ Each letter is numbered for easy reference. For those commenters that submitted more than one comment or submitted the same comment multiple times, a number is placed after the person’s name to indicate it is a subsequent identical submittal. The corresponding responses are contained in Section 3.0 of this document.

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
Volume 1A			
State Agencies			
1.	Office of Planning and Research (State Clearinghouse)	November 26, 2018	3-3
Local and Regional Agencies			
2.	City of Costa Mesa	November 21, 2018	3-6
3.	City of Costa Mesa	November 21, 2018	3-9
4.	City of Fullerton	November 9, 2018	3-11
5.	City of Irvine	October 11, 2018	3-13
6.	City of Irvine	October 11, 2018	3-16
7.	City of La Habra	October 16, 2018	3-19
8.	City of Newport Beach, submitted by Remy Moose Manley	November 16, 2018	3-20
9.	City of Newport Beach, submitted by Councilmember Scott Peotter	November 21, 2018	3-38
10.	South Coast Air Quality Management District	November 6, 2018	3-40
11.	South Coast Air Quality Management District	November 6, 2018	3-44
Organizations			
12.	Aircraft Owners and Pilots Association, submitted by Adam Williams	November 21, 2018	3-48
13.	AirFair, submitted by Melinda Seely	October 24, 2018	3-51
14.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-52
15.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-60
16.	Airport Working Group, submitted by Mel Beale	November 21, 2018	3-68

⁴ As previously noted, Volume 1 has been provided as two files—Volume 1A and Volume 1B to facilitate downloading of the files. Volume 1A includes all the comments from (1) State Agencies; (2) Local and Regional Agencies; (3) Organizations; and (4) Individuals and Businesses, less those that submitted the standardized letter. Volume 1B includes (1) the bracketed standardized letter; (2) the copies of the standardized letter that were received, including those with supplemental comments; (3) the transcript of the Public Meeting (4) Comments Received After the Public Review Period; and (5) Comments Submitted to Others.

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
17.	California Cultural Resource Preservation Alliance, submitted by Patricia Martz, PhD	November 1, 2018	3-75
18.	Citizens Against Airport Noise and Pollution, submitted by Beverly Blais Moosmann	November 19, 2018	3-76
19.	Corona del Mar Residents Assn, submitted by Debbie Stevens	November 21, 2018	3-83
20.	Corona del Mar Residents Assn, submitted by Debbie Stevens	November 21, 2018	3-87
21.	Irvine Terrace Community Association, submitted by Brian Jones	November 20, 2018	3-90
22.	Juaneño Band of Mission Indians, Acjachemen Nation, submitted by Joyce Perry	November 15, 2018	3-91
23.	Southern California Pilots Association, submitted by Joe Finnell	November 7, 2018	3-92
24.	Southern California Pilots Association, submitted by Pat Prentiss	November 8, 2018	3-94
25.	Southern California Pilots Association, submitted by Fred Fourcher	November 21, 2018	3-95
26.	SPON and AirFair	November 21, 2018	3-99
<i>Individuals and Businesses</i>			
27.	ACI Jet	October 25, 2018	3-107
28.	ACI Jet	October 29, 2018	3-109
29.	Deirdre Adams	November 21, 2018	3-111
30.	Joan Allison	November 20, 2018	3-112
31.	Nancy Alston (1)	November 20, 2018	3-113
32.	Nancy Alston (2)	November 21, 2018	3-116
33.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-119
34.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-120
35.	American Aircraft Maintenance, submitted by Lina Shi	November 6, 2018	3-122
36.	Melinda Atkin	November 21, 2018	3-123
37.	Brent and Carla Anderson	November 21, 2018	3-124
38.	Lewis and Terry Becker	November 20, 2018	3-126
39.	David Benvenuti, MD	November 21, 2018	3-127
40.	Leann Benvenuti	November 21, 2018	3-128
41.	Carol Berg	November 20, 2018	3-129
42.	Marvin Blum	November 11, 2018	3-130
43.	Brandt Group, submitted by Robert B. Lange	November 5, 2018	3-131
44.	Michael Brant-Zawadzki	November 20, 2018	3-132
45.	Bob and Diana Brookes	November 21, 2018	3-133
46.	Delores and Wayne Browning	November 20, 2018	3-134

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
47.	Sarah Catz (1)	September 26, 2018	3-135
48.	Sarah Catz (2)	September 27, 2018	3-136
49.	Sarah Catz (3)	September 28, 2018	3-138
50.	Clay Lacy Aviation, submitted by Scott Cutshall	November 21, 2018	3-140
51.	Antoinette Cole	November 21, 2018	3-143
52.	Paul Columbus	October 17, 2018	3-144
53.	W. David Cook	November 19, 2018	3-145
54.	Todd Corbitt	November 5, 2018	3-146
55.	Andy Couch	November 21, 2018	3-147
56.	CPF Airways prepared by Matthew C. Henderson with Miller Starr Regalia (1)	October 25, 2018	3-149
57.	CPF Airways prepared by Matthew C. Henderson with Miller Starr Regalia (2)	October 29, 2018	3-152
58.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (3)	November 20, 2018	3-155
59.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (4)	November 21, 2018	3-160
60.	Linda Crum	November 20, 2018	3-164
61.	Christy Dambrosio	November 20, 2018	3-165
62.	Patrick Davern	November 5, 2018	3-166
63.	Cindy Dillion	November 5, 2018	3-167
64.	Jeff Dvorak	November 21, 2018	3-168
65.	Jeff Dvorak (2)	November 21, 2018	3-172
66.	Maris J. Ensing	November 8, 2018	3-175
67.	Jeanne Fobes	November 21, 2018	3-176
68.	Frederick Fong	November 21, 2018	3-177
69.	Daniel Freedman	October 25, 2018	3-183
70.	Susan Gaunt	November 19, 2018	3-184
71.	Pam and Bill Goode	November 21, 2018	3-185
72.	Peter Grant	November 13, 2018	3-186
73.	Grant Thornton, submitted by Alan Herrmann	November 5, 2018	3-187
74.	Fred Greensite	November 13, 2018	3-188
75.	Joel Hackney	November 5, 2018	3-189
76.	Kathy Harbour	November 21, 2018	3-190
77.	Bill and Cherie Hart	November 20, 2018	3-191
78.	Sandi Hill	November 21, 2018	3-192
79.	Fred Howser	November 20, 2018	3-193
80.	Libby Huyck (1)	November 20, 2018	3-194
81.	Libby Huyck (2)	November 20, 2018	3-195

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
82.	Libby Huyck (3)	November 20, 2018	3-196
83.	Benjamin Imai	November 20, 2018	3-198
84.	Daniel Jensen	November 5, 2018	3-199
85.	Johnson & Associates, submitted by Randal Johnson	November 6, 2018	3-200
86.	Jeanne Johnson	November 21, 2018	3-201
87.	Carol Jung	November 21, 2018	3-202
88.	Franz Kallao	November 21, 2018	3-203
89.	Nancy Kirksey	November 21, 2018	3-204
90.	Carolyn and Bill Klein	November 20, 2018	3-205
91.	Sheila Koff	November 21, 2018	3-206
92.	Wayne Lindholm	November 5, 2018	3-207
93.	Andrea Lingle	November 20, 2018	3-208
94.	Randall Lipton	November 5, 2018	3-209
95.	Stephen Livingston	October 19, 2018	3-210
96.	Thomas Logan	November 5, 2018	3-211
97.	Karen Love	November 20, 2018	3-212
98.	Peter Macdonald	November 12, 2018	3-213
99.	Bonnie McClellan	November 21, 2018	3-215
100.	Meyer Properties, submitted by James Hasty (1)	November 20, 2018	3-216
101.	Meyer Properties, submitted by James Hasty (2)	November 20, 2018	3-219
102.	Shannon and Jeff Miehe	November 21, 2018	3-221
103.	Lesley Miller	November 20, 2018	3-222
104.	Diane Myers	September 24, 2018	3-223
105.	John Nord	November 20, 2018	3-224
106.	Oceanfront Jobs submitted by Steve Bunch	November 7, 2018	3-225
107.	Brigid O'Connor	November 20, 2018	3-227
108.	William J. O'Connor	November 20, 2018	3-228
109.	Lee Pearl	November 21, 2018	3-229
110.	Sally Petersen	October 22, 2018	3-230
111.	Sandra Petty-Weeks	November 21, 2018	3-232
112.	Doug Pham	October 15, 2018	3-233
113.	Doug Pham	November 6, 2018	3-235
114.	Doug Robinett	undated	3-236
115.	Alice Rosellini	November 21, 2018	3-237
116.	Law Offices of Gary L. Schank	undated	3-238
117.	Gary Schank	September 27, 2018	3-239
118.	Law Offices of Gary L. Schank, submitted by Gary Schank	November 16, 2018	3-240
119.	Schock Boats, submitted by Steven Schock	November 5, 2018	3-242

**TABLE 1
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Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
120.	Signature Flight Support, submitted by Julie Broderick	November 6, 2018	3-243
121.	Frank Singer	November 7, 2018	3-245
122.	Susan Skinner	November 21, 2018	3-246
123.	Michael C. Smith	November 20, 2018	3-247
124.	Pauline L. Smith	November 20, 2018	3-248
125.	Triad Investment Management, submitted by David Hutchison	November 21, 2018	3-249
126.	Martha Unickel	November 21, 2018	3-250
127.	U.S. Fasteners, submitted by Kevin Halliburton	November 5, 2018	3-251
128.	Polly and David Verfaillie	November 21, 2018	3-252
129.	Dan Vogt	November 20, 2018	3-253
130.	Peggy Vombaur	November 20, 2018	3-254
131.	Grant Whitcher	November 21, 2018	3-255
132.	Christina and Alan White	November 20, 2018	3-256
133.	Dana White	November 21, 2018	3-257
134.	Karol Wilson	November 20, 2018	3-258
135.	Simone Wilson	November 20, 2018	3-259
136.	Mike Wolf	October 7, 2018	3-262
137.	Kenneth A. Wong	November 21, 2018	3-263
138.	Allen Yourman	November 6, 2018	3-264
Volume 1B			
<i>Standardized Letter</i>			
139.	Brian Alters and Kim BeDell	November 20, 2018	3-272
140.	Ashwill and Associates, submitted by Greg Ashwill	November 21, 2018	3-276
141.	Marc Atkin	November 21, 2018	3-283
142.	Marj Austin	November 21, 2018	3-290
143.	Alan Ayria	November 20, 2018	3-297
144.	Lu Baker	November 20, 2018	3-303
145.	Thomas Baker	November 20, 2018	3-310
146.	Balboa Financial, submitted by Scott Duntley	November 20, 2018	3-316
147.	Liz and Bob Barman	November 20, 2018	3-323
148.	Martha Beauchamp	November 20, 2018	3-330
149.	Robert and Linda Boyd	November 21, 2018	3-334
150.	Cynthia and David Bright	November 20, 2018	3-341
151.	Edwina Broderick	November 20, 2018	3-348
152.	Anita Brown	November 21, 2018	3-355
153.	Nancy Brown	November 21, 2018	3-362
154.	Sean and Monica Burke	November 20, 2018	3-368

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
155.	J. Robert Egan and Kimberly Burrows-Egan	November 20, 2018	3-375
156.	Nicolas Burtnyk	November 20, 2018	3-378
157.	Heather Carlino	November 21, 2018	3-385
158.	Astrid Carlson	November 20, 2018	3-395
159.	Kim James Charney, MD (1)	November 20, 2018	3-398
160.	Kim James Charney, MD (2)	November 21, 2018	3-404
161.	Min Chu (1)	November 21, 2018	3-411
162.	Min Chu (2)	November 21, 2018	3-418
163.	Min Chu (3)	November 21, 2018	3-425
164.	Min Chu (4)	November 21, 2018	3-432
165.	Mary Citrano	November 21, 2018	3-439
166.	Daniel Clark	November 21, 2018	3-446
167.	Jean G. Clark	November 21, 2018	3-451
168.	Teryn Clarke, MD	November 20, 2018	3-456
169.	Paul Cohen	November 21, 2018	3-459
170.	Terri Cohen	November 21, 2018	3-466
171.	Judy Cooper	November 20, 2018	3-471
172.	John Cotton	November 21, 2018	3-479
173.	Carol and Gary Crane	November 20, 2018	3-484
174.	Victoria Cubeiro	November 20, 2018	3-490
175.	Tamara and Jeff Current	November 20, 2018	3-497
176.	Chris and Ed Danoff	November 21, 2018	3-502
177.	Mary Allyn Dexter	November 21, 2018	3-509
178.	Mary Jane Edalatpour	November 20, 2018	3-512
179.	Julia Edwards	November 20, 2018	3-516
180.	Marilyn Elmer	November 20, 2018	3-521
181.	Ronda Fay	November 20, 2018	3-524
182.	Marsha Ferrall	November 20, 2018	3-527
183.	Mary Finlay	November 20, 2018	3-531
184.	Robert Finlay	November 20, 2018	3-537
185.	Rebecca and Jason Finney	November 21, 2018	3-543
186.	Barbara Foley	November 21, 2018	3-546
187.	Dan Foley	November 21, 2018	3-553
188.	J.D. Fox	November 21, 2018	3-560
189.	Shirley Fox and Charles C, Deandorff	November 20, 2018	3-565
190.	Alistair and Fiona Fraser	November 20, 2018	3-571
191.	Adrienne Frederiksen	November 20, 2018	3-574
192.	Torben Frederiksen	November 20, 2018	3-581

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
193.	Carlita and Win Fuller	November 21, 2018	3-588
194.	Stacie Fults	November 20, 2018	3-595
195.	Matt Galt	November 20, 2018	3-599
196.	Annette Giermann	November 20, 2018	3-602
197.	Annette Giermann	November 20, 2018	3-609
198.	Kenny and Nyna Goldberg	November 20, 2018	3-615
199.	Patrick Gormley	November 20, 2018	3-622
200.	Barbara Griffith	November 21, 2018	3-629
201.	Nancy Halvorsen	November 20, 2018	3-636
202.	Walter Harriman	November 21, 2018	3-640
203.	Kathy Harrison	November 21, 2018	3-647
204.	Tabitha May Hasin	November 20, 2018	3-655
205.	George Hauser	November 20, 2018	3-659
206.	William W. Hughes Jr.	November 21, 2018	3-668
207.	Carolyn G. Johnson	November 21, 2018	3-673
208.	Julie Johnson	November 20, 2018	3-680
209.	Clifton and Gail Jones	November 21, 2018	3-685
210.	James Jordan	November 19, 2018	3-692
211.	Marsha and Pat Kendall	November 20, 2018	3-697
212.	Ray and Elizabeth Kennedy	November 20, 2018	3-700
213.	Linda Geller Kensey	November 20, 2018	3-706
214.	Mark Knaeps	November 20, 2018	3-713
215.	Stacy Kramer and Nathanael Singer	November 21, 2018	3-720
216.	Michele Lovenduski	November 19, 2018	3-723
217.	Linda J. Martin	November 20, 2018	3-728
218.	Nicole D. Martin	November 20, 2018	3-735
219.	James E. and Alison L. McCormick III	November 20, 2018	3-741
220.	McMonigle Group submitted by Manal Bozarth	November 20, 2018	3-744
221.	John Meindl	November 21, 2018	3-749
222.	Susan Menning	November 20, 2018	3-757
223.	Whitney Moad	November 20, 2018	3-764
224.	Beverly Blais Moosmann	November 19, 2018	3-771
225.	Bob Moosmann	November 20, 2018	3-778
226.	Robert Murphy	November 20, 2018	3-783
227.	Nautical Luxuries, submitted by Daisy Cathcart	November 20, 2018	3-790
228.	David and Jan New	November 21, 2018	3-794
229.	Randall and Carol Nunnelly	November 20, 2018	3-801
230.	Carey L. O'Bryan IV, MD	November 20, 2018	3-808

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
231.	Margo O'Connor	November 20, 2018	3-811
232.	Ann O'Neil	November 21, 2018	3-818
233.	Bonnie and Dan O'Neil	November 20, 2018	3-823
234.	Firooz R. Oskooi, MD	November 21, 2018	3-826
235.	Peggy and Michael Palmer	November 20, 2018	3-833
236.	Jon B. Patton	November 20, 2018	3-841
237.	William R. Patton (1)	November 21, 2018	3-846
238.	William R. Patton (2)	November 21, 2018	3-851
239.	Lorian K. Petry	November 20, 2018	3-856
240.	Darcy Post	November 20, 2018	3-863
241.	Edward T. Post	November 20, 2018	3-868
242.	Nrapendra Prasad	November 20, 2018	3-873
243.	Janet H. Probst	November 20, 2018	3-879
244.	Stephanie, Steve, Lauren, and Chase Rados	November 20, 2018	3-886
245.	Dale Ransom	November 21, 2018	3-890
246.	Drs. Gail and Sorel Reisman	November 20, 2018	3-896
247.	Nicole F. Reynolds	November 20, 2018	3-902
248.	Catherine Richards	November 20, 2018	3-907
249.	Janni Richardson	November 20, 2018	3-911
250.	Ginny Riley	November 20, 2018	3-915
251.	Vicki and Don Ronaldson	November 21, 2018	3-922
252.	Paul Root	November 21, 2018	3-927
253.	John C. and Kristin H. Rowe	November 20, 2018	3-934
254.	Elisabeth and Andrew Schutz	November 21, 2018	3-941
255.	Christina Schwindt	November 20, 2018	3-948
256.	Mr. and Mrs. John M. Sciarra	November 20, 2018	3-955
257.	Matthew Shaw	November 20, 2018	3-962
258.	Terry P. Shea	November 20, 2018	3-969
259.	Terry A. Sheward	November 21, 2018	3-976
260.	Carrie Slayback	November 21, 2018	3-982
261.	Brad Smith	November 20, 2018	3-986
262.	Gregory and Joyce Smith	November 21, 2018	3-989
263.	Marion Smith	November 20, 2018	3-996
264.	Dr. F. Soulati and Mrs. G. Soulati	November 21, 2018	3-1003
265.	Tracy Specter	November 21, 2018	3-1009
266.	Lisa Stanton	November 20, 2018	3-1014
267.	Joani Stavale	November 20, 2018	3-1019
268.	Louis J. Stavale	November 20, 2018	3-1026

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
269.	Julie Stephenson	November 21, 2018	3-1038
270.	Rick Strack (1)	November 20, 2018	3-1045
271.	Rick Strack (2)	November 20, 2018	3-1052
272.	Louise J. Stuart and Craig S. Davis	November 19, 2018	3-1059
273.	Vikki Swanson	November 21, 2018	3-1066
274.	Shannon Tarnutzer	November 20, 2018	3-1073
275.	Karen Taylor	November 21, 2018	3-1077
276.	Elizabeth Thamer	November 21, 2018	3-1081
277.	Laura Thomson	November 20, 2018	3-1088
278.	Shelly Trainor (1)	November 21, 2018	3-1092
279.	Shelly Trainor (2)	November 21, 2018	3-1099
280.	Fini Van Natta	November 20, 2018	3-1106
281.	Earl Votolato	November 21, 2018	3-1113
282.	Kimberly Votolato	November 21, 2018	3-1118
283.	Ronnie and Cathy Weinstein	November 20, 2018	3-1123
284.	Portia Weiss	November 20, 2018	3-1130
285.	Richard Weiss	November 21, 2018	3-1137
286.	Thomas and Laura White	November 21, 2018	3-1142
287.	Kammi and Steve Wilson	November 21, 2018	3-1146
288.	Steve and Kammi Wilson	November 21, 2018	3-1152
<i>Testimony at the September 26, 2018 Public Meeting^a</i>			
	Daniel Freedman	September 26, 2018	3-1174
	Gary Schank	September 26, 2018	3-1175
	Fred Fourcher, Orange County Pilots Association	September 26, 2018	3-1176
	Kreg Groat, representing CPF Airway Associates	September 26, 2018	3-1177
	Joe Daicheidt, ACI Jet	September 26, 2018	3-1179
	Joe Finnell, Southern California Pilots Association	September 26, 2018	3-1181
	Jim Mosher	September 26, 2018	3-1182
	Bob Lange	September 26, 2018	3-1184
<i>Comments Received After the Public Review Period</i>			
289.	Kathryn Anderson	November 23, 2018	3-1187
290.	Susan and Sam Anderson	November 22, 2018	3-1190
291.	Camille and Matthew Beehler	November 29, 2018	3-1191
292.	Matthew Christensen	November 26, 2018	3-1192
293.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (5)	February 27, 2019	3-1193
294.	CPF Airways, prepared by Matthew C. Henderson with Miller Starr Regalia (6)	February 27, 2019	3-1197
295.	Scott Fischer	November 23, 2018	3-1200

**TABLE 1
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
296.	Marilynn Henry	November 24, 2018	3-1207
297.	Roger Hughes	December 6, 2018	3-1208
298.	Janssen	December 5, 2018	3-1214
299.	Julie Johnson (2)	January 29, 2019	3-1221
300.	Julie Johnson (3)	January 30, 2019	3-1222
301.	Julie Johnson (4)	February 4, 2019	3-1223
302.	Julie Johnson (5)	February 5, 2019	3-1224
303.	Julie Johnson (6)	February 5, 2019	3-1225
304.	Julie Johnson (7)	February 7, 2019	3-1227
305.	Julie Johnson (8)	February 27, 2019	3-1230
306.	Julie Johnson (9)	February 27, 2019	3-1231
307.	Holly Kincaid	November 24, 2018	3-1233
308.	David and Cathy Lichodziejewski	November 25, 2018	3-1237
309.	Beverly Blais Moosmann	December 5, 2018	3-1238
310.	Beverly Blais Moosmann	December 7, 2018	3-1239
311.	Christine Northridge	November 22, 2018	3-1241
312.	Bonnie and Dan O'Neil	December 13, 2018	3-1248
313.	City of Santa Ana	December 3, 2018	3-1251
314.	SCL Equipment Finance submitted by Barbara Griffith	November 26, 2018	3-1252
315.	Myriam Shapiro	November 23, 2018	3-1259
316.	Veronica Sheward	November 29, 2018	3-1260
<i>Comments on the Draft Program EIR Submitted during the Public Review Period to Others</i>			
317.	Andy Couch	November 21, 2018	3-1268
^a Additionally comments were made during the public presentation portion of the public meeting. However, since these individuals did not provide their names, the responses to the comments are not attributable to a specific person. However, all comments from the public meeting have been responded to in Section 3.7.1.			

3.0 COMMENTS RECEIVED

3.1 INTRODUCTION

The numbered and bracketed comment letters/emails and comment cards can be found in the following subsection. Volume 1A is inclusive of Sections 3.2 through 3.5. Volume 1B includes Sections 3.6 through 3.9.

- Comment Letters from State Agencies (Section 3.2)
- Comment Letters from Regional and Local Agencies (Section 3.3)
- Comment Letters from Organization (Section 3.4)
- Comment Letters from Individuals and Businesses (other than the standardized letter)(Section 3.5)
- Standardized Comment Letter (Section 3.6)
- Comments Made at the Public Meeting (Section 3.7)
- Comment Letters Received After the Public Review Period (Section 3.8)
- Comment Letter on the Draft Program EIR Sent to Others (Section 3.9)

State Agencies

3.2 STATE AGENCIES

A comment letter was received from the Governor's Office of Planning and Research (State Clearinghouse) during the public review period. No late comments were received from State agencies.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

Letter 1

November 26, 2018

Ms. Lea Choum
Orange County
3160 Airway Avenue
Costa Mesa, CA 92626

Subject: John Wayne Airport General Aviation Improvement Program
SCH#: 2017031072

Dear Ms. Lea Choum:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 21, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

SCH-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

November 26, 2018

TO: CEQA LEAD AND REVIEWING AGENCIES

RE: ANNOUNCEMENT OF CHANGE, NEW CEQA DATABASE

The **Office of Planning and Research, State Clearinghouse (SCH)** is preparing the transition to a new CEQA database. We would like to inform you that our office will be transitioning from providing hard copies of certain letters and notices to an electronic mail system. Copies of environmental documents, notices and comment letters from state agencies will also be available for view and download.

CEQA lead and reviewing agencies should include an e-mail address (at least one (1)) to receive electronic notifications.

The letters and notifications from the SCH that will now be e-mailed include: acknowledgement of receipt and close of environmental documents, comments received from state reviewing agencies on environmental documents, as well as notices of determinations and exemptions.

Updates on when the database will be accessible for lead agencies to upload and submit environmental documents and notices, along with the ability for state agencies to review and comment on environmental documents through the database, will be provided as those functions become available.

For this transition process, please send your e-mail address to:

State.clearinghouse@opr.ca.gov

Should you have any questions, please do not hesitate in contacting the State Clearinghouse at (916) 445-0613 or state.clearinghouse@opr.ca.gov



Regional and Local Agencies

3.3 REGIONAL AND LOCAL AGENCIES

Ten comment letters were received from the following regional and local agencies during the public review period. In addition, a comment letter from the City of Santa Ana was received after the end of the public review period. The City of Santa Ana letter is provided in Section 3.8.

- City of Costa Mesa
- City of Costa Mesa (hard copy of the electronically submitted letter)
- City of Fullerton
- City of Irvine
- City of Irvine (hard copy of the electronically submitted letter)
- City of La Habra
- City of Newport Beach, submitted by Andrea K. Leisy, with Remy Moose Manley
- City of Newport Beach, Councilmember Scott Peotter
- South Coast Air Quality Management District
- South Coast Air Quality Management District (hard copy of the electronically submitted letter)

From: ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>
Sent: Tuesday, November 20, 2018 3:03 PM
To: EIR627
Subject: FW: Scanned image from MX-3116N
Attachments: copier.sharp@costamesaca.gov_20181120_142253.pdf

Thank you for the opportunity to provide comments on the Draft Program EIR 627 for John Wayne Airport General Aviation Improvement Program.

Attached please find our comments.

CM-1

The hard copy will be mailed out tomorrow.

Thank you.

Minoo Ashabi, AIA
Principal Planner
City of Costa Mesa
714/754-5610
minoo.ashabi@costamesaca.gov

-----Original Message-----

From: copier.sharp@costamesaca.gov <copier.sharp@costamesaca.gov> On Behalf Of copier.sharp@
Sent: Tuesday, November 20, 2018 2:23 PM
To: ASHABI, MINOO <MINOO.ASHABI@costamesaca.gov>
Subject: Scanned image from MX-3116N

Reply to: copier.sharp@costamesaca.gov <copier.sharp@costamesaca.gov> Device Name: Not Set Device Model: MX-3116N
Location: Not Set

File Format: PDF (Medium)
Resolution: 300dpi x 300dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

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<http://www.adobe.com/>



CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

CEQA REVIEW

November 21, 2018

Ms. Lea Choum
3160 Airway Avenue Costa Mesa
CA 92626
Email: EIR627@ocair.com

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT
GENERAL AVIATION IMPROVEMENT PROGRAM**

Thank you for the opportunity to provide comments on the Draft Program EIR 627 for John Wayne Airport General Aviation Improvement Program. Please consider the following comments:

Noise Technical Analysis:

- Page 35 refers to the City of Costa Mesa 2000 General Plan; the City's General Plan was updated on June 21, 2016 and the relevant policies are as follows:

Policy N-1.1:	Enforce the maximum acceptable exterior noise levels for residential areas at 65 CNEL.	CM-2
Policy N-1.7:	Support alternative methods for the reduction of noise impacts at John Wayne Airport while continuing to maintain safety and existing limitations on aircraft daily departures.	

-
- Section 3.1 of the Methodology refers to the FAA's Environmental Design Tool Version 2d released on September 1, 2017. There have been actual studies of the JWA noise by City of Newport Beach, which may include more accurate data than noise modeling data used by FAA. The City of Cost Mesa is requesting that the most accurate and appropriate data be used in the analysis.

Project Description:

- Page 1-3 indicates that the Proposed Project proposes a Full Service West FBO and a Full Service East FBO, for a total of two full service FBOs. The total aircraft storage capacity under this alternative is approximately 354 based aircraft. Alternative 1 proposes a Full Service West FBO, a Full Service Northeast FBO, and a Full Service Southeast FBO, for a total of three full service FBOs. The total aircraft storage capacity under this alternative is approximately 356 based aircraft. These FBOs under both the Proposed Project and Alternative 1 would provide facilities that are sized to accommodate various general aviation aircrafts. However, the summary Table 1-1 refers to a third terminal with the same added facilities. It is not clear if the added FBO is intended to serve two different operations in terms of business jets vs. smaller planes since the numbers are very close in terms of total aircraft. Additional explanation for the difference between the Proposed Project and Alternative 1 would be helpful so that the intensities of each project in terms of noise and air quality could be estimated.

- Page 3-18 refers to the operation of flight schools and the flight school apron capacity for 47 aircraft tie-downs, which is comparable to what is currently provided. The description is not clear on the operational characteristics of the flight schools (number of schools, hour of operation, etc.) or the potential number of daily flights. The City of Costa Mesa is concerned with the potential increase in the flight school capacity once these facilities are modernized. The Project Description needs to be specific about the operation of the schools and to consider any potential noise increases.

CM-5

- Page 3-7 indicates that the facilities planning effort recognizes the trend that fewer small-engine and light twin-engine airplanes and more turboprops and business private jets are based at the airport and, given that larger aircraft require more space, the overall storage capacity of the airport in terms of the number of aircraft will be reduced. Given this, and the fact that the noise modeling shows an incremental increase in the noise levels, it can be concluded that the fewer number of planes will result in higher noise levels since the planes are noisier and or larger.

CM-6

Air Quality:

- Page 4.2-9 includes a note stating that “operational emissions for all pollutants, except for CO, are anticipated to increase with the Proposed Project due to an increase in turbo jet and business jet operations from the Baseline (2016) Condition. The decrease in CO is attributed to the decrease in prop operations estimated for the Proposed Project.” It is unclear how the change in the fleet (aircraft types/ sizes) have been projected in terms of air quality for the planning year 2026.

CM-7

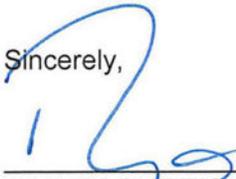
The City of Costa Mesa would prefer a maximum capacity be noted for the larger and noisier planes (e.g., business jets) so that noise and air quality impacts can be more accurately assessed.

CM-8

Please note that safety and quality of life measures such as air quality and noise impacts directly impact our residents and especially for those residing on the East Side of the City who are highly impacted by JWA operation on daily basis.

CM-9

We look forward to participating in any additional reviews before completion of the final EIR and thank you for considering the City's comments.

Sincerely,


BARRY CURTIS, AICP
Director of Economic and
Development Services



CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

Letter 3

CEQA REVIEW



November 21, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626
Email: EIR627@ocair.com

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT
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Thank you for the opportunity to provide comments on the Draft Program EIR 627 for John Wayne Airport General Aviation Improvement Program. Please consider the following comments:

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- Section 3.1 of the Methodology refers to the FAA's Environmental Design Tool Version 2d released on September 1, 2017. There have been actual studies of the JWA noise by City of Newport Beach, which may include more accurate data than noise modeling data used by FAA. The City of Costa Mesa is requesting that the most accurate and appropriate data be used in the analysis.

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3-9

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The City of Costa Mesa would prefer a maximum capacity be noted for the larger and noisier planes (e.g., business jets) so that noise and air quality impacts can be more accurately assessed.

Please note that safety and quality of life measures such as air quality and noise impacts directly impact our residents and especially for those residing on the East Side of the City who are highly impacted by JWA operation on daily basis.

We look forward to participating in any additional reviews before completion of the final EIR and thank you for considering the City's comments.

Sincerely,



BARRY CURTIS, AICP
Director of Economic and
Development Services

From: Joan Wolff <JoanW@ci.fullerton.ca.us>
Sent: Friday, November 9, 2018 3:15 PM
To: EIR627
Cc: Brendan O'Reilly
Subject: NOA
Attachments: John Wayne Airport Improvement Prog reply.pdf

Response to NOA from City of Fullerton

FUL-1

Joan Wolff

Senior Planner
City of Fullerton Community Development Department
303 W. Commonwealth Ave. Fullerton, CA 92832
Phone: (714) 738-6837 Fax: (714) 738-3110

During the month of November, City Hall will be closed on alternate Fridays – November 2, 16 and 30 and will also be closed for the Thanksgiving holiday Nov. 22-23.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system.



CITY OF FULLERTON

Community Development Department

November 9, 2018

Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Dear Ms. Choum,

Thank you for the opportunity to review the John Wayne Airport General Aviation Improvement Program Draft Program EIR. I have discussed the EIR with Brendan O'Reilly, Fullerton Municipal Airport Manager, and we have no comments or concerns at this time.

FUL-2

Best regards,

A handwritten signature in cursive script, appearing to read "Joan Wolff".

Joan Wolff, AICP
Senior Planner

CC: Brendan O'Reilly

THE EDUCATION COMMUNITY

303 West Commonwealth Avenue, Fullerton, California 92832-1775
(714) 738-6598 • Fax (714) 738-3110 • Web Site: www.ci.fullerton.ca.us





October 11, 2018

Sent via USPS and
email: EIR627@ocair.com

Ms. Lea Choum
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626

Subject: First Review of the Draft Program Environmental Impact Report 627 (SCH No. 2017031072) for the John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

City of Irvine staff has reviewed the Draft Program Environmental Impact Report 627 (EIR) for the John Wayne Airport General Aviation Improvement Program (JWA GAIP). The proposed project would be implemented at JWA, which is located on unincorporated County land. JWA encompasses 504 acres total whereas the aviation activities at JWA are located on approximately 400 acres. The GAIP would be implemented on the southern portion of the Airport where general aviation (i.e., private, non-commercial operations) facilities are currently located and consistently represents the majority of operations at the Airport.

The Proposed Project is as follows:

- All improvements are proposed to be confined to the existing Airport footprint
- Two Full Service Fixed Base Operators (FBOs) comprised of a Full Service West FBO and a Full Service East FBO
- New GA Terminal/General Aviation Facility (GAF) at FBO
- One Limited Service FBO
- One existing Limited Service FBO (i.e., Martin Aviation)
- Correction of four existing non-standard design features
- These proposed FBOs would provide facilities that are sized to accommodate various sizes and types of GA aircraft and ramp space as well as fuel storage facilities/farms (i.e., fuel tanks and/or fuel trucks)
- Reduces annual operations (i.e., take-off or landing, each counting as one operation) from 201,000 to 167,900
- Reduces the total aircraft storage capacity for GA aircraft at JWA from 505 to 354 based aircraft (i.e., aircraft leasing aircraft storage from airport, such as a tie-down area or hangar) to respond to aviation trends (i.e., introduction of new aircraft and other changes to GA fleet)

IRV-1

-
- Proposed project assumes 14 primary construction phases over slightly more than seven years from 2019 to 2026
 - The DEIR also addresses Alternative 1 which proposes a Full Service West FBO, a Full Service Northeast FBO, and a Full Service Southeast FBOs (i.e., provides a third full service FBO)
- IRV-1
cont.
-

Based on the review of the Draft EIR, City of Irvine staff would like to provide the following comments:

1. Exhibit 1-2, Local Vicinity Map: Remove "Webster University Irvine" shown directly south of Michelson Dr. and east of MacArthur Blvd. According to Webster University's website, Irvine facilities are located at 32 Discovery in Planning Area 31.
- IRV-2
-

2. Table 1-1, Summary of Key Design Elements for the Proposed Project and Alternatives: Indicate on the chart where footnote "a" is applicable.
- IRV-3
-

3. Page 4.6-9, Irvine General Plan: Revise from 13 to 14 elements and add Irvine Business Complex (IBC), which is Element N.
- IRV-4
-

4. Page 4.6-9, Irvine General Plan: Similar to the Land Use and Circulation Elements, add a description of IBC and Noise Elements.
- IRV-5
-

5. Table 4.6-8, General Plan Goals and Policies Consistency Analysis for the Cities of Newport Beach, Irvine, and Costa Mesa: Amend table to address applicable policies in the following:
 - Land Use Element (see Objective A-6, Land Use Compatibility);
 - Noise Element (see Objective F-1, Mobile Noise; Objective F-3, Noise Abatement); and
 - IBC Element
- IRV-6
-

6. Exhibit 4.7-9, Baseline (2016) and Baseline Plus Proposed Project CNEL Noise Contours, and Exhibit 4.7-11, Baseline (2016) and Baseline Plus Alternative 1 CNEL Noise Contours (also Exhibits 4.7-13 and 14): In Table 4.6-8, address whether the Proposed Project and Alternative 1 impacts Irvine General Plan Figure F-1, Aircraft Noise, which depicts the existing CNEL noise contours for JWA as well as Protection from Airport Operations (see Page N-31).
- IRV-7
-

7. Address whether the Proposed Project and Alternative 1 impacts Irvine General Plan Figure J-4, Clear and Accident Potential Zones.
- IRV-8
-

8. The City of Irvine requested during the Notice of Preparation process to expand the study area to include the intersections and roadways in the City of Irvine, generally bounded by MacArthur Blvd to the west, Campus Drive to the south, Jamboree
- IRV-9
-

Road to the east, and Main Street to the north. Please provide explanation why the study area does not reflect this boundary.

IRV-9
cont.

9. The City of Irvine requested during the Notice of Preparation process that for all existing and proposed driveways that provide direct access between the Airport and the public street system, prepare delay-based operational analyses to evaluate the adequacy of the intersection operations, and if needed, provide operational improvements that may be required. In particular, the intersection of MacArthur & Airport Way/Michelson should be evaluated for operational delay, and improvements identified if the Level of Service (LOS) is deficient/unacceptable. The City of Irvine would like to request an operational analysis be prepared for the intersection of MacArthur/Michelson as the City operates this intersection.
-

IRV-10

Thank you for the opportunity to review and comment on the proposed project. Staff would appreciate the opportunity to review any further information regarding this project as the planning process proceeds.

If you have any questions, I can be reached at 949-724-6395, or by email at mchao@cityofirvine.org.

Sincerely,



Melissa Chao
Senior Planner

cc: Kerwin Lau, Manager of Planning Services
Bill Jacobs, Principal Planner
Sun-Sun Murillo, Project Development Administrator
Lisa Thai, Supervising Transportation Analyst
Stan Ng, Associate Engineer



October 11, 2018

Sent via USPS and
email: EIR627@ocair.com

Ms. Lea Choum
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626

Subject: First Review of the Draft Program Environmental Impact Report 627 (SCH No. 2017031072) for the John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

City of Irvine staff has reviewed the Draft Program Environmental Impact Report 627 (EIR) for the John Wayne Airport General Aviation Improvement Program (JWA GAIP). The proposed project would be implemented at JWA, which is located on unincorporated County land. JWA encompasses 504 acres total whereas the aviation activities at JWA are located on approximately 400 acres. The GAIP would be implemented on the southern portion of the Airport where general aviation (i.e., private, non-commercial operations) facilities are currently located and consistently represents the majority of operations at the Airport.

The Proposed Project is as follows:

- All improvements are proposed to be confined to the existing Airport footprint
- Two Full Service Fixed Base Operators (FBOs) comprised of a Full Service West FBO and a Full Service East FBO
- New GA Terminal/General Aviation Facility (GAF) at FBO
- One Limited Service FBO
- One existing Limited Service FBO (i.e., Martin Aviation)
- Correction of four existing non-standard design features
- These proposed FBOs would provide facilities that are sized to accommodate various sizes and types of GA aircraft and ramp space as well as fuel storage facilities/farms (i.e., fuel tanks and/or fuel trucks)
- Reduces annual operations (i.e., take-off or landing, each counting as one operation) from 201,000 to 167,900
- Reduces the total aircraft storage capacity for GA aircraft at JWA from 505 to 354 based aircraft (i.e., aircraft leasing aircraft storage from airport, such as a tie-down area or hangar) to respond to aviation trends (i.e., introduction of new aircraft and other changes to GA fleet)

- Proposed project assumes 14 primary construction phases over slightly more than seven years from 2019 to 2026
- The DEIR also addresses Alternative 1 which proposes a Full Service West FBO, a Full Service Northeast FBO, and a Full Service Southeast FBOs (i.e., provides a third full service FBO)

Based on the review of the Draft EIR, City of Irvine staff would like to provide the following comments:

1. Exhibit 1-2, Local Vicinity Map: Remove "Webster University Irvine" shown directly south of Michelson Dr. and east of MacArthur Blvd. According to Webster University's website, Irvine facilities are located at 32 Discovery in Planning Area 31.
2. Table 1-1, Summary of Key Design Elements for the Proposed Project and Alternatives: Indicate on the chart where footnote "a" is applicable.
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 - Noise Element (see Objective F-1, Mobile Noise; Objective F-3, Noise Abatement); and
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7. Address whether the Proposed Project and Alternative 1 impacts Irvine General Plan Figure J-4, Clear and Accident Potential Zones.
8. The City of Irvine requested during the Notice of Preparation process to expand the study area to include the intersections and roadways in the City of Irvine, generally bounded by MacArthur Blvd to the west, Campus Drive to the south, Jamboree

Road to the east, and Main Street to the north. Please provide explanation why the study area does not reflect this boundary.

9. The City of Irvine requested during the Notice of Preparation process that for all existing and proposed driveways that provide direct access between the Airport and the public street system, prepare delay-based operational analyses to evaluate the adequacy of the intersection operations, and if needed, provide operational improvements that may be required. In particular, the intersection of MacArthur & Airport Way/Michelson should be evaluated for operational delay, and improvements identified if the Level of Service (LOS) is deficient/unacceptable. The City of Irvine would like to request an operational analysis be prepared for the intersection of MacArthur/Michelson as the City operates this intersection.

Thank you for the opportunity to review and comment on the proposed project. Staff would appreciate the opportunity to review any further information regarding this project as the planning process proceeds.

If you have any questions, I can be reached at 949-724-6395, or by email at mchao@cityofirvine.org.

Sincerely,



Melissa Chao
Senior Planner

cc: Kerwin Lau, Manager of Planning Services
Bill Jacobs, Principal Planner
Sun-Sun Murillo, Project Development Administrator
Lisa Thai, Supervising Transportation Analyst
Stan Ng, Associate Engineer



City of La Habra

"A Caring Community"

COMMUNITY DEVELOPMENT

Letter 7

110 E. La Habra Boulevard
Post Office Box 337
La Habra, CA 90633-0785
Office: (562) 383-4100
Fax: (562) 383-4476

October 16, 2018

Ms. Lea Choum
John Wayne Airport Administrative Office
3160 Airway Avenue
Costa Mesa, California 92626

Re: Notice of Availability of a Draft Program Environmental Impact Report-John
Wayne Airport General Aviation Improvement Program

Dear Ms. Choum,

Thank you for the opportunity to review the Notice of Availability of a Draft Program Environmental Impact Report for the project titled, "John Wayne Airport General Aviation Improvement Program." As you are aware, CEQA allows communities to comment on projects which may impact their particular communities. Based on the project description and location, it is not anticipated that this project will have an impact on the City of La Habra.

LH-1

Should changes occur that increases the scope of the project, please provide us with sufficient notification prior to consideration of the project. The City reserves the right to comment on any proposed changes.

If you should have any questions, please feel free to contact me at (562) 383-4100.

Sincerely,

Carlos Jaramillo
Deputy Director of Community Development

cc: Jim Sadro, City Manager
Andrew Ho, Director of Community and Economic Development
Robert Ferrier, Assistant to the City Manager

From: Bonnie Thorne <BThorne@rmmenvirolaw.com>
Sent: Wednesday, November 14, 2018 11:59 AM
To: EIR627
Cc: Andee Leisy; Harp, Aaron
Subject: Comments RE General Aviation Improvement Program DEIR
Attachments: City of Newport Beach Comment Letter Re GAIP EIR (00478630xB0A85).pdf

Ms. Choum:

Attached please find comments on the General Aviation Improvement Program Draft Programmatic EIR, on behalf of the City of Newport Beach. A hard copy will follow by mail.

NB-1

Please confirm receipt.

Thank you.

Bonnie Thorne
Paralegal/Legal Assistant



REMY | MOOSE | MANLEY, LLP

555 Capitol Mall, Suite 800 | Sacramento, CA 95814

P (916) 443-2745 x 220 | F (916) 443-9017

bthorne@rmmenvirolaw.com | www.rmmenvirolaw.com

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Please consider the environment before printing this email.



REMY | MOOSE | MANLEY
LLP

Andrea K. Leisy
aleisy@rmmenvirolaw.com

November 14, 2018

VIA ELECTRONIC & U.S. MAIL
EIR627@ocair.com

Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Programmatic
Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

We submit the following comments on behalf of our client, the City of Newport Beach (City) regarding the above referenced General Aviation Improvement Project (GAIP or Project) and related Draft Environmental Impact Report (DEIR), including Alternative 1, which is analyzed at an equal level of detail. The City understands that, although certain types of general aviation operations are anticipated to increase under the GAIP (private jets), no new significant adverse noise, air quality or traffic impacts were identified as a direct result of the Proposed Project or Alternative 1. (See DEIR, pp. 2-9, 4.2-19.)

NB-2

Overall, the proposed Project appears poised to significantly increase the number of private jet operations, which will impact the quality of life of the residents of the City. Prior to moving forward with the Project, we request that the County of Orange ("County") conduct additional analysis of these effects on City residents.

NB-3

I. Noise Analysis

The aircraft related noise modeling in the DEIR reflects a new assumption that, by 2026, 40% of the Boeing 737 and Airbus A320 aircraft utilizing the Airport will include the newer Boeing 737-MAX and Airbus A320-NEO with substantially quieter engines. This is different from the 2026 fleet mix assumptions used to prepare the 2014 Settlement Agreement Amendment EIR and influences the future plus project (and Alternative 1) cumulative noise modeling.

NB-4

In support of the assumption, the DEIR includes two website links to current commercial orders placed with Boeing and Airbus. The order summaries appear to be nationwide and therefore not specific to California or the carriers at the Airport. (See DEIR, p. 4-7; App. H, pp. 67, 87, fns. 4, 5; see also DEIR, p. 4.6-48, fn. 15.) As set forth in the DEIR, it is unclear whether, and how, the carriers at the Airport will be ensured to acquire and use the newer engine aircrafts, at the Airport, within the next 8

years to realize the 40% assumption. This assumption appears overly optimistic, which will result in the DEIR understating the overall noise impacts in the 2026 cumulative scenario and, possibly, noise related to future general aviation operations. Overall, these assumptions are not properly explained, are unsupported and understate the potential impacts of the Project. Hence, we request a more thorough analysis of these issues and the impacts associated with a different fleet mix.

NB-4 cont.

II. Flight Patterns

The DEIR states that there will not be a change in existing flight patterns (DEIR, p. 4-6; App. H, pp. 68, 87), but does not set forth the current flight patterns, which are the basis for much of the analysis in the DEIR. Also, it is unclear that the assumption there will not be a change in existing flight patterns is true for both commercial and general aviation aircraft. The City requests that the County explain in detail the flight patterns being flown by private jets and the basis for the assumption that business jets and other general aviation aircraft will also be directed to continue using existing flight patterns.

Please also clarify the general aviation flight pattern assumptions used for the proposed Project and Alternative 1 scenarios, and the baseline information regarding general aviation flight patterns that the EIR consultants relied on. While there is some general discussion about general aviation planes turning sooner than commercial aircraft while over the Upper Newport Bay, there is not much discussion in the DEIR about existing GA flight patterns.

NB-5

Also, please identify whether the SoCal Metroplex project has impacted the flight patterns for GA aircraft and, if so, how.

In addition, the City understands that the same existing runway would be used for general aviation operations (Runway 20L) under the proposed Project and Alternative 1; however, it is unclear if flight patterns would change, or not, due to the increased number of Full Service and Limited Service Fixed Based Operations (FBOs) or the General Aviation Facility, depending on where they are located within the Airport. (See Exhibit 3-1 [proposed Project includes two Full Service FBOs on the west and east sides of the Airport and one Limited Service FBO]; see also Exhibit 3-4 [Alternative 1 includes three Full Service FBOs (on the west, northeast and southeast) and one Limited Service FBO; the western FBO (off Airway Ave) would be new (as opposed to the existing FBOs).] Additional clarification on this point is essential to understanding the potential impacts associated with the Project.

III. Sensitive Receptors

The DEIR explains that the changes in the size of the noise contours as a result of Proposed Project and Alternative 1 is "nominal." Increasing, for example, the total contour area between 65 and 70 CNEL by 0.01 square mile (.6%), and the area

NB-6

exceeding 70 CNEL by .01 square mile (7%) over Baseline 2016 conditions. (DEIR, pp. 4.6-21, -45, 7.7-28.) However, the DEIR does not adequately disclose the precise changes associated with this impact. To be adequate, the DEIR should disclose the addresses or streets and intersections as well as the specific locations where the noise contours are expected to change due to the proposed Project.

Also, the DEIR states that no additional schools, hospitals, or places of worship would be included within the 65 CNEL or greater contour. (DEIR, pp. 4.6-22, -45.) This conclusion appears to be inconsistent with the Technical Noise Analysis in Appendix H, p. 77 (Table 19), however, which identifies one additional school and two additional places of worship within the 65-70 CNEL contours for the Future (2026) Proposed Project and Alternative 1 scenarios. Please clarify and identify where, if any, the new sensitive receptors (one additional school and two additional places of worship) are located, assuming Table 19 of the appendix is correct.

NB-6 cont.

IV. Health Risk Analysis

The DEIR includes a detailed discussion of the health risk assessment (HRA) prepared for the Settlement Agreement EIR (EIR 617), a different project, and compares the emissions anticipated to occur under the proposed Settlement Agreement Amendment to the GAIP Proposed Project and Alternative 1. The HRA prepared for the Settlement Agreement Amendment (EIR 617), however, did not anticipate the different GAIP emissions anticipated under the Proposed Project and Alternative 1, including increased emissions from the increased number of GA jet aircraft.

Under CEQA, rather than compare the relatively small amount of emissions anticipated to occur under the GAIP Proposed Project/Alternative 1 to the amount of emissions anticipated in EIR 617 for increased commercial carrier operations, the DEIR should have identified the agency approved methodologies for considering the potential health risks of a project, and considered whether the additional amount of emissions anticipated to occur under the GAIP Proposed Project and Alternative 1 would cause a direct or cumulatively considerable potential health risk.

NB-7

Although there is a forecasted decrease in GA piston-powered aircraft assumed in the DEIR, there is also an assumed increase in turbine engine and jet aircraft operations, particularly over time, which must be considered as “additive” to the SA Amendment operations and other foreseeable related projects. Not, as the DEIR does, engage in a “de minimis” type comparison. (See *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 120.) This is especially important when, as recognized by the DEIR, the existing levels of TAC-related cancer causing emissions in the air basin are already cumulatively considerable and significant. (DEIR, p. 4.2-31 [discussing the 2015 MATES-IV Report released by SCAQMD]; see *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692.)

Also, as identified by KB Environmental Sciences, Inc., EIR 627 appears not to: (i) address the significant impact found to on-site airport workers in EIR 617; or (ii) consider the dispersion of GA aircraft emissions and the potential effects from such emissions to sensitive receptors. (See Attachment A [Peer Review by Mr. Kenney, KB Environmental Sciences, Inc.])

The HRA prepared for EIR 617, for example, estimates that on-site airport workers could experience an increased incidence of non-cancer effects under the short-term exposures. By comparison, EIR 627 seems to conclude that non-cancer risks to airport workers are not expected. The HRA prepared for EIR 617 also did not include dispersion modeling of GA aircraft emissions, much less GA emissions as contemplated under the GAIP Project or Alternative 1. Please provide substantial evidence supporting the findings and conclusions in the EIR 617 on these issues.

NB-7 cont.

Lastly, EIR 627 appears to assume that the most intensive activities will occur in the southwestern-most area of the Airport. The analysis of health risks does not consider the variances in distances and directions between the new proposed sources of emissions (GA jet aircraft and cars) to the sensitive residential receptors in that area. Please clarify.

V. Haul Routes

The DEIR does not consider what haul routes would be used during construction of the GAIP, although a substantial number of vehicle miles traveled (VMT) are identified. (DEIR, p. 6-7, Tables 6-2 and 6-3.) Although the DEIR is a programmatic document in nature, the proposed Project and Alternative 1 identify where the Full Service and Limited Service FBOs will be located. The document should therefore include an analysis of the haul routes likely to be used for demolition, excavation, construction and/or expansion of GAIP facilities throughout the various construction phases of the Project (or Alternative 1). Please also clarify if any routes would travel through the City of Newport Beach.

NB-8

VI. Fuel Types

Lastly, the City has heard from several constituents that there is a desire, on behalf of the smaller general aviation community, for the County to offer lead free/lead reduced/alternative fuel as a part of the Project to reduce or eliminate lead emissions.

NB-9

///

Ms. Choum
November 14, 2018
Page 5

★ ★ ★ ★

Thank you in advance for your consideration of the City's comments. Please provide me with a copy of all public notices issued in connection with the Project, including the Notice of Availability of the Final EIR. Please also contact me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Andrea K. Leisy". The signature is written in black ink and is positioned directly below the typed name.

Andrea K. Leisy

Encl.
Cc: Aaron Harp

ATTACHMENT A

John Wayne Airport Environmental
Impact Report (EIR), Health Risk
Assessment (HRA): Peer Review

Prepared for:
City of Newport Beach

Prepared by:
KB Environmental Sciences, Inc.

November 12, 2018

Executive Summary

A *Draft Program Environmental Impact Report* (EIR 627) has been prepared for the proposed General Aviation (GA) Improvement Program (GAIP) at John Wayne Airport (JWA or “the Airport”). Previously, a separate EIR (EIR 617) was also prepared and certified, in 2014, for purposes of amending the Settlement Agreement governing commercial operations at JWA, referred to as the “Settlement Agreement (SA) Amendment EIR”.

The objective of this Peer Review is to determine whether or not the reliance on the Health Risk Assessment (HRA) prepared and adopted for the SA 617 EIR is appropriate for the GAIP EIR 627 analysis.

The HRA prepared for the SA Amendment (EIR 617) was conducted in accordance with the California Air Resources Board (CARB) *Air Toxics Hot Spots Program Risk Assessment Guidelines* and consistent with guidance documents issued by the U.S. Environmental Protection Agency (EPA) and the California Environmental Protection Agency (“CalEP). The principal aim is to estimate the potential changes in human cancer and non-cancer risks attributable to exposures of Toxic Air Contaminates (TAC) associated with proposed projects.

NB-10

The outcomes of the respective analyses in the EIRs are summarized as follows:

- **EIR 617 HRA:** The HRA for EIR 617 concludes that there will be no significant increase in the incidence of cancer and long- or short-term non-cancer effects for all receptors in the vicinity of the airport including nearby residential communities, sensitive land uses and areas on the airport where the general public and airport workers have access. However, it is estimated that on-airport workers could experience an increased incidence of non-cancer effects under short-term exposures to TACs.
- **EIR 627:** EIR 627 concludes that the emissions from the GAIP are less than the EIR 617 project, so it assumes that the health impacts are also less. From this it is concluded that the GAIP would not cause any significant risk to human health among those that work at the Airport or reside nearby (including any “sensitive receptors”).

Based upon the findings of this Peer Review, the following observations are considered “Key” in terms of determining whether or not the application of the HRA for the 617 EIR is appropriate for EIR 627. The underlined information signifies the “bottom-line” conclusions and recommendations.

- **General Aviation (GA) Aircraft:** The EIR 617 air emissions inventory includes emissions from GA aircraft but the dispersion modeling does not. This is because GA operations do not change under the EIR 617. Therefore, the EIR 617 HRA did not involve GA operations. Clarification and further justification for this approach should be provided.
- **Aircraft Fleet Mix & Flight Paths:** Although not reported in EIR 627, the assumed reduction in propeller-driven GA aircraft operations and increased turbo-prop and jet operations seems to be assuming that there will be a lesser amount of TACs under EIR 627. Also the flight paths are not clearly defined which could result in a concentration of emissions. These findings should be substantiated as reported upon in the EIR 627.

NB-11

NB-12

- **Health Risk Assessment:** There was no HRA conducted for EIR 627 and the health risks are extrapolated from the EIR 617 HRA. The permissibility of applying the EIR 617 HRA to EIR 627

NB-13

under the California Environmental Quality Act (CEQA) should be reconsidered because the use of the HRA in this way may not be appropriate due to the different nature of the projects.

NB-13
cont.

- **Health Risks:** In contrast to the Significant Non-Cancer Health Risks estimated for on-airport workers for the EIR 617 HRA, it is unclear and unsubstantiated why these same risks to airport workers are Less-than-Significant under EIR 627. This conclusion needs to be explained and justified.

NB-14

Based on these findings of this Peer Review, the underlined recommendations calling for clarifications and additional are considered necessary before fully determining whether or not the results from the EIR 617 HRA are applicable to EIR 627.

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III. HRA Methodologies, Terms & Assumptions	2
IV. Summary of 617 & 627 Results.....	3
V. Peer Review	4
VI. Conclusion.....	5
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I. Introduction & Objective

A *Draft Program Environmental Impact Report* (referred to as DPEIR 627 or the “GA Project EIR”) has been prepared for the proposed John Wayne Airport (JWA or “the Airport”) General Aviation (GA) Improvement Program (GAIP).¹ The GAIP comprises a series of projects planned for the airport’s GA facilities (e.g., aprons, hangars and other buildings) and the expected decrease in GA piston-powered aircraft and increase in turbo-powered and jet aircraft. Previously, a separate EIR (EIR 617) was also prepared for JWA and is referred to as the “Settlement Agreement (SA) Amendment EIR”.² The SA EIR addressed the expected increase in passengers and commercial aircraft operations at the Airport.

Prepared in accordance with the California Environmental Quality Act (CEQA), both the GA and the SA EIRs evaluated the potential impacts (or risks) to human health. Conducted in the form of a Health Risk Assessment (HRA), the analyses prepared for EIR 617 focused on the effects of the increase in commercial flights proposed as part of the SA Amendment on nearby communities, particularly “sensitive” land-uses and airport workers. In comparison, the analysis of health risk impacts for the GA EIR (EIR 627) was based on a comparison to the SA HRA (EIR 617).

The objective of this Peer Review is to determine whether or not the application of the HRA for the SA EIR is appropriate for EIR 627. In other words, “can the findings from the SA HRA also be used to evaluate the health risks of the GAIP”?

This review was accomplished by assessing the methodology, assumptions and outcomes of the SA HRA in conjunction with comparisons to the GAIP in terms of the generation of Toxic Air Contaminants (TAC). Notably, this evaluation was based on information and data contained in the GA and SA EIRs and no additional HRA or other technical analyses were performed.

NB-15

II. EIR 627 Approach

As discussed above, the approach taken in the GAIP EIR was to use the SA HRA as a “screening mechanism.” In particular, the TAC emissions³ associated with the SA project were compared with those of the GAIP. Insofar as the emissions from the GAIP are less than the SA project, EIR 627 estimated that the health impacts are also less. From this it is concluded that the GAIP would not cause any significant risk to human health among those that work at the Airport or reside nearby (including any “sensitive receptors”).

III. EIR Projects & Actions

Briefly described, the projects and actions planned for JWA and evaluated in EIRs 617 and 627 are as follows:

- **General Aviation Improvement Program (EIR 627):** An assortment of facilities and other improvements (e.g., Fixed Based Operator (s) and GA Terminal; airplane hangars, aprons and fuel systems; on-site roadways and vehicle parking lots) under differing development alternatives.

¹ John Wayne Airport General Aviation Improvement Program (GAIP) - *Draft Program Environmental Impact Report* 627, prepared for the County of Orange, September 2018.

² U.S. District Court, Central District of California, County of Orange vs. Air California vs. City of Newport Beach vs. County of Orange County Board of Supervisors. Oct. 15, 2014.

³ The majority of TACs are fractional components of Volatile Organic Compounds - VOCs (also known as Hazardous Air Pollutants – HAPs) and particulate matter (PM). Therefore, it is generally assumed VOCs and PM serve as a corresponding measure of TACs.

These projects are planned in conjunction with the forecasted decrease in GA piston-powered aircraft and increase turbine engine and jet aircraft operations.

- **Settlement Agreement (SA) Amendment (EIR 617):** The forecasted increase in passengers and commercial air-carrier operations through 2026. The project did not propose any improvements to the Airport.

NB-15
cont.

Full descriptions for the GAIP and SA projects are provided in the individual EIRs, including (but not limited to) the analysis years, airport activity levels, the Preferred Project and alternatives evaluated and impact mitigation measures. Complete copies of the 2014 HRA is also included in EIR 617.

IV. HRA Methodologies, Terms & Assumptions

The SA HRA⁴ was conducted in accordance with the California Air Resources Board (CARB) *Air Toxics Hot Spots Program Risk Assessment Guidelines*⁵ and consistent with guidance documents issued by the U.S. Environmental Protection Agency (EPA) and the California Environmental Protection Agency ("CalEP). The principal aim of the analysis is to estimate the potential changes in human cancer and non-cancer risks attributable to exposures of TAC associated with the proposed action.

Several HRA-related terms and concepts considered relevant to this Peer Review are described as follows (listed in alphabetical order):

Common Terms & Concepts

- **Air Quality Models:** The Emissions Dispersion Modeling System (EDMS) developed by the Federal Aviation Administration (FAA) was used for the SA EIR air quality analysis and the new Aviation Environmental Design Tool (AEDT) was used for the GA EIR.
- **Exposure Conditions:** For residents and other sensitive receptors - continuous exposure for 24 hours/day, 350 days/year and over a 70-year lifetime. For on-site workers - exposures of 8 hours/day, 245 working days/year over a 40-year working lifetime. In both cases, these risk criteria represent "worst-case" conditions.⁶
- **Risk Assessment (HRA):** An evaluation of the change(s) in the incidences on cancer and non-cancer due to long- or short-term exposures to environmental contaminants. Effects and conditions that could contribute to increased health risks but are not accounted for in the HRA (e.g., pre-existing health conditions, non-airport sources of emissions).
- **Significance Thresholds:** Numerical thresholds above which cancer and non-cancer risks are considered significant:
 - Maximum Incremental Cancer Risk ≥ 10 in 1 million,
 - Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million), and
 - Non-Carcinogenic (Chronic/Acute) Hazard Index ≥ 1.0 .⁷

NB-16

⁴ John Wayne Airport Settlement Agreement Amendment - *Air Quality Technical Report*, prepared for Orange County, April 2014.

⁵ Air Toxics Hot Spots Program Risk Assessment Guidelines, Technical Support Document for Exposure Assessment and Stochastic Analysis, California Air Resources Board, Office of Environmental Health Hazard Assessment (OEHHA).

⁶ "Worst-case" conditions represent time-periods, pollutant concentrations, toxicity characteristics, meteorology and other factors that are considered extreme and occur simultaneously. While possible, these circumstances are highly unlikely.

⁷ Non-carcinogenic impacts are those to the respiratory system including inflammation and bronchial irritation, impacts to the nervous system, immune system, reproductive system, the kidneys, and the eyes.

- **Sensitive Receptors:** The places that could be affected by emissions associated with the Airport included residential communities; schools, day care centers, nursing homes and hospitals; and parks and athletic facilities located up to 1,000 meters (0.6 miles) away.
- **Sources of Emissions:** Air emissions included commercial and GA aircraft, auxiliary power units (APUs), ground support equipment (GSE) and on-site motor vehicles. For the EIR 617 HRA, the focus was on TACs from commercial aircraft.
- **Toxic Air Contaminates (TAC):** The vast majority of TACs (also referred to as Chemicals of Potential Concern - CPOC) are hydrocarbon-based compounds (e.g., formaldehyde benzene, naphthalene) and particulate matter (PM).⁸ Notably lead (Pb), a component of leaded avgas, is not included among TACs analyzed in a HRA.⁹

NB-16
cont.

Important Assumptions

There are also a number of assumptions pertaining to the SA and GA EIRs that are considered important to this Peer Review. These, and the reasons for their importance, are briefly stated below:

- **Aircraft Operations & Fleet Mix:** The EIR analyses are based in large part on current and future-year estimates of airport and project-related activity levels reported in the EIRs 617 and 627. The types of aircraft using the Airport (e.g., B737, Cessna 160, etc.), and aircraft activity levels under the two projects affect the amounts of TACs produced. Also, the flight paths which are not disclosed, impact the concentration of emissions.
- **Concurrent Projects & Actions:** It is assumed that the planned SA and GA projects are both implemented on schedule and the emissions are additive. Again, aircraft activity levels and aircraft types affect the amounts of TACs produced.
- **HRA Methodology:** For accuracy, consistency and acceptability an HRA is conducted following established guidelines from local, state and federal agencies (see above). Variances and exclusions can result in different outcomes.
- **HRA Applicability:** A HRA was not prepared for EIR 627 and rather relies upon the EIR 617 HRA results. EIR 627 therefore assumes that the EIR 617 HRA results are applicable.

NB-17

NB-18

NB-19

Most notably, this Peer Review analyzes the HRA for EIR 617 relied on in EIR 627 because that is the only analysis available.

NB-20

V. Summary of HRA Results

As discussed above, the primary objective of this Peer Review is aimed at evaluating the appropriateness of applying the results from the SA HRA to the GAIP. For brevity and comparative purposes, the outcomes of the two assessments are summarized as follows:

- **EIR 617 HRA:** The results of the HRA predicted that health risks associated with the SA project are:

NB-21

⁸ Particulate matter is segregated by two particle sizes: PM₁₀ are less than 10 microns in diameter and PM_{2.5} are less than 2.5 microns in diameter. Ultrafine particles (UFP) are less than 0.1 microns but are not included in Health Risk Assessments.

⁹ Lead is among the six pollutants for which there are National (NAAQS) and California (CAAQS) Ambient Air Quality Standards (others include carbon monoxide (CO), nitrogen dioxide (NO₂) and ozone (O₃).

- Cancer & Cancer Burden: Less than significant risks for all receptors including nearby residential communities, sensitive land uses and areas on the Airport where the general public and airport workers have access;
- Chronic Non-Cancer: Less than significant risk for all receptors described above.
- Acute Non-Cancer: Significant risk impact for on-site airport workers.

NB-21
cont.

In other words, EIR 627 does not expect there will be additional risks of cancer and long- or short-term health effects attributable to the project. However, it is estimated that on-site airport workers could experience an increased incidence of non-cancer effects under short-term exposures to TACs.

- **EIR 627:** From this analyses it was determined that HC and PM emissions (and therefore TACs) for the GAIP¹⁰ would be less than estimated for SA EIR 617. From this, it was concluded that a small increment of emissions would not cause an exceedance of the Significance Thresholds for cancer and non-cancer health impacts.

In short, EIR 627 does not expect there will be any significant increase in occurrence of cancer and non-cancer impacts in either the short- or long-terms because of the GAIP project.

NB-22

Again, it is important to note that the objective of this Peer Review is to determine of the outcomes from EIR 617 are also appropriate for EIR 627.

VI. Peer Review Findings & Conclusion

This section presents the overall findings and conclusions for this Peer Review.

- **Findings:** The essential findings of this Peer Review are as follows (arranged in approximate order of importance):

- **Non-cancer Health Risks:** For EIR 617 it is not expected there will be additional risks of cancer and long- or short-term health effects attributable to the project. But it is estimated that on-airport workers could experience an increased incidence of non-cancer effects under the short-term exposures.

NB-23

By comparison, for EIR 627 it is reported that airport worker non-cancer risks are not expected. Importantly to this Peer Review, it is not clear how this finding is derived or substantiated.

- **Project Modeling Orientations:** The EIR 617 project involves additional commercial flights mainly oriented around the Airport main terminal and primary runway. By comparison, the EIR 627 projects are mostly located in the southwestern-most area of the Airport. The variances in distances and directions between the sources of emissions and the sensitive receptors can have an effect on the transport and fate of TACs.

NB-24

In this case, the effects of orientation are unsubstantiated.

- **Lead:** Lead is among the six pollutants for which there are NAAQS/CAAQS and therefore it is not listed as a TAC. Leaded avgas for some GA aircraft is one of the last remaining sources of this pollutant. However, lead-containing avgas will be phased-out by 2020 and replaced with alternative fuels. In addition, the U.S. EPA has identified airports with lead emissions greater than 0.5 tons annually for in-depth study and JWA is not among them. Lead emissions were not included in either the 617 or 628 EIR analyses.

NB-25

¹⁰ For this Peer Review it is assumed that the GAIP includes the Proposed Project and Alternative 1.

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- **Conclusions:** Based upon the findings of this Peer Review, the following observations are considered “Key” in terms of determining whether or not the application of the HRA for the 617 EIR is appropriate for EIR 627. The underlined information signifies the “bottom-line” conclusions and recommendations.

NB-26

- **General Aviation (GA) Aircraft:** The EIR 617 air emissions inventory includes emissions from GA aircraft but the dispersion modeling does not. This is because GA operations do not change under the EIR 617. Therefore, the EIR 617 HRA did not involve GA operations. Clarification and further justification for this approach should be provided.

-
- **Aircraft Fleet Mix & Flight Patterns:** Although not reported in EIR 627, the reduction in propeller-driven GA aircraft operations and increased turbo-prop and jet operations seems to assume that there will be a lesser amount of TACs under the GAIP project. Also, the flight paths are not clearly identified (existing + future) which could result in concentrating emissions. These findings should be substantiated and reported upon in the EIR 627.

NB-27

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- **Health Risk Assessment:** There was no HRA conducted for EIR 627 and the health risks are extrapolated from the EIR 617 HRA. The appropriateness of applying the EIR 617 HRA to EIR 627 under CEQA should be re-evaluated because the projects are different and the use of the EIR 617 HRA may not be appropriate.

NB-28

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- **Health Risks:** In contrast to the Significant Non-Cancer Health Risks estimated for on-airport workers for the EIR 617 HRA, it is unclear and unsubstantiated why these same risks to airport workers are Less-than-Significant under EIR 627. This conclusion needs to be explained and justified.

NB-29

From this Peer Review, the underlined recommendations calling for clarifications and additional are considered necessary before fully determining whether or not the results from the EIR 617 HRA are applicable to EIR 627.

NB-30

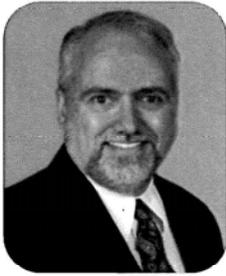
[End of Report]

References

- Air Toxics Hot Spots Program Risk Assessment Guidelines, Technical Support Document for Exposure Assessment and Stochastic Analysis, California Air Resources Board, Office of Environmental Health Hazard Assessment (OEHHA)
- John Wayne Airport General Aviation Improvement Program (GAIP) - Draft Program Environmental Impact Report 627, prepared for the County of Orange, September 2018.
- John Wayne Airport Settlement Agreement Amendment - *Air Quality Technical Report*, prepared for Orange County, April 2014.
- U.S. District Court, Central District of California, County of Orange vs. Air California vs. City of Newport Beach vs. County of Orange County Board of Supervisors. Oct. 15, 2014.

Reviewer Qualifications

Mr. Kenney is Vice President of KB Environmental Sciences, Inc. and provides project management as well as "hands-on" technical involvement for a wide variety of air quality assessments for airports, the aviation industry and governmental agencies throughout California, across the U.S. and around the world. His specialized expertise and experience includes air quality measurements, air emissions inventories, dispersion modeling, as well as hazardous air pollutants (HAPs) and greenhouse gases (GHGs). Mike has considerable experience providing technical services in support of NEPA and CEQA documents. He is also trained in the areas of human health and environmental toxicology.



Senior Air Quality Specialist

Mr. Kenney is Vice President of KB Environmental Sciences, Inc. and provides project management as well as “hands-on” technical involvement for a wide variety of air quality assessments for airports, the aviation industry and governmental agencies throughout California, across the U.S. and around the world. His specialized expertise and experience includes air quality measurements, air emissions inventories, dispersion modeling, as well as hazardous air pollutants (HAPs) and greenhouse gases (GHGs). Mike has considerable experience providing technical services in support of NEPA and CEQA documents. He is also trained in the areas of human health and environmental toxicology.

Expertise

Air quality assessments for airports, marine ports and roadways; industrial hygiene, human health risks and worker exposure evaluations; and hazardous materials surveys.

Years of Experience

A total of 39 years consulting
15 years with KBE
25 years with other private consulting firms and government regulatory agency

Education

BA, 1976, Environmental Science,
University of Maine

MS, 1979, Environmental
Engineering Sciences,
University of Florida

Post Graduate Studies, 1987-1993,
Industrial Hygiene and
Environmental Health,
University of South Florida

Certifications/Professional Affiliations

Certified Hazardous Materials
Manager, 1994, CHMM No. 5503

Qualified Environmental
Professional, 1995, QEP No.
06930024

Certified Industrial Hygienist, 2003,
CIH No. 8719

Competent Toastmaster, 1988

Representative Projects & Services

Los Angeles International Airport (LAX) Air Quality Assessment Services, Los Angeles, California

Involved in a wide array of ongoing air quality impact assessments at LAX including the development and assessment of air quality mitigation measures, and consistency with the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA).

San Diego International Airport (SAN) Air Quality Assessment Services, San Diego, California

Involved in the preparation of a series of products and services that enabled the San Diego County Regional Airport Authority (SDCRAA) to advance their “award-winning” Environmental Management Program. These initiatives include the SAN Master Plan *Environmental Impact Statement (EIS) / Environmental Impact Report (EIR) Air Quality Assessment* and the SAN *Air Quality Management Plan* comprised of emissions inventories, mitigation strategies, and stakeholder coordination.

Houston Airport System (HAS) Emission Inventory, Houston, Texas

Working with the FAA, HAS, Texas Commission on Environmental Quality (TCEQ) as well as Southwest and Continental Airlines, this initiative was designed to ensure that the State Implementation Plan (SIP) for the Houston-Galveston-Brazoria non-attainment area contains accurate and up-to-date emissions for George Bush Intercontinental Airport (IAH). Involved extensive data collection, preparation of emissions inventories.

San Francisco International Airport (SFO) Air Quality Assessment Services, San Francisco, California

Compiled a comprehensive construction emissions inventory related to airport improvements at SFO. Part of this work included assessments with OFFROAD, EMFAC and CARB’s Off-road Emissions Inventory (OEI) database. Air quality impact analysis was performed to satisfy both NEPA and CEQA requirements.

Boston-Logan International Airport Air Quality Services

Project Manager for a wide array of services including air quality studies, emission reduction measures, GHG assessments, human health risk evaluations, public and agency coordination.

From: Peotter, Scott <speotter@newportbeachca.gov>
Sent: Wednesday, November 21, 2018 3:50 PM
To: Kenneth A. Wong; EIR627; Dixon, Diane; Avery, Brad; Duffield, Duffy; Muldoon, Kevin; Herdman, Jeff; O'Neill, William
Subject: Re: ***Disallow Any Changes that increase MA noise or hours of operation (curfew)***

Couldn't agree more and I have been pushing the city to fight this EIR and we have put in a long list of comments to the county. I would love to get a "settlement" agreement from the county in regards to General Aviation. The only way to do that is to file a lawsuit. But I will not be there much longer, so the next council will have to pick up the ball.

NBSP-1

Good Luck



SCOTT PEOTTER
NEWPORT BEACH CITY COUNCIL
Representing the 6th District

From: Kenneth A. Wong <kenwongcal@gmail.com>
Sent: Wednesday, November 21, 2018 12:31:12 PM
To: EIR627@ocair.com; Dixon, Diane; Avery, Brad; Duffield, Duffy; Muldoon, Kevin; Herdman, Jeff; Peotter, Scott; O'Neill, William
Subject: ***Disallow Any Changes that increase JWA noise or hours of operation (curfew)***

To Whom It May Concern – including persons at John Wayne Airport and the Newport Beach City Council:

NBSP-2

My family and I have lived in Costa Mesa and Newport Beach for over half a century (...since 1966). We have been homeowners in the Port Streets in Newport Beach, for the last 20 years. I am informed that today – Wed., November 21 – is the deadline for your receipt of all letters or emails to be considered, on this extremely important issue.

Like many other long-time residents of the area affected by the operations of John Wayne Airport, we well-recall the OC Measures (...including "A" and "S") of the 1980s – including the re-votes of the previously-decided Measures --that in the end resulted in Orange County's regrettable rejection of the Federal government's intended gift of the entire El Toro Airbase for dedicated-use as Orange County International Airport. And, as a consequence, we daily live with the jet noise

and other facts of commercial flight operations here in this prime coastal -- and substantially residential -- area. As you know, what is now JWA -- originally called "Orange County Airport" -- was designed and intended solely for small, private, single-engine, propeller aircraft operations only... for which the associated engine sound was indisputably *de minimus*, versus that of jet engines.

*****It is imperative that no changes of any kind -- now or at anytime in the future -- be allowed to occur that would in any way increase JWA noise or hours of operation.*****

Specifically this includes, but in no manner is limited to: No consideration of, and especially No implementation of, any adoption of a "General Aviation Improvement Program" (GAIP) -- that in any fashion causes or contributes to an increased change in the type, size, or jet engine size of permitted aircraft, and fleets thereof -- including private and corporate aircraft at anytime on JWA property, regardless whether transiting or based in existing or proposed, larger hangars. Likewise, No consideration of, and No implementation of, any change can occur that in any fashion may enlarge or expand the existing curfew on take-offs and landings at JWA.

NBSP-2
cont.

Thank you for your full attention, awareness and understanding. Please do not hesitate to reach-out to me should you have any questions.

Kenneth A. Wong
Attorney at Law
2618 San Miguel Dr., #182
Newport Beach, CA 92660
cell: (949) 903-2461

From: Alina Mullins <AMullins@aqmd.gov>
Sent: Tuesday, November 6, 2018 4:58 PM
To: EIR627
Cc: Daniel Garcia
Subject: SCAQMD Staff Comments on Draft Program Environmental Impact Report (Draft PEIR) for the Proposed John Wayne Airport General Aviation Improvement Project (SCH No. 2017031072)
Attachments: ORC180920-06 DPEIR John Wayne Airport General Aviation Improvement Project.pdf

Dear Ms. Choum,

Attached are SCAQMD staff's comments on the Draft Program Environmental Impact Report (Draft PEIR) for the proposed John Wayne Airport General Aviation Improvement Project (SCH No. 2017031072) (SCAQMD Control Number: ORC180920-06). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. SCAQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the final CEQA document. Please contact me if you have any questions regarding these comments.

AQMD-1

Kind regards,

Alina Mullins

Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov

**Please note that the SCAQMD is closed on Mondays.*



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

November 6, 2018

EIR627@ocair.com

John Wayne Airport
Attn: Lea Choum, JWA Project Manager
3160 Airway Avenue
Costa Mesa, CA 92626

Draft Program Environmental Impact Report (Draft PEIR) for the Proposed John Wayne Airport (JWA) General Aviation Improvement Project (SCH: 2017031072)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final CEQA document.

SCAQMD Staff’s Summary of Project Description

The Lead Agency proposes to demolish 134,000 square feet of existing facilities and construct and operate two full service fixed base operators (FBO) totaling 97,000 square feet within a 504 acre site. The project is located at the John Wayne Airport in the City of Santa Ana.

AQMD-2

SCAQMD Staff’s Summary of Air Quality Analysis

The Lead Agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.¹ However, the lead agency did not adequately analyze the proposed project’s air quality impacts from construction and operation. Additionally, the Lead Agency performed a HRA screening process that does not adequately address the potential health risk impacts associated with the proposed project. Therefore, SCAQMD staff has comments regarding the air quality analysis and has recommendations for further mitigation measures. Detailed comments are provided below.

SCAQMD Staff’s Comments

Overlapping Construction and Operation

The project is expected to be built-out in multiple phases in order to minimize disruption to current JWA operations.² For this reason, it is reasonably foreseeable that emissions from part of the project’s construction phase would likely occur simultaneous to the project’s operational phase. However, the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Therefore, to analyze the worst-case scenario for air quality impacts, SCAQMD staff recommends that the Lead Agency identify the overlapping phases, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD’s air quality CEQA operational thresholds of significance to determine the level of significance in the final CEQA document.

AQMD-3

Operational Emissions from Permitted Unit

The proposed project may include a 5,000 – 20,000 gallon avgas aboveground storage tank. Upon review of the Draft PEIR it did not appear SCAQMD that the Lead Agency quantified and incorporated emissions from the aboveground storage tank into the project’s operational emissions analysis.

AQMD-4

¹ Draft PEIR, Section 4.2-16.

² Draft PEIR, Page 3-19.

Therefore, SCAQMD staff recommends that the Lead Agency clarify if these emissions were accounted for in the operational analysis. If they were not, the Lead Agency should quantify the emissions and incorporate them into the proposed project's operational emissions analysis in order to determine the level of significance for the whole of the project in the final CEQA document.

AQMD-4
cont.

Health Risk Assessment

The Lead Agency incorporated by reference the emissions that were analyzed in the JWA 2014 Settlement Agreement Amendment Final EIR 617 (Final EIR 617) and the associated Health Risk Assessment (HRA). Referencing this prior CEQA document, the Lead Agency performed a HRA screening process in order to determine the level of significance for the maximum incremental cancer risk that the proposed project may cause.

Emissions from Volatile Organic Compounds (VOCs) and Particulate Matter (PM) that were analyzed in Final EIR 617 were compared to those analyzed in the proposed project; results of the comparison show that the proposed project is expected to contribute a fraction of these emissions. Since Toxic Air Contaminants (TACs) are expressed as fractions of VOCs and PM emissions, the Lead Agency concluded that the TACs from the proposed project, less than those previously analyzed in Final EIR 617, would have less than significant impacts to the maximum incremental cancer risk at sensitive receptors.³

SCAQMD staff is concerned that the reference to Final EIR 617 and the associated HRA does not adequately address potentially significant health risk impacts associated with the proposed project since the Final EIR 617 evaluated different operations. The proposed project includes the storage and usage of avgas, which is the only remaining transportation fuel that contains lead.⁴ Upon review of Final EIR 617 and the HRA, it did not appear to SCAQMD staff that the storage and use of avgas was evaluated.⁵ Additionally, general aviation activities for the proposed project would likely occur at different locations on the airport's property than previously analyzed for the Final EIR 617.⁶ Therefore, it cannot be said with certainty that the health impacts to nearby sensitive receptors evaluated in the Final EIR 617 HRA will remain the same for the proposed project since the location of emissions sources affects emission concentrations and dispersion, influencing the health risk impacts to nearby sensitive receptors.

AQMD-5

Further, since the adoption of Final EIR in 2014, the Office of Environmental Health Hazards Assessment (OEHHA) has updated the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments.⁷ The methodology used in the Final EIR 617 HRA is now outdated and may underestimate health risk impacts. Therefore, considering the above mentioned factors, SCAQMD staff recommends that the Lead Agency prepare a HRA that is specific to the proposed project and uses the most recent OEHHA methodology. If the Lead Agency determines that the project results in significant health risk impacts SCAQMD staff recommends that the lead agency consider additional mitigation measures to reduce the project's health risk impacts available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

SCAQMD Permits and Rules

If the proposed project includes a 5,000 – 20,000 gallon avgas aboveground storage tank, then a SCAQMD permit for construction and operation will be required. The assumptions in the air quality analysis for the CEQA document will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Permitting questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-3385. The CEQA

AQMD-6

³ Draft PEIR, Section 4.2, Pages 26-29.

⁴ Draft PEIR, Section 4.5, Page 9.

⁵ Final EIR 617, Section 4.1.

⁶ Final EIR 617, Section 4.1 Page 12 and Draft PEIR, Air Quality Technical Report, Page 9.

⁷ OEHHA Guidance Manual, Accessed at: <https://oehha.ca.gov/media/downloads/crrr/2015guidancemanual.pdf>.

document should also discuss compliance with applicable SCAQMD Rules, including, but may not be limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1401 – New Source Review of Toxic Air Contaminants.⁸

AQMD-6
cont.

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final CEQA document. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

AQMD-7

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,
Daniel Garcia
Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

DG/AM
ORC180920-06
Control Number

⁸ SCAQMD, Rule 201 – Permit to Construct Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf?sfvrsn=4>, Rule 203 – Permit to Operate Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf?sfvrsn=4>, and Rule 1401 – New Source Review of Toxic Air Contaminants Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4>.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

November 6, 2018

EIR627@ocair.com

John Wayne Airport

Attn: Lea Choum, JWA Project Manager

3160 Airway Avenue

Costa Mesa, CA 92626

Draft Program Environmental Impact Report (Draft PEIR) for the Proposed John Wayne Airport (JWA) General Aviation Improvement Project (SCH: 2017031072)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 134,000 square feet of existing facilities and construct and operate two full service fixed base operators (FBO) totaling 97,000 square feet within a 504 acre site. The project is located at the John Wayne Airport in the City of Santa Ana.

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.¹ However, the lead agency did not adequately analyze the proposed project's air quality impacts from construction and operation. Additionally, the Lead Agency preformed a HRA screening process that does not adequately address the potential health risk impacts associated with the proposed project. Therefore, SCAQMD staff has comments regarding the air quality analysis and has recommendations for further mitigation measures. Detailed comments are provided below.

SCAQMD Staff's Comments

Overlapping Construction and Operation

The project is expected to be built-out in multiple phases in order to minimize disruption to current JWA operations.² For this reason, it is reasonably foreseeable that emissions from part of the project's construction phase would likely occur simultaneous to the project's operational phase. However, the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Therefore, to analyze the worst-case scenario for air quality impacts, SCAQMD staff recommends that the Lead Agency identify the overlapping phases, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the final CEQA document.

Operational Emissions from Permitted Unit

The proposed project may include a 5,000 – 20,000 gallon avgas aboveground storage tank. Upon review of the Draft PEIR it did not appear SCAQMD that the Lead Agency quantified and incorporated emissions from the aboveground storage tank into the project's operational emissions analysis.

¹ Draft PEIR, Section 4.2-16.

² Draft PEIR, Page 3-19.

Therefore, SCAQMD staff recommends that the Lead Agency clarify if these emissions were accounted for in the operational analysis. If they were not, the Lead Agency should quantify the emissions and incorporate them into the proposed project's operational emissions analysis in order to determine the level of significance for the whole of the project in the final CEQA document.

Health Risk Assessment

The Lead Agency incorporated by reference the emissions that were analyzed in the JWA 2014 Settlement Agreement Amendment Final EIR 617 (Final EIR 617) and the associated Health Risk Assessment (HRA). Referencing this prior CEQA document, the Lead Agency performed a HRA screening process in order to determine the level of significance for the maximum incremental cancer risk that the proposed project may cause.

Emissions from Volatile Organic Compounds (VOCs) and Particulate Matter (PM) that were analyzed in Final EIR 617 were compared to those analyzed in the proposed project; results of the comparison show that the proposed project is expected to contribute a fraction of these emissions. Since Toxic Air Contaminants (TACs) are expressed as fractions of VOCs and PM emissions, the Lead Agency concluded that the TACs from the proposed project, less than those previously analyzed in Final EIR 617, would have less than significant impacts to the maximum incremental cancer risk at sensitive receptors.³

SCAQMD staff is concerned that the reference to Final EIR 617 and the associated HRA does not adequately address potentially significant health risk impacts associated with the proposed project since the Final EIR 617 evaluated different operations. The proposed project includes the storage and usage of avgas, which is the only remaining transportation fuel that contains lead.⁴ Upon review of Final EIR 617 and the HRA, it did not appear to SCAQMD staff that the storage and use of avgas was evaluated.⁵ Additionally, general aviation activities for the proposed project would likely occur at different locations on the airport's property than previously analyzed for the Final EIR 617.⁶ Therefore, it cannot be said with certainty that the health impacts to nearby sensitive receptors evaluated in the Final EIR 617 HRA will remain the same for the proposed project since the location of emissions sources affects emission concentrations and dispersion, influencing the health risk impacts to nearby sensitive receptors.

Further, since the adoption of Final EIR in 2014, the Office of Environmental Health Hazards Assessment (OEHHA) has updated the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments.⁷ The methodology used in the Final EIR 617 HRA is now outdated and may underestimate health risk impacts. Therefore, considering the above mentioned factors, SCAQMD staff recommends that the Lead Agency prepare a HRA that is specific to the proposed project and uses the most recent OEHHA methodology. If the Lead Agency determines that the project results in significant health risk impacts SCAQMD staff recommends that the lead agency consider additional mitigation measures to reduce the project's health risk impacts available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

SCAQMD Permits and Rules

If the proposed project includes a 5,000 – 20,000 gallon avgas aboveground storage tank, then a SCAQMD permit for construction and operation will be required. The assumptions in the air quality analysis for the CEQA document will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Permitting questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-3385. The CEQA

³ Draft PEIR, Section 4.2, Pages 26-29.

⁴ Draft PEIR, Section 4.5, Page 9.

⁵ Final EIR 617, Section 4.1.

⁶ Final EIR 617, Section 4.1 Page 12 and Draft PEIR, Air Quality Technical Report, Page 9.

⁷ OEHHA Guidance Manual, Accessed at: <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>.

document should also discuss compliance with applicable SCAQMD Rules, including, but may not be limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1401 – New Source Review of Toxic Air Contaminants.⁸

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final CEQA document. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM
ORC180920-06
Control Number

⁸ SCAQMD, Rule 201 – Permit to Construct Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf?sfvrsn=4>, Rule 203 – Permit to Operate Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf?sfvrsn=4>, and Rule 1401 – New Source Review of Toxic Air Contaminants Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4>.

Organizations

3.4 ORGANIZATIONS

Fifteen comment letters were received from the following organizations:

- Aircraft Owners and Pilots Association, submitted by Adam Williams
- AirFair, submitted by Melinda Seely
- Airport Working Group, submitted by Mel Beale
- Airport Working Group, submitted by Mel Beale (submittal of the same letter using a different email address)
- Airport Working Group, submitted by Mel Beale (submittal of hard copy of the same letter)
- California Cultural Resource Preservation Alliance, submitted by Patricia Martz, Ph.D.
- Citizens Against Airport Noise and Pollution, submitted by Beverly Blais Moosmann
- Corona del Mar Residents Association, submitted by Debbie Stevens
- Corona del Mar Residents Association, submitted by Debbie Stevens (submittal of hard copy of the same letter)
- Irvine Terrace Community Association, submitted by Brian Jones
- Juaneño Band of Mission Indians Acjachemen Nation, submitted by Joyce Perry
- Southern California Pilots Association, submitted by Joe Finnell
- Southern California Pilots Association, submitted by Pat Prentiss
- Southern California Pilots Association, submitted by Fred Fourcher
- Stop Polluting Our Newport and AirFair, submitted by Steven Taber, with Leech Tishman

From: Williams, Adam <Adam.Williams@aopa.org>
Sent: Wednesday, November 21, 2018 10:47 AM
To: EIR627
Cc: Ginter, Mike; Dunn, Bill; McCaffrey, Melissa
Subject: DEIR comments from AOPA
Attachments: AOPA to SNA 11.18 .pdf

Dear Ms. Choum,

Please find attached our comments on DEIR 627.

Regards,
ADAM WILLIAMS
Manager, Airport Policy
Aircraft Owners & Pilots Association
p: 202.609.9702
a: 50 F Street NW, Suite 750, Washington, DC 20001
www.aopa.org



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F. 202-273-7951

www.aopa.org

November 21, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

RE: Draft EIR 627

Dear Ms. Choum,

The Aircraft Owners and Pilots Association (AOPA) is the world's largest general aviation association with nearly 330,000 members, including over 32,000 members in California. On behalf of our members, I am writing to provide comments on the Draft Environmental Impact Report (DEIR) for the General Aviation Improvement Program (GAIP). According to the project description provided in the DEIR, the proposed project will reduce general aviation parking capacity at John Wayne Airport (SNA) by 41 percent. The capacity reduction will be caused, in part, by the addition of a so-called "General Aviation Terminal" intended to serve the needs of regularly scheduled commercial charter operators. AOPA strongly opposes the displacement of general aviation aircraft to construct new air carrier facilities at SNA.

AOPA-1

AOPA has been following the positive general aviation trends at SNA over the past two years. The County Board of Supervisors took action to ensure FBOs would charge fair and reasonable prices. General aviation traffic has since increased and one FBO has reported a threefold increase in fuel sales. The airport is on a positive trajectory and can expect robust general aviation demand into the future. While the project description cites a projected decrease in general aviation operations between 2016 and 2026, FAA data has shown a steady increase in general aviation operations at SNA every year from 2015 until 2018. For the 12-month period ending in September 2018, general aviation operations were 218,747, a 12% increase from the 12-month period ending in September 2017.

AOPA-2

As such, AOPA believes the County must maintain sufficient general aviation parking capacity to meet future demand. If parking capacity is reduced and hundreds of aircraft are displaced to other nearby airports, the resultant environmental impact on those communities is unknown. It is our belief that displacing aircraft currently based at SNA to other surrounding airports will have a significant environmental impact on those facilities. That impact is not included in the subject DEIR but should be a study element. Therefore, the current DEIR is deficient in detailing ALL environmental impacts that will result by implementing this program.

AOPA-3

Additionally, the use of the based aircraft at SNA should be studied to determine if displaced aircraft would still need to be used to pick up their owners and passengers at SNA. If so, the number of takeoffs and landings at SNA would increase.

AOPA-4

Section 4.7 of the DEIR shows a negligible change in noise impact from current operations to the forecast 2026 general aviation fleet mix. While a small increase in turbojet activity is forecast, the real number of future annual turbojet operations is unknown and may be substantially increased by the addition of a new facility. If a specific operator is expected to occupy the facility, their fleet and schedule should be considered as part of the environmental impact study.

AOPA-5

Thank you for your attention to this important matter. If I may be of further assistance please contact me at 202-609-9702 or adam.williams@aopa.org.

Sincerely,



Adam Williams
Manager, Airport Policy



10.8 Let's lock the gate at John Wayne Airport!

October 24, 2018

Ms. Leah Choum
JWA Project Manager
3160 Airway Avenue
John Wayne Airport
Santa Ana, CA 91707

Re: General Aviation Improvement Program Draft Environmental Impact Report 627

Dear Ms. Choum,

Air Fair, a non profit California Corporation, representing concerned residents of the City of Newport Beach appreciates the opportunity to review and comment upon the John Wayne Airport (JWA) General Aviation Improvement Program (GAIP).

We want to express support for the project scope which states that any improvements under the GAIP would be "confined to the existing Airport footprint". We agree with the position taken by the City of Newport Beach opposing any expansion of the general aviation uses beyond the current airport limits. AF-1

We are concerned that the proposed reduction in the availability of facilities for smaller piston engine aircraft coupled with an increase in operation of large corporate jets could have a significant impact on the noise levels, particularly at night. We urge a thorough analysis of this issue. AF-2

We are also concerned about the proposal for an international general aviation terminal. The impact of this proposal should be studied to assess the potential such an enhanced terminal would have on the number of additional aircraft operations that would be generated. Of particular concern is the potential for group charter flights. AF-3

Sincerely

Melinda Seely, President

From: Mel Beale <mail@awgoc.com>
Sent: Wednesday, November 21, 2018 12:05 PM
To: EIR627
Subject: Comments on John Wayne Airport General Aviation Improvement Program Draft EIR 627
Attachments: AWG Comment Letter- John Wayne Airport GAIP Draft EIR 627.pdf

Dear Ms. Choum,

Attached are the comments on the GAIP Draft Environmental Impact Report (EIR) 627 from the Airport Working Group of Orange County (AWG). Our organization has spent many hours reading and analyzing the draft program EIR and have serious concerns about its analysis of the range of outcomes of the Proposed Project and Alternative 1. Without these concerns being adequately addressed by additional data and further analysis, the findings of the EIR are not sufficient to move forward with the project as defined.

AWG-1

We look forward to your response and further collaboration,

Sincerely,

Mel Beale
President, Airport Working Group of Orange County

Airport Working Group of Orange County

VIA ELECTRONIC & U.S. MAIL
EIR627@ocair.com

November 20, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Programmatic Environmental Impact Report
(SCH No. 2017031072)

Dear Ms. Choum:

We submit the following comments regarding the General Aviation Improvement Project (GAIP) and related Draft Environmental Impact Report (DEIR), including Alternative 1.

Introduction

The Proposed Project for General Aviation Improvements and Alternative 1 would both result in a limited control facility environment which will allow long-term FBO leaseholders significant flexibility to adapt the space to their own needs based on economics and optimization of square footage of aircraft storage capacity. Appendix C and D of the DEIR provide forecasts and estimates of GA aircraft local storage demand, but the only forecast analyzed for environmental impact was a single conservative baseline forecast. In the baseline forecast, applied to the constrained forecast scenario, there will be a significant increase to the number of corporate, business, or private jet operations, which will negatively impact the quality of life of local residents living near the departure tracks. But to obtain a true potential environmental impact, a broader analysis of the impact using a potential higher capacity utilization (above the baseline levels) by the entrepreneurial and innovative leaseholders is needed. This should be based on some constrained version of the high growth rate from § 6.1.3 Table 13 in Appendix C which shows a much higher growth rate.

AWG-2

In addition, the aircraft operations forecast must also include worst case scenario daily/weekly/yearly average operations based on a survey of corporate and business aircraft owners within the “competitive market area (CMA)” and SNA area. No survey results were cited in the EIR 627, yet aircraft utilization by class of equipment is available from a number of nationally recognized credible sources. Environmental impacts must be quantified based on a range of possible operations in alignment with the higher, aggressive forecast on market demand.

AWG-3

Further, the recent introduction at John Wayne Airport of scheduled charter operations at the existing ACI facility has proven quite successful showing a demand for this service. The new FBO tenants, with the proposed vastly expanded service capabilities for customs, immigration, and security would significantly increase the attractiveness of John Wayne Airport versus other airports in the CMA, both for based and itinerant operations. Although the passenger counts are controlled within the Settlement Agreement (SA), the manner of operations for GA is not as strictly controlled as commercial. Would late departures (after the commercial curfew or before 7am) become common? The DEIR 627 did not forecast an increased % in transit (non-hangered) operators use of John Wayne, but with the new large central terminal with services, there is a strong likelihood this higher number of transit operations would occur. This was not analyzed for noise or pollution impact.

AWG-4

Comments based on the DPEIR 627 base document-

1. **BASELINE** – The baseline for analysis reflected in the EIR is 2016. However, CEQA requires that, under normal circumstances, the baseline be contemporaneous with the publication of the Notice of Preparation (“NOP”) for the project. 14 C.C.R. § 15125(a). If the date of NOP publication is not consistent with the 2016 baseline chosen for the EIR, please explain the choice of 2016 as a baseline.

AWG-5

2. **NOISE** – The EIR noise analysis, based on 2016 “existing” project data fails to take into account the cumulative noise impacts of the Southern California Metroplex Project. While the EIR, § 4.7.8 concedes the “final procedures in the Metroplex” were implemented in April 2017, thus concluding the Metroplex project’s implementation, the EIR also dismisses the impact because the procedures were purportedly “modified three times in 2017.” Those changes do not, however, excuse the absence of the noise data after implementation of the Metroplex project as the existing noise environment.

AWG-6

Moreover, it should be noted that the AEDT air quality/noise model was not implemented in 2016, but, rather, in March 2012 (see 77 Fed.Reg. 18297-98, 3/27/12), although in an earlier form, AEDT2a. Thus, the EIR’s claim that a “direct comparison of the program EIR to the data presented in Final EIR 617 [prepared for the last Settlement Agreement amendment] cannot be made” is entirely unsupported.

AWG-7

3. **AIR QUALITY** – The EIR’s limitation on the analysis of air quality impacts to those of general aviation only is in error. To the extent the EIR contemplates the possibility that the project’s improvements will allow the projected facilities to accommodate charter and commuter aircraft, as well as traditional piston and turbine general aviation aircraft (see, e.g., EIR, § 3.6.1, p. 3-10), the air quality impact of charter and commuter aircraft must also be included in the evaluation of air quality impacts.

AWG-8

4. **CAPACITY INCREASE** – The EIR discloses that “transient aircraft parking areas are excluded from the capacity analysis,” § 3.6.2, p. 3-17, fn. 24, even though one of the results of the project is the potential for a dramatic increase in transient aircraft arrival and departure, including access to a new international general aviation terminal, and accommodated by sharing of tie-down space with based aircraft. The noise and air quality impact of that increase in potential transient operations remains unevaluated.

AWG-9

Comments based on the Appendices

Since the DPEIR document findings were largely based on the detail contained in the Appendices and related Tables and Figures, the following comments are directed to the assumptions, forecasts, and estimates continued in these Appendices, the foundation of the findings.

1. Appendix B- General Aviation Opportunities Facilities Layout Report comments

- a. Key operations forecasts for the Proposed Project and Alternative 1 DEIR impact were based on the layout detail in this Appendix prepared by AECOM. Table 1 Facilities Matrix Evaluation shows total full service FBO hangar space in the Proposed project would be 199,320 SF with 30 aircraft in hangars (32 on Apron) and 299,640 SF in Alternative 1 with 45 aircraft in hangars (& 47 on Apron). How this space will be used by long lease term FBO's cannot be mandated by John Wayne Airport administration. Quoting from Appendix B § 3.1-

“When comparing the capacity of the FBO facilities, it should be noted that the number of “aircraft in hangars” and the number of “aircraft on apron” is not an absolute. This is because the type and size of aircraft parked at a busy FBO facility is wide ranging and can change frequently...”.

Referencing Table 25 of Appendix C §6.5 (General Aviation Jet Aircraft with over 500 Operations in 2016) shows common GA aircraft as large as the Gulfstream V/G500, with a wingspan of 91 feet 6 in. and a length of 91ft 2 in., as well as a Cessna Citation CJ1 with a much smaller footprint of 46 ft. 9 in. wingspan and length of 42 ft. 7 in. Hangar use for different fleet mixes of this variety in size would have a major impact of the number of aircraft capacity and hence operations, to be expected. FBO's driven by economics, may determine a different mix with more mid-size business jet aircraft would yield higher profits. There could be as many as 20-25% more business jets housed under these scenario's so the incremental business jets on site under the GAIP could be significantly higher than the 73 forecasted in the proposal or 76 forecasted in the Alternative 1 scenario.

AWG-10

The issue is the DEIR did not analyze the noise, pollution, or other community impacts for significance based on different combinations of housed large business jet aircraft (and large aircraft tie downs). Since the AECOM analysis states this as a real variable, the DEIR must take into consideration different local hangered aircraft populations at the proposed FBO's to ensure that even at a higher aircraft capacity, there would not be a significant impact, or, it must state a mitigation program.

The impact of a substantial increase in incremental business jet operations is made worse from a community perspective because business jet departures follow the same FAA SIDs departure tracks used by commercial airlines at SNA, i.e., PIGGN, HHERO, FINNZ, etc., using avionics instruments. The same neighborhoods that are impacted by commercial aircraft will be impacted by noise and pollution under the same departure tracks, whereas the large number of displaced, smaller GA prop/piston engine aircraft are fanned after takeoff along different visual paths. This clearly is an increase in noise for residents near NM5, NM6, and NM7 who are not under the flight path of prop/piston aircraft.

Different hi/lo fleet mixes based on aircraft size other than the single mix of aircraft fleet operations shown in Table 10 in Appendix H § 6.1.1 (OPERATIONS, FLEET MIX, RUNWAY USE AND FLIGHT TRACKS) must be analyzed to truly understand the potential environmental impact.

AWG-10
cont.

2. **Appendix C- General Aviation Forecasting and Analysis Technical Report** comments

a. In §7. Summary, Table 28 (SNA Forecast Summary), there are three forecasts for based aircraft and annual operations based on the fleet forecast at each forecast level- Baseline, Low Scenario, and High Scenario. The level of aircraft capacity and operations then taken forward in the constrained forecast of Appendix D was: 1- not adequately explained for the purpose of external evaluation, and, 2. only a single forecast level was defined in the constrained forecast for both the Proposed Project and Alternative 1, whereas already noted by the document’s authors, an exact use of the hangars cannot be an absolute.

AWG-11

b. A key component of the environmental impact analysis is the actual assets that will be generating the impact, specifically, the aircraft fleet using the proposed facilities. §6.5 of Appendix C Design Aircraft, provides details on sizes of general aviation aircraft (Table 25), and Table 15 provides 2016 data on average landings per active based GA aircraft types. Corporate aircraft are shown to have averaged 230-240 landings in 2016, which would equate to 2 times that number for operations (takeoffs and landings) of local based aircraft. That means each corporate aircraft may have 460-480 “operations” per year and the Proposal has 73 jet aircraft and Alternative 1, 76 jet aircraft. This would calculate to 35,040 – 36,480 annual operations by corporate / business aircraft per year, approximately what was shown in the noise impact tables in Appendix H. However, no analysis was done based on a range of values of a different mix of fleet which may increase the number of hangered / based jet aircraft to higher numbers based on facility usage by the FBOs. In addition, some corporate jet owners use their aircraft much more frequently that the national average with 1.x – 2+ takeoffs per day, Monday through Friday. Such scenarios seem possible and which may have a significant environmental impact in noise and pollution. A range of forecasts of jet fleet mix, total based aircraft and annual operations above one takeoff a day needs to be completed in the final EIR.

AWG-12

3. **Appendix D – Capacity Analysis and General Aviation Constrained Forecasts** comments

a. As mentioned in comments on the facility configuration (Appendix B) and the unconstrained forecast of GA local demand (Appendix C), the explanations given in Appendix D for how this information was used to create -

- i. essentially a single GA facility capacity footprint (Table 3) and aircraft fleet mix for the Proposed Project (Table 4)
- ii. and similar scenarios for Alternative 1 in Tables 5 and 6.

AWG-13

was severely lacking enough clarity to support the assumptions or adequate grounds to challenge. The link from each of these analyses and how the ground footprint was designed as a high-level capacity layout must be detailed. Otherwise, the key results defined in Tables 4 and 6 can be challenged as this is the foundational level of information on which the EIR submittal should be evaluated for adequacy.

b. Just as was shown in Appendix C, more than a single set of GA aircraft-based assumptions must be evaluated in the “Capacity Analysis...”. A “what if” higher jet

AWG-14

<p>aircraft base assumption, based on a potential FBO's ingenuity at final floor space configuration, must be evaluated in both the Proposed and Alternative 1 projects. The jet aircraft will create significantly more noise and pollution over a concentrated area (already impacted by commercial airlines) than the displaced small aircraft weekend fliers.</p>	AWG-14 cont.
<p>c. Transient or itinerant operations are hardly analyzed at all in any of the analysis. The key issue raised here is whether the much more accommodating services (customs, immigration, security, and other) will create a competitive advantage over other CMA facilities in Southern California. Even corporate aircraft based at other airports, may begin to use SNA to disembark international passengers due to the new conveniences, with the crew then flying the aircraft to its base location. This increase may equate to more than one cycle (takeoff + landing) per business event, significantly multiplying the GA business operations above the forecast in the DEIR, and, the additional itinerant aircraft would likely be jet powered, with negative noise and pollution impacts per event. Analysis of the attractiveness of SNA under the Proposed Project and Alternative 1 to generating a significant increase in transit and itinerant business must be addressed. A survey of so ca based business jet owners on this issue would be a good first step, or a look at a similar upgrade in another US airport to see the CAGR impact of operations.</p>	AWG-15
<p>d. The likely growth in scheduled charter operations using the new FBO facilities was not addressed adequately, and somewhat disregarded since the passengers would be counted under the Settlement Agreement. However, GA operations are not controlled as to restrictions placed on commercial carriers, such as nightly curfews and class of aircraft. LAX has commercial carrier departures after midnight and also very early in the morning departures for South America and the East Coast. SNA with new services, may be able to offer similar options through scheduled charters. Such potential scenarios were not studied at all and must be addressed, particularly with noise and pollution issues.</p>	AWG-16

4. Appendix H- Noise Analysis Technical Report comments

<p>a. The baseline date used for the project completion date of 2026 includes assumptions which can be disputed by discussions with local stakeholders. Specifically, there is a major assumption on the projected noise levels in the no-project scenario based on the Settlement Agreement increase in commercial activity, but with a mix of commercial aircraft that is much higher in new quiet equipment (Boeing Max and Airbus NEO). Table 15 in Appendix H shows the large commercial fleet operations to be 32,326 of the total of 114,100, or 28%. This was based on a simplistic assumption of fleet activity aligning with the projections of Airbus and Boeing on deliveries of these aircraft to the major carriers over that time period. In fact, there are commercial passenger market reasons that this severely overstates the use of these aircraft at John Wayne Airport. This is based on the origin and destinations (schedules) of the carriers operating at SNA today and passenger forecasts. The use of these aircraft at John Wayne may be less than half the projected operations shown in Table 15, and if this is the case, the incremental impact of the additional GA jet aircraft operations versus no project may be significant. A more studied and defensible set of assumptions for all aircraft types must be included in the DEIR for impact evaluation.</p>	AWG-17
<p>b. As stated in other comments to other Appendices, the forecast of aircraft operations for the corporate / business jet increased hangar and apron tie-down aircraft appears understated at roughly one cycle per day, Monday through Friday. Many corporations and businesses use aircraft utilization as the key ROI metric for</p>	AWG-18

management or Board of Director capital approval. If that is a standard metric which is likely measured quarterly by the CFO, one cycle (one takeoff & landing) seems marginal in producing a solid ROI. Large corporations have multiple aircraft and staff crew on payroll and try to keep the planes in the air as much as possible. Many times they can be used as a shuttle service for senior management to ferry people to and from job sites. Such use would drive the utilization much higher and could easily exceed 2-3 cycles per day on a 24-hour clock. This needs to be addressed in the DEIR by looking at other large business jet airports and what the activities are.

AWG-18
cont.

- c. Mid-sized and large jet engine powered business aircraft fly the same departure procedures as commercial airlines, whereas smaller aircraft like this being displaced generally “fan” right or left immediately after takeoff. The result of the Proposed Project and Alternative 1 will significantly increase the noise and pollution for the community members under the commercial departure procedures. The CNEL contours shown in the Figures of Appendix H do not adequately address the incremental impact on residents near noise monitors 5,6, and 7, and with the error in commercial fleet population noted in comment **IV.b.** overstating the use of quiet aircraft (MAX and NEO) in the base assumptions for 2016, this is magnified. A special analysis should be done within the DEIR to address this incremental impact in a more meaningful way than shown in Tables 16 and 17 of Appendix H.

AWG-19

5. Appendix E – Air Quality Technical Report comments

- a. The comments and issues of concern are based on the displacement of many smaller aircraft with limited operations with larger business fleet aircraft that burn kerosene, fly the same departure tracks as commercial aircraft, and have micro particle effluent over neighborhoods. The analysis shown in Appendix E could only be evaluated by professional air pollution control experts and leaves the layman at a significant disadvantage. However, three concerns must be addressed- 1- the likely understatement of business jet operations as noted in other comments in this document and shown in Tables 18 and 21 of Appendix E. If business jet operations were increased by 20-30%, what impact would that have on the results shown in Tables 20, 23, 24, and 25? 2- the effluent volume of different pollutants based of different fleet mix operations scenarios, and, 3- the cumulative impact of pollutants from older aircraft versus the unrealistic assumption of more efficient MAX and NEO aircraft as a % of total operations.

AWG-20

- b. The detrimental impact of a highly likely incremental transit and itinerant operations volume due to the improved facilities at John Wayne FBOs terminal services was not addressed at all. Some impact of the value of customs, security, immigration, and ambiance, must be analyzed as to how many additional daily itinerant operations there will be post completion of the anticipated facilities improvement. Experiences at other airports and detailed surveys by 3rd parties would create a baseline for analysis and a re-issue of the DEIR.

AWG-21

As shown in the comments above, the GAIP DPEIR document included a number of key questionable assumptions for the future aircraft operations volume and impact under the Proposed Project and Alternative 1 versus no project. The assumptions used in the Appendices had a significant impact how determinations were made and serious issues with these assumptions or forecasts make determinations on environmental impact moot until addressed.

AWG-22

Conclusion

As pointed out in this document, the Draft EIR 627 has serious deficiencies which make a final determination of environmental impact on the Proposed Project or Alternative 1 insufficient without further analysis. As a further example, the EIR reveals that the Project will result in a dramatic diminution in the smallest and currently quietest type of aircraft, the single and multi-engine fixed wing piston, see Table 5-1, p. 5-7, and a substantial increase in turbine engine aircraft. *Id.* Nevertheless, the EIR fails to analyze, or even mention, the impact of the displacement of those smaller aircraft, including the surface traffic and air quality impacts of users having to access them at far flung airports throughout the region. This omission, as well as the other issues detailed in our comments, requires further action.

AWG-23

Sincerely,

A handwritten signature in cursive script that reads "Mel Beale". The signature is written in black ink and is positioned above the typed name and title.

Mel Beale
President, AWG Board of Directors

From: Mel Beale <volvo77.mb@gmail.com>
Sent: Wednesday, November 21, 2018 12:12 PM
To: EIR627
Subject: Comment letter on John Wayne Airport General Aviation Improvement Program draft EIR
Attachments: AWG Comment Letter- John Wayne Airport GAIP Draft EIR 627.pdf

[also sent from mail@awgoc.com and by US mail]

Dear Ms. Choum,

Attached are the comments on the GAIP Draft Environmental Impact Report (EIR) 627 from the Airport Working Group of Orange County (AWG). Our organization has spent many hours reading and analyzing the draft program EIR and have serious concerns about its analysis of the range of outcomes of the Proposed Project and Alternative 1. Without these concerns being adequately addressed by additional data and further analysis, the findings of the EIR are not sufficient to move forward with the project as defined.

We look forward to your response and further collaboration,

Sincerely,

Mel Beale
President, Airport Working Group of Orange County

VIA ELECTRONIC & U.S. MAIL
EIR627@ocair.com

November 20, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Programmatic Environmental Impact Report
(SCH No. 2017031072)

Dear Ms. Choum:

We submit the following comments regarding the General Aviation Improvement Project (GAIP) and related Draft Environmental Impact Report (DEIR), including Alternative 1.

Introduction

The Proposed Project for General Aviation Improvements and Alternative 1 would both result in a limited control facility environment which will allow long-term FBO leaseholders significant flexibility to adapt the space to their own needs based on economics and optimization of square footage of aircraft storage capacity. Appendix C and D of the DEIR provide forecasts and estimates of GA aircraft local storage demand, but the only forecast analyzed for environmental impact was a single conservative baseline forecast. In the baseline forecast, applied to the constrained forecast scenario, there will be a significant increase to the number of corporate, business, or private jet operations, which will negatively impact the quality of life of local residents living near the departure tracks. But to obtain a true potential environmental impact, a broader analysis of the impact using a potential higher capacity utilization (above the baseline levels) by the entrepreneurial and innovative leaseholders is needed. This should be based on some constrained version of the high growth rate from § 6.1.3 Table 13 in Appendix C which shows a much higher growth rate.

In addition, the aircraft operations forecast must also include worst case scenario daily/weekly/yearly average operations based on a survey of corporate and business aircraft owners within the “competitive market area (CMA)” and SNA area. No survey results were cited in the EIR 627, yet aircraft utilization by class of equipment is available from a number of nationally recognized credible sources. Environmental impacts must be quantified based on a range of possible operations in alignment with the higher, aggressive forecast on market demand.

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Comments based on the DPEIR 627 base document-

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As shown in the comments above, the GAIP DPEIR document included a number of key questionable assumptions for the future aircraft operations volume and impact under the Proposed Project and Alternative 1 versus no project. The assumptions used in the Appendices had a significant impact how determinations were made and serious issues with these assumptions or forecasts make determinations on environmental impact moot until addressed.

Conclusion

As pointed out in this document, the Draft EIR 627 has serious deficiencies which make a final determination of environmental impact on the Proposed Project or Alternative 1 insufficient without further analysis. As a further example, the EIR reveals that the Project will result in a dramatic diminution in the smallest and currently quietest type of aircraft, the single and multi-engine fixed wing piston, see Table 5-1, p. 5-7, and a substantial increase in turbine engine aircraft. *Id.* Nevertheless, the EIR fails to analyze, or even mention, the impact of the displacement of those smaller aircraft, including the surface traffic and air quality impacts of users having to access them at far flung airports throughout the region. This omission, as well as the other issues detailed in our comments, requires further action.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Beale". The signature is written in a cursive, flowing style with a large initial "M" and "B".

Mel Beale
President, AWG Board of Directors

VIA ELECTRONIC & U.S. MAIL
EIR627@ocair.com



November 20, 2018

Ms. Lea Choum
 3160 Airway Avenue
 Costa Mesa, CA 92626

Re: General Aviation Improvement Program - Draft Programmatic Environmental Impact Report
 (SCH No. 2017031072)

Dear Ms. Choum:

We submit the following comments regarding the General Aviation Improvement Project (GAIP) and related Draft Environmental Impact Report (DEIR), including Alternative 1.

Introduction

The Proposed Project for General Aviation Improvements and Alternative 1 would both result in a limited control facility environment which will allow long-term FBO leaseholders significant flexibility to adapt the space to their own needs based on economics and optimization of square footage of aircraft storage capacity. Appendix C and D of the DEIR provide forecasts and estimates of GA aircraft local storage demand, but the only forecast analyzed for environmental impact was a single conservative baseline forecast. In the baseline forecast, applied to the constrained forecast scenario, there will be a significant increase to the number of corporate, business, or private jet operations, which will negatively impact the quality of life of local residents living near the departure tracks. But to obtain a true potential environmental impact, a broader analysis of the impact using a potential higher capacity utilization (above the baseline levels) by the entrepreneurial and innovative leaseholders is needed. This should be based on some constrained version of the high growth rate from § 6.1.3 Table 13 in Appendix C which shows a much higher growth rate.

In addition, the aircraft operations forecast must also include worst case scenario daily/weekly/yearly average operations based on a survey of corporate and business aircraft owners within the "competitive market area (CMA)" and SNA area. No survey results were cited in the EIR 627, yet aircraft utilization by class of equipment is available from a number of nationally recognized credible sources. Environmental impacts must be quantified based on a range of possible operations in alignment with the higher, aggressive forecast on market demand.

Further, the recent introduction at John Wayne Airport of scheduled charter operations at the existing ACI facility has proven quite successful showing a demand for this service. The new FBO tenants, with the proposed vastly expanded service capabilities for customs, immigration, and security would significantly increase the attractiveness of John Wayne Airport versus other airports in the CMA, both for based and itinerant operations. Although the passenger counts are controlled within the Settlement Agreement (SA), the manner of operations for GA is not as strictly controlled as commercial. Would late departures (after the commercial curfew or before 7am) become common? The DEIR 627 did not forecast an increased % in transit (non-hangered) operators use of John Wayne, but with the new large central terminal with services, there is a strong likelihood this higher number of transit operations would occur. This was not analyzed for noise or pollution impact.

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As pointed out in this document, the Draft EIR 627 has serious deficiencies which make a final determination of environmental impact on the Proposed Project or Alternative 1 insufficient without further analysis. As a further example, the EIR reveals that the Project will result in a dramatic diminution in the smallest and currently quietest type of aircraft, the single and multi-engine fixed wing piston, see Table 5-1, p. 5-7, and a substantial increase in turbine engine aircraft. *Id.* Nevertheless, the EIR fails to analyze, or even mention, the impact of the displacement of those smaller aircraft, including the surface traffic and air quality impacts of users having to access them at far flung airports throughout the region. This omission, as well as the other issues detailed in our comments, requires further action.

Sincerely,

A handwritten signature in black ink that reads "Mel Beale". The signature is written in a cursive, flowing style.

Mel Beale
President, AWG Board of Directors



P.O. Box 54132
Irvine, CA 92619-4132

California Cultural Resource Preservation Alliance, Inc.
An alliance of American Indian and scientific communities working for
the preservation of archaeological sites and other cultural resources.

November 1, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, California 92626

RE: John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

Thank you for the opportunity to comment on the above-mentioned project. The Cultural Resources section is very comprehensive, and we concur with the determinations that (1) significant historic structures are not present. (2) there is the potential for the presence of buried archaeological resources. (3) A qualified archaeologist and a culturally related Native American will be retained to monitor ground disturbing activities that will affect native soils. We do have concerns regarding the statement that the monitors will salvage and catalogue artifacts as necessary and ask that the language be changed to provide for consideration of the feasibility of avoidance and preservation in place with data recovery as the fall back mitigation measure. This is in line with California Code of Regulations 15126.4 (b) (3) (A) and (B).

CCRPA-1

Finally, we request that the California Cultural Resource Preservation Alliance, Inc. be placed on your list of organizations to be contacted regarding this and future projects in the region.

CCRPA-2

Sincerely,

Patricia Martz, Ph.D.
President

From: Beverly Blais <bblaisesq@gmail.com>
Sent: Monday, November 19, 2018 5:42 PM
To: EIR627
Subject: Comments to General Aviation Improvement Plan Draft EIR
Attachments: 11.15.18 EIR Comments.docx

Ms. Lea Choum:

Attached please find the comments to the Draft EIR for the proposed General Aviation Improvement Plan from Citizens Against Airport Noise and Pollution. CAANP-1

Sincerely,
Beverly Blais Moosmann

BEVERLY BLAIS MOOSMANN
544 Vista Grande
Newport Beach, CA 92660
bblaisesq@gmail.com

November 19, 2018

Via Electronic Mail
EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report
(SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”):

1. DEIR Complexity and Length Relative to Time Limitations for Comment:

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to “comment” on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted.

CAANP-2

Question: Why can’t additional time be provided for the review and comment to the DEIR?

2. Project Objectives (Section 3).

This section lists separate objectives of the GAIP, which appear only to benefit airport operations and profitability.

Comment: As you are surely aware, under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economical benefits of the GAIP with no indication of concerns for the communities impacted by noise and pollution emanating from JWA.

Questions:

- a. Is the GAIP for the benefit of nonresident corporate jet aircraft?
- b. Is the GAIP for the benefit of local corporate jet aircraft?
- c. Have local corporations been surveyed regarding their interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- d. Does the GAIP benefit the exiting fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?
- f. How does a decrease in the number of smaller privately owned piston-powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- g. What is the basis for the assumptions of daily departure and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- h. Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- i. Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not?
- j. How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- k. Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?
- l. If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not?
- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
- n. What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- o. What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?
- p. How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?
- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?

CAANP-2
cont.

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- r. What will be the economic benefit to JWA if the GAIP is approved?
 - s. If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
 - t. If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?
 - u. If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

3. DEIR Conclusions that Environmental Impacts are Insignificant (Section 4).

Comment: The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations. There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.

CAANP-2
cont.

Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.

Questions:

- a. As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- c. Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure pattern by the large corporate jets on the same neighborhood impacted by commercial departures considered in the Noise Impact section of the Appendix? As this would have the same impact as a net

increase in commercial departures that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?

- e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- f. How would the noise from departing large GA jet aircraft compare with the noise emitted from the commercial jet fleet currently using JWA? If this analysis has been done, what is the basis for the analysis?
- g. Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- h. Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?

4. Health Risk Analysis (Section 4).

Comment: Although related to the above comment, the health risk analysis (“HRA”) in Section 4 of the DEIR is extremely complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement (“EIR 617”) for its health risk analysis (“HRA”). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence.

CAANP-2
cont.

Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses “sensitive receptors” and “sensitive populations” noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

Questions:

- a. In arriving at the conclusion that the environmental impact of the GAIP is “less than significant,” what consideration has been given to the schools, athletic fields, parks and residential areas located within a close proximity and under the flight paths of JWA? If the impact these populations have not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR, including the impact to schools, why isn’t there an in depth discussion of health concerns especially as they relate to children?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within a close proximity of airports? Within 10 miles of JWA?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mixture is different and heavier in carbon and particulate pollutants?
- e. In preparing the DEIR, was there any consideration of the added pollution that would result from the increase in GA jet aircraft combined with the existing commercial fleet? If no, why not?
- f. In preparing the DEIR, was there any consideration of the impact of increased noise levels that would result from nighttime flights of GA jet aircraft? If no, why not?

CAANP-2
cont.

5. Flight Patterns.

Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

Questions:

- a. Will the GA jet aircraft added to JWA through the GAIP follow the existing flight patterns presently used by commercial jets as mandated by the SoCal Metroplex?
- b. If the GA jet aircraft added through the GAIP will follow the flight patterns mandated under the SoCal Metroplex, has there been any consideration as to the impact that will be caused by the increase in air traffic over Newport Beach? If no, why not?
- c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?

Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

CAANP-2
cont.

Sincerely,

Beverly Moosmann

From: Corona del Mar Residents Assn <Info@Cdmra.org>
Sent: Wednesday, November 21, 2018 3:10 PM
To: EIR627
Cc: CityCouncil@newportbeachca.gov; GLeung@newportbeachca.gov; AHarp@newportbeachca.gov; TFinnigan@newportbeachca.gov; MLocey@newportbeachca.gov; Info@Cdmra.org
Subject: Public Comments: DEIR Comments - John Wayne Airport General Aviation Improvement Program
Attachments: JWA DEIR_General Aviation_181121.pdf

Dear Ms. Choum:

The Corona del Mar Residents Association (CdMRA) submits the attached comments on the Draft Environmental Impact Report 627 (DEIR) for the John Wayne Airport General Aviation Improvement Program on behalf of residents of Corona del Mar, a neighborhood within the City of Newport Beach.

CDMRA-1

Please provide our organization with a copy of any public notices issued in connection with this project, including the revised DEIR, Notice of Availability of the Final EIR and any public meetings.

A hardcopy of our attached letter is being mailed to your Costa Mesa address, and to Mary Locey for distribution to interested parties at the City of Newport Beach.

CDMRA-2

Feel free to contact me if you have any questions.

Debbie Stevens

President

- cc: Newport Beach City Council
- Grace Leung, Newport Beach City Manager
- Aaron Harp, Newport Beach City Attorney
- Tara Finnigan, Newport Beach City PIO
- Mary Locey, Newport Beach MPA
- Corona del Mar Residents Association



Corona del Mar Residents Association
PO Box 1500 | Corona del Mar, CA 92625 | VM/Text 949.478.2454
Cdmra.org | [Facebook @CdMRA](https://www.facebook.com/CdMRA)

Corona del Mar RESIDENTS ASSOCIATION

VOLUNTEERS ADVOCATING FOR CORONA DEL MAR RESIDENTIAL QUALITY OF LIFE SINCE 1987

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Karen Mascitelli
- MEMBERS AT LARGE*

JASMINE CREEK
Larry Finn
- THE TERRACES of CDM*
Kathy Blank

November 21, 2018

Lea Choum
3160 Airway Ave.
Costa Mesa, CA 92626

Email copy to: EIR627@ocair.com

Subject: DEIR Comments – John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

We are submitting the following comments on the Draft Environmental Impact Report 627 (DEIR) for the John Wayne Airport General Aviation Improvement Program on behalf of residents of Corona del Mar, a neighborhood within the City of Newport Beach. The Corona del Mar Residents Association (CdMRA) is a residents' advocacy group which covers roughly 6,300 homes between Jamboree Road on the west, Cameo Highlands/Shores on the east, Bayside Drive on the south and San Joaquin Hills on the north.

CDMRA-3

Based on the information in the DEIR, it appears that while general aviation operations are expected to increase due to the proposed project, the impacts of noise, air quality and traffic all resulting from increased flights and frequencies have not been sufficiently addressed. The following provides our specific comments.

CDMRA-4

1. The DEIR appears to be understating the potential impacts of the project on air quality, noise, and traffic. No substantial evidence was provided in the DEIR to support the assumptions that by 2026 40% of the Boeing 737 and Airbus A320 aircraft utilizing the airport will include newer Boeing 737-MAX and Airbus A320-NEO with substantially quieter engines. Since this assumption cannot be supported by facts, the DEIR must use assumptions that error on the side of worst-case or maximum impacts for environmental analyses that include noise and air quality. The DEIR must provide a thorough analysis of these issues and the impacts associated with different fleet mixes, to provide an adequate analysis of the environmental impacts, should the assumed fleet mix not be achieved.

CDMRA-5

2. The existing and proposed flight patterns for general aviation are not discussed in detail. Therefore, the potential impact of a change in flight patterns cannot be determined.

CDMRA-6

November 21, 2018
Lea Choum
Page Two

3. Sensitive Receptors: There are several areas near the airport where applications for new development of residential areas have been proposed and have undergone or are in the process of undergoing environmental review including: (1) the Koll Center Residences project (located within the Koll Center Newport) proposed for up to 260 residential units; (2) Newport Crossings (located at in the Newport Place Planned Community, adjacent to the airport) proposed for 250 residential dwelling units. Also, Uptown Newport (at 4311-4321 Jamboree Road) is currently under construction for up to 1,244 residential units, plus 11,500 square feet of neighborhood-serving retail space, and two acres of park space. The addition of these residential developments would add sensitive receptors to the airport area and the potential impact of the project of these developments must be evaluated as part of the project-specific and cumulative impact analysis for all environmental resources including air quality, health risks, noise, and traffic.

CDMRA-7

4. The health risk assessment is inadequate and does not provide any analysis of the potential increase in toxic air contaminants associated with the increase in GA flights. The HRA must evaluate the potential increase in emissions associated with the proposed project as well as other cumulative projects including DEIR 617. Further, the HRA must consider the potential increase in sensitive receptors (new residential developments) adjacent to the airport which are undergoing environmental review and should be considered in the analysis. DEIR 627 did not evaluate these as potential sensitive receptors.

CDMRA-8

5. Appendix E of the DEIR includes the Air Quality Technical Report (AQ Report) and indicates that the emission calculations were completed using the CalEEMod model. The AQ Report indicates that the CalEEMod output files are included in Attachment 2 to Appendix E. However, Attachment 2 to Appendix E was not provided on the website as part of the Draft DEIR (not in the file with the individual Appendix and not as part of the "Complete DEIR 627 Files"). Without Attachment 2, the emission factors, hours of use, type of equipment, engine load, and other related assumptions are unknown and the air quality analysis does not contain sufficient evidence to support the conclusions. Therefore, we are requesting a copy of the CalEEMod output files and an additional 30 days to review those files.

CDMRA-9

6. The DEIR has used the wrong analysis to estimate localized emissions impact. The DEIR indicates that it is acceptable to use the SCAQMD's screening tables for projects greater than 5 acres in size (see DEIR Appendix E, page 18 and DEIR Chapter 4.2 page 4.2-15). The SCAQMD recommends using the screening tables only for projects that are less than or equal to five acres. The SCAQMD states in their Localized Significance Threshold Methodology (revised July 2008)¹: "It is recommended that lead agencies perform project-specific air quality modeling for larger projects." Therefore, the SCAQMD does not concur with the conclusion in the DEIR that the LST methodology can be applied to projects greater than 5 acres. Project-specific modeling is required to estimate the potential localized air

CDMRA-10

¹ SCAQMD Final Localized Significance Threshold Methodology, July 2008, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>

November 21, 2018
Lea Choum
Page Three

quality impacts as the SCAQMD's screening tables do not apply to sites greater than 5 acres. The SCAQMD in fact provides guidance for larger projects to determine localized impacts either through dispersion modeling of onsite emission sources or other appropriate SCAQMD-approved methodologies (see SCAQMD, 2008). Project-specific dispersion modeling results determine whether or not a larger project generates pollution concentrations that cause or contribute to an exceedance of the applicable ambient air quality standards or the localized significance thresholds at sensitive receptor sites. The DEIR should be revised with project-specific air quality modeling provided for localized air quality impacts.

CDMRA-
10 cont.

7. Noise impacts have been underestimated. The DEIR doesn't address the fact the GA aircraft are not subject to the same requirements as commercial airlines. Since the proposed project will add GA jet aircraft, the DEIR must address the potential increase in noise during the evening and nighttime periods.

CDMRA-
11

For years, our residents have been impacted by eastbound flights leaving JWA, especially when flight paths and patterns change. Noise, air pollution, traffic become more of a problem with each of these changes. We also deal with safety concerns created by lower-altitude aircraft turning eastward over our homes rather than proceeding to the waypoint over the ocean, all because of fuel efficiencies and on-time arrival objectives set by the airlines with no regard to the impact on residential neighborhoods below the flight path.

CDMRA-
12

We believe that an increase in general aviation flights, without adequately addressing their environmental impact on households near the airport or under the flight paths, is unacceptable and should be remedied by a rigorous study of these issues before proceeding with any changes in general aviation traffic at John Wayne Airport.

Thank you for your consideration of CdMRA's concerns. Please provide our organization with a copy of any public notices issued in connection with this project, including the revised DEIR, Notice of Availability of the Final EIR and any public meetings.

Feel free to contact me if you have any questions.

Debbie Stevens

CdMRA President

cc: Newport Beach City Council:	CityCouncil@newportbeachca.gov
Grace Leung, Newport Beach City Manager:	GLeung@newportbeachca.gov
Aaron Harp, Newport Beach City Attorney:	AHarp@newportbeachca.gov
Tara Finnigan, Newport Beach City PIO:	TFinnigan@newportbeachca.gov
Mary Locey, Newport Beach MPA:	MLocey@newportbeachca.gov
Corona del Mar Residents Assn:	Info@Cdmra.org

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Irene Villalobos

SHORE CLIFFS
Sandie Haskell
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CAMEO HIGHLANDS
Marjorie Sawyer
Karen Tringali

CAMEO SHORES
Doretta Ensign
Karen Mascitelli

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JASMINE CREEK
Larry Finn

THE TERRACES of CDM
Kathy Blank

November 21, 2018

Lea Choum
3160 Airway Ave.
Costa Mesa, CA 92626

Email copy to: EIR627@ocair.com

Subject: DEIR Comments – John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

We are submitting the following comments on the Draft Environmental Impact Report 627 (DEIR) for the John Wayne Airport General Aviation Improvement Program on behalf of residents of Corona del Mar, a neighborhood within the City of Newport Beach. The Corona del Mar Residents Association (CdMRA) is a residents' advocacy group which covers roughly 6,300 homes between Jamboree Road on the west, Cameo Highlands/Shores on the east, Bayside Drive on the south and San Joaquin Hills on the north.

Based on the information in the DEIR, it appears that while general aviation operations are expected to increase due to the proposed project, the impacts of noise, air quality and traffic all resulting from increased flights and frequencies have not been sufficiently addressed. The following provides our specific comments.

1. The DEIR appears to be understating the potential impacts of the project on air quality, noise, and traffic. No substantial evidence was provided in the DEIR to support the assumptions that by 2026 40% of the Boeing 737 and Airbus A320 aircraft utilizing the airport will include newer Boeing 737-MAX and Airbus A320-NEO with substantially quieter engines. Since this assumption cannot be supported by facts, the DEIR must use assumptions that error on the side of worst-case or maximum impacts for environmental analyses that include noise and air quality. The DEIR must provide a thorough analysis of these issues and the impacts associated with different fleet mixes, to provide an adequate analysis of the environmental impacts, should the assumed fleet mix not be achieved.
2. The existing and proposed flight patterns for general aviation are not discussed in detail. Therefore, the potential impact of a change in flight patterns cannot be determined.



November 21, 2018

Lea Choum

Page Two

3. **Sensitive Receptors:** There are several areas near the airport where applications for new development of residential areas have been proposed and have undergone or are in the process of undergoing environmental review including: (1) the Koll Center Residences project (located within the Koll Center Newport) proposed for up to 260 residential units; (2) Newport Crossings (located at in the Newport Place Planned Community, adjacent to the airport) proposed for 250 residential dwelling units. Also, Uptown Newport (at 4311-4321 Jamboree Road) is currently under construction for up to 1,244 residential units, plus 11,500 square feet of neighborhood-serving retail space, and two acres of park space. The addition of these residential developments would add sensitive receptors to the airport area and the potential impact of the project of these developments must be evaluated as part of the project-specific and cumulative impact analysis for all environmental resources including air quality, health risks, noise, and traffic.
4. The health risk assessment is inadequate and does not provide any analysis of the potential increase in toxic air contaminants associated with the increase in GA flights. The HRA must evaluate the potential increase in emissions associated with the proposed project as well as other cumulative projects including DEIR 617. Further, the HRA must consider the potential increase in sensitive receptors (new residential developments) adjacent to the airport which are undergoing environmental review and should be considered in the analysis. DEIR 627 did not evaluate these as potential sensitive receptors.
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¹ SCAQMD Final Localized Significance Threshold Methodology, July 2008, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>

November 21, 2018

Lea Choum

Page Three

quality impacts as the SCAQMD's screening tables do not apply to sites greater than 5 acres. The SCAQMD in fact provides guidance for larger projects to determine localized impacts either through dispersion modeling of onsite emission sources or other appropriate SCAQMD-approved methodologies (see SCAQMD, 2008). Project-specific dispersion modeling results determine whether or not a larger project generates pollution concentrations that cause or contribute to an exceedance of the applicable ambient air quality standards or the localized significance thresholds at sensitive receptor sites. The DEIR should be revised with project-specific air quality modeling provided for localized air quality impacts.

7. Noise impacts have been underestimated. The DEIR doesn't address the fact the GA aircraft are not subject to the same requirements as commercial airlines. Since the proposed project will add GA jet aircraft, the DEIR must address the potential increase in noise during the evening and nighttime periods.

For years, our residents have been impacted by eastbound flights leaving JWA, especially when flight paths and patterns change. Noise, air pollution, traffic become more of a problem with each of these changes. We also deal with safety concerns created by lower-altitude aircraft turning eastward over our homes rather than proceeding to the waypoint over the ocean, all because of fuel efficiencies and on-time arrival objectives set by the airlines with no regard to the impact on residential neighborhoods below the flight path.

We believe that an increase in general aviation flights, without adequately addressing their environmental impact on households near the airport or under the flight paths, is unacceptable and should be remedied by a rigorous study of these issues before proceeding with any changes in general aviation traffic at John Wayne Airport.

Thank you for your consideration of CdmRA's concerns. Please provide our organization with a copy of any public notices issued in connection with this project, including the revised DEIR, Notice of Availability of the Final EIR and any public meetings.

Feel free to contact me if you have any questions.

Debbie Stevens

CdmRA President

cc: Newport Beach City Council:	CityCouncil@newportbeachca.gov
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Aaron Harp, Newport Beach City Attorney:	AHarp@newportbeachca.gov
Tara Finnigan, Newport Beach City PIO:	TFinnigan@newportbeachca.gov
Mary Locey, Newport Beach Administrator:	MLocey@newportbeachca.gov
Corona del Mar Residents Assn:	Info@Cdmra.org

From: Brian Jones <bjonese55@gmail.com>
Sent: Tuesday, November 20, 2018 11:53 AM
To: EIR627
Subject: GAIP

Anything done should not lead to noisier planes or a failure to observe the current curfews by private aircraft.

ITCA-1

Brian Jones

2001 Sabrina Terrace

Corona Del Mar CA 92625

President
Irvine Terrace Community Association
Board of Directors

From: Joyce Perry <kaamalam@gmail.com>
Sent: Thursday, November 15, 2018 12:45 PM
To: EIR627
Subject: John Wayne Airport General Aviation Improvement Program

Good Afternoon Ms. Choum,

This email serves as the official response from the Juaneno Band of Mission Indians, Acjachemen Nation, (Belardes and Perry) on the above mentioned project. We are concerned there is the potential for the the presence of buried cultural resources therefore, we request a Native American monitor certificated by our Tribe be present during ground disturbing activities. We also request that if any cultural deposits are found, a feasible avoidance and preservation plan is in place to protect the resources. Thank you for your consideration.

JBMI-1

JBMI-2

Húu'uni 'óomaqati yáamaqati.
Teach peace
Joyce Stanfield Perry
Payomkawichum Kaamalam - President
Juaneño Band of Mission Indians, Acjachemen Nation
Tribal Manager, Cultural Resource Director

From: Joseph Finnell <joefinl@socal.rr.com>
Sent: Wednesday, November 7, 2018 9:40 PM
To: EIR627
Subject: SNA GA Improvement Plan
Attachments: SNA Improvement ltr.pdf

Dear Ms. Choum,

Attached is a pdf comment letter submitted for consideration regarding issues in EIR627.

SCPA-1

Thank you for your cooperation and help.

On behalf of SoCal Pilots
Joe Finnell, President
SoCal Pilots Association
714-839-7377 (H)
714-293-3601 (C)



November 7, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, California 92626

Dear Ms. Choum,

The Southern California Pilots Association (SoCal Pilots) has enjoyed a constructive and mutually beneficial relationship with John Wayne Airport, its management and on-field businesses over the years. It was only a few years ago that general aviation tiedown spaces were in short supply and simply not available. Waiting lists were utilized.

SCPA-2

Over the last few years, FBOs colluded to milk as much revenue as possible from captive on-field customers. This price gouging for service and avgas made it so expensive for tenants that a mass exodus resulted when aircraft owners having had enough, moved to surrounding airports. This left many tiedown vacancies on SNA's tarmac.

In this airport improvement program, the county and airport management have decided that improvement is achieved by shrinking the number of tie-down spaces to accommodate a variety of changes that will only impact current tenants. With the recent FBO changes, aircraft services and avgas prices have become more in line with neighboring airports. As a result, customers have become more willing to make SNA their aircraft home base.

SCPA-3

Further, the proposed reduction in quantity of tiedown spaces is counter to the airport's obligation to support all aircraft at John Wayne as required by federal government funding support terms.

SCPA-4

SoCal Pilots strongly urges you to keep and maintain at least the current capacity of 596 GA aircraft while increasing the number of hangars on the field.

SCPA-5

Additionally, effort should be made to keep the existing perimeter road where it is by obtaining a waiver from the FAA. Doing so will prevent displacing or unnecessarily eliminating additional tiedown spaces.

SCPA-6

It is not an improvement to reduce capacity, preventing new GA tenants, or to squeeze existing tenants off the field. Please review and update the EIR to prevent this impact.

SCPA-7

Respectfully,


Joseph Finnell, President
SoCal Pilots Association

From: Pat Prentiss <patprentiss@aol.com>
Sent: Thursday, November 8, 2018 5:36 AM
To: Joseph Finnell
Cc: EIR627
Subject: Re: SNA GA Improvement Plan

Joe,

Excellent letter stated with accuracy.

SCPA 2-1

Best,
Pat Prentiss,
SoCal Pilot's Association
President, JWA/SNA Chapter

Sent from my iPhone

> On Nov 7, 2018, at 9:39 PM, Joseph Finnell <joefinl@socal.rr.com> wrote:
>
> Dear Ms. Choum,
>
> Attached is a pdf comment letter submitted for consideration regarding issues in EIR627.
>
> Thank you for your cooperation and help.
>
> On behalf of SoCal Pilots
> Joe Finnell, President
> SoCal Pilots Association
> 714-839-7377 (H)
> 714-293-3601 (C)
>
> <SNA Improvement ltr.pdf>
>
>

From: Fred Fourcher <fred@bitcentral.com>
Sent: Wednesday, November 21, 2018 1:11 PM
To: EIR627
Cc: Joe Finnell; Gary Schank; Pat Prentiss; Paul Columbus; Ed Martell; Williams, Adam
Subject: So Cal Pilots response to DEIR 627
Attachments: SNA-EIR627 SoCal Pilots Response 11-21-18.pdf

Ms. Choum,

I have attached the So Cal Pilots Association updated response to DEIR 627.

SCPA 3-1

Happy Thanksgiving,

Fred

Fred Fourcher, CEO
Bitcentral, Inc.
fred@bitcentral.com
Direct Line: 949-417-4111
www.bitcentral.com



**General Aviation “Improvement” Program – DEIR 627 Response from So Cal Pilots
November 21, 2018**

The So Cal Pilots Association would like to amend and add the following comments to our prior submission. The So Cal Pilots Association represents the collective voice of more than 1,400 individual pilots and aircraft owners.

The three main needs of the So Cal Pilots are:

SCPA 3-2

1. Little or no reduction in the number of light GA aircraft on the field
 2. Significantly more hangar space for Light GA than current
 3. Competitive maintenance and FBO facilities that keep our prices low
-

The So Cal Pilots association takes great issue with the reduction of aircraft at SNA as shown in the proposed project and three alternatives. We understand that the “General Aviation Terminal” as outlined in this DEIR does not serve the interests of the light General Aviation community and is intended to serve the needs of scheduled commuter airline traffic out of one or more of the FBO facilities. We view this as an expansion of the airport’s commercial operations into the area of the airport which now supports light General Aviation. The following are specific areas, So Cal Pilots have noted as deficiencies in the DEIR that need to be addressed.

SCPA 3-3

1. The DEIR does not adequately address the true impact of displacing up to 242 aircraft. We would like the EIR to include the impact of these aircraft on neighboring airports and study the actual use behaviors of existing aircraft located at these airports whose owners reside near JWA. These aircraft are typically brought to JWA to pick up owners and passengers then depart again, doubling the takeoffs and landings than if they were based at JWA. Also, the EIR should state if there are hangars available at Fullerton, the closest GA Airport as well as other airports farther away.

SCPA 3-4

2. The DEIR does not address whether an exemption from the FAA can be obtained in order to keep the perimeter road in the same place as it is today. Movement of the perimeter road away from the runway by 10 feet is reducing hundreds of thousands of square feet from GA facilities

SCPA 3-5

3. The DEIR only shows a reduction in aircraft as compared to the existing conditions and does not address ways to keep the current number of aircraft on the field. Because there is a 35 year wait for hangars and no wait for tie down spaces, the EIR needs to address the impact of shifting the current number of aircraft to predominately being housed in hangars. A hangar that takes the same footprint yet houses two aircraft is a more efficient use of land. The EIR needs to address the environmental impact of having two planes stacked in T hangars instead of just one aircraft. This saves land and other resources while keeping the planes covered, reducing maintenance and the environmental impact of aircraft painting on a more frequent basis. An example of a lift system: <http://armaerospace.com>

SCPA 3-6

4. The DEIR does not address the impact of the trends in newer aircraft types, such as electric aircraft used initially for training and eventually for business and pleasure flights. Electric aircraft can cut the cost per flight hour in half as compared to a Cessna 172. This should have a positive impact on flight training and the number of aircraft on the field due to the significantly lower operating costs. The environmental impact of charging facilities along with the lower noise and pollution should also be accounted for in the EIR. The following link shows how electric aircraft are being used today for flight training in Fresno. <https://youtu.be/RsrD97CEKwk>

SCPA 3-7

5. The DEIR does not address changes in the GA Fleet such as turboprops and very light jets. These aircraft such as the Cirrus Vision Jet and the Piper M600 are in the 6,000 lb. range and have wingspans longer than conventional piston GA aircraft. The current DEIR and proposed plan do not specifically address the size of T hangars necessary for wingspans slightly larger than conventional GA aircraft.

SCPA 3-8

6. The DEIR fails to make a distinction between unscheduled GA aircraft used for personal and business flights and scheduled flights using Regional Jets. The environmental impact of operating these terminals with parking, traffic, the large number of passengers, and the increased number of flights is not adequately addressed. These flights would normally be classified as commercial airlines currently operating out of the main terminal. Adding scheduled airline capacity to the FBOs needs to be clearly stated in the DEIR as the reason for the reduction in the numbers of light GA aircraft at SNA. The proposed increase in scheduled airline traffic masquerading as GA flights has a significant environmental impact on the surrounding communities, and the overall GA community.

SCPA 3-9

7. The EIR must adequately address all aspects of this proposed business model at SNA. The DEIR specifies land and facilities for two or three General Aviation Terminals on land that could be used to serve general aviation aircraft instead of commercial airline customers. What is the environmental impact for each general aviation aircraft displaced from John Wayne Airport? Every square foot of land used for a "General Aviation" Terminal is one less square foot used to park light general aviation aircraft. Eliminating as many as 242 parking spaces for light general aviation aircraft and replacing them with scheduled airline traffic is not in the spirit of the settlement agreement and expectations of the surrounding communities.

SCPA 3-10

8. The DEIR does not address the need for multiple limited service FBOs which are essential to the light GA community. The one limited service FBO listed is Jays Maintenance however there are other maintenance operations on the field today. The EIR needs to include 2 or 3 of these kinds of facilities to support light GA at SNA. Also, the EIR needs to address or more of these limited service FBOs offering self-serve fuel. Flight schools, aircraft sales and aircraft parts are all part of a vibrant GA ecosystem that exist today and need to be part of the project going forward.

SCPA 3-11

Table 11: Based Aircraft Storage Capacity

		ACI Jet	Atlantic Aviation	Jay's Maint	Martin Aviation	Executive Hangars	SouthCoast Hangars	Orange County			
Summary	Full Svc NW FBO	Full Svc NE FBO	Full Svc SE FBO	Ltd Svc SW FBO	Ltd Svc FBO	T-Hangars	Box Hangars	Tie-Downs	Flight School	OCSD	Total
Existing Conditions	-	73	39	0	8	97	11	368	0	-	596
Proposed Project	32	30	0	17	8	96	30	88	47	5	354
Alternative 1	32	30	30	17	8	114	0	72	47	5	356
Alternative 2	0	30	30	17	8	72	19	132	47	5	361
Alternative 3	0	73	23	0	8	97	11	342	0	0	554

Note: May not sum due to rounding.

SCPA 3-12

From: Steven Taber <Staber@LeechTishman.com>
Sent: Wednesday, November 21, 2018 12:10 PM
To: EIR627
Subject: SPON/AirFair Comments on DEIR 627 and the John Wayne Airport General Aviation Improvement Program
Attachments: 2018.11.21 Final Comment Letter for GAIP.pdf

Dear Ms. Choum,

Attached are the comments of SPON and AirFair on the John Wayne Airport General Aviation Improvement Program and the draft EIR 627 for your consideration.

SAF-1

Yours very truly,

Steven M. Taber

Steven Taber | Partner
staber@leechtishman.com

LEECHTISHMAN
LEECH TISHMAN FUSCALDO & LAMPL, INC.
leechtishman.com

200 South Los Robles Avenue, Suite 210
Pasadena, CA 91101
T: 626.796.4000 | F: 626.795.6321
Direct 626.395.7300 | Toll-Free 844.750.1600

PITTSBURGH | CHICAGO | LOS ANGELES | NEW YORK | SARASOTA | WILMINGTON, DE

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November 21, 2018

Steven M. Taber
staber@leechtishman.com

VIA U.S. POST AND EMAIL (EIR627@ocair.com)

Ms. Lea Choum,
3160 Airway Avenue
Costa Mesa, California 92626

**Re: *Comments of SPON and AirFair on the John Wayne Airport
General Aviation Improvement Program Draft Program EIR 627***

Dear Ms. Choum:

We submit the following comments on the John Wayne Airport General Aviation Improvement Program (GAIP or Project) and the Program Draft Environmental Impact Report 627 (DEIR) on behalf of our clients, Stop Polluting Our Newport (SPON) and AirFair, both of which are non-profit California corporations. SPON and AirFair consist of residents of the City of Newport Beach who are concerned about operations at John Wayne Airport since they directly impact the residents' lives and well-being. It is out of concern for the public health and their property that SPON and AirFair submit these comments.

SAF-2

Primary among SPON and AirFair's concerns is the fact that GAIP will significantly increase the number of business jet operations at John Wayne Airport (the "Airport"). This increase will have a deleterious effect on the public health and welfare in Orange County and in the City of Newport Beach. As a result, SPON and AirFair request that the County of Orange conduct additional analyses before commencing the Project.

I. *Programmatic Approach*

SPON and AirFair are concerned that the Project is being presented as a "Program EIR." As a "Program EIR," this is the first step in a very long process. In particular, SPON and AirFair are concerned that the facts and assumptions presented in the DEIR are intentionally vague and ambiguous so that decisions can be made at a later date. This approach is inadequate for proper evaluation of potential impacts or decision-making. Once the decision is made to proceed with

SAF-3

this Program, citizens, such as the members of SPON and AirFair, will lose their ability to comment on and effect meaningful change to the impact of the Project on the surrounding community. In addition, the authority provided by the DEIR is too broad because the programmatic approach may allow for some issues to never be thoroughly assessed. SPON and AirFair believe that it is in the public interest for the environmental assessment to be revised to include more detailed information than what is presented in the DEIR.

SAF-3
cont.

II. *Increase in Jet Traffic*

The Project, obviously, has the potential to have a significant impact on the local environment, yet the DEIR fails to give any idea of that potential impact due to its lack of detail about how usage, and therefore traffic and noise, would evolve under the different scenarios.

The DEIR assumes a scenario where business jet traffic will increase at the expense of smaller private planes as the facilities are reconfigured to allow more business jets to be based at JWA. Yet no details are provided in the DEIR about how many times a day these business jets might be taking off and landing or whether any constraints could be placed on their use beyond the limits currently in place. This change in fleet mix is important, because business jets usually fly the same flight paths as commercial jets, whereas piston planes rarely do. That is, business jets file flight plans and generally fly using instrument flight rules, whereas piston-powered aircraft do not file flight plans and generally fly using visual flight rules. The result will be a net increase in jet traffic over Newport Beach using the same commercial flight patterns. The DEIR did not take this into account and an estimate of the increase in jet traffic must be provided in order to assess the potential increase in noise and pollution for Newport Beach residents.¹

SAF-4

Moreover, in modeling the aircraft noise created by the Project, the County uses the assumption that “the percentage of day, evening and night distribution of future aircraft operations would be consistent with the percentage of existing operations.” DEIR, p.4,7-20. However, with an increase in business jet traffic at the airport will come an increase in nighttime operations. It is, therefore, reasonably foreseeable that the number of night operations will increase as the number of arrivals of longer haul business jets often occur in the evening hours due to the longer time duration of their trips. Business jets often arrive from distant airports later in the evening than single- and multi-engine propeller-driven aircraft. In addition, business jets often leave late at night so that they can reach destinations

SAF-5

¹ See also the City of Newport Beach’s analysis of flight patterns. The City states that the DEIR assumes that there will be no change in flight patterns as a result. But when coupled with the fact that the baseline pre-dates the implementation of the Southern California Metroplex flight routes, it does not seem plausible that the flight routes would not change.

in the Midwest and East Coast by the beginning of the business day. The DEIR downplays this fact by repeatedly pointing out that the County of Orange has noise standards that the business jets must meet if they are flying at night. However, since the County's noise standards are expressed in terms of single event noise level and not as an average, it is possible for business jets, which can generally meet the SENEL standard, to fly more frequently at night. The DEIR is inadequate because it does not address the maximum number of business jets that could depart from JWA within a 24-hour period.

SAF-5
cont.

Finally, it is logical to assume that an increase in business jet operations will lead to an increase in charter flights offered through the full-service FBO. This will result in an increase in the number of passengers using the Airport. Since passengers on charter flights are not included in the MAP CAP that was agreed upon in the Settlement Agreement, SPON and AirFair believe that the number of passengers utilizing the full-service FBO should be analyzed in the DEIR.

SAF-6

In addition, SPON and AirFair have several questions that the DEIR and the Airport have left unanswered.

1. What is the largest private/business jet that could be accommodated?

SAF-7

2. How does its size compare with the commercial jets currently departing JWA?

SAF-8

3. How does noise from the largest private/business jet compare with the quietest commercial jet currently used at JWA?

SAF-9

4. How would street traffic increase as a result of more space being provided for business jets?

SAF-10

III. *Baseline Is Outdated*

Throughout the DEIR the Airport uses 2016 as the baseline year for its analysis. However, 2016 is one year before the Southern California Metroplex was fully implemented at the Airport. In 2017, the Federal Aviation Administration implemented three new departure routes as part of the Southern California Metroplex: PIGGN ONE, which was implemented in March 2017, and HHERO ONE and FINZZ ONE, which both were implemented in April 2017. The FAA also began two new arrival routes: DSNEE ONE/ROOBY ONE (March 2017) and OHSEA ONE/TILLT ONE (April 2017). These fundamental changes in the movement of aircraft in and around the Airport are acknowledged in the DEIR on page 1-12, where the Airport states “[i]n March and April 2017, additional departure procedures were implemented for departures to the south of JWA.” The

SAF-11

DEIR does not explain why 2016 was chosen as the baseline when using 2017, when the Southern California Metroplex changes were in place, would provide a more accurate baseline of the conditions at the Airport.

Using 2016 as the baseline ignores the impact that these new “safer and more efficient” routes have had on the noise and pollution over Newport Beach. For example, the noise contour maps used in the DEIR are obsolete due to the implementation of the Southern California Metroplex. The Airport knew that there have been fundamental changes in the mapping of noise due to the Southern California Metroplex new flight routes, yet it chose to ignore them in developing the noise contours for the DEIR. While it is true that the FAA will continue to “tweak” and revise the new flight routes, because the changes in the flight routes were so fundamental, it stands to reason that the DEIR should have taken them into account. The DEIR should be revised to use 2017 as the baseline year.

SAF-11
cont.

IV. *International General Aviation Facility*

An optional improvement considered in the DEIR as part of the Project is the construction of an International General Aviation Facility. DEIR, p.3-9. SPON and AirFair are opposed to the idea of creating an international general aviation facility at the Airport. SPON and AirFair believe that the addition of an international general aviation facility could result in a large increase in business jet traffic and therefore noise, traffic and pollution, particularly from an increase in nighttime operations. The impact cannot be analyzed without specific details regarding the maximum potential number of passengers who would transit through the proposed facility. Of particular concern is the possibility that an International General Aviation Facility will generate an increase in group charter flights and passengers.

SAF-12

V. *Addition of the Orange County Sheriff Department Hangar Facility*

SPON and AirFair have a concern that the addition of a hangar facility for the Orange County Sheriff's Department will result in an increase in helicopters flying in and out of JWA. While the DEIR assumes that there will not be an increase in the number of helicopters based at the Airport, there is no mention of whether the addition of a hangar facility at the Orange County Sheriff's flight operations would result in an increase in helicopter flights at the Airport. This needs to be analyzed before the DEIR is sufficient.

SAF-13

Finally, SPON and AirFair incorporate by reference all the comments made by the City of Newport Beach and request answers to the questions raised by the City of Newport Beach. In particular, SPON and AirFair want to express support for the project scope indicating that any GAIP improvements would be “confined to the

SAF-14

existing Airport footprint.” Any expansion beyond the current boundaries of the Airport will result in an unconscionable increase in noise and pollution to the detriment of public health and welfare.

SAF-14
cont.

Thank you in advance for your consideration of SPON and AirFair’s comments. Please provide me with a copy of all public notices issued in connection with the Project, including the Notice of Availability of the Final EIR. If you have questions or comments, please feel free to call me at (626) 395-7300 or send me an email at staber@leechtishman.com

SAF-15

Very truly yours,

LEECH TISHMAN FUSCALDO & LAMPL, INC.



Steven M. Taber

Individuals and Businesses

3.5 INDIVIDUALS AND BUSINESSES

The letters/emails/comment cards from individuals and businesses can be found under four subheadings in this responses to comments document. Section 3.5 includes individuals and businesses that submitted individualized letters within the 60-day public review period. Those individuals that submitted a standardized letter (i.e., form letter) will find their comment letter in Section 3.6. Those individuals who provided verbal comments at the September 26, 2019 public meeting will find their comments in Section 3.7. For those that submitted their comments after the close of public review period, the letters are provided in Section 3.8.

This section (Section 3.5) includes comments from the 112 individuals and businesses that submitted individualized letters within the 60-day public review period. The following is the list of those commenters. There are individuals that submitted multiple letters or the same letter multiple times. In these instances, there is a number in parentheses after their name to differentiate the letters.

A	B (cont.)	F
ACI Jet (1)	Bob and Diana Brooks	Jeanne Fobes
ACI Jet (2)	Delores and Wayne Browning	Frederick Fong
Deirdre Adams	C	Daniel Freedman
Joan Allison	Sarah Catz (1)	G
Nancy Alston (1)	Sarah Catz (2)	Susan Gaunt
Nancy Alston (2)	Sarah Catz (3)	Pam and Bill Goode
American Aircraft Maintenance, submitted by Lina Shi (1)	Clay Lacy Aviation, submitted by Scott Cutshall	Peter Grant
	Antoinette Cole	Grant Thornton submitted by Alan Herrmann
American Aircraft Maintenance, submitted by Lina Shi (2)	Paul Columbus	Fred Greensite
	W. David Cook	H
	Todd Corbitt	Joel Hackney
American Aircraft Maintenance, submitted by Lina Shi (3)	Andy Couch	Kathy Harbour
	CPF Airways (1)	Bill and Cherie Hart
	CPF Airways (2)	Sandi Hill
Melinda Atkin	CPF Airways (3)	Fred Howser
Brent and Carla Anderson	CPF Airways (4)	Libby Huyck (1)
B	Linda Crum	Libby Huyck (2)
Lewis and Teresa Becker	D	Libby Huyck (3)
David Benvenuti, MD	Christy Dambrosio	I
Leann Benvenuti	Patrick Davern	Benjamin Imai
Carol Berg	Cindy Dillion	J
Marvin Blum	Jeff Dvorak	Daniel Jensen
Brandt Group, submitted by Robert B. Lange	Jeff Dvorak (2)	Johnson & Associates, submitted by Randal Johnson
	E	
Michael Brant-Zawadzki	Maris Ensing	Jeanne Johnson

Comments Received

J (cont.)	O	T
Carol Jung	Oceanfront Jobs submitted by Steve Bunch	Triad Investment Management, submitted by David Hutchison
K		
Franz Kallao	Brigid O'Connor	
Nancy Kirksey	William J. O'Connor	U
Carolyn and Bill Klein	P	Martha Unickel
Sheila Koff	Lee Pearl	U.S. Fasteners, submitted by Kevin Halliburton
L	Sally Petersen	
Wayne Lindholm	Sandra Petty-Weeks	V
Andrea Lingle	Doug Pham	Polly and David Verfaillie
Randall Lipton	Doug Pham	Dan Vogt
Stephen Livingston	R	Peggy Vombauer
Thomas Logan	Doug Robinett	W
Karen Love	Alice Rosellini	Grant Witcher
M	S	Christina and Alan White
Peter Macdonald	Law Offices of Gary L. Schank	Dana White
Bonnie McClellan	Gary Schank	Karol Wilson
Meyer Properties submitted by James Hasty	Law Offices of Gary L. Schank	Simone Wilson
Meyer Properties submitted by James Hasty	Schock Boats, submitted by Steven Schock	Mike Wolf
	Signature Flight Support, submitted by Julie Broderick	Kenneth A. Wong
Shannon and Jeff Mieke		
Lesley Miller	Frank Singer	
Diane Myers	Susan Skinner	
N	Michael C. Smith	
John Nord	Pauline L. Smith	

October 25, 2018

Ms. Lea Choum
County of Orange
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626

Re: Draft Program EIR 627

Dear Ms. Lea Choum,

I attended the Draft Program EIR 627 meeting on September 26, 2018 and provided oral comments at the meeting. Today, I take the opportunity to provide written comments as well.

My love of aviation started at John Wayne Airport and it is where I learned to fly 12 years ago under the guidance of Michael Church with Sunrise Aviation. Currently I have over 2,000 hours in a variety of single and multi-engine aircraft. From that time until the present I have seen a dynamic change in the airport, and specifically in General Aviation and Business Aviation at JWA.

The consultants who developed the Draft EIR forecast a reduction in the number of General Aviation aircraft at JWA. This is because data from 2016 was incorporated. This is simply no longer the case. General Aviation now thrives at John Wayne Airport, and I see every reason for that trend to continue. Fuel sales are currently at record levels for this airport – some at 300% of where they were previously. Aircraft based at our facility have increased 145% since April 2017 (shortly after ACI Jet assumed operation from the predecessor). Growth will continue to occur under the same circumstances. Previously, the main obstacle to growth was fuel price and that is no longer a barrier at JWA. Piston aircraft 100LL sales have surged, but this group of pilots need to be protected with both self-service fuel farms and competitively priced, low cost 100LL pumped from a full service FBO. Additionally, JWA needs to plan for an environmentally friendly approach by having the ability to offer No-Lead (Unleaded) Avgas when it is approved for use by piston aircraft.

ACI-1

John Wayne Airport is critical for the success of Orange County. This airport remains the front door to General Aviation and Business Aviation for Southern California. A reduction in the number of General Aviation aircraft at JWA is not the solution. We cannot reduce the number of GA aircraft - we need to increase it, or at a minimum, maintain it at current levels. The ideal scenario for a healthy, robust airport that serves all the community is a dynamic mix of GA aircraft, Business Aircraft, Government Aircraft, and Airlines. Limiting the operations or abilities of one (either directly or indirectly) to accommodate the others is not the way to best serve Orange County.

The delays of the GAIP continue to have an important impact on this airport. The GAIP has been underway for a greater duration of time than it has taken for Bombardier to develop a new business jet – the Global 7000. There are 12 months of delays in the GAIP already, not one building has been erected, and sadly there is still not a clear date as to when that will happen. We currently do not have the ability to hangar a Bombardier Global 7000 at JWA. As such, neither ACI Jet nor the aircraft operator can provide critical maintenance as the only place this aircraft can be put on jacks is on the ramp. The current hangars cannot accommodate this aircraft and other future ones of this size which are planned. Quite simply, this airport needs new hangars and as the delay of the GAIP continues, JWA and Orange County miss out on many opportunities from both a service and revenue perspective.

ACI-2

19301 Campus Dr #100, Santa Ana, CA 92707
(949) 201-2550 | SNA@acijetcom | www.acijet.com



However, my primary comment is a more focused approach, specifically on two FBOs, which will speed up all improvements. A good FBO by nature is safe, service oriented, reasonably priced, nimble, flexible, and efficiently uses both space and resources. It is important that JWA decides the best path forward for General Aviation at JWA is to have two full-service FBOs as opposed to three. JWA is already behind in the GAIP by a year. Some of the critical lost time can potentially be made up by two FBOs at JWA that can immediately make long-term investments in infrastructure to include construction of new facilities which will better serve customers of JWA. This will make for a better JWA. Further, if awarded correctly, two FBOs will provide both competition at the airport and they can efficiently maximize the utilization of space. More than two will start to limit the available space for customers at the airport.

ACI-3

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Daichendt".

Joe Daichendt
Senior Vice President, FBOs
ACI Jet
Joe@ACIJet.com
(949) 310-0111

RECEIVED

OCT 29 2018

JWA



October 25, 2018

Ms. Lea Choum
County of Orange
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626

Re: Draft Program EIR 627

Dear Ms. Lea Choum,

I attended the Draft Program EIR 627 meeting on September 26, 2018 and provided oral comments at the meeting. Today, I take the opportunity to provide written comments as well.

My love of aviation started at John Wayne Airport and it is where I learned to fly 12 years ago under the guidance of Michael Church with Sunrise Aviation. Currently I have over 2,000 hours in a variety of single and multi-engine aircraft. From that time until the present I have seen a dynamic change in the airport, and specifically in General Aviation and Business Aviation at JWA.

The consultants who developed the Draft EIR forecast a reduction in the number of General Aviation aircraft at JWA. This is because data from 2016 was incorporated. This is simply no longer the case. General Aviation now thrives at John Wayne Airport, and I see every reason for that trend to continue. Fuel sales are currently at record levels for this airport – some at 300% of where they were previously. Aircraft based at our facility have increased 145% since April 2017 (shortly after ACI Jet assumed operation from the predecessor). Growth will continue to occur under the same circumstances. Previously, the main obstacle to growth was fuel price and that is no longer a barrier at JWA. Piston aircraft 100LL sales have surged, but this group of pilots need to be protected with both self-service fuel farms and competitively priced, low cost 100LL pumped from a full service FBO. Additionally, JWA needs to plan for an environmentally friendly approach by having the ability to offer No-Lead (Unleaded) Avgas when it is approved for use by piston aircraft.

John Wayne Airport is critical for the success of Orange County. This airport remains the front door to General Aviation and Business Aviation for Southern California. A reduction in the number of General Aviation aircraft at JWA is not the solution. We cannot reduce the number of GA aircraft - we need to increase it, or at a minimum, maintain it at current levels. The ideal scenario for a healthy, robust airport that serves all the community is a dynamic mix of GA aircraft, Business Aircraft, Government Aircraft, and Airlines. Limiting the operations or abilities of one (either directly or indirectly) to accommodate the others is not the way to best serve Orange County.

The delays of the GAIP continue to have an important impact on this airport. The GAIP has been underway for a greater duration of time than it has taken for Bombardier to develop a new business jet – the Global 7000. There are 12 months of delays in the GAIP already, not one building has been erected, and sadly there is still not a clear date as to when that will happen. We currently do not have the ability to hangar a Bombardier Global 7000 at JWA. As such, neither ACI Jet nor the aircraft operator can provide critical maintenance as the only place this aircraft can be put on jacks is on the ramp. The current hangars cannot accommodate this aircraft and other future ones of this size which are planned. Quite simply, this airport needs new hangars and as the delay of the GAIP continues, JWA and Orange County miss out on many opportunities from both a service and revenue perspective.

19301 Campus Dr #100, Santa Ana, CA 92707
(949) 201-2550 | SNA@acijetcom | www.acijet.com



However, my primary comment is a more focused approach, specifically on two FBOs, which will speed up all improvements. A good FBO by nature is safe, service oriented, reasonably priced, nimble, flexible, and efficiently uses both space and resources. It is important that JWA decides the best path forward for General Aviation at JWA is to have two full-service FBOs as opposed to three. JWA is already behind in the GAIP by a year. Some of the critical lost time can potentially be made up by two FBOs at JWA that can immediately make long-term investments in infrastructure to include construction of new facilities which will better serve customers of JWA. This will make for a better JWA. Further, if awarded correctly, two FBOs will provide both competition at the airport and they can efficiently maximize the utilization of space. More than two will start to limit the available space for customers at the airport.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Daichendt".

Joe Daichendt
Senior Vice President, FBOs
ACI Jet
Joe@ACIJet.com
(949) 310-0111

From: D Adams <dea6@sbcglobal.net>
Sent: Wednesday, November 21, 2018 6:29 AM
To: EIR627; citycouncil@newportbeachca.gov
Subject: EIR627

Any modification of the general aviation program that increases the number of larger planes, corporate jets etc will cause disruption to those of us under the flight plan. The current noise requirements for the larger General Aviation planes are not adequate. Several times a month a general aviation plane outside of curfew hours disrupts sleep. It is annoying but tolerable because it happens so rarely. However, increasing the size and number of the general aviation planes will increase those disruptions and would be a hardship to those of use living under the flight paths of JWA.

DA-1

We look forward to the curfew hours. While it doesn't guarantee no plane noise, it does guarantee reduced plane noise. Anything that allows more larger planes to fly outside of curfew should be discouraged and that includes changing the general aviation program at JWA. Therefore, I do not support any of the proposed projects.

DA-2

Deirdre Adams
Coral Avenue
Balboa Island

From: joanfallison@netscape.net
Sent: Tuesday, November 20, 2018 10:40 AM
To: EIR627
Subject: Private jet expansion at JWA

I am already noticing much air noise from helicopters and private jets going over my house to the southern part of O.C. WE DO NOT NEED ANY MORE NOISE NOR POLLUTION CAUSED BY MORE PLANES. JA-1

Count me as being opposed to any further expansion of a small airport. JA-2

Joan Allison
2704 Hilltop
Newport Beach, CA



Nancy Alston
309 Vista Madera
Newport Beach, CA 92660
November 20, 2018

Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Via Electronic Mail EIR627@ocair.com
Also, in person to street address

Re: General Aviation Improvement Program – DEIR 627

Dear Ms. Choum:

I am submitting comments and questions in response to the project, General Aviation Improvement Program and the DEIR. The project will significantly increase the noise and pollution on Newport Beach as well as seven other cities under both the arrival and departure paths. Increasing general aviation jets of any description, unconstrained by the commercial jet curfew, can only lead to a decrease in quality of life for our residents.

NA-1

How ironic that this increase in jet traffic at JWA comes at the same time as our federal government finally recognized, with the passage of the 2018 FAA Reauthorization Act, the impact of aircraft traffic on local communities.

NA-2

Because of the vagueness of the DEIR document, the residents of Newport Beach have no idea what changes this Project will bring about with its attendant noise and pollution. I am asking a few questions, but with a longer time period, I could have more.

NA-3

Sincerely yours,
Nancy Alston
nanalston@gmail.com

Nancy Alston
attached 2 pages

When you respond to the following questions, will you please give as much detail as time allows.

1. How many GA Jets can JWA handle in a 24-hr. period if there are no constraints except for the current commercial traffic?	NA-4
2. Your document states that the GA Jets at JWA are Stage 3. Will those in the future all be Stage 3?	NA-5
3. What assumptions were made in predicting GA Jet operations in the future? The same for GA General?	NA-6
4. What are the average numbers of passengers on the GA/Jets currently? What is the assumption for the future? Does your analysis of operations for GA/Jets and GA General take into account the number of planes merely arriving to pick up people at JWA?	NA-7
5. What percentage of GA Jet departures currently operate on average per month before 7 AM and after 10 PM? What percentage pursuant to the alternatives?	NA-9
6. What is the largest GA Jet that can be accommodated at JWA?	NA-10
7. Was a noise model made for the above GA Jet? If so, what were the results? If not, why not?	NA-11
8. What percentage of current GA Jet operations are charters? What about pursuant to the different alternatives? What assumptions were made for the future for charters? On average per month, how many passengers are presently on departing charters?	NA-12
9. The Proposed Project and all the alternatives, other than the No Project Alternative, would reduce the capacity for General Aviation aircraft at the Airport. Did you consider reducing the number of GA Jet Operations? If not, why not?	NA-13
10. Are you concluding or defending that under the Project the addition of more general aviation jets does not affect the community because in the last 10 years the total number of general aviation planes has greatly declined?	NA-14

Did you take into account that the historical annual number of general aviation flights, which combined a <u>majority</u> of piston-driven planes and a <u>minority</u> of GA Jets, cannot be compared in noise and pollution to the Project's general aviation mix which includes a higher ratio of GA Jets to non-jets?	NA-15
Going forward, is it your prognostication that under the Project, JWA will show a continuing decline in piston-driven aircraft, but an increase in GA Jets?	NA-16
11. Do you anticipate future EIRs as the proposed project is implemented, as a result of certain items not being fully identified as to location and the like, i.e., the GAT/FBO? Also, with each project or with each phase?	NA-17
12. What is the reason for including an International General Aviation Facility? As it is understood, the location would be determined in the future, correct?	NA-18
13. Given that the project is both general at the planning level and that some of the improvements are to be implemented at a later date how is this project to be implemented? How can the cumulative impacts be considered?	NA-19
14. Were cumulative impacts considered?	NA-20
15. Did or has the County undertaken to reduce noise and emissions in any of the proposed alternatives?	NA-21
16. Did you consider fuel consumption for each alternative? Did you consider ways to reduce fuel consumption? Doesn't the proposed alternative actually increase fuel consumption because of the type of aircraft it would favor?	NA-22
17. The document states that there is no plan to expand the airport footprint. Is that correct?	NA-23
Does that include any proposal for "through the fence" operations or potential location of other services off site? What guarantee is that during the build out phase of the various projects? Or in future plans?	NA-24
18. Considering the recent 2018 FAA Reauthorization Bill passed by Congress with its inclusion of effects on communities, etc., do you foresee any changes to your prognostications regarding the Project.	NA-25

From: Nancy Alston <nanalston@gmail.com>
Sent: Wednesday, November 21, 2018 1:32 PM
To: EIR627
Subject: Comments: Aviation Improvement Program - DEIR 627
Attachments: Comments for GAIP and DEIR.pdf

Nancy Alston
309 Vista Madera
Newport Beach, CA 92660
November 21, 2018

Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Via Electronic Mail EIR627@ocair.com
Also, in person to street address

Re: General Aviation Improvement Program - DEIR 627

Dear Ms. Choum:

I am submitting comments and questions in response to the project, General Aviation Improvement Program and the DEIR.

The Project will significantly increase the noise and pollution affecting Newport Beach as well as the seven other cities under both the arrival and departure paths. Increasing General Aviation Jets of any description, unconstrained by the commercial jet curfew, can only lead to a decrease in quality of life for our residents.

How ironic that this increase in jet traffic at JWA occurs at the same time as our federal government finally recognized, with the passage of the 2018 FAA Reauthorization Act, the impact of aircraft traffic on local communities.

Because of the vagueness of the DEIR document, the residents of Newport Beach have no idea what changes this Project will about with its attendant noise and pollution.

Sincerely yours,
Nancy Alston
nanalston@gmail.com

Attached 2 pages

When you respond to the following questions, will you please give as much detail as time allows.

1. How many GA Jets can JWA handle in a 24-hr. period if there are no constraints except for the current commercial traffic?
2. Your document states that the GA Jets at JWA are Stage 3. Will those in the future all be Stage 3?
3. What assumptions were made in predicting GA Jet operations in the future? The same for GA General?
4. What are the average numbers of passengers on the GA/Jets currently? What is the assumption for the future? Does your analysis of operations for GA/Jets and GA General take into account the number of planes merely arriving to pick up people at JWA?
5. What percentage of GA Jet departures currently operate on average per month before 7 AM and after 10 PM? What percentage pursuant to the alternatives?
6. What is the largest GA Jet that can be accommodated at JWA?
7. Was a noise model made for the above GA Jet? If so, what were the results? If not, why not?
8. What percentage of current GA Jet operations are charters?

What about pursuant to the different alternatives? What assumptions were made for the future for charters?

On average per month, how many passengers are presently on departing charters?

9. The Proposed Project and all the alternatives, other than the No Project Alternative, would reduce the capacity for General Aviation aircraft at the Airport.

Did you consider reducing the number of GA Jet Operations? If not, why not?

10. Are you concluding or defending that under the Project the addition of more general aviation jets does not affect the community because in the last 10 years the total number of general aviation planes has greatly declined?

Did you take into account that the historical annual number of general aviation flights, which combined a majority of piston-driven planes and a minority of GA

Jets, cannot be compared in noise and pollution to the Project's general aviation mix which includes a higher ratio of GA Jets to non-jets?

Going forward, is it your prognostication that under the Project, JWA will show a continuing decline in piston-driven aircraft, but an increase in GA Jets?

11. Do you anticipate future EIRs as the proposed project is implemented, as a result of certain items not being fully identified as to location and the like, i.e., the GAT/FBO? Also, with each project or with each phase?
12. What is the reason for including an International General Aviation Facility? As it is understood, the location would be determined in the future, correct?
13. Given that the project is both general at the planning level and that some of the improvements are to be implemented at a later date how is this project to be implemented? How can the cumulative impacts be considered?
14. Were cumulative impacts considered?
15. Did or has the County undertaken to reduce noise and emissions in any of the proposed alternatives?
16. Did you consider fuel consumption for each alternative? Did you consider ways to reduce fuel consumption? Doesn't the proposed alternative actually increase fuel consumption because of the type of aircraft it would favor?
17. The document states that there is no plan to expand the airport footprint. Is that correct? Does that include any proposal for "through the fence" operations or potential location of other services off site? What guarantee is that during the build out phase of the various projects? Or in future plans?
18. Considering the recent 2018 FAA Reauthorization Bill passed by Congress with its inclusion of effects on communities, etc., do you foresee any changes to your prognostications regarding the Project.

From: Lina AAM <lina@aviation4s.com>
Sent: Tuesday, November 6, 2018 3:06 PM
To: EIR627
Subject: EIR comments

Dear all,

As the owner of a piston aircraft maintenance company based at John Wayne airport, we would love to help improve the environment and satisfy the need for local piston airplanes owners.

As part of GA society, as well as small airplane owner myself, if we can get the limited FBO space, we will build more hangar space and maintain them in our newer facility. We will also bring less environment impact aircrafts to John Wayne Airport, make sure this improvement program is a win-win situation for the county and for pilots like me who also own small piston airplane. AAM-1

GA is a very important part of John Wayne airport, We are Cirrus Aircraft authorized service center, most of our customers who own piston airplanes also own big jets. We want to try our best to make sure everyone is taken care of, as well as meet the EIR program. AAM-2

Please take deep consideration with our help and the coming proposal to meet the need for everyone.

Lina Shi

President and CEO
American Aircraft Maintenance
Part 145 repair station Based at John Wayne since 2001 19711-B campus drive, Santa Ana, CA92707 Cell Phone: 213-269-9999

Sent from my iPhone

From: Lina AAM <lina@aviation4s.com>
Sent: Tuesday, November 6, 2018 3:11 PM
To: EIR627
Cc: Nelson, Shawn [HOA]; michellesteel@shawnsteel.com; lbartlett1@aol.com; ado@fyklaw.com; todd@toddspitzer.com; Scott Cutshall; joefinl@socal.rr.com
Subject: Re: Airport Improvement Plan

Dear all,

As the owner of a piston aircraft maintenance company based at John Wayne airport, we would love to help improve the environment and satisfy the need for local piston airplanes owners.

As part of GA society, as well as small airplane owner myself, if we can get the limited FBO space, we will build more hangar space and maintain them in our newer facility. We will also bring less environment impact aircrafts to John Wayne Airport, make sure this improvement program is a win-win situation for the county and for pilots like me who also own small piston airplane. AAM 2-1

GA is a very important part of John Wayne airport, We are Cirrus Aircraft authorized service center, most of our customers who own piston airplanes also own big jets. We want to try our best to make sure everyone is taken care of, as well as meet the EIR program. AAM 2-2

Please take deep consideration with our help and the coming proposal to meet the need for everyone.

Lina Shi

President and CEO
American Aircraft Maintenance
Part 145 repair station Based at John Wayne since 2001
[19711-B campus drive,](#)
[Santa Ana, CA92707](#)
Cell Phone: [213-269-9999](#)

Sent from my iPhone

On Nov 6, 2018, at 07:24, Wayne Lindholm <wslindholm@gmail.com> wrote:

Dear Ms Lea Choum:

As a pilot that keeps a plane in one of the Executive Hangers we are quite disappointed and concerned with the reduction of GA space and hangers for the Piston Aviation Community. We would like to see an **improvement** plan **not** a plan that reduces the capacity for GA at SNA.

Please Consider:

1. Ways to **maintain** the current capacity of approximately 596 GA aircraft while increasing the number of hangars.
2. Can we get a waiver from the FAA to **keep the existing location** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars.

AAM 2-3

(Comments may be submitted, in writing, postmarked no later than 5:00 PM on November 6, 2018, via regular mail to Ms. Lea Choum, 3160 Airway Avenue, Costa Mesa, California 92626 or by e-mail to EIR627@ocair.com)

Sincerely:

Wayne Lindholm, (Concerned Pilot)

From: Lina AAM <lina@aviation4s.com>
Sent: Tuesday, November 6, 2018 4:04 PM
To: EIR627
Cc: Steel, Michelle [HOA]; Do, Andrew [HOA]; Bartlett, Lisa [HOA]; Spitzer, Todd [HOA]; Fishel, Audra [HOA]
Subject: EIR comments

Dear all,

As the owner of a piston aircraft maintenance company based at John Wayne airport, we would love to help improve the environment and satisfy the need for local piston airplanes owners.

As part of GA society, as well as small airplane owner myself, if we can get the limited FBO space, we will build more hangar space and maintain them in our newer facility. We will also bring less environment impact aircrafts to John Wayne Airport, make sure this improvement program is a win-win situation for the county and for pilots like me who also own small piston airplane. AAM 3-1

GA is a very important part of John Wayne airport, We are Cirrus Aircraft authorized service center, most of our customers who own piston airplanes also own big jets. We want to try our best to make sure everyone is taken care of, as well as meet the EIR program. AAM 3-2

Please take deep consideration with our help and the coming proposal to meet the need for everyone.

Lina Shi

President and CEO
American Aircraft Maintenance
Part 145 repair station Based at John Wayne since 2001 19711-B campus drive, Santa Ana, CA92707 Cell Phone: 213-269-9999

Sent from my iPhone

From: Melinda Atkin <melinda.atkin@gmail.com>
Sent: Wednesday, November 21, 2018 10:22 AM
To: EIR627
Subject: General Aviation Improvement Program

Follow Up Flag: Follow up
Flag Status: Flagged

From: Brent Anderson <banderson_pire@yahoo.com>
Sent: Wednesday, November 21, 2018 2:20 PM
To: EIR627
Subject: Objection to GAIP expansion at JWA
Attachments: Ltr to OCAir.com 11-21-18.pdf

Please see the attached letter opposing the proposed expansion and changes at JWA under the proposed GAIP.

BCA-1

Brent Anderson

November 21, 2018

Dear Ms. Choum,

As residents of Newport Beach, we are impacted by takeoffs and landings at JWA. Citizens Against Airport Noise and Pollution (CAANP.com), an organization dedicated to a reduction in the noise and pollution generated from John Wayne Airport, has alerted us that we have a new issue occurring at JWA. The County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities at JWA. These new hangars will displace smaller privately owned aircraft in favor of larger privately owned jet aircraft, including corporate jet fleets, which may make international flights.

BCA-2

CAANP is concerned about the impact on our nighttime curfew, increased pollution from leaded jet fuel and increases in daily departures that will be the result of the GAIP. Only commercial jets are

currently governed by curfew hours. The GAIP will lead to a new mix of general aviation aircraft at JWA, allowing more large private and corporate jets to depart and fly overhead anytime of the day or night. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not

BCA-3

been adequate for the quality of life in our communities. Further, the increase in nighttime flights would set a dangerous precedent for the future of the JWA curfew, which will be subject to

BCA-4

renegotiation in 2035. We would like to go on the record as strongly opposing this proposed expansion.

BCA-5

Sincerely,



Brent & Carla Anderson
232 Via Eboli
Newport Beach, CA 92663

From: Terry Becker <hiccupoo@yahoo.com>
Sent: Tuesday, November 20, 2018 11:31 AM
To: EIR627
Subject: New Hangar at JWA

Dear Ms Choum

We do not want more and larger corporate jets departing over our homes in Newport Beach. We are requesting the idea of a new hangar to accommodate larger privately owned aircraft not happen. We know they are not subject to the current curfew hours and we are totally against any additional flights.

LTB-1

Lewis and Teresa Becker
304 Esplanade
Newport Beach CA 92660

From: leann@drbenvenuti.com
Sent: Wednesday, November 21, 2018 11:54 AM
To: EIR627
Subject: DEIR

Dear Sirs,

I live under the flight path on Linda Isle. My family and I put up with the daytime larger jets. DB-1

At night, we use ear plugs for the smaller jets. The new G.A.I.P. will allow larger jets to fly overhead all night. This will be very negative for our lives. DB-2

Thank you,
David Benvenuti, M.D.
106 Linda Isle
Newport Beach, CA 92660
dbenvenutimc@yahoo.com

From: Leann Benvenuti <leann.benvenuti@gmail.com>
Sent: Wednesday, November 21, 2018 12:17 PM
To: EIR627
Subject: DEIR

Dear Ms Chom

Hello. My name is Leann Benvenuti and I live on Linda Isle.

I have already noticed a huge increase in jet noise caused by no longer deviating the flight departures and no longer having jets do a steep departure for noise abatement.

LB-1

We have been greatly impacted on Linda Isle.

Now you want to allow larger personal jets to depart to all hours of the night. When will we stop the madness??!!

LB-2

I already hear smaller jets depart at all hours of the night. Some are loud. Some are quiet. Larger jets equals louder noises.

Please No no no.

Thank you,
Leann Benvenuti
949-233-7753
leann.benvenuti@gmail.com

Sent from my iPhone

From: Carol Berg <cgb23@cox.net>
Sent: Tuesday, November 20, 2018 10:59 AM
To: EIR627
Subject: John Wayne Airport

I am deeply opposed t any improvement that would increase the noise, pollution, number of flights or curfew CB-1
at John Wayne/Orange County Airport airport.

Carol Berg

From: Marvin Blum <mblumdds@aol.com>
Sent: Sunday, November 11, 2018 12:54 PM
To: EIR627
Subject: ASpA

Sent from my iPhone

From: Robert Lange <rlange@brandtgp.com >
Sent: Monday, November 5, 2018 10:52 AM
To: EIR627
Cc: joefinl@socal.rr.com
Subject: Proposed General Aviation Re-Configuration KSNA

I am the Aircraft Owners and Pilots Association (AOPA) representative at John Wayne Airport and this communication is in regards to the proposed mislabeled "General Aviation Reconfiguration." BG-1

Historically, general aviation has been considered Joan Smith and her Piper Cub. However, under the guise of General Aviation, there has been in the last few years a huge surge in on-demand jet charter/fractional ownership business, BG-2

which also operates, for the most part, under part 91. The attorneys that drew up the recent City of Newport Beach aviation agreement obviously withheld and/or the City failed to recognize, this critical information during their negotiations. BG-3

At a very minimum, it appears appropriate that your current initiative be re/properly labeled. This is obviously not a standard general aviation re-alignment, this is a major jet traffic expansion. Any other label is, on its face, misleading. BG-4

In Orange County, true general aviation, again Joan Smith and her Piper Cub, has few alternatives. Re-assignment of general aviation aircraft from KSNA to Long Beach, Fullerton and/or Corona, with the attached one-hour one way commute for the typical owner/operator, is on its face a non-starter. BG-5

Regards,

Robert B. Lange
Brandt Group, Inc.
17 Corporate Plaza Dr., Suite 200, Newport Beach, CA 92660-7959
Direct Phone: (949) 644-8229 Direct Fax: (949) 644-7003
rlange@brandtgp.com



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From: Brant-Zawadzki, Michael <michael.brantzawadzki@hoag.org>
Sent: Tuesday, November 20, 2018 4:05 PM
To: EIR627

As a resident of Newport Beach, Lido Isle,
I am quite concerned over the potential increase in privately or corporate owned jet noise that would come with MBZ-1
proposed hangar expansion at John Wayne Airport.
A night time to 7 AM curfew for private jets needs to be part of the plan. MBZ-2

M. Brant-Zawadzki

Sent via the Samsung Galaxy Note8, an AT&T 4G LTE smartphone

NOTICE TO RECIPIENT: If you are not the intended recipient of this email, you are prohibited from sharing, copying, using or disclosing its contents. If you have received this email in error, please notify the sender immediately by reply email and permanently delete this email and any attachments without reading, forwarding or saving.

From: Diana Brookes <dianab@ejbco.com>
Sent: Wednesday, November 21, 2018 9:50 PM
To: EIR627
Subject: JWA proposal

To whom it may concern: we are 60 year residents of Newport Beach and have lived in the Dover Shores area for the last 30 years where we brought up our three daughters. It seems we have been fighting this noise and pollution problem in our community for years. The problem has not been resolved and if this proposal is allowed to pass and bigger hangers are built for larger private jets, this could ruin all of us! The air we breathe, the lack of curfew for private planes would profoundly effect our quality of life with the increased noise and our property values would be dismal to say the least. This situation would be felt by hundreds of residents in the area as many neighborhoods including your own I'm sure are within the flight pattern. We have given so much over the years to provide a beautiful terminal within the confines of the land available with thousands flying in and out all year. The curfew has kept us sane and allowed for families to still have a sanctuary in their own homes. If this passes, that would be taken away and be a huge tragedy. Is it not bad enough that we lost the perfect place for an international and cargo terminal at El Toro? This has got to end. We are done here and enough is enough. Please help us to maintain the quality of life we have appreciated and enjoyed for many years in this special community we live in.

BDB-1

BDB-2

BDB-3

BDB-4

Sincerely, Bob and Diana Brookes

dianab@ejbco.com
1609 Lincoln Lane
Newport Beach, CA 92660

Diana Sammis Brookes

From: Dolores Browning <dolores@wlbrowning.com>
Sent: Tuesday, November 20, 2018 9:37 AM
To: EIR627
Subject: JW Airport

To Whom it may concern:

My husband and I are both against the GIAP plan to add larger hangers at John Wayne Airport.

DWB-1

Dolores and Wayne Browning
1046 Pescador Drive
Newport Beach, CA 92660

From: Sarah Catz <sarahcatz@gmail.com>
Sent: Wednesday, September 26, 2018 9:37 PM
To: EIR627
Subject: Tonight's presentation

Hi

I arrived late to the public meeting tonight due to traffic. Is there a way I can view the powerpoint presentation that was shown at the meeting?

SC-1

Best,

Sarah Catz

From: Sarah Catz <sarahcatz@gmail.com>
Sent: Thursday, September 27, 2018 5:21 PM
To: EIR627
Subject: Re: Tonight's presentation
Attachments: image001.png; image001.png

Thank you!!

SC2-1

On Thu, Sep 27, 2018 at 5:11 PM EIR627 <eir627@ocair.com> wrote:

Ms. Catz,

Good Afternoon, the presentation will be uploaded to the GAIP website tomorrow. We will provide you with the link as soon as it is uploaded.

Best Regards,

John Wayne Airport, Orange County

3160 Airway Avenue | Costa Mesa, CA 92626

ocair.com [Facebook](#) [Twitter](#)



From: Sarah Catz <sarahcatz@gmail.com>
Sent: Wednesday, September 26, 2018 9:37 PM

To: EIR627 <eir627@ocair.com>

Subject: Tonight's presentation

Hi

I arrived late to the public meeting tonight due to traffic. Is there a way I can view the powerpoint presentation that was shown at the meeting?

Best,

Sarah Catz

From: Sarah Catz <sarahcatz@gmail.com>
Sent: Friday, September 28, 2018 2:48 PM
To: EIR627
Subject: Re: Tonight's presentation

Thanks so much!!

SC3-1

Sent from my iPhone

On Sep 28, 2018, at 2:01 PM, EIR627 <eir627@ocair.com> wrote:

Good Afternoon Sarah,

The presentation is now available online at <https://www.ocair.com/generalaviation/gaimprovement>.

Best Regards,

EIR 627 Team

John Wayne Airport, Orange County
3160 Airway Avenue | Costa Mesa, CA 92626
ocair.com [Facebook](#) [Twitter](#)

<image003.png>

From: Sarah Catz <sarahcatz@gmail.com>
Sent: Thursday, September 27, 2018 5:21 PM
To: EIR627 <eir627@ocair.com>
Subject: Re: Tonight's presentation

Thank you!!

On Thu, Sep 27, 2018 at 5:11 PM EIR627 <eir627@ocair.com> wrote:

Ms. Catz,

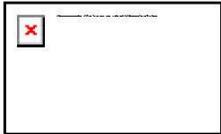
Good Afternoon, the presentation will be uploaded to the GAIP website tomorrow. We will provide you with the link as soon as it is uploaded.

Best Regards,

John Wayne Airport, Orange County

3160 Airway Avenue | Costa Mesa, CA 92626

ocair.com [Facebook](#) [Twitter](#)



From: Sarah Catz <sarahcatz@gmail.com>
Sent: Wednesday, September 26, 2018 9:37 PM
To: EIR627 <eir627@ocair.com>
Subject: Tonight's presentation

Hi

I arrived late to the public meeting tonight due to traffic. Is there a way I can view the powerpoint presentation that was shown at the meeting?

Best,

Sarah Catz

From: Scott Cutshall <scutshall@claylacy.com>
Sent: Wednesday, November 21, 2018 4:39 PM
To: EIR627
Subject: Comments on DEIR 627
Attachments: Clay Lacy DEIR Final 2018-11-21.pdf

Hello Ms. Choum,

Thank you to you are the airport staff for their diligent work on the GAIP. Attached are my comments for DEIR 627. CLA-1

My Best,

Scott Cutshall
Vice President

+1.714.369.7027 | mobile
+1.818.989.2900 | main
scutshall@claylacy.com

Clay Lacy Aviation | claylacy.com
John Wayne Orange County Airport
19531 Campus Drive, Suite 17, Santa Ana, CA 92707



November 21, 2018

Ms. Lea Choum
County of Orange
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626

Dear Ms. Choum:

Thank you for the opportunity to provide comment on the Draft Environmental Impact Report (DEIR) for the John Wayne Airport or Draft Program EIR 627. The comments and recommendations provided pertain to reducing the environmental impact of John Wayne Airport (JWA) while maximizing benefits to the County of Orange, John Wayne Airport, the local community, and most importantly the general aviation customers who use the airport.

CLA-2

The DEIR studies five potential options, Alternative 1 (Table 1-1, DEIR) is the only option that fully implements the County’s stated objectives of the GAIP. Alternative 1 is also the only option that “embraces flexibility to allow for technological advances and market trends”, and increases total hangar capacity at the airport. However, the Proposed Project and all Alternatives show a decrease in spaces available for General Aviation aircraft which is not in the best interests of General Aviation. The DEIR should be revised to outline the environmental implications of displacing so many aircraft from JWA. Solutions are possible, and Clay Lacy Aviation is committed to working with the airport and its users to identify creative solutions to remove the negative impacts.

CLA-3

The DEIR does not adequately study how many redundant movements can be eliminated by increasing hangar capacity and required maintenance services at JWA. Reducing redundant movements would significantly reduce noise and lessen the environmental impact of the airport while increasing tax revenues for the County.

What is a Redundant Movement?

A redundant movement is a takeoff or landing that occurs when an aircraft, who’s owner lives or works in Orange County, would prefer to park the plane at JWA but is forced to park their plane at an adjacent airport, such as Long Beach, Carlsbad, Fullerton, Corona, Chino, Burbank, Van Nuys or Ontario Airport due to lack of hangar space, outside parking space, or when certain required maintenance services are not offered at JWA. Therefore, each time the owner wishes to fly, the aircraft must land at JWA from its home airport, pick up the owner, their family or business associates, then depart to their destination. The same arrival and departure is then

CLA-4

repeated when the aircraft returns to JWA to deplane its passengers, then departs to its home airport. The result is that each flight doubles the number of arrivals and departures at JWA.

CLA-4
cont.

There are two areas that should be studied to reduce this environmental impact:

1. Increase hangar capacity: One way to further increase hangar capacity of Alternative 1 would be to increase the height of several t-hangars to 25 feet. This would enable the use of piston aircraft aviation lifts to double-stack the hangars, effectively increasing the t-hangar capacity for piston aircraft by over 50%.

CLA-5

2. Business structure of tenants: When considering new FBO leaseholders, the airport should study the impact of selecting leaseholders who provide maintenance services, authorizations or capabilities not currently offered at the airport. If a required maintenance service is not offered at the airport, the aircraft must depart JWA for maintenance, then return back to JWA after maintenance, resulting in a redundant arrival and departure.

CLA-6

Clay Lacy Aviation looks forward to reviewing the Final EIR and we commend the County for its efforts to continue to improve general aviation at John Wayne Airport. We remain available for any questions regarding this response as well as the GAIP in general.

Sincerely,



Scott Cutshall
Vice President, Brand Development
Clay Lacy Aviation, Inc.

cc: Hon. Andrew Do, Chairman, Supervisor, 1st District, County of Orange
Hon. Shawn Nelson, Vice Chairman, Supervisor, 4th District, County of Orange
Hon. Michelle Steel, Supervisor, 2nd District, County of Orange
Hon. Todd Spitzer, Supervisor, 3rd District, County of Orange
Hon. Lisa Bartlett, Supervisor, 5th District, County of Orange
Barry Rondinella, Director, John Wayne Airport, County of Orange

From: antoinettecole@aolcom <antoinettecole@aol.com>
Sent: Wednesday, November 21, 2018 8:25 AM
To: EIR627
Subject: Airport Noise

I live on Balboa Island. The Airplane noise is very loud. We are concerned about our health. It is hard to believe that the noise will increase. Please consider the tax payers when making any decisions. We pay high taxes to live in Newport and the airplane noise is a huge problem. As I have typed these few sentences six loud planes have gone over my head at 8:00 am.

AC-1

Antoinette Cole
115 Coral Ave. Newport Beach 92662

From: Paul Columbus <clancy17b@earthlink.net>
Sent: Wednesday, October 17, 2018 3:19 PM
To: EIR627; NOP627
Cc: Steel, Michelle [HOA]
Subject: John Wayne Airport General Aviation Improvement Plan, Draft Program Environmental Impact Report 627

Hello,

Please refer to "Draft Program Environmental Impact Report 627" "IP#16-432" " SCH No. 2017031072" dated September 2018, authored by Psomas, Landrum & Brown, and Austin Airport Consulting, hereinafter referred to as "Report".

Airports in LA and Riverside County have been busy adding T-Hangars for a simple reason: they are excellent moneymakers. T-Hangars use the same real estate footprint as tie downs while yielding three to five times the rent, and construction costs of T-Hangars are typically paid back in less than a year. When viewed as an economic investment, T-Hangars are a lucrative "no-brainer".

In addition to being profitable, T-Hangars are ecologically friendlier than tie downs by providing active containment of leaked oil, spilled fuel, oxidized paint or other hazardous materials. And while tie downs are frame-less, T-Hangars provide a structure upon which to install solar panels, generating even more income.

The demand for T-Hangars is proven. Per the County of Orange, light single engine piston General Aviation aircraft compromise the overwhelming majority of aircraft activity at John Wayne airport. (See "John Wayne posts August 2018 Statistics", www.ocair.com/newsroom/news). T-Hangars are a critical resource used by these aircraft. Indeed, the wait time at John Wayne for T-Hangars is measured not in weeks, not in months, not even in years. The wait time for T-Hangars at John Wayne Airport is measured in decades.

PC-1

Nowhere within the Report is mention of any expansion of T-Hangar capacity. Alarming, Section 3.6.2 of the Report proposes a reduction of T-Hangars of 15%. Alternative 2 of the Report proposes a reduction of T-Hangars by 35%.

The County of Orange and John Wayne Airport management should not miss this easy opportunity to maximize its revenue while reducing the ecological impact of the current proposal. I strongly urge reconsideration of the Program with the addition of large amounts of T-Hangars.

Feel free to contact me with any further questions. Thank you in advance for your attention,

Paul Columbus
P.O. Box 1207
Laguna Beach, CA 92652-1207
USA
(+1) 949/394-0662 (mobile) Pacific Time

From: David Cook <2cookies@earthlink.net>
Sent: Monday, November 19, 2018 10:15 PM
To: EIR627
Subject: Comments on EIR 627 and the JWA General Aviation Improvement Program (GAIP)

Att: Lea Choum

EIR627@ocair.com

The following are my comments on EIR 627 and the JWA General Aviation Improvement Program (GAIP)

The GIAP proposes to increase the presence of large corporate aircraft at JWA at the expense of light aircraft general aviation.

WDC-1

1. The EIR 627 does not adequately account for the increase of non-airline jet aircraft noise and pollution over the Back Bay departure corridor:

--Unlike airline operations, the number of departures is uncontrolled

--The number of after-hours departures is not controlled

WDC-2

--Does not take into consideration the slower evolution of quieter next generation engines (as used by the airlines) into the corporate jet fleet

--Does not take into consideration the additional pollution and noise from additional corporate jet operations on the JWA airport.

2. With the exception of Alternate 3 of the GIAP, all plans foster large corporate aircraft operations and facilities at the expense of general aviation light aircraft, which have historically been an important part of Orange County / John Wayne Airport. Since now there are only 2 airports serving light aircraft in Orange County (JWA and Fullerton Airport), all GAIP alternatives except Alternate 3 will significantly decrease light aircraft parking and facilities in Orange County.

WDC-3

Thank you for the opportunity to comment on EIR 627 and GAIP.

Sincerely,

W. David Cook

420 Vista Roma

Newport Beach, CA 92660

From: corbitt <corbitt@me.com>
Sent: Monday, November 5, 2018 7:04 AM
To: EIR627
Subject: Environmental Impact Report (EIR) Comments

Dear Ms. Lea Choum,

I am a new renter to the field but have been flying out of SNA since I received my private pilots license in 2002. To be honest if the GA community was not so strong at the SNA airport I would have never been able to obtain my license and purchase an airplane. I tired to get another rating at Corona and Riverside and was never able to finish up because the drive was too far and it didn't work for my busy schedule. Same with when I purchased my airplane, I cannot drive to Fullerton, Corona or Riverside to fly after work, it's not realistic. SNA is my only option for flying and owing a airplane. To be honest the rental fees for a parking space is reasonable as well. As we know there area always way to make things better but currently GA at the SNA airport is pretty awesome!!

TC-1

I would like to ask that the 2 major points below of the current SNA GA Improvement Plan be reviewed to come up with a **NEW** Improvement Plan that does not reduce the capacity for GA at SNA

1. Study ways to **MAINTAIN** the current capacity of approximately 596 GA aircraft while increasing the number of hangers.

TC-2

2. Study the applicability of a waiver from the FAA to **KEEP THE EXISTING LOCATION** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangers.

TC-3

Thanks,

Todd Corbitt
corbitt@me.com

From: Andrew Couch <andrew@andrewcouch.com>
Sent: Wednesday, November 21, 2018 2:54 PM
To: EIR627
Subject: General Aviation Improvement Program

I write today to express my opposition to the misleadingly labeled “General Aviation Improvement Program” that the County has proposed for John Wayne Airport.

This is more accurately described as a “Business Jet Improvement Program”, because the primary result of the implementation of the Proposed Project, or Alternatives 1 or 2, will be a substantial increase in the number of business jet operations at John Wayne Airport, operations that will not be limited by the airline curfew set forth in the 1985 settlement agreement as amended, or the other restrictions on commercial airline operations.

AC-1

It may be necessary to update the 30 year old plan for John Wayne Airport, to modify parts of the airport to comply with FAA regulations or changing needs. It is not necessary to significantly increase the facilities for business jets, which will result in a significant increase in business jet operations and a significant increase in the noise created by business jets.

AC-2

Under current federal statutes, there may be restrictions upon the limits that can be imposed upon business jet aircraft at John Wayne Airport. However, one of the limits that can be imposed is to limit the business jet facilities. If there is no place to park the business jets, then they won't use John Wayne Airport.

AC-3

The general public will not benefit from the proposed business jet improvements to John Wayne Airport. The very wealthy who fly in business jets will benefit, as will the County, as indicated by the various business jet revenue streams identified in the Draft Program Environmental Report 627. But the general public, and especially Newport Beach residents, will suffer the additional noise generated by the increased business jet operations. A jet engine doesn't care if it is attached to an airliner or business jet, it emits the same noise.

AC-4

AC-5

In addition, the Proposed Project and Alternatives 1 and 2 all require the eviction of significant numbers of piston engine general aviation aircraft owned and operated by ordinary people to make room for the expanded business jet facilities. There are only two airports left in Orange County. At the public meeting on September 26 and in the draft report, there was mention made of available piston engine parking at Fullerton airport. That is not a viable alternative for significant numbers of piston engine airplane owners and pilots. Unfortunately, as Orange County has grown, so has its traffic problems. It can take as long as one hour to drive from John Wayne Airport to Fullerton Airport, one way. If the unlucky airplane owner or pilot who is evicted from John Wayne Airport lives in Dana Point or San Clemente, that can double the travel time between the home of the airplane owner or pilot and Fullerton Airport, one way. The forced relocation of dozens of piston engine airplanes from John Wayne Airport to Fullerton Airport is so impractical that it doesn't deserve serious consideration.

AC-6

The County has extensive recreation facilities for its residents who want to pursue a wide variety of recreational activities. Every time that the County has proposed some expansion of air carrier activity at John Wayne Airport, it has made the point that John Wayne Airport is not a mini-LAX, but instead is a general aviation airport that provides a wide variety of services to residents, in

AC-7

addition to airline operations. The County should honor that commitment made to the County's residents by ensuring that ordinary people who own or rent airplanes are not displaced from John Wayne Airport to make room for the very wealthy and their business jets. AC-7 cont.

Any required updates to John Wayne Airport can be accomplished with Alternative 3 to the Draft Program Environmental Impact Report 627, which does not require the eviction of significant numbers of piston engine airplanes from John Wayne Airport. AC-8

Andy Couch
Newport Beach



**MILLER STARR
REGALIA**

Letter 56

1331 N. California Blvd.
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Walnut Creek, CA 94596

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www.msrllegal.com

Matthew C. Henderson
Direct Dial: 925 941 3271
matthew.henderson@msrllegal.com

October 25, 2018

VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum
County of Orange
3160 Airway Avenue
Costa Mesa, CA 92626

Re: John Wayne Airport General Aviation Improvement Program DEIR,
State Clearinghouse No. 2017031072

Dear Ms. Choum,

This office represents CPF Airway Associates, LLC (CPF), which owns property at 2990 and 3000 Airway Avenue in Costa Mesa, directly adjacent to John Wayne Airport (Airport). This letter is sent to provide initial comments on the Draft Program Environmental Impact Report 627 (DEIR) for the Airport's General Aviation Improvement Program (Project) prepared for the County of Orange (County).

As an initial matter, the sheer bulk of the DEIR – approximately 566 pages, with some 2,245 additional pages of technical appendices – makes it extremely burdensome, costly, and difficult for a client such as mine to review, analyze, and provide meaningful comments. CEQA's fundamental purpose of informing decisionmakers and the public is not well served by such massive and highly technical documents. (Cal. Code Regs., tit. 14, § 15002, subd. (a)(1).) Indeed, the CEQA Guidelines state that an EIR should usually be no longer than 150 pages, and in unusually complex cases no longer than 300 pages. (Cal. Code Regs., tit. 14, § 15141.) Accordingly, we ask that the County extend the comment period so that CPF, other stakeholders, and the public at large may provide meaningful comments to the DEIR. Moreover, the comments we provide here are of necessity preliminary in nature, and we may provide further feedback to the County as the environmental review process continues.

CPF-1

My client also wishes to emphasize that it is not opposed to the Project per se. A number of my client's tenants are involved in the aviation business and are active in the Airport's operations. Accordingly, the viability of the Airport going forward is of paramount concern to my client. With that in mind, the comments in this letter are intended to improve the Project, not attack it.

CPF-2

One major concern with the Project and the DEIR is the failure to account for the existing secured entry gate into the Airport from my client's property. This is the only such gate at the Airport, and is used by airlines (including but not limited to Southwest, Alaska, and American) and other operators to move cargo and other items into and out of the Airport's secured area pursuant to "through the gate" agreements with the County. These airlines and operators have intentionally located their facilities close to the gate in order to maximize its usability and the efficiency of their operations. As such, the gate serves a vital role in the Airport's functionality and efficient operation.

It is therefore worrisome that the DEIR does not address the gate or how it will or will not be impacted by the Project. The proposed site plans for the Project and Alternative 1 (Exhibits 3-1 and 3-4) show T-hangars where the gate now exists. It therefore appears that the Project would eliminate, or at the very least potentially impact the operations of, the gate. The DEIR does not address this issue, which could have substantial impacts on traffic, air quality, greenhouse gas emissions, and noise. This is particularly the case given that occupants at 2990 and 3000 Airway Avenue regularly use the gate on a 24 hour basis, obviating the need to access the Airport from a more distant location. This issue could be addressed by, for instance, swapping areas now designated for the tie-down apron with that allocated for the T-hangars, which presumably would allow for the continued uninterrupted operation of the gate.

CPF-3

Similarly, the DEIR does not acknowledge or analyze the existence of a heliport at 3000 Airway Avenue. This heliport has been fully licensed and in existence for several years under the FAA identifier 10CL. The heliport provides a number of services to the community, including the provision of new and recurrent training for pilots with government agencies at the local, state, and federal levels (such as the Orange County Sheriff, the Los Angeles County Sheriff, the FBI, ATF, etc.). Its close proximity to the Airport complements the Airport's uses and furthers its regional and local importance as a helicopter facility. Any changes in the Airport's layout and use may affect operations at the heliport, but this issue is not discussed in the DEIR.

CPF-4

Finally, given the fact that the DEIR observes that demand for general aviation facilities and services at the Airport is going to increase in the future (Tables 3-1, 3-2, 3-2; Appendix C, Table 28), the fact that the Project and all alternatives only consider **reducing** the Airport's capacity is difficult to understand. The Project objectives include "to utilize limited land area efficiently and economically, "to embrace flexibility to allow for technological advances and market trends," and "to maximize economic, self-sustaining, revenue producing facilities." It is difficult to understand how providing for reduced general aviation operations in the same existing space could be considered as furthering the goal of efficiency, which would be expected to provide a greater level of service. Accordingly, these objectives would be better served by expanding, or at least maintaining, the Airport's current

CPF-5

capacity for general aviation. The failure to include an alternative that increases the Airport's capacity is a flaw in the DEIR.

CPF-5
cont.

* * *

In conclusion, these comments are necessarily preliminary in nature, and my client may supplement them in the future. There are certainly broader concerns as to limiting general aviation at the Airport, and the substitution of carriers such as JetSuiteX for existing small-scale private owners and pilots. Thus, while modernizing the Airport and preparing it for the future are laudable goals, they must be undertaken with an eye towards enhancing both its usability and its availability. Failing to do so will have a region-wide ripple effect due to displacement and the substitution of users giving rise to greater impacts (regional jets for single-engine propeller aircraft, e.g.). Accordingly, while a carefully considered and designed plan for the Airport can help it serve the general aviation community in Orange County and Southern California more broadly, a project that reduces capacity while not fully accounting for its impacts that directly and negatively impact the immediate surroundings is a recipe for confusion and future conflict. My client remains optimistic that the Project can be further refined to provide the greatest benefit at the least detriment, and hopes to continue to respectively and constructively participate in the process of review and approval.

CPF-6

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw



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October 25, 2018



VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum
County of Orange
3160 Airway Avenue
Costa Mesa, CA 92626

Re: John Wayne Airport General Aviation Improvement Program DEIR,
State Clearinghouse No. 2017031072

Dear Ms. Choum,

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My client also wishes to emphasize that it is not opposed to the Project per se. A number of my client's tenants are involved in the aviation business and are active in the Airport's operations. Accordingly, the viability of the Airport going forward is of paramount concern to my client. With that in mind, the comments in this letter are intended to improve the Project, not attack it.

One major concern with the Project and the DEIR is the failure to account for the existing secured entry gate into the Airport from my client's property. This is the only such gate at the Airport, and is used by airlines (including but not limited to Southwest, Alaska, and American) and other operators to move cargo and other items into and out of the Airport's secured area pursuant to "through the gate" agreements with the County. These airlines and operators have intentionally located their facilities close to the gate in order to maximize its usability and the efficiency of their operations. As such, the gate serves a vital role in the Airport's functionality and efficient operation.

It is therefore worrisome that the DEIR does not address the gate or how it will or will not be impacted by the Project. The proposed site plans for the Project and Alternative 1 (Exhibits 3-1 and 3-4) show T-hangars where the gate now exists. It therefore appears that the Project would eliminate, or at the very least potentially impact the operations of, the gate. The DEIR does not address this issue, which could have substantial impacts on traffic, air quality, greenhouse gas emissions, and noise. This is particularly the case given that occupants at 2990 and 3000 Airway Avenue regularly use the gate on a 24 hour basis, obviating the need to access the Airport from a more distant location. This issue could be addressed by, for instance, swapping areas now designated for the tie-down apron with that allocated for the T-hangars, which presumably would allow for the continued uninterrupted operation of the gate.

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Finally, given the fact that the DEIR observes that demand for general aviation facilities and services at the Airport is going to increase in the future (Tables 3-1, 3-2, 3-2; Appendix C, Table 28), the fact that the Project and all alternatives only consider **reducing** the Airport's capacity is difficult to understand. The Project objectives include "to utilize limited land area efficiently and economically," "to embrace flexibility to allow for technological advances and market trends," and "to maximize economic, self-sustaining, revenue producing facilities." It is difficult to understand how providing for reduced general aviation operations in the same existing space could be considered as furthering the goal of efficiency, which would be expected to provide a greater level of service. Accordingly, these objectives would be better served by expanding, or at least maintaining, the Airport's current

capacity for general aviation. The failure to include an alternative that increases the Airport's capacity is a flaw in the DEIR.

* * *

In conclusion, these comments are necessarily preliminary in nature, and my client may supplement them in the future. There are certainly broader concerns as to limiting general aviation at the Airport, and the substitution of carriers such as JetSuiteX for existing small-scale private owners and pilots. Thus, while modernizing the Airport and preparing it for the future are laudable goals, they must be undertaken with an eye towards enhancing both its usability and its availability. Failing to do so will have a region-wide ripple effect due to displacement and the substitution of users giving rise to greater impacts (regional jets for single-engine propeller aircraft, e.g.). Accordingly, while a carefully considered and designed plan for the Airport can help it serve the general aviation community in Orange County and Southern California more broadly, a project that reduces capacity while not fully accounting for its impacts that directly and negatively impact the immediate surroundings is a recipe for confusion and future conflict. My client remains optimistic that the Project can be further refined to provide the greatest benefit at the least detriment, and hopes to continue to respectfully and constructively participate in the process of review and approval.

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw

From: Karen Wigylus <karen.wigylus@msrlegal.com >
Sent: Tuesday, November 20, 2018 3:07 PM
To: EIR627
Cc: Matt Henderson
Subject: Letter to Lea Choum, County of Orange dated 11/20/2018 re: John Wayne Airport
Attachments: 2018-11-20 Ltr to Lean Choum, County of Orange.pdf

This email is sent on behalf of Matthew C. Henderson.
Please direct all replies to Matt at matthew.henderson@msrlegal.com.
Thank you, Karen.

CPF 2-1

Karen Wigylus | Miller Starr Regalia

Legal Assistant to Matthew C. Henderson
1331 N. California Boulevard, Fifth Floor, Walnut Creek, CA 94596
t: 925.935.9400 | d: 925.941.3273 | f: 925.933.4126 | karen.wigylus@msrlegal.com | www.msrlegal.com



MILLER STARR REGALIA CONFIDENTIAL COMMUNICATION

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Matthew C. Henderson
Direct Dial: 925 941 3271
matthew.henderson@msralgal.com

November 20, 2018

VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum
County of Orange
3160 Airway Avenue
Costa Mesa, CA 92626

Re: John Wayne Airport General Aviation Improvement Program DEIR,
State Clearinghouse No. 2017031072

Dear Ms. Choum,

As you know, this office represents CPF Airway Associates, LLC (CPF), the owner of property at 2990 and 3000 Airway Avenue in Costa Mesa, directly adjacent to John Wayne Airport (Airport). This letter is sent with respect to the Draft Program Environmental Impact Report 627 (DEIR) for the Airport's General Aviation Improvement Program (GAIP) prepared for the County of Orange (County).

More particularly, we have not found any plan or other document that is identified as the GAIP itself. On November 6, 2018 on behalf of my client I submitted a request to the County for the documents comprising the GAIP under the Public Records Act (Government Code section 6250 et seq.). The Public Records Act ordinarily requires a response within ten days, which would have required the County to provide the GAIP documents by November 16. (Gov. Code, § 6253, subd. (c).) However, on that date the County stated that it would be unable to provide documents until November 30, 2018. A true and correct copy of the County's correspondence is included with this letter.

CPF 2-2

Given that the County will not be turning over the GAIP documents until after the close of the extended comment period for the DEIR on November 21, my client reserves the right to provide additional comments on the DEIR based on those documents. My client cannot fully evaluate the adequacy of the DEIR without being able to review the GAIP itself and the DEIR's assessment of the same.

Lea Choum
County of Orange
November 20, 2018
Page 2

Thank you for your attention to this matter.

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw

From: Orange County Public Records [<mailto:orangecounty@public-records-requests.com>]
Sent: Friday, November 16, 2018 9:35 AM
To: Matt Henderson
Subject: [External Message Added] Orange County public records request #18-1308

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

Orange County Public Records

Hi there

A message was sent to you regarding record request #18-1308:

Dear Mr. Henderson:

This email is in response to the above-referenced Public Records Act request, which was received by the Orange County Executive Office on November 6, 2018. John Wayne Airport is reviewing your request and seeking responsive records. Pursuant to Government Code Section 6253, subdivision (c), the County will need an extension of time to prepare its initial response. This extension is due to the need to search for and collect the requested records.

We will provide a determination on your request on or before November 30, 2018. Nothing in this email should be construed as a representation that the County has all of the records requested, or that such records (if

Sincerely,

Aida Lopez

Staff Specialist

John Wayne Airport

[View Request 18-1308](#)

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November 20, 2018



VIA U.S. MAIL AND EMAIL (EIR627@ocair.com)

Lea Choum
County of Orange
3160 Airway Avenue
Costa Mesa, CA 92626

Re: John Wayne Airport General Aviation Improvement Program DEIR,
State Clearinghouse No. 2017031072

Dear Ms. Choum,

As you know, this office represents CPF Airway Associates, LLC (CPF), the owner of property at 2990 and 3000 Airway Avenue in Costa Mesa, directly adjacent to John Wayne Airport (Airport). This letter is sent with respect to the Draft Program Environmental Impact Report 627 (DEIR) for the Airport's General Aviation Improvement Program (GAIP) prepared for the County of Orange (County).

More particularly, we have not found any plan or other document that is identified as the GAIP itself. On November 6, 2018 on behalf of my client I submitted a request to the County for the documents comprising the GAIP under the Public Records Act (Government Code section 6250 et seq.). The Public Records Act ordinarily requires a response within ten days, which would have required the County to provide the GAIP documents by November 16. (Gov. Code, § 6253, subd. (c).) However, on that date the County stated that it would be unable to provide documents until November 30, 2018. A true and correct copy of the County's correspondence is included with this letter.

Given that the County will not be turning over the GAIP documents until after the close of the extended comment period for the DEIR on November 21, my client reserves the right to provide additional comments on the DEIR based on those documents. My client cannot fully evaluate the adequacy of the DEIR without being able to review the GAIP itself and the DEIR's assessment of the same.

Lea Choum
County of Orange
November 20, 2018
Page 2

Thank you for your attention to this matter.

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw

From: Orange County Public Records [<mailto:orangecounty@public-records-requests.com>]
Sent: Friday, November 16, 2018 9:35 AM
To: Matt Henderson
Subject: [External Message Added] Orange County public records request #18-1308

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

Orange County Public Records

Hi there

A message was sent to you regarding record request #18-1308:

Dear Mr. Henderson:

This email is in response to the above-referenced Public Records Act request, which was received by the Orange County Executive Office on November 6, 2018. John Wayne Airport is reviewing your request and seeking responsive records. Pursuant to Government Code Section 6253, subdivision (c), the County will need an extension of time to prepare its initial response. This extension is due to the need to search for and collect the requested records.

We will provide a determination on your request on or before November 30, 2018. Nothing in this email should be construed as a representation that the County has all of the records requested, or that such records (if

Sincerely,

Aida Lopez

Staff Specialist

John Wayne Airport

[View Request 18-1308](#)

<http://orangecounty.nextrequest.com/requests/18-1308>



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From: Linda Crum <lindacrum12@gmail.com>
Sent: Tuesday, November 20, 2018 3:42 PM
To: EIR627
Subject: Airport expansion

Dear Ms Choum

Please do not expand the hangers at John Wayne airport. I live directly under the flight path and this would severely impact my quality of life with large private jets taking off at all hours. Each morning I am awakened at 7:01 by a large jet roaring over my house. These private jets may be able to take off at any time and are not regulated. As it is now, my patios are covered with black specks of engine residue and greasy jet fuel. I respectfully ask for your help.

LC-1

Linda Crum
701 N Bay Front
Balboa island, CA 92662
949 637-7739
Lindacrum12@gmail.com

Sent from my iPhone

From: Christy Dambrosio <christyd716@gmail.com>
Sent: Tuesday, November 20, 2018 10:58 AM
To: EIR627
Subject: Jwa

Please no expansion of any kind at JWA. We get too much pollution and noise already and these planes don't have curfew.

CD-1

Christy Dambrosio 26 Ocean Vista Newport Beach, California 92660 Sent from my iPhone

From: Patrick Davern <davern1@cox.net>
Sent: Monday, November 5, 2018 2:54 PM
To: EIR627
Subject: SNA GA Improvement Plan

Ms. Lea Choum,

I'm am writing today to urge your team to do additional studies for the improvement plan at John Wayne. It appears that the current options being considered curtail tie down spaces and add little to no hangar spaces. It also gives more square footage to later operators who cater to jet aircraft.

PD-1

I am a 40 year resident of Orange County and new to general aviation. Over the last two years, I have gained my pilots license at John Wayne airport through vendors located at and around the field. I have also purchased a plane and rent a tie down spot (#35) on the field. So, I've made a large investment in pilot training for myself and an aircraft for my family and business interests. I am fond of the airport administration the controllers, and the small businesses that serve the aviation community.

I strongly believe General Aviation is crucial for aviation and the community overall. There is a worldwide pilot shortage and Southern California traffic is getting worse by the year. John Wayne should invest in having more tie down spaces, covered and uncovered as well as additional hangar space for the general public. This investment will surely pay large dividends for the local community and the airport. I have spent considerable dollars over the last year at and around the airport and I know other tenants do as well.

PD-2

It's sad to see airports such as Santa Monica lose support and ultimately close. Let's work to have a well balanced plan for everyone at John Wayne not just the large corporate operators. I think John Wayne with a smart plan can collect more tie down rents, see more fuel sales, and attract more pilots and planes with a good design to serve more pilots.

Thanks, Patrick Davern 714 813 0685

From: Cindy Dillion <cindydillion@cox.net>
Sent: Monday, November 5, 2018 7:54 AM
To: EIR627
Subject: EIR for KSNA

Importance: High

Ladies and Gentlemen,

As a long-time resident of Newport Beach who remembers the very beginnings of AirCal, I have to strenuously object to any plan that diminishes John Wayne as a general aviation airport.	CD-1
John Wayne has a rich history of serving the general aviation community while protecting the neighboring residents and it is a shame that commercial aviation has not only ruined living in so many surrounding neighborhoods, but will now be pushing out general aviation.	CD-2
<ul style="list-style-type: none">I urge you to identify an alternative that maintains current capacity of approximately 596 general aviation aircraft and also increases the number of hangars; and	CD-3
<ul style="list-style-type: none">I also urge you to obtain the waiver for keeping the existing location of the perimeter road avoiding losing more tie downs and hangars.	CD-4

Very truly yours,
Cindy Dillion
7 Bodega Bay, CdM
919 E Balboa (right under the flight path!)
949 295 0521

From: Jeff Dvorak <dvorakjeff@yahoo.com>
Sent: Wednesday, November 21, 2018 2:24 PM
To: EIR627
Subject: Questions for JWA DEIR 627 GAIP
Attachments: Dvorak- Questions for GAIP DEIR 627 Nov 21 2019.pdf

Dear Ms.Choum,

Attached are my questions for DEIR 627 GIAP. Please add my e-mail to the list of interested parties for further communication and updates on the DEIR 627 at JWA.

JD-1

Thank you for your attention and I look forward to your comments.

Sincerely,
Jeff Dvorak

November 21, 2018

EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report

Dear Ms. Choum:

As a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”):

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to “comment” on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it and respond to it with their comments and questions in the time allotted. Due to the length and technical complexity of the document I have read the executive summary and select sections of the document. I was unable to thoroughly study the entire 2800+ pages. I apologize if some of my questions are addressed somewhere within the 2800 page report.

JD-2

Q: Why can't additional time be provided for the review and comment to the DEIR?

The DEIR lists 6 separate objectives of the GAIP, which appear only to benefit airport operations and profitability. Under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain the efficiency and economic benefits of the GAIP with little indication of concerns for the communities impacted by noise and pollution emanating from JWA.

JD-3

Q: Are the residents in the immediate area surrounding the airport considered stakeholders in the project?

JD-4

Q: If so why is there little public awareness of the pending GAIP?

JD-5

<p>Q: How do the local residents in the immediate area benefit from the proposed changes at JWA? The options increase the amount of air pollutions (CO is down, but all other emissions are up by 20% table 4.2-13). Noise is also increased as 10-12 housing units now are in the 65-70 CNEL noise levels. (table 4.6-4)</p>	JD-6
<p>The report states 10-12 houses are now within 65-70 CNEL. Q: Specifically what are the address of these 10-12 homes? Have you and will you contact the individual owners and inform them of the impact of the GAIP? If no why not?</p>	JD-7
<p>Section 4.7-19 “ <i>additionally the County of Orange requires that the 45 CNEL interior noise limit for habitable rooms of residences be met with windows open or windows closed</i>”. Please provide a map similar to exhibit 4.7-6 and 4.7-8 with a 45 CNEL contour line.</p>	JD-8
<p>Q: Are all residents within the affected area aware of the Orange County requirement? Q: What testing and services are provided to homeowners within the impacted area to determine if the interior of their homes meets the 45 CNEL?</p>	JD-9
<p>Section 4.6-23 states “<i>Therefore the 65 CNEL contour expanding beyond the existing contour and including additional residences would be a significant land use compatibility impact.</i>” The DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc. Q: How do you come to this conclusion as these are conflicting statements?</p>	JD-10
<p>There is plenty of Noise data available through the noise monitors. Within the past year the departure routes have consolidated due to the Metroplex. Older air quality data may no longer represent the current situation. Q: What current air quality data is available to support the study? Q: Have any actual air samples been tested 2018? Q: Have air pollution contour maps been developed similar to the noise maps (exhibit 4.7-6) to demonstrate the how the air pollution is distributed over the neighboring community? Q: If no, are there plans to do so, and why not?</p>	JD-11
<p>Q: What is the process the airport commission uses to access the needs of the “stakeholders”?</p>	JD-12
<p>Q: How was the conclusion derived to reduce GA piston aircraft and increase GA jet aircraft capacity? Is there data from market studies to support this?</p>	JD-13
<p>Q: How does the GAIP reducing capacity for GA piston powered aircraft benefit the existing fleet of privately owned piston-powered aircraft based at JWA?</p>	JD-14

Q: How many of the GA piston aircraft owners who keep their plane at JWA are residents of Orange County?

Q: With the proposed increase in GA jets, how many of the GA jets based in JWA are owned by residents/companies headquartered in Orange County?

JD-15

Q: Will out of county owners be allowed to keep their planes at JWA?

One of the six objectives listed in the GAIP is to *“to maximize economic, self-sustaining, revenue producing facilities”*

Q: Is this GAIP designed to increase revenue for JWA and the FBO's or more interested in serving the aircraft owners in Orange County?

JD-16

Q: What will be the economic benefit to JWA?

Q: How does a decrease in the number of smaller privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?

JD-17

Q: Will the projected increase in GA jet traffic be subjected to a night-time curfew? If not why not?

JD-18

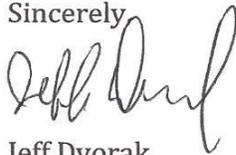
Q: As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?

JD-19

Q: Are any flight schools specializing in jet aircraft flight instruction anticipated? If so will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?

JD-20

Sincerely,



Jeff Dvorak
302 Avenida Cumbre
Newport Beach, CA 92660

DvorakJeff@yahoo.com

From: Susan Dvorak <susan_dvorak@hotmail.com>
Sent: Wednesday, November 21, 2018 3:50 PM
To: EIR627
Subject: John Wayne Airport GAIP DEIR Comments - Dvorak

November 21, 2018

[Via Electronic Mail](mailto:EIR627@ocair.com)
EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”):

The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018.

Comment: This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to “comment” on the DEIR, it is submitted that most members of the general public are ill equipped to read through the entirety of the document, sufficiently understand it, and respond to it with their comments and questions in the time allotted.

JD 2-1

Due to the length and technical complexity of the document I read the executive summary and select sections of the document, so I apologize if some of my questions are addressed somewhere within the 2,800 page report.

Question: Why can’t additional time be provided for the review and comment to the DEIR?

The DEIR lists six separate objectives of the GAIP, which appear only to benefit airport operations and profitability. The Project references “Stakeholders.” Under the recently enacted FAA Reauthorization Act of 2018, there are numerous sections that address community concerns regarding the impact of noise and pollution on health. The Project Objectives clearly pertain to the efficiency and economic benefits of the GAIP with little indication of concerns for the communities impacted by noise and pollution emanating from JWA.

JD 2-2

<p><u>Question:</u> Are the residents in the immediate area surrounding the airport considered stakeholders in the project? If so, why is there little public awareness of the pending GAIP? Why weren't residents of Newport Beach and other areas affected by JWA included in the GAIP process from the beginning? Why weren't there any robustly publicized public forums on the proposed GAIP?</p>	JD 2-3
<p>How do the local residents in the immediate area benefit from the proposed changes at JWA? The options increase the amount of air pollutions (CO is down, but all other emissions are up by 20% table 4.2-13). Noise is also increased as 10-12 housing units now are in the 65-70 CNEL noise levels. (table 4.6-4)</p>	JD 2-4
<p>The report states 10-12 houses are now within 65-70 CNEL.</p> <p><u>Question:</u> Specifically what are the address of these 10-12 homes? Have you and will you contact the individual owners and inform them of the impact of the GAIP? If no why not?</p>	JD 2-5
<p>Section 4.7-19 " <i>additionally the County of Orange requires that the 45 CNEL interior noise limit for habitable rooms of residences be met with windows open or windows closed</i>". <u>Comment:</u> Please provide a map similar to exhibit 4.7-6 and 4.7-8 with a 45 CNEL line. <u>Question:</u> Are all residents within the affected area aware of the Orange County requirement? What testing and services are provided to homeowners within the impacted area to determine if the interior of their homes meets the 45 CNEL?</p>	JD 2-6
<p>Section 4.6-23 states "Therefore the 65 CNEL contour expanding beyond the existing contour and including additional residences would be a significant land use compatibility impact." The DEIR conclusion is that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc. <u>Comment:</u> These are conflicting statements. <u>Question:</u> How did you arrive at this conclusion?</p>	JD 2-8
<p><u>Question:</u> There is plenty of noise data available through the noise monitors, but what current air quality data is available to support the study? The departure routes have consolidated in the past year due to the NextGen Metroplex. Have any actual air samples been tested since the implementation of NextGen Metroplex project? Have air pollution contour maps been developed similar to the noise maps (exhibit 4.7-6) to demonstrate how the air pollution is distributed over the neighboring community? Are there plans to develop air pollution contour maps? If no, why not?</p>	JD 2-9
<p><u>Additional Questions:</u> What is the process the airport commission uses to access the needs of the "stakeholders"?</p>	JD 2-10
<p>How was the conclusion derived to reduce GA piston aircraft and increase GA jet aircraft capacity? Is there data from market studies to support this?</p>	JD 2-11
<p>How does the GAIP plan to reduce capacity for GA piston powered aircraft benefit the existing fleet of privately owned piston-powered aircraft based at JWA?</p>	JD 2-12
<p>How many GA piston aircraft owners who keep their plane at JWA are residents of Orange County?</p>	JD 2-13
<p>How many of the GA jets that will be based in JWA are owned by residents/companies headquartered in Orange County? Will out of county owners be allowed to keep their planes at JWA?</p>	JD 2-14
<p>How does a decrease in the number of smaller, privately owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities? Be specific.</p>	JD 2-15
<p>Will the projected increase in GA jet traffic be subjected to a curfew? If not why not?</p>	JD 2-15

As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet? JD 2-16

One of the six objectives listed in the GAIP is to “*to maximize economic, self-sustaining, revenue producing facilities.*” What will be the economic benefit to JWA? JD 2-17

If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not? JD 2-18

Sincerely,
Jeff Dvorak
302 Avenida Cumbre
Newport Beach, CA 92660
DvorakJeff@yahoo.com

From: Maris Ensing <maris@madsystems.com>
Sent: Thursday, November 8, 2018 12:21 PM
To: EIR627
Subject: John Wayne Airport General Aviation Improvement Program

Good afternoon,

having looked at the proposed plans, I am concerned about a few aspects:

1. after spending a significant amount of money and time building and then not using the covered tie-downs where I am currently a tenant after waiting for years, I am more than a little unhappy that I might end up not having a quality covered tie-down again in the future for any length of time. Although I would love a hanger, the additional costs are significant, and availability thus far has been non-existent. We need to keep the covered tie-downs so that all that investment in airport infra-structure is not wasted, and so that our investment in our aircraft is not diminished through parking out in the full sun and weather. ME-1

I do not feel that we need another FBO on the field more than we need covered tie-downs as they currently stand. ME-2

2. changing the perimeter road will affect the number of places for General Aviation aircraft. I consider that unacceptable and irresponsible. Are we not trying to maintain a healthy GA community in Southern California and make it possible for people to be at an airport located within reasonable distance from their homes? Everybody that drives on the airport is trained and is very well aware that crossing the line from the perimeter road as it stands is not permitted - ergo: there is no need to add another empty zone between the road and the taxiways. If someone does cross that line, it doesn't matter if they do it now or with the road another 30' to the side - it's illegal and they should not be driving on the airport. ME-3

3. any future plans should involve an increase of possibilities for GA at John Wayne Airport. As the economy improves and young fliers will have more opportunities to acquire aircraft, one would hope that there will be an increase in pilots and aircraft, hopefully back to and beyond the levels seen before the recession that decimated the number of private aircraft at John Wayne airport. ME-4

When one combines the concerns expressed here with the obvious concerns that I and many of my fellow pilots have with regards to the continuous high-rise high-density building that is going on around the airport, one does get the distinct feeling that this is just another step to try and push GA out as much as possible. Considering that such an opportunity existed in the form of the nearby defunct airbase, and that that opportunity was not taken up, it hardly seems appropriate to continue to erode possibilities for the pilot citizens of Orange County to own aircraft and keep them stationed at John Wayne airport. ME-5

Best regards

Maris J. Ensing
733 North Main St
Orange, CA 92868

From: Jeanne Fobes <jeannefobes@gmail.com>
Sent: Wednesday, November 21, 2018 12:59 PM
To: EIR627
Subject: Proposed GAIP

Dear Ms. Choum, As a resident of Newport Beach, I am impacted by takeoffs and landings at JWA. Citizens Against Airport Noise and Pollution (CAANP.com), an organization dedicated to a reduction in the noise and pollution generated from John Wayne Airport, has alerted us that we have a new issue occurring at JWA. The County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities at JWA . These new hangars will displace smaller privately owned aircraft in favor of larger privately owned jet aircraft., including corporate jet fleets, which may make international flights. CAANP is concerned about the impact on our nighttime curfew, increased pollution from leaded jet fuel and increases in daily departures. that will be the result of the GAIP. Only commercial jets are currently governed by curfew hours. The GAIP will lead to a new mix of general aviation aircraft at JWA, allowing more large private and corporate jets to depart and fly overhead anytime of the day or night. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not been adequate for the quality of life in our communities. Further, the increase in nighttime flights would set a dangerous precedent for the future of the JWA curfew, which will be subject to renegotiation in 2035. I would like to go on the record as strongly opposing this proposed expansion. Sincerely,

JF-1

JF-2

JF-3

From: Fly USA1 <flyusa1@live.com>
Sent: Wednesday, November 21, 2018 1:28 PM
To: EIR627
Subject: Comments - General Aviation Improvement Program 2018
Attachments: KSNA - DEIR FPF 11-21-2018.pdf

November 21, 2018

Ms. Lea Choum
JOHN WAYNE AIRPORT
3160 Airway Avenue
Costa Mesa, CA 92626

Re: COMMENTS - DRAFT ENVIRONMENTAL IMPROVEMENT REPORT

Dear Ms. Choum:

I am a private pilot, airplane owner, and tie down tenant on the Westside at the Covered Tie Downs; I have been flying out of John Wayne now for about 25 years; I received my early training and certification here on the field. I fly on the average about 90-100+ flights and well over 100 hours each year; I also purchase over 1,500 gallons of aviation fuel yearly between the local and surrounding FBO's. In my peer group at John Wayne, almost all members of the SoCal Pilots Association, there are many other senior, high time, and frequent flying private pilots; our aggregate flight hours, fuel purchases, and control tower operations locally are significant within the context of General Aviation at John Wayne.

FF-1

Please review and accept my DEIR comments and suggestions as follows:

- The DEIR is voluminous and written with fairly technical language, it is difficult for the general public to decipher important information contained within; I respectfully suggest that a summary, in highlighted or bullet form, be rewritten and posted in plain English for the broader audience in general public

FF-2

- The proposal obfuscates the term, General Aviation, as defined by *single engine, twin engine, and small light jet airplanes*; it broadly aggregates all three categories with charter jet and turbo-propeller operations, those for-hire-transportation operators, as a single "General Aviation" body. That is wrong; latter belongs to the "Commercial" category with the airlines regardless of their wingspan and fleet size. The Report's aggregated definition is problematic because the proposal is supposedly to "improve General Aviation" but by the above definition, it effectively threatens to eliminate all three former species of our local aviation ecosystem.
 - Please re-categorize commercial jet airline operation **to include** chartered operators of both jet and turbojet-propeller aircrafts **for hire** regardless of wingspan and fleet size

FF-3

- As a local pilot, I can attest that prevailing airport traffic flow at John Wayne is extremely congested, enlarging commercial jet and for-hire-transport airplane operations at this point forward would compound this congestion at the expense of safety, timely flight operations, and general public health

FF-4

- Note that just one jet accident, fatal or not, at any time at John Wayne, can be equivalent in cost and potential property damage of up to 5 or 10 smaller single or twin engine GA accidents which are very rare
- Note also that jet smoke and exhaust over-exposure is very real and can be fatally harmful to humans, please see the [Public Health Statement of JP-8 and Jet-A fuels by ATSDR, Agency for Toxic Substance & Disease Registry](#). *"Exposure to jet fuels can occur if you have skin contact with soil or water contaminated from a spill or leak...also...if you swim in waters where jet fuels have been spilled. If jet fuels have leaked... and entered groundwater...might breathe in some of the chemicals evaporating from a spill or leak site if you are in an area where an accident has occurred... Some of the effects...observed in humans include changes in reaction time and other tests of neurological function. Humans who accidentally ingested...a fuel oil similar in composition to...JP-8... and Jet A fuels, were reported as suffering harmful effects on the respiratory tract, gastrointestinal tract, and*

FF-5

nervous system. The observed effects included cough and difficulty breathing, abdominal pain and vomiting, drowsiness, restlessness, and convulsions..." (<https://www.atsdr.cdc.gov/phs/phs.asp?id=771&tid=150>)

FF-5 cont.

- The proposed expansion of commercial operations compounds this health hazard in jet fumes, noise pollution; it also adds to the already overcrowded local and freeway traffic. Within a decade or sooner, I predict John Wayne will face similar public and political pressure experienced by [Santa Monica \(KSMO\)](#) where local residents backed by property developers are keenly, and successfully, moving towards closing the airport for its prime real estate. We also saw that just recently in 2003, at the former [Meigs Field \(KCGX\)](#) in Chicago.
-

FF-6

- The proposed idea to add yet another new FBO on the field is unsustainable and shortsighted; not only is it because the economy is cyclical and volatile, in a protracted downturn business and leisure travels by private jets and chartered airplanes will be substantially depressed to a halt. The least competitive FBO business will sustain the most losses. Note that General Aviation in smaller aircrafts may slow but it will continue along in its usual snail-like pace mostly unfazed in its usage like a personal car. If the decision is to proceed with adding another FBO on the field, I strongly suggest the Airport to subject all the Base Operators to quarterly financial reporting to assure that they maintain a sound level of equity in their capital structure. You do not want a nonpaying FBO tenant in bankruptcy under the protection of law, especially in a protracted economic downturn.
-

FF-7

- The proposed expansion of commercial operations will also displace over 200 GA airplanes currently **domiciled** at John Wayne; many pilots like myself reside in south Orange County and if we reposition our airplanes to other towered airports such as Fullerton, Chino, Long Beach, or Torrance, the commute time in traffic will be utterly impossible. Further, we would have to fly back into John Wayne for maintenance if our mechanic are Jay's Aircraft or American Aircraft

- An adjunct to this situation is more problematic because if we are based elsewhere we would have no badge access to be on the field so when we fly in for maintenance, we will have to leave by surface streets which will add to the local traffic flow and pollution
 - Another important aspect is the capacity of the towered airports in Southern California to absorb the potential diaspora of private airplanes from John Wayne. I do not believe there are currently anywhere close to 200 GA parking spots available in the L.A. basin
-

FF-8

- The commercial operations should be expanded as follows:
 - Maintain the existing three FBO mix as is without adding anymore new FBO's
 - Martin Aviation, local Orange County
 - ACI Jet, Regional Western US
 - Atlantic Aviation, National US
 - Reposition all East side GA hangars and GA tie downs to the West side
 - Consolidate ACI's ramp access to the East side only
 - They can maintain the same ramp size footprint, if not more, by taking over the areas where the hangars are currently at - southward
 - Expand Atlantic Aviation's foot print to the north
 - They can maintain the same or larger ramp size footprint by taking over the areas where the hangars are currently at - northward.
 - Maintain Martin Aviation as is, but mandate that they compete in fuel sales
 - Reposition American Aircraft Maintenance and flight school operations to the Westside to consolidate with other general aviation airplanes
 - Reposition the airport maintenance facility north of the tower to the end of the East side with new facilities around where they still have equipment storage

FF-9

Under the above scenario, John Wayne will host one regional FBO in ACI Jet, one national FBO in Atlantic Aviation on the Eastside; and one local boutique FBO in Martin Aviation, which has a museum, a joy ride service, and an avionic service station on the Westside. This model will aggregate all non-commercial private airplanes, maintenance facilities, flight schools, and rental tie downs and hangars on the Westside leaving the high-revenue *high-risk* operations on the Eastside with the airliners.

- The General Aviation aspect should be developed on the Westside around the control tower and Fire Dept. as follows:
 - Expand the Westside with a both shade structures similar to the existing covered tied downs and open tie downs north and south of the tower
 - Convert the two maintenance buildings, north and south of the control tower for GA use as a pilot terminal facilities
 - Convert the maintenance shade structures by the control tower to GA covered tied downs
 - After ACI is cleared of the Westside, convert current the jet hangars on the Westside to airport controlled rental hangars (direct revenue)
 - Build both box and T-hangars to the north and south of the control tower and south of Martin Aviation
-

-
- Widen the access for the airline support operations at the Helistream building – right now they only have one gate and none of the new Alternatives provisioned for their continued operation; it looks like someone forgot that there is an airline support facility domiciled there.
 - Install self-serve fuel pumps on the West side for GA
 - VERY IMPORTANT – *the County must retain control* over the fuel pump and all GA parking, including the open, covered, and future hangar facilities on the Westside. This is critical to preventing price gouging if controlled by private entities – as we are currently witnessing at non County operated hangars and tie downs at John Wayne

FF-9 cont.

The above are my suggestions and observations for improvement as a private pilot at the airport for the past 25 years; I know they are broad and high-level and I hope you will agree with the big picture I am conveying. In addition, I fully understand the Administration's desire to improve profits, but I respectfully submit that one should not lose sight of the fact that John Wayne Airport is only a modern community public service agency after all; it is not a publicly traded for-profit entity. Those better economics should be for the convenience and betterment of the *local public, equally and as much as possible, because our very lives and livelihood makes up the constituents of the Airport with our tax dollars*. No Improvement campaigns must be just for the line-item bottom line profitability of the Airport entity alone and by itself.

FF-10

Thank you for the opportunity to submit my comments and suggestions.

Respectfully,

Frederick Fong
KSNA - N9430W
Post Office Box 8005
Newport Beach, CA 92658
flyusa1@live.com

November 21, 2018

Ms. Lea Choum
JOHN WAYNE AIRPORT
3160 Airway Avenue
Costa Mesa, CA 92626

Re: COMMENTS - DRAFT ENVIRONMENTAL IMPROVEMENT REPORT

Dear Ms. Choum:

I am a private pilot, airplane owner, and tie down tenant on the Westside at the Covered Tie Downs; I have been flying out of John Wayne now for about 25 years; I received my early training and certification here on the field. I fly on the average about 90-100+ flights and well over 100 hours each year; I also purchase over 1,500 gallons of aviation fuel yearly between the local and surrounding FBO's. In my peer group at John Wayne, almost all members of the SoCal Pilots Association, there are many other senior, high time, and frequent flying private pilots; our aggregate flight hours, fuel purchases, and control tower operations locally are significant within the context of General Aviation at John Wayne.

Please review and accept my DEIR comments and suggestions as follows:

- The DEIR is voluminous and written with fairly technical language, it is difficult for the general public to decipher important information contained within; I respectfully suggest that a summary, in highlighted or bullet form, be rewritten and posted in plain English for the broader audience in general public
 - The proposal obfuscates the term, General Aviation, as defined by *single engine, twin engine, and small light jet airplanes*; it broadly aggregates all three categories with charter jet and turbo-propeller operations, those for-hire-transportation operators, as a single "General Aviation" body. That is wrong; latter belongs to the "Commercial" category with the airlines regardless of their wingspan and fleet size. The Report's aggregated definition is problematic because the proposal is supposedly to "improve General Aviation" but by the above definition, it effectively threatens to eliminate all three former species of our local aviation ecosystem.
 - Please re-categorize commercial jet airline operation **to include** chartered operators of both jet and turbojet-propeller aircrafts **for hire** regardless of wingspan and fleet size
- As a local pilot, I can attest that prevailing airport traffic flow at John Wayne is extremely congested, enlarging commercial jet and for-hire-transport airplane operations at this point forward would compound this congestion at the expense of safety, timely flight operations, and general public health
 - Note that just one jet accident, fatal or not, at any time at John Wayne, can be equivalent in cost and potential property damage of up to 5 or 10 smaller single or twin engine GA accidents which are very rare
 - Note also that jet smoke and exhaust over-exposure is very real and can be fatally harmful to humans, please see the [Public Health Statement of JP-8 and Jet-A fuels by ATSDR, Agency for Toxic Substance & Disease Registry](#). *"Exposure to jet fuels can occur if you have skin contact with soil or water contaminated from a spill or leak...also...if you swim in waters where jet fuels have been spilled. If jet fuels have leaked...and entered groundwater...might breathe in some of the chemicals evaporating from a spill or leak site if you are in an area where an accident has occurred... Some of the effects...observed in humans include changes in reaction time and other tests of neurological function. Humans who accidentally ingested...a fuel oil similar in composition to...JP-8...and Jet A fuels, were reported as suffering harmful effects on the respiratory tract, gastrointestinal tract, and nervous system. The observed effects included cough and difficulty breathing, abdominal pain and vomiting, drowsiness, restlessness, and convulsions...."* (<https://www.atsdr.cdc.gov/phs/phs.asp?id=771&tid=150>)
 - The proposed expansion of commercial operations compounds this health hazard in jet fumes, noise pollution; it also adds to the already overcrowded local and freeway traffic. Within a decade

FF-11

or sooner, I predict John Wayne will face similar public and political pressure experienced by [Santa Monica \(KSMO\)](#) where local residents backed by property developers are keenly, and successfully, moving towards closing the airport for its prime real estate. We also saw that just recently in 2003, at the former [Meigs Field \(KCGX\)](#) in Chicago.

- The proposed idea to add yet another new FBO on the field is unsustainable and shortsighted; not only is it because the economy is cyclical and volatile, in a protracted downturn business and leisure travels by private jets and chartered airplanes will be substantially depressed to a halt. The least competitive FBO business will sustain the most losses. Note that General Aviation in smaller aircrafts may slow but it will continue along in its usual snail-like pace mostly unfazed in its usage like a personal car. If the decision is to proceed with adding another FBO on the field, I strongly suggest the Airport to subject all the Base Operators to quarterly financial reporting to assure that they maintain a sound level of equity in their capital structure. You do not want a nonpaying FBO tenant in bankruptcy under the protection of law, especially in a protracted economic downturn.
- The proposed expansion of commercial operations will also displace over 200 GA airplanes currently domiciled at John Wayne; many pilots like myself reside in south Orange County and if we reposition our airplanes to other towered airports such as Fullerton, Chino, Long Beach, or Torrance, the commute time in traffic will be utterly impossible. Further, we would have to fly back into John Wayne for maintenance if our mechanic are Jay's Aircraft or American Aircraft
 - An adjunct to this situation is more problematic because if we are based elsewhere we would have no badge access to be on the field so when we fly in for maintenance, we will have to leave by surface streets which will add to the local traffic flow and pollution
 - Another important aspect is the capacity of the towered airports in Southern California to absorb the potential diaspora of private airplanes from John Wayne. I do not believe there are currently anywhere close to 200 GA parking spots available in the L.A. basin
- The commercial operations should be expanded as follows:
 - Maintain the existing three FBO mix as is without adding anymore new FBO's
 - Martin Aviation, local Orange County
 - ACI Jet, Regional Western US
 - Atlantic Aviation, National US
 - Reposition all East side GA hangars and GA tie downs to the West side
 - Consolidate ACI's ramp access to the East side only
 - They can maintain the same ramp size footprint, if not more, by taking over the areas where the hangars are currently at - southward
 - Expand Atlantic Aviation's foot print to the north
 - They can maintain the same or larger ramp size footprint by taking over the areas where the hangars are currently at - northward.
 - Maintain Martin Aviation as is, but mandate that they compete in fuel sales
 - Reposition American Aircraft Maintenance and flight school operations to the Westside to consolidate with other general aviation airplanes
 - Reposition the airport maintenance facility north of the tower to the end of the East side with new facilities around where they still have equipment storage

FF-11
cont.

Under the above scenario, John Wayne will host one regional FBO in ACI Jet, one national FBO in Atlantic Aviation on the Eastside; and one local boutique FBO in Martin Aviation, which has a museum, a joy ride service, and an avionics service station on the Westside. This model will aggregate all non-commercial private airplanes, maintenance facilities, flight schools, and rental tie downs and hangars on the Westside leaving the high-revenue *high-risk* operations on the Eastside with the airliners.

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 - VERY IMPORTANT – *the County must retain control* over the fuel pump and all GA parking, including the open, covered, and future hangar facilities on the Westside. This is critical to preventing price gouging if controlled by private entities – as we are currently witnessing at non County operated hangars and tie downs at John Wayne

FF-11

The above are my suggestions and observations for improvement as a private pilot at the airport for the past 25 years; I know they are broad and high-level and I hope you will agree with the big picture I am conveying. In addition, I fully understand the Administration's desire to improve profits, but I respectfully submit that one should not lose sight on the fact that John Wayne Airport is only a modern community public service agency after all; it is not a publically traded for-profit company. Those better economics should be for the convenience and betterment of *the local public, equally and as much as possible, because our very lives and livelihood makes up the constituents of the Airport with our tax dollars.* No Improvement campaigns must be just for the line-item bottom line profitability of the Airport entity alone and by itself.

Thank you for the opportunity to submit my comments and suggestions.

Respectfully,



Frederick Fong
KSNA - N9430W
Post Office Box 8005
Newport Beach, CA 92658
flyusa1@live.com

From: Dan Freedman [mailto:dan@fsa.ca]
Sent: Thursday, October 25, 2018 4:49 PM
To: EIR627 <eir627@ocair.com>; Program, GA Improvement [JWA] <GProgram@ocair.com>
Subject: Comments on the General Aviation Improvement Program

These are my comments on John Wayne Airport's General Aviation Improvement Program

Although improving the facilities for General Aviation (GA) at John Wayne Airport (JWA) is very positive, reducing the number of available general aviation (GA) long-term parking spots is extremely negative for GA, outweighing any positive outcome that the improvements may deliver.

DF-1

In short, no amount of facilities improvement can offset the extreme negative effects to the airport and its user community of evicting somewhere around one quarter of the GA aircraft, the users of which JWA exists to serve.

Users of aircraft no longer able to be based at JWA will not be the only people to bear the negative effects of the GAIP's capacity reduction. Aircraft maintenance services on the airport will be greatly and negatively impacted, and there will be some negative impact on fuel providers.

DF-2

New hangars sound wonderful. Self service fuel is long overdue at JWA. On-field customs is very welcome. But **PLEASE** find a way to achieve some or all of these objectives without forcing aircraft tenants off of the field! If that cannot be done, my view as a GA user of JWA is that achieving none of these goals would be a far preferable outcome than forcing aircraft off of the field.

DF-3

If it is possible to achieve one or more outcomes, but not all, without forcing aircraft off the field, most aircraft owners would likely want self-service fuel to be provided (preferably by a new fuel provider, to increase the current poor level of competition among fuel providers at JWA, which currently results in high fuel prices when compared to nearby airports).

I would be happy to provide further perspective if there are any questions or uncertainties when reading or interpreting this set of comments.

Most sincerely

Daniel Freedman
1840 W Meadowbrook Dr

From: Susan Gaunt <smgaunt1@gmail.com>
Sent: Monday, November 19, 2018 6:14 PM
To: EIR627
Subject: GAIP

Dear Ms. Choum,

As a citizen of Newport Beach, I am greatly concerned about the negative impact the GAIP would have on life in this city. I am strongly opposed to the GAIP and the fact that the new mix of jets would not be subject to current curfews. We have too much noise and pollution in Newport Beach already. Thank you, SG-1

Susan Gaunt
414 Villa Point Drive
Newport Beach, CA
92660
smgaunt@sbcglobal.net

From: Pam Goode <pbgoode@gmail.com>
Sent: Wednesday, November 21, 2018 7:05 PM
To: EIR627
Subject: Airport

We are very opposed to any growth at JWA. We have lived on Balboa Island for over 40 years and the noise and dirt from the airplanes continues to get worse. We have been concerned about an airplane going down over the departure areas and are frankly surprised that it hasn't happened. JWA isn't large enough to have any more airplanes. Please save our environment and safety and peace. We DO NOT need to have our lives disrupted any more. PBG-1

ENOUGH PLEASE

Pam and Bill Goode
211 East Bay Front
Balboa Island, CA
92662
pbgoode@gmail.com

From: Peter Grant <pgpilotsx@gmail.com>
Sent: Tuesday, November 13, 2018 9:23 AM
To: EIR627
Subject: JWA GA improvement program

To whom it may concern,

What is the real reason behind this, more business jets, which are not commercial , which means more noise at the airport and surrounding areas, GA is important for the future of aviation, do upgrades by all means but don't reduce the population of GA, this is a great airport. PG-1

We have had a hanger here since 1983, and wish to remain with it, so how do you plan to designate hangers if you go through with the planned upgrades (which is not an upgrade) it's a scam PG-2

Peter Grant

Sent from my iPad

From: Herrmann, Alan <Alan.Herrmann@us.gt.com>
Sent: Monday, November 5, 2018 7:18 AM
To: EIR627
Subject: KSNA Airport project

Dear Ms. Lea Choum,

I recently reviewed the proposals for the KSNA airport plan. I would like it to be known that I am NOT in favor of any plan that reduces the number of available spaces for general aviation or the accommodations. GT-1

Furthermore, I believe that we should be considering the following:

1) Study ways to maintain the current capacity of approximately 596 GA aircraft while increasing the number of hangars. GT-2

2) Study the applicability of a waiver from the FAA to keep the existing location of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars. GT-3

Thank you,

Alan Herrmann
Office Managing Partner - Orange County
D +1 949 608 5227
M +1 949 922 8369
E alan.herrmann@us.gt.com
GT.COM

4695 MacArthur Court
Suite 1600
Newport Beach, CA 92660



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From: Fred Greensite <fred.greensite@gmail.com>
Sent: Tuesday, November 13, 2018 2:48 PM
To: EIR627
Subject: Comment on: Draft Program Environmental Impact Report (EIR 627)

November 13, 2018

Re: Draft Program Environmental Impact Report (EIR 627)

Dear Ms. Choum

Please consider that hundreds of general aviation pilot aircraft owners depend on the tie-down sites of Westside Parking. Any plan that would eliminate enough tie-down spots such that GA pilots would no longer be able to park their planes at SNA John Wayne Airport, would create a great hardship on these aircraft owners, as there are no airports less than roughly an hour or so away (in usual freeway traffic) - and no guarantee that feasible replacement airports would have sufficient tie-down spots for the aircraft thrown off of SNA as a result of such a plan.

FG-1

I hope the relevant committee will give this due consideration, so that the present aircraft owners dependent on these tie-down spots are not forced to terminate their aircraft ownership due to adoption of such a "heartless" plan.

FG-2

Sincerely,
Fred Greensite

SNA Westside Parking Tie-down spot #222

From: Joel Hackney <joel@heirsm.com>
Sent: Monday, November 5, 2018 8:20 AM
To: EIR627
Subject: SNA GA Improvement Plan

To whom it may concern,

I'm a little concerned about the "GA Improvement plan" that has been submitted as it doesn't seem to really improve any conditions for General Aviation. Hangars and covered parking are in short supply at SNA and would be a vast improvement for the GA community. Currently there are no hangars available and no way to get on a waiting list to ever receive one. This condition is not because of overcrowding at the airport, but rather extremely limited number of hangars to begin with. There needs to be a study that would maintain the current GA capacity while increasing the number of Hangars and covered parking at SNA. An overall decrease in GA capacity will only make things worse.

JH-1

Please consider the below suggestions:

JH-2

1. Study ways to **maintain** the current capacity of approximately 596 GA aircraft while increasing the number of hangars.

2. Study the applicability of a waiver from the FAA to **keep the existing location** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars.

JH-3

Joel Hackney

From: Kathy Harbour <harbour.kathy@gene.com>
Sent: Wednesday, November 21, 2018 10:04 AM
To: EIR627
Cc: harboke@gene.com
Subject: Airplane noise at John Wayne

Dear Ms Choum

I am writing to let you know of my opposition to the proposed plan for the expansion of the general aviation hangers which would allow larger private planes to fly anytime and not be subject to the curfew.

Newport Beach has been terribly impacted by the amount of planes that are now allowed to fly in and out of John Wayne. I am personally severely impacted by the noise everyday from 7 am to 10 at night. The noise never stops.

KH-1

It is such an aggravating part of each day and knowing that it might get worse would only add to the problem.

Please consider the families of Newport Beach that are so negatively impacted by the airplane noise.

Respectfully,
Kathy Harbour
8 turtle bay drive
Newport Beach

Sent from my iPhone

From: Cheryl Hart <hartc@cox.net>
Sent: Tuesday, November 20, 2018 5:16 PM
To: EIR627
Subject: GAIP

Please note that my husband and I are NOT in favor of the proposed GAIP that would allow larger private jets to use JWA. We are opposed to any lifting or modifying of the existing curfews. BCH-1

Thank you.

Bill and Cherie Hart
7 Rue Grand Vallee
Newport Beach, CA. 92660

Cherie Hart
949-278-8117



Virus-free. www.avast.com

From: Sandi Hill <tugwillyb@gmail.com>
Sent: Wednesday, November 21, 2018 7:17 AM
To: EIR627
Subject: Airport expansion

I would like to object the expansion of the JWA to private jets that are not under the stipulation of the curfew regulations.

SH-1

Sandi Hill
Tugwillyb@gmail.com

Sent from my iPhone

From: Fritz Howser <fritz@fhcdevco.com>
Sent: Tuesday, November 20, 2018 12:26 PM
To: EIR627
Subject: Draft EIR for GAIP

Ms. Choum,

I am opposed to any increase in noise - both decibel & duration (i.e. extended operating hours) that may be associated with the General Aviation Improvement Plan (GAIP).

The air traffic noise is already a problem with the commercial airlines and the restrictions are not enough.

Please let my 50 years as a resident of Newport Beach mean something....don't let our fine City get further impacted and potentially ruined by increased air traffic noise.

FH-1

Simply stated we don't need more flights.

Thank you for your time and consideration of the above.

Fred Howser
608 St. James Place
Newport Beach, CA 92663
949-566-9155 x-11
fritz@fhcdevco.com

From: Libby Huyck <libonlido@aol.com>
Sent: Tuesday, November 20, 2018 11:17 AM
To: EIR627
Subject: Can you forward 627 and pertinent docs by email?

Please forward to me 627 docs. Thank you.

LH-1

Draft Program EIR 627 and technical studies

Libby Huyck

From: Libby Huyck <libonlido@aol.com>
Sent: Tuesday, November 20, 2018 11:29 AM
To: EIR627
Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”):

LH 2-1

I just now received this notice from Lido Isle Community Association. Many of us have been involved in the election so it was nice of you to extend the deadline. **Can you please put these docs online at your ocair.com website?** Nobody goes to locations to look at reports any more. Heck, nobody even cares enough to vote any more either.

If i don't hear from you by later today, I will talk to the LICA Director who hopefully can help me out.

Libby Huyck
949 424 4179

From: Libby Huyck <libonlido@aol.com>
Sent: Tuesday, November 20, 2018 1:30 PM
To: EIR627
Subject: Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

So this is an EIR for the "new project" at the airport. This is not a EIR for the noise problem at the airport. I would like to see something done about the noise from the planes that has dramatically increased last year. And if some planes do have "quiet technology", there are still enough loud planes that make it very loud for those of us in the path. Please address the noise from the planes. That is what everyone I know is complaining about.

LH 3-1

Thank you.
Libby Huyck

-----Original Message-----

From: EIR627 <eir627@ocair.com>
To: Libby Huyck <libonlido@aol.com>
Sent: Tue, Nov 20, 2018 11:46 am
Subject: RE: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Good Morning,

The Draft EIR can be found in the following link:

<https://www.ocair.com/deir627>

Best Regards,

EIR 627 Team

John Wayne Airport, Orange County
3160 Airway Avenue | Costa Mesa, CA 92626
ocair.com [Facebook](#) [Twitter](#)



LH 3-2

From: Libby Huyck <libonlido@aol.com>
Sent: Tuesday, November 20, 2018 11:29 AM
To: EIR627 <eir627@ocair.com>
Subject: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a member of the general public and a concerned resident of Newport Beach, the following are my comments regarding the Draft Environmental Impact Report ("DEIR") pertaining to the proposed John Wayne Airport General Aviation Improvement Project ("GAIP"):

I just now received this notice from Lido Isle Community Association. Many of us have been involved in the election so it was nice of you to extend the deadline. **Can you please put these docs online at your ocair.com website?** Nobody goes to locations to look at reports any more. Heck, nobody even cares enough to vote any more either.

LH 3-2
cont.

If i don't hear from you by later today, I will talk to the LICA Director who hopefully can help me out.

Libby Huyck
949 424 4179



November 17, 2018

18482 Topanga Canyon Rd
Silverado, CA 92676
949.589.0669

Ms. Lea Choum
County of Orange
John Wayne Airport
3160 Airway Avenue
Costa Mesa, California 92660

Dear Ms. Choum,

I have learned of the new EIR for John Wayne Aiport and am very concerned. The massive reduction in tie down spaces offered by the proposal and all alternatives except #3 is an unmitigated disaster for General Aviation in OC! I would like to ask that the EIR be revised with less drastic reductions that still address the majority of the issues outlined in the EIR. We can and must do better than the current slate of proposals.

BI-1

Things to consider:

- Displacing aircraft doesn't really solve any problems, it just distributes them.
- Moving the perimeter road by 10' has a HUGE impact, and very little benefit!

BI-2

- There are other options/considerations for the next 50-100 years that are completely missed – for example electric aircraft and stacked hangars.

BI-3

Please consider revising the EIR with better options. If this cannot be done, please consider option #3 as the only viable alternative.

BI-4

Sincerely,

Benjamin Imai (Tie Down Tenant)

From: Daniel Jensen <n833sd@gmail.com>
Sent: Monday, November 5, 2018 7:41 AM
To: EIR627
Subject: SNA Improvement plan EIR comment

To whom it may concern,

Please incorporate in the final EIR some options for maintaining the current level of capacity of General Aviation aircraft at John Wayne airport.

And consider these two thoughts for further study;

DJ-1

1. Study ways to **maintain** the current capacity of approximately 596 GA aircraft while increasing the number of hangars.

2. Study the applicability of a waiver from the FAA to **keep the existing location** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars.

DJ-2

Thank you.

--

Dan Jensen
tenant, spot 200

JOHNSON & ASSOCIATES
A Professional Law Corporation

100 Bayview Circle, Suite 220, Newport Beach, California 92660

Telephone (949) 851-6993

E-Mail: RKJ@Johnson4Law.com

Facsimile (949) 851-8062

November 6, 2018

- Sent Via Email Only -
eir627@ocair.com

Lea Choum

Re: SNA Improvement Plan

Dear Ms. Choum:

I am a private pilot that has had SNA as my home base for over twenty-five years. I have flown many different types of aircraft out of SNA and am currently an owner of a Beechcraft Bonanza that is housed at SNA.

JA-1

Through my entire flying life I have had my maintenance performed by Jay's Aircraft Maintenance who is on the field at SNA. They are an integral part of my ability to fly as a private pilot. It is important to me that SNA be maintained as a GA Airport. I am aware that the airport currently houses almost 600 GA aircraft. It is also important to me that the airport study ways to maintain the current capacity of GA Aircraft.

JA-2

JA-3

I also believe that keeping the existing location of the perimeter road is important in that by doing so it would reduce the capacity of the GA tie-downs and hangars available for pilots such as myself.

JA-4

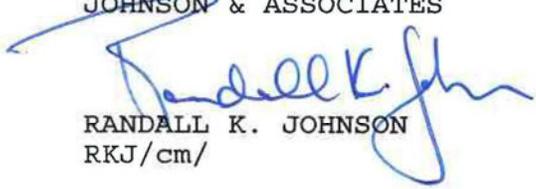
In short, I want Jay's Aircraft to stay on the field to service GA piston aircraft, which in reality no one else on the field does in that they cater mainly to jet aircraft, as well as maintain the GA availability.

JA-5

I appreciate your time in this regard.

Yours very truly,

JOHNSON & ASSOCIATES


RANDALL K. JOHNSON
RKJ/cm/

From: Jeanne Johnson <jeanneyjohnson@cox.net>
Sent: Wednesday, November 21, 2018 12:04 PM
To: EIR627
Subject: Private jet expansion

Just alerted to the possible expansion of facilities that would allow more private jets to fly in/out of JWA. These flights would not need to abide by current restrictions on commercial flights. The hours, noise and increased frequency will have a deleterious affect and greatly impact our lives and value of our homes.

JJ-1

Hopefully quality of life will over rule corporate greed

Jeanne Johnson
109 Jasmine Creek Drive
Corona Del Mar, 92625

Jeanneyjohnson@cox.net

Sent from my iPad

From: Carol Jung <cmariejung@yahoo.com>
Sent: Wednesday, November 21, 2018 7:46 AM
To: EIR627
Subject: Air issue

Dr. Madam,

I am upset to hear that SNA may be allowing new large aircraft to use the airport. I am against this. We have excessive noise and distress from all the planes that already fly over our house. It shocks me how loud it is. And we don't need more aircraft being able to leave AT ANY TIME OF DAY OR NIGHT.

CJ-1

I am a 20 resident and homeowner. Carol Jung, 432 fernleaf ave, CDM 92625

Best,
Carol Jung
[Sent from Yahoo Mail on Android](#)

From: Kallao, Franz <FKallao@mirage.com>
Sent: Wednesday, November 21, 2018 11:49 AM
To: EIR627
Subject: Private Aircraft Curfew

To whom it may concern:

I am very concerned about the proposal allowing private aircraft without curfew rules.

My condo is right in the flight path and the man at flights already are bothersome, loud, and inconsiderate of all of us living in this area.

FK-1

Please consider what you would prefer if you were a resident here - many have purchased many many years ago and this just keeps getting worse!

Please help us!

With gratitude,

Franz Kallao
80 Villa Point Dr
Newport Beach, CA 92660
702-210-0885

From: Nancy Kirksey <nkirksey@gmail.com>
Sent: Wednesday, November 21, 2018 7:08 PM
To: EIR627
Subject: General aviation proposed expansion

Dear Ms Choum,

I am a Corona Del Mar resident and I would like to voice my opposition to any expansion of General/private aviation that would allow flight take off or landings during the current curfew hours. Thanks for your consideration.

NK-1

Best,
Nancy Kirksey
17 Montecito Dr.
Corona Del Mar, Ca 92625
Nkirksey@gmail.com
949.246.9000

From: Carolyn Klein <cjklein101@yahoo.com>
Sent: Tuesday, November 20, 2018 5:11 PM
To: EIR627
Subject: Aircraft Expansion

We strongly oppose allowing larger private aircraft at JWA. Carolyn and Bill Klein

CBK-1

From: Sheila Koff <sheilakoff@gmail.com>
Sent: Wednesday, November 21, 2018 4:00 PM
To: EIR627
Subject: No more planes at OCX

No more expansion of the airport over OC citizens.

SK-1

Sheila Koff
Newport Beach. 92625

From: Wayne Lindholm <wslindholm@gmail.com>
Sent: Monday, November 5, 2018 3:25 PM
To: EIR627; Nelson, Shawn [HOA]; michellesteel@shawnsteel.com; lbartlett1@aol.com; ado@fyklaw.com; todd@toddsplitzer.com
Cc: fred.m.vonzabern@boeing.com; 'Fred Fourcher'; Scott Cutshall; cawelsh@me.com; 'Frank Singer'; 'Lina AAM'; 'Jay Dabba'; 'Wayne Lindholm'; joefinl@socal.rr.com
Subject: Airport Improvement Plan

Dear Ms Lea Choum:

As a pilot that keeps a plane in one of the Executive Hangers we are quite disappointed and concerned with the reduction of GA space and hangers for the Piston Aviation Community. We would like to see an **improvement** plan **not** a plan that reduces the capacity for GA at SNA. WL-1

Please Consider:

1. Ways to **maintain** the current capacity of approximately 596 GA aircraft while increasing the number of hangars. WL-2

2. Can we get a waiver from the FAA to **keep the existing location** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars. WL-3

(Comments may be submitted, in writing, postmarked no later than 5:00 PM on November 6, 2018, via regular mail to Ms. Lea Choum, 3160 Airway Avenue, Costa Mesa, California 92626 or by e-mail to EIR627@ocair.com)

Sincerely:

Wayne Lindholm, (Concerned Pilot)

From: Andy Lingle <andylinge@gmail.com>
Sent: Tuesday, November 20, 2018 7:12 PM
To: EIR627
Cc: ANDY LINGLE
Subject: Private Jets at JWA

November 20, 2018

Dear Ms. Choum

I live in Dover Shores and we're pretty close to the flight path from JWA. In my experience the noise from private jets is often much louder and more annoying than the noise from commercial aircraft. I'm concerned about the plan to add more, and larger, private jets and especially about the fact that they are not subject to the same curfew rules and noise rules as the commercial jets. As the commercial jets get quieter (and I'm thankful for that), and the number of private jets that aren't subject to restrictions increases, this is going to become a more intense and harmful problem. Are there any plans to impose noise and curfew limits on private jets??

AL-1

AL-2

Thank you for any light you can shed on this growing problem.

Andrea Lingle

andylinge@gmail.com

949-548-7646

From: rlipton@theliptongroup.com
Sent: Monday, November 5, 2018 11:36 AM
To: EIR627
Subject: SNA

Good morning,

I am an active general aviation pilot, out of SNA, and have been for the last 49 years. It's a great airport and it took root with general aviation.

The purpose of this note is to encourage you to support plans that respect the general aviation flying community. Frankly, we need more hanger space and at least the current number of tie-downs. I've been on the list for a hanger since 1994!

Businesses that cater to business jets and business jet owners represent some economic firepower. Please do not serve the desires of the few at the expense of the many.

RL-1

Pilots are a declining population in a time of increasing demand. General aviation is busy trying to turn the tide. It is important that we maintain the facilities to do this important work. We, too, contribute substantially to the economic well-being of SNA and Orange County.

If I can be of any assistance in the deliberation process, I will happily make myself available.

Very truly yours,
Randall Lipton

Subject: FW: General Aviation Improvement Program Comments

From: snlivingst@aol.com [mailto:snlivingst@aol.com]

Sent: Friday, October 19, 2018 2:13 PM

To: NOP627 <nop627@ocair.com>

Subject: General Aviation Improvement Program Comments

Name: Stephen Livingston Phone: (949) 274-6489

Address: 1943 Port Cardigan Pl, NB, CA 92660 Email: SLLawyer@aol.com

Comments:

I am one of many home owners in Newport Beach living within earshot of the normal John Wayne airport take off pattern. Every morning before 7PM we hear business jets taking off from John Wayne airport. Most of these jets are as loud as the commercial jets taking off after 7pm. We are concerned that Options 1 and 2 of the General Aviation Improvement Program (GAIP) will significantly increase the number of business jets which means more noise. SL-1

No where in the GAIP is there a stated limit as to the size and take SL-2

off times of business jets. We believe this is an attempt by the airport to circumvent the 1985 Settlement Agreement. GAIP Options 1 and 2 will increase the number of commercial passengers using John Wayne SL-3

airport. Also it will significantly increase the number of jet SL-4
take offs and landings at all hours of the day and night.

We are against GAIP Options 1 and 2 because they are a detriment to our community and are violating established agreements. SL-5

From: THOMAS LOGAN <tblogan1@sbcglobal.net>
Sent: Monday, November 5, 2018 12:32 PM
To: EIR627
Subject: East-side hangars

Dear Ms. Choum,

I am concerned about keeping my hangar at John Wayne Airport. Presently, I have a hangar at Executive Hangars, which took me about 10 years to originally secure.

Will the Executive Hangars be torn down? If so, I assume we would have first-refusal rights on the new ones. Is that correct? If they are going to be torn down, when would that happen and what we would do with our planes in the meantime?

TL-1

Please let me know asap on the above questions. I am concerned.

Thanks so much,

Tom Logan
Executive Hangars #52

<http://www.imdb.com/name/nm0517665/>

From: karenalove2@gmail.com
Sent: Tuesday, November 20, 2018 10:03 PM
To: EIR627
Subject: GAIP

I live at 17 Sea Cove Lane. I am very against GAIP. How has expanding LAX improved the quality of life in Los Angeles? It has decidedly not. Also it is known these bigger planes will be spewing carcinogenic lead fuels down on all of us. Please protect us all. We do not need more planes here, with the deadly pollution it will bring. Please look out for us, in the path of these harbingers of death.

KL-1

Sent from my iPhone

From: Peter Macdonald <peter.macdonald79@gmail.com>
Sent: Monday, November 12, 2018 6:02 PM
To: EIR627
Cc: 'Peter Macdonald'
Subject: SNA GA Improvement Plan

Ms. Lea Choum,
3160 Airway Avenue,
Costa Mesa,
California 92626

Dear Ms. Choum:

I am a GA pilot and have had airplanes based at SNA for nearly 15 years. I have been an Orange County resident for around 25 years, am a commercial pilot and CFI, and am a strong supporter of general aviation. I would like to see SNA expand its capacity for GA aircraft in fueling, tie-downs and in hangars. There has been a dire shortage of hangers for at least the time I have been flying out of SNA and I am sure that any hangars provided at the airport would be filled rapidly by local pilots at rates that would provide a strong return to the airport.

PM-1

I am also a long-term member of the SNA pilots association, now part of So Cal Pilots, and I know we would all would like to see an improvement plan not a plan that reduces the capacity for GA at SNA. I think it is important that there is further study and inclusion in the EIR of these issues:

PM-2

1. Study ways to **maintain** the current capacity of approximately 596 GA aircraft while significantly **increasing** the number of hangars.

PM-3

2. Study the applicability of a waiver from the FAA to **keep the existing location** of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars.

PM-4

SNA should be a great resource for the citizens of Orange County and local pilots. Catering for locals, who love flying and want to support the airport, should be a basic aim. I was thrilled to see the improvements that emerged with the replacement of Signature with ACI – and was hopeful that improvements would continue. The GA Improvement Plan as currently outlined would instead significantly damage the environment for general aviation at SNA.

PM-5

Regards

Peter Macdonald

24566 Santa Clara Avenue
Dana Point
CA 92629

Telephone 949 310 9296

The preceding email message (including any attachments) contains information that may be confidential, protected by the attorney-client or other applicable privileges, or constitutes non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this

message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

From: Bonnie McClellan <bonniemcclellan43@msn.com>
Sent: Wednesday, November 21, 2018 6:01 PM
To: EIR627
Subject: More noisy jets

I am opposed to changing configuration of airport to allow space for larger private jets that have no curfews! Bonnie McClellan 1034 w bay ave. Newport Beach 92661 Bonnie. Sent from my iPhone

BM-1

From: Jim Hasty <jhasty@meyerprop.com>
Sent: Tuesday, November 20, 2018 10:33 AM
To: EIR627
Subject: JWA Draft EIR
Attachments: JWA Draft EIR Letter 11-20-2018.pdf

Dear Mr. Choum:

Please find a letter attachment which reflects the concerns our company has in regard to the DEIR 627. MP-1

Should you have any questions, my contact information is shown below.

Thank you.

Jim

James B. Hasty
Senior Vice President
Meyer Properties
4320 Von Karman
Newport Beach, CA 92660
(949)862-0500
(949)862-0515 FAX
jhasty@meyerprop.com

MEYER PROPERTIES

4320 VON KARMAN • NEWPORT BEACH, CALIFORNIA 92660
(949) 862-0500 • FAX (949) 862-0515

November 20, 2018

Ms. Lea Choum
3160 Airway Ave.
Costa Mesa, CA 92626

Re: John Wayne Airport
Draft Environmental Impact Report 627

Dear Ms. Choum:

I am submitting these comments in response to the captioned Draft Environmental Impact Report (DEIR). Our company owns property nearby at Koll Center Newport which is primarily an office park and which is currently impacted by aircraft noise, air pollution and vehicular traffic. We also own property at Airway Commerce Center which is a business park continuous to the west side of John Wayne Airport. This property suffers all of the aforementioned impacts, but to a much greater extent in regard to noise and air pollution.

MP-2

It is the opinion of our company that the DEIR is inherently defective because the Noise Element is fundamentally flawed in its design, methodology and implementation in determining the Community Noise Equivalent Level (CNEL) boundaries. In this regard it is our understanding that the CNEL methodology is ineffective in accurately measuring the extent of such harm to humans because as a weighted average method of measurement it distorts and minimizes the real impact of single event noise during the most relevant times of the day.

MP-3

Section 4.7 Noise: The methodology employed to measure noise on what is essentially the east and west sides of the airport is deficient. There are no monitoring stations on the east or west sides of the runways so not accurate measurements can be made. Further, many existing residential uses and numerous proposed uses on the east side of the airport are mid-rise and high-rise residential structures which reach heights up to 160 feet. No monitoring at these heights has been conducted.

MP-4

Moreover, atmospheric conditions affect the transmission of sound and no thorough studies have been done to examine the differences of sound in relation to changes in climate. There are no comparisons of changes in sound levels between a sunny day, a cloudy day or a rainy day.

MP-5

Further, the accurate distinction between jet noise, combustor noise, turbomachinery noise and aerodynamic noise have not been adequately studied nor have accurate Sound Exposure Levels or Single Event Noise Contours been established.

MP-6

Noise is well known to have deleterious effects on the health of humans such as sleep deprivation, hearing impairment, high blood pressure, hypertension and coronary heart disease. Without accurate and comprehensive studies which address these conditions the harm to human health cannot be known. And, with the projected increase in private jets this additional noise will only exacerbate these problems.

MP-7

Failure to comprehensively study and accurately measure noise and it's compatibility with surrounding uses and human health would appear to be a violation of the Aviation Safety and Noise Abatement Act, the related Airport Noise Compatibility Planning Regulations and California Airport Noise Regulations.

MP-8

Accordingly, we strongly recommend Section 4.7 of the DEIR be rewritten to address these concerns and subsequently recirculated for public comment.

Thank you in advance for your consideration of this most serious problem.

Sincerely,
Meyer Properties, LP



James B. Hasty
Senior Vice President

MEYER PROPERTIES

4320 VON KARMAN • NEWPORT BEACH, CALIFORNIA 92660
(949) 862-0500 • FAX (949) 862-0515



November 20, 2018

Ms. Lea Choum
3160 Airway Ave.
Costa Mesa, CA 92626

Re: John Wayne Airport
Draft Environmental Impact Report 627

Dear Ms. Choum:

I am submitting these comments in response to the captioned Draft Environmental Impact Report (DEIR). Our company owns property nearby at Koll Center Newport which is primarily an office park and which is currently impacted by aircraft noise, air pollution and vehicular traffic. We also own property at Airway Commerce Center which is a business park continuous to the west side of John Wayne Airport. This property suffers all of the aforementioned impacts, but to a much greater extent in regard to noise and air pollution.

It is the opinion of our company that the DEIR is inherently defective because the Noise Element is fundamentally flawed in its design, methodology and implementation in determining the Community Noise Equivalent Level (CNEL) boundaries. In this regard it is our understanding that the CNEL methodology is ineffective in accurately measuring the extent of such harm to humans because as a weighted average method of measurement it distorts and minimizes the real impact of single event noise during the most relevant times of the day.

Section 4.7 Noise: The methodology employed to measure noise on what is essentially the east and west sides of the airport is deficient. There are no monitoring stations on the east or west sides of the runways so not accurate measurements can be made. Further, many existing residential uses and numerous proposed uses on the east side of the airport are mid-rise and high-rise residential structures which reach heights up to 160 feet. No monitoring at these heights has been conducted.

Moreover, atmospheric conditions affect the transmission of sound and no thorough studies have been done to examine the differences of sound in relation to changes in climate. There are no comparisons of changes in sound levels between a sunny day, a cloudy day or a rainy day.

Further, the accurate distinction between jet noise, combustor noise, turbomachinery noise and aerodynamic noise have not been adequately studied nor have accurate Sound Exposure Levels or Single Event Noise Contours been established.

Noise is well known to have deleterious effects on the health of humans such as sleep deprivation, hearing impairment, high blood pressure, hypertension and coronary heart disease. Without accurate and comprehensive studies which address these conditions the harm to human health cannot be known. And, with the projected increase in private jets this additional noise will only exacerbate these problems.

Failure to comprehensively study and accurately measure noise and it's compatibility with surrounding uses and human health would appear to be a violation of the Aviation Safety and Noise Abatement Act, the related Airport Noise Compatibility Planning Regulations and California Airport Noise Regulations.

Accordingly, we strongly recommend Section 4.7 of the DEIR be rewritten to address these concerns and subsequently recirculated for public comment.

Thank you in advance for your consideration of this most serious problem.

Sincerely,
Meyer Properties, LP

A handwritten signature in blue ink, appearing to read "J. B. Hasty", is positioned below the typed name.

James B. Hasty
Senior Vice President

From: Shannon Miehe <smiehe@pacbell.net>
Sent: Wednesday, November 21, 2018 1:57 PM
To: EIR627
Subject: New proposed GAIP regulations

Dear Ms. Choum,

We adamantly oppose ANY expansion of John Wayne airport to large corporate jets and corporate fleets under the proposed GAIP regulations. Noise from SNA already has a negative impact on our neighborhood in CDM since the implementation of the new "NextGen" FAA rules. We do not need or want ANY further expansion of SNA to large aircraft, especially those that would not be subject to the curfew currently in place for commercial jets or the current noise abatement regulations. SJM-1

SJM-2

Please protect the local neighborhoods surrounding the airport. The environmental impact of SNA on neighboring communities is being ignored more and more at the expense of our health and property values— first by the FAA, and now by local agencies as well. It's not okay. SJM-3

Sincerely,

Shannon and Jeff Miehe
1543 Sandcastle Drive
Corona del Mar, CA 92625

From: Lesley Miller <lzlymiller@gmail.com>
Sent: Tuesday, November 20, 2018 10:22 AM
To: EIR627
Cc: Nick Rosenthal
Subject: Airplane noise and pollution - Newport Beach

Hello! I am a long-time resident of
The Newport Balboa Peninsula and friend to Nancy Pelosi and Robert Mueller family. I value traditional American values which include clean living and pollution-free environment. Please do all reasonably possible to safeguard our little neighborhood from awful noise and waste pollution. I assure you that I will do my part - as I always have - Lesley Miller, Esq. (Tel 3106250186) LM-1

Sent from my iPhone

From: Diane Myers <rmyers533@cox.net>
Sent: Monday, September 24, 2018 12:54 PM
To: EIR627
Cc: jeffroutree@ocair.com; Bossenmeyer, Barbara [JWA]
Subject: Fwd: New helipad

Ms. Lea Choum-

I wrote this email & sent it to Jeff Rountree yesterday, expressing my dismay at the airport's decision to displace small GA airplanes in favor of large (more expensive) helicopters in a location that is NOT compatible with the remaining small GA airplanes.

PLEASE re-think the placement of the helipad for helicopters arriving at Atlantic.

DM-1

There is a LOT of ramp space south and west of their primary ramp; airplanes could be rearranged to give plenty of space for helicopters.

Regards,
Diane Myers
Orange County 99
Retired Continental Airlines Captain
Sunrise Aviation Instructor

Begin forwarded message:

From: Diane Myers <rmyers533@cox.net>
Date: September 23, 2018 at 18:17:34 PDT
To: jeffroutree@ocair.com
Subject: New helipad

Jeff -

When I arrived at Sunrise yesterday to fly with my multi student in Sunrise's Seminole, Michael Church informed me that the airplane had been moved one row north.

Because the airport administration has decided to create a helipad for large helicopters operating into Atlantic between that hangar and the taxiway.

When those helicopters are operating they will render the closest rows of small GA airplanes unusable: all the Decathlons will be stuck until the helicopters shut down, unable to taxi out toward taxiway Alpha. In addition, the airplanes at the end of the row north of that pad will be unable to operate until the helicopters shut down.

DM-2

And I certainly don't want to park my car anywhere close to those dust-making machines.

With all the ramp space available south of Atlantic's large ramp, surely there could be a better location for the new helipad.

Respectfully,
Diane Myers
Orange County 99
Sunrise Instructor

From: John Nord <jcn92662@gmail.com>
Sent: Tuesday, November 20, 2018 12:52 PM
To: EIR627
Subject: "Improvement"

Follow Up Flag: Follow up
Flag Status: Flagged

From: Steve Bunch <steve@ofjobs.com>
Sent: Wednesday, November 7, 2018 11:37 AM
To: EIR627
Subject: KSNA EIR
Attachments: OC EIR Response 110718-2.pdf

Please don't harm General Aviation at KSNA by reducing GA services and parking. Small business like ours depend on John Wayne Airport. See attached letter.

OJ-1

Steve Bunch
President
Oceanfront Jobs, Ltd.



November 7, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, California 92626

Dear Ms. Choum,

Please do not reduce the space available to General Aviation Aircraft and businesses at John Wayne Airport.

Any new plan for the John Wayne Airport (KSNA) that reduces available space for General Aviation businesses and aircraft will be detrimental to businesses in Orange County. Countless businesses from outside of Orange County who use the John Wayne Airport General Aviation facilities to expedite their travel. Please find a new solution that increases the amount of space available for General Aviation aircraft and related services. OJ-2

The current proposals will cost Orange County businesses revenue and the county will lose tax revenue because of it.

General Aviation has long been a driving force for many of us who do business in Orange County, allowing us to fly in for meetings near the airport then continue to other meetings in the region the same day. These meetings happen in restaurants, coffee shops and other meetings places which contribute financially to the county and local businesses and their employees. OJ-3

General Aviation facilities need to grow, not be hampered.

Sincerely,

Steve Bunch
President
Oceanfront Jobs, Ltd.

Steve Bunch* steve@ofjobs.com

553 N. Pacific Coast Hwy, #255 * Redondo Beach, CA 90277

From: B O'Connor <boconnor2017@gmail.com>
Sent: Tuesday, November 20, 2018 1:05 PM
To: EIR627
Subject: General Aviation Improvement Program – Draft Environmental Impact Report

As a Newport Beach homeowner I am greatly concerned about the proposed changes. Clearly the changes are motivated by the need to increase revenue. But in doing so the communities surrounding the airport will have potentially grave reduction of property values, lifestyle and health. BO-1

I utilize this airport to come and go and bought my home knowing full well it was there. But the proposed changes are potentially dramatic and unacceptable as such. BO-2

Driving this specific revenue stream is all well and fine. But at some near-future-point the airport revenue's negative impact on surrounding communities will make those communities less attractive - it follows that other sources of revenue will then decline - tourism, property taxes etc. BO-3

Also the idea that the environmental impact is negligible is laughable. Every single time I get on a plane at JWA I am confronted by a flyer, legally required by the state of California, citing the grave health concerns of jet fuel. My 13 year-old daughter is horrified each and every time she reads it and this last time jokingly (?) used her t-shirt to cover her face as she entered the plane. I can only shudder as I consider the increased jet fuel exposure from these proposed changes. Hardly negligible. BO-4

I beg you and your staff to take a more global view of revenue and to hesitate with careful thought and consideration before pursuing these changes further. BO-5

Brigid O'Connor, MBA
1500 E. Oceanfront
Newport Beach, CA 92661
cell/ 303-378-8738

From: William J OConnor <wjoc1@att.net>
Sent: Tuesday, November 20, 2018 3:31 PM
To: EIR627
Subject: Private Jet Aircraft

I think we should not allow a facility for larger private jets. We have a surprisingly loud amount of noise at present and it is ruining living conditions in some of the most expensive real estate in Ca. So much for the [great park] scam.

WJO-1

William J O'Connor
90 Linda Isle
Newport Beach California 92660

Sent from my iPhone Bill O'Connor

From: Lee Pearl <smartpearl1@hotmail.com>
Sent: Wednesday, November 21, 2018 4:58 PM
To: EIR627
Subject: Project Comments

11/21/18

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

My name is Lee Pearl and I live on Balboa Island. About four years I began an effort to raise awareness of the greatest issue impacting the future quality of life of Newport Beach, expansion of the John Wayne Airport.

If JWA is allowed any expansion, it will open the door for the runway expansion, larger planes, more flights and eventually the elimination of the curfew. The first step in the expansion of the airport is the current project proposing the expansion and modifications to the General Aviation Facility. These flights are not regulated by the curfew. If the General Aviation is allowed to expand without an agreement between the City and JWA (County) there will be many more jet flights outside of the curfew impacting the quality of life of Newport Beach residents.

LP-1

I strongly oppose this expansion without a long term agreement benefiting the residents of Newport Beach. I also believe the deadline for comments are not reasonable since I just heard about the project two days ago. Due to the impact on Newport residents a greater outreach should have been done. I found out today was the deadline and had one hour to prepare my comments. I have quarterly Balboa Island General Meeting and cannot inform residents of the EIR due to my meeting date of December 2, 2018 Lee Pearl 316 Onyx Newport Beach CA 92662

LP-2

CC: City of Newport Beach



Sally Peterson
P.O. Box 5036
Newport Beach, CA 92662
spete@att.net

Ms. Lea Choum
JWA Project Manager
3160 Airway Avenue
Costa Mesa, CA 92626

RE: JWA General Aviation Improvement Program
Draft EIR

Comments:

Flaw in General Analysis:

The Fleet mix assumptions do not adequately address the impacts of economic swings nor the changes in commercial screening. As the historic numbers show, the GA jet population declines at a greater rate than GA piston aircraft during economic declines. The GA jets have also experienced surges when commercial aircraft operations were burdened and slowed by increased security requirements. A downturn in the economy coupled with the anticipated increase in screening for GA aircraft would cause a very significant decline in the GA jet fleet.

SP-1

The conclusions reflect the overall net impact for all areas combined. However, the fleet mix assumptions for this plan will reduce GA aircraft impacts in some area and shift that burden to others. Specifically, the plan calls for an increase in the based large GA jets, and the type of facilities proposed will likely support more transient GA jet traffic. Newport Beach is burdened by these aircraft. Changes in aircraft burden have been successfully challenged in recent years.

4.2 Air Quality – The burden of increased emissions on departure is over Newport Beach. The impact on this city is compounded by the fact that the flight path is over areas of historic homes that utilize open windows and doors for cooling and ventilation, allowing pollutants into the interior.

SP-2

The EIR should address the installation of a fuel tank for less polluting alternative jet fuel. This is manufactured locally, can be used without alteration to engines, and is cost effective.

4.7 Noise – The EIR does not address the fact that the increased burden of departure noise will be shifted to Newport Beach. The impact of increased GA jet traffic over Newport Beach is compounded by the fact that GA jets can fly 24 hours a day. Night time flights do have noise restrictions. GA aircraft are subject a Single Event Night-time Noise Limit of 86 to 86.9 dB. The noise of a freight train is quieter at 80 dB. Again, because homes in this area use windows for ventilation, the noise impact is greater.

SP-3

This GA jet fleet has a long history of violating the Noise Limits. In the first half of 2018, there were 65 GA violations. In the last half of 2017, there were 64 violations. These numbers demonstrate that this lack of observance of regulations is a chronic problem for this type of aircraft and should be addressed.

SP-4

Objectives – Finally, the objectives of this plan are not adequately addressed.

Enhanced safe and secure operations. - The increase in Bus. Jet and On Demand traffic from JWA without adequate advanced security and security screening poses a risk to passengers, the airport, and the people below.

Utilize limited land area efficiently and economically and maximize economic, self-sustaining, revenue-producing facilities need to be addressed together in a full economic feasibility study. This should have been a part of the fleet mix analysis. Again, the forecast fleet mix does not adequately address the extreme swings in demand for AG jets and does not do a cost/benefit analysis comparing No Changes with the fleet mix As Is vs. Proposed.

SP-5

Thank you for the opportunity to comment on this EIR.



Sally Peterson
Resident of Newport Beach

From: Sandra Petty-Weeks <spwestminster@gmail.com>
Sent: Wednesday, November 21, 2018 9:20 AM
To: EIR627
Subject: LARGER PRIVATE JET AIRCRAFT EXPANSION AT JWA

Importance: High

Dear Ms. Choum,

As a resident of Newport Beach, I am impacted by takeoffs and landings at JWA. Citizens Against Airport Noise and Pollution (CAANP.com), an organization dedicated to a reduction in the noise and pollution generated from John Wayne Airport, has alerted us that we have a new issue occurring at JWA. The County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities at JWA . These new hangars will displace smaller privately owned aircraft in favor of larger privately owned jet aircraft., including corporate jet fleets, which may make international flights. CAANP is concerned about the impact on our nighttime curfew, increased pollution from leaded jet fuel and increases in daily departures. that will be the result of the GAIP. Only commercial jets are currently governed by curfew hours. The GAIP will lead to a new mix of general aviation aircraft at JWA, allowing more large private and corporate jets to depart and fly overhead anytime of the day or night. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not been adequate for the quality of life in our communities. Further, the increase in nighttime flights would set a dangerous precedent for the future of the JWA curfew, which will be subject to renegotiation in 2035.

JF-1

JF-2

I would like to go on the record as strongly opposing this proposed expansion.

JF-3

Sincerely,

Sandra Petty-Weeks
262 Cedar St
Newport Beach, CA 92663



John Wayne Airport
General Aviation Improvement Program
Draft Program Environmental Impact Report
Public Information Meeting
September 26, 2018



Name Dang Pham Phone 949 552 0155

Address 28 Woodsonnel Irvine 92604 Email dpf33a@yahoo.com

Comment: We don't need a 3rd FBO to cater to big jets -

Two are adequate - We would like to have enough Mechanics
and avionics shop to help fix our planes -

DP-1

- Please keep the tie down spaces for small air planes -

DP-2

- We would like self serve fuel if space is available

DP-3

- Covered tie down or hangars are very necessary to preserve our
planes. Do not destroy them -

DP-4

Blank lined area for additional comments.

Please return comment cards during the Public Information Meeting or mail to Ms. Lea Choum, JWA Project Manager, 3160 Airway Avenue, Costa Mesa, CA 92626. Comments can also be emailed to NOP627@ocair.com. Comments are due by November 6, 2018.

Doug Pham DDS
4902 Irvine center drive # 203
Irvine, CA 92604

SANTA ANA CA 926

12 OCT 2018 PM 4.1



Ms. Lea Choum
County of Orange
John Wayne Airport
3160 Airway Avenue
Costa Mesa, CA 92626



92626-460860



From: Dpf33 <dpf33a@yahoo.com>
Sent: Tuesday, November 6, 2018 7:46 AM
To: EIR627
Subject: John Wayne airport

I would vote for improvements plan that would not reduce capacity for small aircrafts . Worsening the pilot shortage in the future directly. DP 2-1

I would ask you to keep the perimeter road as is, and not reducing the space for small planes. No small planes mean no pilots for big planes either. DP 2-2

Doug Pham
Aircraft owner. N888hd.
949-933-6677

Sent from my iPad



John Wayne Airport
General Aviation Improvement Program
Draft Program Environmental Impact Report



Name Doug Robinson Phone 949-370-6200
Address 31251 AVE TERRAMAL Email DOUGROBINETT@COX.NET
SON JUAN CAP 92675
Comment: _____

IT APPEARS THE PLANS ARE FOR 128
FEWER AIRPLANE PARKING SPACES THAN
ARE CURRENTLY BEING USED. HOW
DO YOU DECIDE WHICH 128 PLANES

DR-1

GET EVICTED? WHY DOES THE
FBO GET ADDITIONAL PARKING
SPACES?

DR-2

Please return comment cards to Ms. Lea Choum, JWA Project Manager, 3160 Airway Avenue, Costa Mesa, CA 92626.
Comments can also be emailed to EIR627@ocair.com. Comments are due by November 6, 2018.

From: Alice rosellini <rwindway@yahoo.com>
Sent: Wednesday, November 21, 2018 10:35 AM
To: EIR627
Subject: Additional hangers and flights at JWA

Please Note : As a resident of Newport Beach, and one that is directly below the take off pattern, I throughly object to ANY and ALL increase flights. I CERTAINLY object to any and ALL possible flights going or coming out of the JWA during the curfew hours that are established as of this date, 11/20/2018

AR-1

Uncontrolled jet flight due to private and business flights will only harm the already impacted resident and surrounding area.

Alice Rosellini
1629 Antiqua Way
Newport Beach

LAW OFFICES OF GARY L. SCHANK

**23052 ALICIA PARKWAY
MISSION VIEJO, CA 92692
949-289-3682 ♦ 949-709-0924 (FAX)
GSCHANK@GMAIL.COM**

Questions:

<i>How many light aircraft tie-down spots are there now, and how many will exist after GAIP?</i>	GLS-1
<i>Table 5-1 indicates a decrease from 596 to 354. If true, how will it be determined who stays and who goes?</i>	GLS-2
<i>How many light aircraft hangars exist now, and how many will exist after GAIP?</i>	GLS-3
<i>Will there be covered spots under GAIP?</i>	GLS-4
<i>What will the tie-down fees be after GAIP?</i>	GLS-5

Gary L. Schank

From: Gary Schank <gschank@gmail.com>
Sent: Thursday, September 27, 2018 9:14 PM
To: NOP627
Subject: GAIP comment

Dear GAIP Rep:

I am an aircraft tenant at JWA.

As all three proposals result in a reduction of GA airplanes, this not an improvement to those who will be forced to leave.

GS-1

In order to minimize the negative impact on GA aircraft, I urge that Proposal #3 be implemented, as it results in the least amount of GA aircraft reduction, i.e., it is the lesser of evils.

Gary Schank

Sent from my iPad

LAW OFFICES OF GARY L. SCHANK

Letter 118

23052 ALICIA PARKWAY
MISSION VIEJO, CA 92692
949-289-3682 ♦ 949-709-0924 (FAX)
GSCHANK@GMAIL.COM



November 13, 2018

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92626

Re: John Wayne Airport GAIP-Environmental Impact Report

This writing is to express concerns with the Environmental Impact Report of the John Wayne Airport General Aviation Improvement Program. The EIR omits several issues. However, I will restrict my concerns to one issue: Standard Instrument Departure Procedures (SID's).

As you are no doubt aware, there are numerous restrictions on airline operations at John Wayne Airport. The restrictions are based upon the noise footprint created by those jets. In addition to the restricted volume of departures, airliners are also required to fly very precise departure routes called "Standard Instrument Departures" (SID's), in order to minimize noise levels over residential areas under the departure path.

GLS-1

While business jets are not usually commercially operated, their performance is essentially identical to that of an airliner, and they can be as noisy, or even noisier than modern airliners. Additionally, business jets operate in flight regimes that require that they fly under Instrument Flight Rules (IFR). Consequently, business jets will be required to fly the same departure "SID's" as the airliners.

GLS-2

John Wayne Airport has 13 unique SID's, each of which requires a different flight path and profile. The EIR does not address the noise environment impact of business jets flying any of these departure procedures with which these jets must certainly comply. Therefore, an accurate and thorough EIR would need to evaluate the environmental impact of each SID. The names of the SID's are as follows:

- ANAHEIM 1 DEPARTURE
- CHANNEL 3 DEPARTURE
- EL TORO 4 DEPARTURE
- FINZZ 2 RNAV DEPARTURE
- HAWWC 3 RNAV DEPARTURE
- HHERO 3 RNAV DEPARTURE
- HOBOW 2 RNAV DEPARTURE
- IRVINE 4 DEPARTURE
- MIKAA 1 RNAV DEPARTURE
- MUSEL 8 DEPARTURE
- PIGGN 2 RNAV DEPARTURE

GLS-3

Ms. Lea Choum
3160 Airway Avenue
Costa Mesa, CA 92679
Page 2 of 2

- PLZZA 1 RNAV DEPARTURE
- STAYY 1 RNAV DEPARTURE

The very purpose of the GAIP is to increase the number of business and private jets at the airport. Naturally, with the increased number of jets at the airport, there will be an increased volume of arrivals and departures. The EIR does not address the increased volume of aircraft departing via the "SID's", does not address the various types of "SID's" and their noise footprint and does not determine whether the various types of business jets flying these SID's have the performance and noise levels to maintain the standards with which the airport has agreed to maintain.

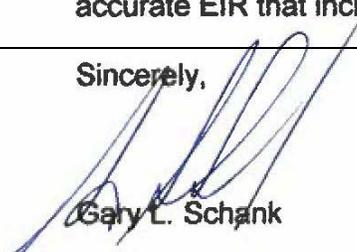
GLS-3
cont.

I am an expert on the subject of Instrument Flight Procedures and would gladly make myself available if you wish to discuss this subject in more detail.

The GAIP will require many years and large sums of money to implement. It is in the interest of the entire community to be sure that all environmental issues are addressed and satisfied before any plan is finalized. Therefore, I hereby request that a new thorough and accurate Environmental Impact Study be initiated that will generate an accurate EIR that includes all environmental issues.

GLS-4

Sincerely,



Gary L. Schank

From: Steven Schock <steve@schockboats.com >
Sent: Monday, November 5, 2018 9:22 AM
To: EIR627
Subject: SNA GA Improvement Plan

Please see below my comments regarding the GA Improvement Plan that I think should be incorporated into the final EIR.

1. Study ways to maintain the current capacity of approximately 596 GA aircraft	
2. Study ways to maintain the current capacity of approximately 596 GA aircraft while increasing the number of hangars.	SB-1
3. Study the applicability of a waiver from the FAA to keep the existing location of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars.	SB-2

Thanks
Steve



Steve Schock
Schock Boats
2900 Lafayette Rd.
Newport Beach, Ca 92663
Office (949) 673-2050
www.schockboats.com

From: Broderick, Julie (SNA) <julie.broderick@signatureflight.com>
Sent: Tuesday, November 6, 2018 2:57 PM
To: EIR627
Cc: Broderick, Julie (SNA)
Subject: EIR627 Comment Card Submission
Attachments: SNA EIR (Signature Nov 6 18) Comment Submission.pdf

Hello:

The attached Comment Card is for the Counties use and consideration for finalizing the Draft EIR GAIP.

SFS-1

Thank you,

Julie Broderick
Area Director
OAK/SAN/FAT/PSP/TRM/SFO/SBA
949-289-1780 Mobile
[Julie.broderick@signatureflight.com](mailto:julie.broderick@signatureflight.com)
www.signatureflight.com



This message may contain confidential and/or privileged information. If you are not the intended recipient or believe you have received this message in error, please notify us immediately by responding to the sender and then delete this message from your system.

From: Frank Singer <franksinger13@outlook.com>
Sent: Wednesday, November 7, 2018 10:05 AM
To: EIR627; michellesteel@shawnsteel.com; todd@toddspitzer.com
Subject: Re: Airport Improvement Plan

Ms Lea Choum,

I have had my plane(s) at John Wayne for over thirty years, with the last fifteen years at Executive Hangers. When I first tried to get a hanger the waiting period was 20 years....yes TWENTY YEARS. I finally got a hanger by buying an airplane partnership that had an hanger. It appears that the "improvement plan" is not an improvement for the General Aviation (GA) community because it reduces GA capacity. Any new plan should increase GA tie down and hanger space not reduce it by relocating the perimeter road further from the runway. I understand the stated GA capacity at SNA is approximately 600 planes. We are a growing community and should have capacity far in excess of 600 planes which would attract more GA pilots to Orange County.

Frank Singer
3552 Venture Dr
Huntington Beach, CA 92649
FrankSinger13@outlook.com
O 714.840.6476
C 714.390.1725

From: Susan Skinner <susanskinner949@gmail.com>
Sent: Wednesday, November 21, 2018 9:22 AM
To: EIR627
Subject: Private jet hangers

Ms. Choum:

I would like to express my concern regarding the possible expansion of private jet hangers at John Wayne Airport. Doing so undermines the noise curfew that protects the residents of Newport Beach as private jets are not subject to the noise curfew. Thus, building more capacity for larger private jets which can fly at any time creates the opportunity for more noise impacts to the community below.

SS-1

Please include my comments in the EIR being prepared for this project.

Thank you,

Susan Skinner
2042 Port Provence Place
Newport Beach, CA 92660

From: Mike Smith <mike.cdm@gmail.com>
Sent: Tuesday, November 20, 2018 9:24 AM
To: EIR627
Subject: NO on Corporate Jet Expansion

RE EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Dear Ms. Choum:

I am a long time resident of Newport Beach who has watched the enlargement of our airport for decades. We feel the environmental impact of jet flights every day. Adding larger private/corporate jets to the present load is not in the interest of residents/taxpayers. I urge the airport authorities to stop further consideration of this project.

MCS-1

Please forward my strong opposition to the Committee.
Sincerely,

Michael C Smith
1807 Bayadere Terrace
Corona del Mar, CA 92625

From: Polly Smith <polly-smith@pacbell.net>
Sent: Tuesday, November 20, 2018 9:14 AM
To: EIR627
Subject: EIR627

EIR627@ocair.com

Ms. Lea Choum
Land Use Manager at JWA
3160 Airway Avenue
Costa Mesa, CA 92626

Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

Dear Ms. Choum:

As a long-time resident of Newport Beach I have watched the airport grow and have tolerated the noise and pollution. BUT ENOUGH IS ENOUGH!

The added noise and pollution would be intolerable. We do not want airport operations outside the existing 7AM-11PM presently allowed.

PLS-1

Pauline L. Smith
1807 Bayadere Terrace
Corona del Mar, CA 92625

From: David Hutchison <dhutchison@triadim.com>
Sent: Wednesday, November 21, 2018 9:25 AM
To: EIR627
Subject: GAIP

Dear Ms. Choum:

I am a Newport Beach resident living in the Port Streets neighborhood. 1724 Port Barmouth Place.

I got this message today on the GAIP from Nextdoor:

Orange County, owner and operator of the JWA airport, has proposed a General Aviation Improvement Program (GAIP) which, if enacted, will allow the County to construct new hangar facilities that will displace smaller privately owned aircraft IN FAVOR OF LARGER PRIVATELY OWNED JET AIRCRAFT, INCLUDING CORPORATE JET FLEETS, which may make international flights. ONLY COMMERCIAL JETS ARE CURRENTLY GOVERNED BY CURFEW HOURS. The GAIP will lead to a new mix of general aviation (private) aircraft at JWA, allowing more large private and corporate jets to depart and FLY OVERHEAD ANYTIME OF THE DAY OR NIGHT. While the general aviation aircraft would be subject to certain noise requirements, they would not be subject to the curfew. And, as we all know, the noise requirements currently in place have not been adequate for the quality of life in our communities. Further, the increase in nighttime flights would SET A DANGEROUS PRECEDENT FOR THE FUTURE OF THE JWA CURFEW, which will be subject to renegotiation in 2035.

TIM-1

I am strongly opposed to the GAIP program. Impact to Newport's quality of life must be considered. Please do not implement this program.

Sincerely,
Dave Hutchison

David M. Hutchison, CFA Partner | Portfolio Manager
Triad Investment Management, LLC
1301 Dove Street, Suite 1080, Newport Beach, CA 92660
D: (949) 381-7614 | **C:** (925) 577-0966 | **E:** dhutchison@triadim.com
W: www.triadim.com



From: Meryl Sawyer <merylsawyer@sbcglobal.net>
Sent: Wednesday, November 21, 2018 7:20 AM
To: EIR627
Subject: Larger Private Airplanes

Ms. Choum,

I believe that by enlarging our facilities for private airplanes would only encourage more and more airplanes to fly over Newport Beach. The pollution from the planes already flying is endangering the health of the community. My family is against this expansion. I'm sure I speak for the other residents of Linda Island as well. DO NOT APPROVE THIS!

MU-1

Sincerely,
Martha Unickel
26 Linda Isle
Newport Beach, CA 92660
(949) 723-0969



Virus-free. www.avast.com

Cc

From: Kevin Halliburton [mailto:kevin@usfastener.com]

Sent: Monday, November 05, 2018 4:31 PM

To: EIR627 <eir627@ocair.com>

Subject: SNA GA Improvement Plan EIR

To Whom It May Concern:

As a pilot, plane owner and current tenant based out of KSNA I have two concerns about the SNA GA Improvement Plan EIR:

-
- | | |
|--|-------|
| 1. That the study include adequate ways to maintain the current capacity of approximately 596 GA aircraft while increasing the number of hangars. | USF-1 |
| 2. The study include an applicability of a waiver from the FAA to keep the existing location of the perimeter road and not relocate it by 10 feet further from the runway, thus reducing the capacity of GA Tie downs and hangars. | USF-2 |
-

Should you have any questions whatsoever please feel free to contact me at any time.

Regards,

Kevin Halliburton
U.S. FASTENER/MetalGrip Fasteners
20 Rancho Circle
Lake Forest, CA 92630
800-262-3278
949-770-7711
949-770-0705 (fax)

kevin@usfastener.com

WWW.USFASTENER.COM

From: Polly Verfaillie <phackathorn@hotmail.com>
Sent: Wednesday, November 21, 2018 10:12 AM
To: EIR627
Subject: Airport noise and new construction

Hello,

We are residents and homeowners of the city of Newport Beach. We are concerned about the noise from the airport.

Please do not allow the county or the airport to construct new hangar facilities which would allow more, larger private jets.

PDV-1

Thank you for considering the voices of the people who live here and pay huge taxes.

Polly and David Verfaillie
1621 port abbey place, Newport Beach, CA 92660

Sent from my iPhone

From: dan@danvogt.com
Sent: Tuesday, November 20, 2018 3:02 PM
To: EIR627
Subject: LARGER PRIVATE JETS AT JOHN WAYNE AIRPORT

Dear Ms. Choum,

I would like to express my opposition for the change at JWA. As a resident of Newport Beach, I feel the General Aviation Improvement Program (GAIP) will negatively benefit the citizens of the surrounding area.

DV-1

I am a frequent airport user for private, corporate and commercial flights.

Please add me to the list of residents opposed to the project.

Thanks for the consideration.

-Dan

Dan Vogt
5 Seafaring Dr
Corona del Mar, CA 92625
949.241.7000

From: Peggy <pvombaur@aol.com>
Sent: Tuesday, November 20, 2018 8:33 PM
To: EIR627
Subject: Stop the Airline expansion

How many lawsuits should be litigated?

PV-1

We are prepared to fight!!!

Sent from my iPhone

From: Grant Whitcher <steelpro2@aol.com>
Sent: Wednesday, November 21, 2018 10:08 AM
To: EIR627
Subject: MS Choum

RE:OC Airport DEIR

My name is Grant Whitcher and I reside at 53 Linda Isla Newport Beach.

My neighborhood is currently affexted by daily flights from 7 am to 10 pm.

They are so loud we cannot hold a conversation outside,nor be on the phone even inside the house when a plane is overhead.

GW-1

We also need to clean up the sky. This must be done every coupke days to prevent staining and build up.

The last thing we need is more traffic and larger planes with extended operating hours.

This project must be stopped in its tracks

From: Christina White <cricketsea@aol.com>
Sent: Tuesday, November 20, 2018 9:22 AM
To: EIR627
Subject: No More Expansion, Please.

Dear Ms. Choum,

I disagree Strongly with the Proposed expansion of the GA Improvement Program. This is a Negative Impact directly on our quality of life, air & happiness.

We are trying to reduce the
Noise & Pollution here in
Newport Beach.

CAW-1

Sincerely,
Christina & Alan White
30 Ocean Vista
Newport Beach, CA
92660

This applies for all the 102 families here at my community at Sea Island.

Sent from my iPhone
Christina White

From: Dana <danerw@aol.com>
Sent: Wednesday, November 21, 2018 7:22 PM
To: EIR627
Subject: JWA Changes

Hello

I'm writing to register my voice against allowing the construction of hangars at the John Wayne Airport that would allow larger private and corporate airplanes to fly without the constraint of the existing curfew on hours that commercial airplanes are subject to. The residents of Newport Beach are already long suffering in the noise and pollution generated by the Airport. The curfew is absolutely paramount to our quality of life. I can tell you that the existing aircraft that fly outside of the curfew are extremely disruptive to a quality night of sleep that we are mostly guaranteed now by the curfew.

DW-1

Sincerely,

Dana White
204 Villa Point Dr
Newport Beach, CA 92660

Sent from my iPhone

From: Karol Wilson <karolwilson77@yahoo.com>
Sent: Tuesday, November 20, 2018 9:07 AM
To: EIR627
Subject: Airport

Please no more expansion. Our ground traffic is horrendous. We don't need more air traffic.

KW-1

Karol Wilson
Sent from my iPhone

From: wilson.simone10@gmail.com
Sent: Tuesday, November 20, 2018 2:44 PM
To: EIR627
Subject: proposed changes for the John Wayne Airport

Dear Ms. Choum:

My family and I live in Newport Beach and are concerned about the proposed changes over at the Orange County airport. I have just been made aware of the Draft Environmental Impact Report (“DEIR”) pertaining to the proposed John Wayne Airport General Aviation Improvement Project (“GAIP”).

SW-1

I am concerned about the noise, security and pollution impacts these proposed changes could have, especially when it seems one of the main parties to benefit would be companies running non resident corporate jet aircraft. I expect that local and smaller privately owned small aircraft would be decreased or priced out from use of their current space. It seems that proposed changes of this nature, with so many potential impacts to residents, should be considered and discussed in the community and before the city council over a longer period of time, so more people are aware of what is going on and can become involved in the process.

SW-2

I am wondering about the following questions that some of our grass roots community leaders have raised re the GAIP:

- | | |
|---|-------|
| 1) Has it been determined how many additional GA jet aircraft departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not? | SW-3 |
| 2) Will there be a cap or a maximum number of GA jet aircraft departures allowable during a 24-hour period? If yes, how many? If no, why not? | SW-4 |
| 3) How does the GAIP, with its goal of accommodating large corporate jet aircraft at JWA through building additional hangars, benefit Newport Beach and other neighboring communities? | SW-5 |
| 4) Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? | SW-6 |
| 5) If the GAIP increases the number of international flights in and out of JWA, will there be a cap or maximum number allowed during any a 24-hour period? If yes, what will be the maximum number? If no, why not? | SW-7 |
| 6) How many international flights are anticipated to arrive at JWA on a daily or weekly basis? | SW-8 |
| 7) What type of TSA-type security screening will be conducted regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe. | SW-9 |
| 8) What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved? | SW-10 |
| 9) How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? | SW-11 |
| 10) How many overnight hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? | SW-12 |
| 11) What will be the economic benefit to JWA if the GAIP is approved? | SW-13 |
| 12) If the GAIP is approved, will existing flight schools be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools? | SW-14 |

13) If any flight schools specializing in jet aircraft flight instruction are anticipated, will a cap or maximum number of training departures and arrivals during a 24-hour period be established? If yes, what will be the maximum number? If no, why not?	SW-15
14) If any flight schools specializing in jet aircraft flight instruction are anticipated, will hours for their operation and training flights be established? If yes, what will be the hours? If no, why not?	SW-16
It is disappointing to see that the DEIR conclusion that the GAIP will be not significantly cause a negative impact to the community in terms of noise, air quality, hazardous materials, etc., is unrealistic. It is submitted that there has been an insufficient consideration of the additional noise and pollution that will be created; especially considering the leaded fuel mixture used by private GA jet aircraft and their exemption from curfew hours under GA regulations.	SW-17
There have been numerous studies reported in many peer-reviewed scholarly journals that airport noise and pollution have serious health impacts for neighboring communities. It is unrealistic to conclude that if the GAIP is approved that there will be no significant negative environmental impact to Newport Beach and other neighboring communities.	SW-18
Furthermore, the assumptions supporting the noise analysis are flawed and unrealistic. The projection that by 2016, 40% of the Boeing 737 and Airbus A320 aircraft using JWA will include the quieter 737-MAX and Airbus A320-Neo is sheer speculation and is in conflict with the 2014 Settlement Agreement EIR noise modeling.	SW-19
This conclusion raises additional questions:	
1) As GA jet aircraft have a long history of violating noise limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?	SW-20
2) Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?	SW-21
3) Will JWA place a cap or limit on the number of nighttime arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?	SW-22
4) Will there be a limitation on large GA jet departures? Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?	SW-23
5) Do the GAIP conclusions of no significant noise or pollution impact take into consideration the Next-Gen satellite-precision concentrated flight paths that have clearly has a significant negative impact on Newport Beach? If yes, what conclusions have been drawn? If no, why not?	SW-24
6) The Health Risk Analysis conclusions in Section 4 are complicated and confusing. The DEIR also relies heavily on the EIR submitted during the 2014 Settlement Agreement (“EIR 617”) for its health risk analysis (“HRA”). It is submitted that reliance on the previous EIR is misplaced. EIR 617 relied on existing 2014 flight patterns prior to the implementation of the FAA Next Gen concentrated satellite driven precision flight patterns that are flown today. Furthermore, the DEIR does not anticipate the different emissions anticipated from the expected increase in GA jet aircraft if the GAIP is approved. To suggest that there will be a minimal increase in emissions is unrealistic and unsupported by any evidence. Comment: The DEIR is also woefully deficient in its discussion of the potential health impacts to more sensitive members of the community, especially the impact on children. The DEIR discusses “sensitive receptors” and “sensitive populations” noting only those closest to the boundary of JWA, specifically mentioning a residential development approximately 855 feet from the boundary of JWA and airport workers. In response, there have been numerous studies conducted and published in peer-reviewed scholarly journals about the serious health issues caused by airports, over flights, departures and arrivals on children and adults in communities under the flight paths. These studies have confirmed that children suffer cognitive deficits and respiratory illnesses, while the general population suffers undue stress, heart disease, high blood pressure, cognitive decline, auditory problems, heart attacks, strokes and greater cancer risk. Similarly, research studies have concluded that the adverse health affects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools well within a distance of 10 miles from the JWA departure paths and thousands of people who live under the flight paths.	SW-25

Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences between GA and commercial aircraft departure patterns and how they might change upon approval of the GAIP.

SW-26

I appreciate your time and attention to this important matter. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

SW-27

Sincerely,

Simone Wilson
427 El Modena Ave
Newport Beach, Ca 92663

From: Mike Wolf <ymikewolf@yahoo.com>
Sent: Sunday, October 7, 2018 9:17 PM
To: EIR627
Subject: OC General Aviation Improvement Program

Attention: Ms. Leah Choum

Dear Ms.Choum:

Regarding the proposed general aviation improvement program at John Wayne airport, as a Newport Beach resident, I am greatly concerned about the increased noise levels that would be generated by increased numbers of business jets operating there. Therefore out of the alternatives presented I would be most strongly in favor of plan number three, the plan with the least reduction in spaces for smaller aircraft.

MW-1

Thank you for your consideration.

Respectfully submitted,

Michael Wolf, MD

Sent from my iPhone

From: Kenneth A. Wong [<mailto:kenwongcal@gmail.com>]
Sent: Wednesday, November 21, 2018 12:31 PM
To: EIR627 <eir627@ocair.com>; ddixon@newportbeachca.gov; bavery@newportbeachca.gov;
dduffield@newportbeachca.gov; kmuldoon@newportbeachca.gov; jherdman@newportbeachca.gov;
speotter@newportbeachca.gov; woneill@newportbeachca.gov
Subject: ***Disallow Any Changes that increase JWA noise or hours of operation (curfew)***

To Whom It May Concern -- including persons at John Wayne Airport and the Newport Beach City Council:

My family and I have lived in Costa Mesa and Newport Beach for over half a century (...since 1966). We have been homeowners in the Port Streets in Newport Beach, for the last 20 years. I am informed that today -- Wed., November 21 -- is the deadline for your receipt of all letters or emails to be considered, on this extremely important issue.

KAW-1

Like many other long-time residents of the area affected by the operations of John Wayne Airport, we well-recall the OC Measures (...including "A" and "S") of the 1980s -- including the re-votes of the previously-decided Measures -- that in the end resulted in Orange County's regrettable rejection of the Federal government's intended gift of the entire El Toro Airbase for dedicated-use as Orange County International Airport. And, as a consequence, we daily live with the jet noise and other facts of commercial flight operations here in this prime coastal -- and substantially residential -- area. As you know, what is now JWA -- originally called "Orange County Airport" -- was designed and intended solely for small, private, single-engine, propeller aircraft operations only... for which the associated engine sound was indisputably *de minimus*, versus that of jet engines.

KAW-2

*****It is imperative that no changes of any kind -- now or at anytime in the future -- be allowed to occur that would in any way increase JWA noise or hours of operation.*****

Specifically this includes, but in no manner is limited to: No consideration of, and especially No implementation of, any adoption of a "General Aviation Improvement Program" (GAIP) -- that in any fashion causes or contributes to an increased change in the type, size, or jet engine size of permitted aircraft, and fleets thereof -- including private and corporate aircraft at anytime on JWA property, regardless whether transiting or based in existing or proposed, larger hangars. Likewise, No consideration of, and No implementation of, any change can occur that in any fashion may enlarge or expand the existing curfew on take-offs and landings at JWA.

KAW-3

Thank you for your full attention, awareness and understanding. Please do not hesitate to reach-out to me should you have any questions.

Kenneth A. Wong
Attorney at Law
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From: Allen Yourman <ayourman@gmail.com>
Sent: Tuesday, November 6, 2018 3:18 PM
To: EIR627
Subject: EIR

The proposed plan does not have enough GA tiedown positions. I request that alternatives 2 or 3 be selected. AY-1

Allen Yourman