

# FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT 627

## John Wayne Airport General Aviation Improvement Program

### Responses to Comments Volume 1B—Comments Received

**SCH No. 2017031072**

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

April 2019



**FINAL PROGRAM ENVIRONMENTAL IMPACT  
REPORT 627**

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

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Volume 1B—Comments Received**

**April 2019**

*Prepared for:*

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

**Contact: Lea Choum**

*Prepared by:*

**Psomas  
Landrum & Brown  
Austin Transportation Consulting  
Ramboll**

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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

**TABLE 1  
LIST OF COMMENTERS**

Letter No.	Commenter	Date of Correspondence/ Date Received	Page Number
<b>Volume 1A</b>			
<b>State Agencies</b>			
1.	Office of Planning and Research (State Clearinghouse)	November 26, 2018	3-3
<b>Local and Regional Agencies</b>			
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
<b>Organizations</b>			
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
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

**TABLE 1  
LIST OF COMMENTERS**

<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Correspondence/ Date Received</b>	<b>Page Number</b>
<b><i>Individuals and Businesses</i></b>			
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
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

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<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Correspondence/ Date Received</b>	<b>Page Number</b>
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
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



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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 Mieke	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
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

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<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Correspondence/ Date Received</b>	<b>Page Number</b>
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
<b>Volume 1B</b>			
<b>Standardized Letter</b>			
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
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

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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
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

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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 McCormick	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
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

**TABLE 1  
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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
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

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<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Correspondence/ Date Received</b>	<b>Page Number</b>
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
<b><i>Testimony at the September 26, 2018 Public Meeting<sup>a</sup></i></b>			
	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
<b><i>Comments Received After the Public Review Period</i></b>			
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
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

**TABLE 1**  
**LIST OF COMMENTERS**

<b>Letter No.</b>	<b>Commenter</b>	<b>Date of Correspondence/ Date Received</b>	<b>Page Number</b>
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
<b><i>Comments on the Draft Program EIR Submitted during the Public Review Period to Others</i></b>			
317.	Andy Couch	November 21, 2018	3-1268
<sup>a</sup> 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.			

**Standardized Letter**



### 3.6 STANDARDIZED LETTER

A standardized letter was submitted by 151 commenters prior to the close of the public review period on the Draft Program Environmental Impact Report (“EIR”). To avoid confusion, the numbering of the bracketed comments is not sequential. Rather the numbering of the comments, and the respective responses, corresponds to the numbering provided in the standardized letter (i.e., the comments were not renumbered as part of the bracketing process). A single copy of the standardized letter (with comments bracketed) is provided in the beginning of this section, followed by the numbered letters in alphabetical order by last name.

Some commenters provided additional comments beyond those presented in the standardized letter. For those letters, the supplemental comments are bracketed. The comments with supplemental comments are noted with a **(sc)** in the listing below. Several people submitted the standardized letter more than once. Both copies of the letter are included and there is a number next to the persons’ name that indicates more than one copy of the standardized letter was submitted. The standardized letter was submitted by the following entities during the public review period:

<b>A</b>	<b>C (cont.)</b>	<b>F</b>
Brian Alters and Kim BeDell	Kim James Charney, MD (1)	Ronda Fay
Ashwill and Associates, submitted by Greg Ashwill	Kim James Charney, MD (2)	Marsha Ferrall
	Min Chu (1)	Mary Finlay
Marc Atkin	Min Chu (2)	Robert Finlay
Marj Austin	Min Chu (3)	Rebecca and Jason Finney
Alan Ayria	Min Chu (4)	Barbara Foley
<b>B</b>	Mary Citrano	Dan Foley
Lu Baker	Daniel Clark	J.D. Fox
Thomas Baker	Jean G. Clark	Shirley Fox and Charles C. Deandorff
Balboa Financial, submitted by Scott Duntley <b>(sc)</b>	Teryn Clarke, MD	
	Paul Cohen	Alistair and Fiona Fraser
Liz and Bob Barman	Terri Cohen	Adrienne Frederiksen <b>(sc)</b>
Martha Beauchamp	Judy Cooper	Torben Frederiksen <b>(sc)</b>
Robert and Linda Boyd <b>(sc)</b>	John Cotton	Carlita and Win Fuller
Cynthia and David Bright <b>(sc)</b>	Carol and Gary Crane	Stacie Fults
Edwina Broderick <b>(sc)</b>	Victoria Cubeiro	<b>G</b>
Anita Brown <b>(sc)</b>	Tamara and Jeff Current	Matt Galt
Nancy Brown	<b>D</b>	Annette Giermann (1)
Sean and Monica Burke	Chris and Ed Danoff	Annette Giermann (2)
J. Robert Egan and Kimberly Burrows-Egan	Mary Allyn Dexter	Kenny and Nyna Goldberg <b>(sc)</b>
Nicolas Burtnyk	<b>E</b>	Patrick Gormley
<b>C</b>	Mary Jane Edalatpour	Barbara Griffith
Heather Carlino	Julia Edwards	<b>H</b>
Astrid Carlson	Marilyn Elmer	Nancy Halvorsen

Comments Received

<b>H (cont.)</b>	<b>O</b>	<b>S (cont.)</b>
Walter Harriman	Carey L. O'Bryan IV, MD	Gregory and Joyce Smith
Kathy Harrison <b>(sc)</b>	Margo O'Connor <b>(sc)</b>	Marion Smith <b>(sc)</b>
Tabitha May Hasin	Ann O'Neil	Dr. F. Soulati and Mrs. G. Soulati
George Hauser	Bonnie and Dan O'Neil	
William W. Hughes Jr.	Firooz R. Oskooi, MD	Tracy Specter
<b>J</b>	<b>P</b>	Lisa Stanton
Carolyn G. Johnson	Peggy and Michael Palmer <b>(sc)</b>	Joani Stavale
Julie Johnson	Jon B. Patton	Louis J. Stavale
Clifton and Gail Jones	William R. Patton (1)	Julie Stephenson
James Jordan	William R. Patton (2)	Rick Strack (1)
<b>K</b>	Lorian K. Petry	Rick Strack (2)
Marsha and Pat Kendall	Darcy Post	Louise J. Stuart and Craig S. Davis
Ray and Elizabeth Kennedy	Edward Post <b>(sc)</b>	
Linda Geller Kensey	Nrapendra Prasad	Vikki Swanson <b>(sc)</b>
Mark Knaeps <b>(sc)</b>	Janet H. Probst <b>(sc)</b>	<b>T</b>
Stacy Kramer and Nathanael Singer	<b>R</b>	Shannon Tarnutzer
	Stephanie, Steve, Lauren, and Chase Rados	Karen Taylor
<b>L</b>		Elizabeth Thamer
Michele Lovenduski	Dale Ransom	Laura Thomson
<b>M</b>	Drs. Gail and Sorel Reisman	Shelly Trainor (1)
Linda J. Martin	Nicole F. Reynolds	Shelly Trainor (2)
Nicole D. Martin	Catherine Richards	<b>V</b>
James E. and Alison L. McCormick III	Janni Richardson	Fini Van Natta
McMonigle Group, submitted by Manal Bozarth <b>(sc)</b>	Ginny Riley	Earl Votolato
	Vicki and Don Ronaldson	Kimberly Votolato
John Meindl	Paul Root	<b>W</b>
Susan Menning <b>(sc)</b>	John C. and Kristin H. Rowe <b>(sc)</b>	Ronnie and Cathy Weinstein
Whitney Moad	<b>S</b>	Portia Weiss
Beverly Blais Moosmann	Elisabeth and Andrew Schutz	Richard Weiss
Bob Moosmann	Christina Schwindt <b>(sc)</b>	Thomas and Laura White
Robert Murphy	Mr. and Mrs. John M. Sciarra	Kammi and Steve Wilson
<b>N</b>	Matthew Shaw	Steve and Kammi Wilson
Nautical Luxuries, submitted by Daisy Cathcart	Terry P. Shea	
	Terry A. Sheward	
David and Jan New	Carrie Slayback	
Randall and Carol Nunnely	Brad Smith	

In addition to the commenters listed above, ten people submitted the standardized letter after the end of the public review period. These individuals are listed in Section 3.8.

**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. 1

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. 2

Questions:

- |   |     |
|---|-----|
| a. Is the GAIP for the benefit of nonresident corporate jet aircraft?   | 2-a |
| b. Is the GAIP for the benefit of local corporate jet aircraft?   | 2-b |
| 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?   | 2-c |
| d. Does the GAIP benefit the exiting [sic] fleet of privately owned piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?                           | 2-d |
| e. Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?  | 2-e |
| 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? | 2-f |
| 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?                 | 2-g |
| 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?   | 2-h |
| 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?   | 2-i |

*Comments Received*

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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?	2-j
k.	Will the GAIP result in an increase of international flights to JWA via GA jet aircraft?	2-k
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?	2-l
m.	How many international flights are anticipated to arrive at JWA on a daily or weekly basis?	2-m
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.	2-n
o.	What is the predicted net average daily change in aircraft departures and arrivals if the GAIP is approved?	2-o
p.	How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved?	2-p
q.	How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?	2-q
r.	What will be the economic benefit to JWA if the GAIP is approved?	2-r
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?	2-s
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?	2-t
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?	2-u

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**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.

3-1

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.

3-2

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?

3-a

b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?

3-b

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?

3-c

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?

3-d

e. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?

3-e

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?

3-f

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?

3-g

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?

3-h

#### 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.

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.

4

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#### 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?

4-a

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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?

4-b

---

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?

4-c

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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?

4-d

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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?

4-e

- |  |     |
|--|-----|
| 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? | 4-f |
|--|-----|

**5. Flight Patterns.**

<p><u>Comment:</u> 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.</p>	5
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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?   | 5-a |
| 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? | 5-b |
| c. Will there be any changes in GA flight patterns if the GAIP is approved? If yes, what will be the changes?   | 5-c |

**From:** Brian Alters <brian.alters@sbcglobal.net>  
**Sent:** Tuesday, November 20, 2018 7:35 AM  
**To:** EIR627

November 17, 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.

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?
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- 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?
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### **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.

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?
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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.

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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?

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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.

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- 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.

Sincerely,

Drs. Brian Alters and Kim BeDell  
309 Signal Rd  
Newport Beach  
Sent from my iPhone

**From:** Greg Ashwill <greg@ashwill.com>  
**Sent:** Wednesday, November 21, 2018 12:27 PM  
**To:** EIR627  
**Subject:** Comments to General Aviation Improvement Program - Draft EIR  
**Attachments:** SKM\_C55818112113310.pdf

Dear Ms. Choum,

Please see the attached letter.

Thank you for your consideration,

**Greg J. Ashwill, SIOR**

**ASHWILL ASSOCIATES**

Commercial Real Estate

21660 E. Copley Drive, Suite 195

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909.612.9898 direct

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November 17, 2018

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

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Sincerely,



(include your name, home and email address)

Greg J. Ashwill  
404 Evening Star Lane  
Newport Beach, CA 92660  
e-mail: [greg@ashwill.com](mailto:greg@ashwill.com)

**From:** Marc Atkin <marcatkin1@gmail.com>  
**Sent:** Wednesday, November 21, 2018 10:47 AM  
**To:** EIR627  
**Subject:** re: Curbing noise and pollution from John Wayne Airport  
**Attachments:** 11.15.18 EIR Comments.docx

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Marc Atkin  
431 Promontory Drive E Newport Beach Ca 92660

Marcatkin1@gmail.com

**From:** M AUSTIN <MARJAUSTIN@msn.com>  
**Sent:** Wednesday, November 21, 2018 8:46 AM  
**To:** EIR627  
**Subject:** Scan\_20181121.png  
**Attachments:** Scan\_20181121.png

Sent from [Mail](#) for Windows 10

November 17, 2018

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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.

Sincerely,

Mr. & Mrs. John M. Scania (include your name, home and email address)

4104 MORNING STAR LANE  
NEWPORT BEACH, CA, 92660



**From:** Alan Ayria <alan.ayria@gmail.com>  
**Sent:** Tuesday, November 20, 2018 3:57 PM  
**To:** EIR627  
**Subject:** Letter  
**Attachments:** Letter to JWA Land Use Mgr re Comments on EIR.20Nov2018.docx

Please note my letter with comments re EIR.  
thank you,  
Alan

November 20, 2018

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

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

Re: General Aviation Improvement Program – Draft EIR (SCH No. 2017031072)

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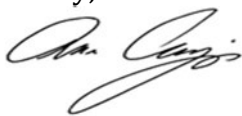
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Sincerely,



Alan Ayria

2000 Vista Cajon, NB 92660; [alan.ayria@gmail.com](mailto:alan.ayria@gmail.com)

**From:** TOMLU BAKER <tomlubaker@hotmail.com>  
**Sent:** Tuesday, November 20, 2018 11:51 PM  
**To:** EIR627  
**Cc:** TOMLU BAKER  
**Subject:** LARGER PRIVATE JET AIRCRAFT EXPANSION AT JWA:  
**Attachments:** Airport2.docx

Please read attached file with letter.

Lu Baker  
Holmwood Dr.  
Newport Beach 92663

Get [Outlook for Android](#)

November 17, 2018

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

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

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Lu Baker  
Holmwood Drive  
Newport Beach 92663

**From:** TOMLU BAKER <tomlubaker@hotmail.com>  
**Sent:** Tuesday, November 20, 2018 12:47 PM  
**To:** EIR627  
**Cc:** TOMLU BAKER  
**Subject:** Fwd: AIRPORT  
**Attachments:** AIRPORT.pdf

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From: TOMLU BAKER  
Sent: Tuesday, November 20, 12:37 PM  
Subject: AIRPORT

Get [Outlook for Android](#)

November 17, 2018

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Land Use Manager at JWA  
3160 Airway Avenue  
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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.

Sincerely,  
Thomas Baker  
Newport Beach, 92663

---

**From:** Scott Duntley <scott@balboafinancial.com>  
**Sent:** Tuesday, November 20, 2018 10:37 AM  
**To:** EIR627  
**Subject:** JWA proposed development  
**Attachments:** 11.15.18 EIR Comments.pdf

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I am concerned that 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. I am concerned with the impact on our nighttime curfew, increased pollution from leaded jet fuel and the increase 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 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 life quality in our city. 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.

BF-1

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The County has already filed its Draft Environmental Impact Report for the GAIP. (See <https://www.ocair.com/deir627>.) I wish to make my feelings known regarding the GAIP and the negative impact this program would likely have on our quality of life.

BF-2

Attached is a letter which details questions and comments regarding the Draft EIR. Please review and respond.

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—  
Scott Duntley  
BALBOA FINANCIAL  
(949) 427-2680 (ph)  
(949) 427-2681 (fax)  
(949) 278-7127 (mobile)  
[Scott@balboafinancial.com](mailto:Scott@balboafinancial.com)  
[www.balboafinancial.com](http://www.balboafinancial.com)

Real Estate Capital Alliance Member (RECA) – Nationwide Creative Capital Solutions – Over \$3.7 billion arranged in 2017

November 20, 2018

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

I am 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”):

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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:

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Sincerely,

A handwritten signature in black ink, appearing to read "S D", with a horizontal line extending to the right from the end of the signature.

Scott Duntley

Owner

1106 Santiago Dr.,

Newport Beach, CA 92660

949-278-7127

**From:** Liz Barman <barman.liz@gmail.com>  
**Sent:** Tuesday, November 20, 2018 12:14 PM  
**To:** EIR627  
**Subject:** Airport Expansion  
**Attachments:** 11.15.18 EIR Comments.docx

November 20, 2018

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

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Sincerely,  
Liz and Bob Barman  
6 Rue Saint Cloud  
Newport Beach, California 92660

**From:** Martha Beauchamp <mimi4x@aol.com>  
**Sent:** Tuesday, November 20, 2018 8:05 AM  
**To:** EIR627  
**Subject:** GAIP

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

Sincerely,

Martha Beauchamp  
83 Ocean Vista  
Newport Beach, CA 92990

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Robin Boyd <rrboyd@gmail.com>  
**Sent:** Wednesday, November 21, 2018 9:56 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program-Draft Environmental Impact Report  
**Attachments:** Questions on DEIR Changes.pdf

Dear Ms. Choum:

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We are 70 year residents of Newport Beach and feel strongly that the attached summary of points and questions need to be answers prior to any approval of the DEIR. We have felt substantial impact in the quality of our lives with the continued expansion the John Wayne Airport. We are impacted daily with pollution from airplane take off and landing. Curfew hours must be maintained for all General Aviation aircraft using John Wayne Airport. Thank you for your consideration and providing support for the residents of Newport Beach regarding the impact that this DEIR as written would produce.

RLB-1

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Sincerely,

Robert And Linda Boyd

348 Otero,  
Newport Beach, Ca 92660  
949 612 6004

**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.

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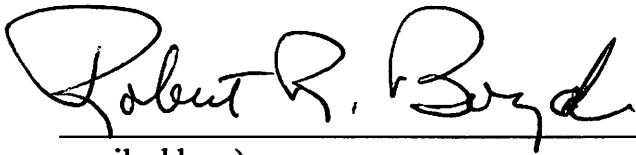
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Sincerely,



(include your name, home and email address)

348 OTERO, NEWPORT BEACH, CA  
92660  
949-612-6004

**From:** Cindy Bright <cpbright@earthlink.net>  
**Sent:** Tuesday, November 20, 2018 11:18 AM  
**To:** EIR627  
**Subject:** Airport ExpansionThe Airport  
**Attachments:** 11.15.18 EIR Comments.docx

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The Airport Expansion is a terrible idea and will be very harmful for the surrounding communities.

CDB-1

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November 17, 2018

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

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Sincerely,

Cynthia and David Bright

1133 Santa Barbara Drive, Newport Beach, CA 93660

[cpbright@earthlink.net](mailto:cpbright@earthlink.net)

[hdbright@earthlink.net](mailto:hdbright@earthlink.net)

**From:** Edwina Broderick <edwinabroderick@gmail.com>  
**Sent:** Tuesday, November 20, 2018 8:34 PM  
**To:** EIR627  
**Subject:** DEIR  
**Attachments:** Draft Environmental Impact Report.pdf

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Dear Ms. Choum, Attached is my signed letter regarding my concerns as a homeowner under the flight path in Dover Shores.

---

EB-1

Please keep me informed of all developments related to the DEIR.

Gratefully,

Edwina Broderick

November 20, 2018

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

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**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?
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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.

Sincerely,

A handwritten signature in cursive script that reads "Edwin Broderick".

311 Morning Star Lane, NB, CA 92660 edwinbroderick@gmail.com

\_\_\_\_\_(include your name, home and email address)

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**From:** Anita Brown <anitahbrown@gmail.com>  
**Sent:** Wednesday, November 21, 2018 9:49 AM  
**To:** EIR627  
**Cc:** Steel, Michelle [HOA]; Bartlett, Lisa [HOA]; Nelson, Shawn [HOA]; Do, Andrew [HOA]; Spitzer, Todd [HOA]  
**Subject:** Comments to GAIP Draft EIR  
**Attachments:** Comments on GAIP AIR ab 11.17.18.pdf

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Attached are my comments on the Draft EIR. We, as citizens of the surrounding communities of JWA, are shocked that the County would be considering this expansion of JWA. JWA adjoins many pre-existing neighborhoods who moved here with the understanding that JWA is a small local airport, NextGen with its low flying commercial planes flying in a concentrated area is ruining the quality of life for these communities - unbearable noise and much increased pollution.

AB-1

The Supervisors' plan to expand the General Aviation is short-sighted and very detrimental to the life and health of those in surrounding community.

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I know money is usually the underlying factor in the Board's decisions. As such, the Board should consider these realities.

- Has the Board considered that Newport Beach, Laguna and Huntington Beach are large generators of property tax income? The noise and pollution will eventually start to erode property values. People are already talking about selling their homes. What was once a high property value (=high property tax) area will eventually go the path of Playa del Rey and become blighted.
- Tourism, a big generator of sales tax income, will diminish. No one wants to vacation or hold business conferences in resort towns with low flying noisy airplanes dumping fuel overhead all day (and with GAIP) all night.
- Lawsuits will be inevitable as cancer, high blood pressure and other illnesses inevitably begin to increase. And, God forbid, a plane goes down in one of the many family oriented neighborhoods, or pre-schools, elementary schools and high schools adjacent to JWA. Fingers will all point to those on the Board of Supervisors that voted to increase airplane departures.

AB-2

AB-3

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A far-sighted Board would recognize these realities, keep JWA at its current levels, work with the FAA to diminish the existing noise and pollution and begin to create efficient transportation to Ontario International for other air traffic business.

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AB-4

Anita Brown  
4 Crooked Stick Drive  
Newport Beach 92660

November 17, 2018

Via Electronic Mail  
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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?
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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.

Sincerely,

*Nancy Brown*

*nancyjbrown39@gmail.com* (include your name, home and email address)

**From:** Monica Burke <monicaburke@gmail.com>  
**Sent:** Tuesday, November 20, 2018 5:22 PM  
**To:** EIR627  
**Attachments:** 11.15.18 EIR Comments.docx



November 17, 2018

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

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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.

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?
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- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
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### **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.

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.

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- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
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- 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?
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- 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?

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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.

Sincerely,

Sean and Monica Burke  
413 Cabrillo Terrace  
Corona Del Mar, 92625

[Monicaspud@roadrunner.com](mailto:Monicaspud@roadrunner.com)

Sean@Seanmburke.com

\_\_\_\_\_ (include your name, home and email  
addresses

**From:** Kimberly Burrows-Egan <kburrows.egan@me.com>  
**Sent:** Tuesday, November 20, 2018 1:13 PM  
**To:** EIR627  
**Subject:** Environmental impact by NOISE from JWA

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. 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 hangars, 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 hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? 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,

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Kimberly Burrows-Egan, RN, NP

1418 Lincoln Lane  
Newport Beach, CA 92660

[eganjr@icloud.com](mailto:eganjr@icloud.com)  
[kburrows.egan@me.com](mailto:kburrows.egan@me.com)  
949-466-4826

**From:** Nicolas Burtnyk <burtnyk@gmail.com>  
**Sent:** Tuesday, November 20, 2018 12:39 PM  
**To:** EIR627  
**Subject:** EIR Comments  
**Attachments:** 11.15.18 EIR Comments.docx

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Sincerely,

Nicolas Burtnyk

November 17, 2018

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

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Land Use Manager at JWA  
3160 Airway Avenue  
Costa Mesa, CA 92626

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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?
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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.

Sincerely,

Nicolas Burtnyk  
burtnyk@gmail.com  
1504 E Ocean Blvd., Newport Beach, CA 92661



**From:** Heather Carlino <hcarlino@hotmail.com>  
**Sent:** Wednesday, November 21, 2018 8:52 AM  
**To:** EIR627  
**Subject:** Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** 11.21.18 EIR Comments.docx

November 21, 2018

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

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”):

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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.

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

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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:

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3. 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?
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6. 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?
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Sincerely,  
Heather Carlino  
279 W Wilson St. APT B  
Costa Mesa, CA 92627  
[hcarlino@hotmail.com](mailto:hcarlino@hotmail.com)

November 21, 2018

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

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3160 Airway Avenue  
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Sincerely,

Heather Carlino  
279 W Wilson St. APT B  
Costa Mesa, CA 92627  
[hcarlino@hotmail.com](mailto:hcarlino@hotmail.com)

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Astrid Carlson <acarlson2300@gmail.com>  
**Sent:** Tuesday, November 20, 2018 3:55 PM  
**To:** EIR627  
**Subject:** John Wayne Airport

November 17, 2018 Via Electronic Mail [EIR627@ocair.com](mailto: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”):

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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. 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2300 Cliff Drive

Newport Beach, CA 92663

949.631.3182

[acarlson2300@gmail.com](mailto:acarlson2300@gmail.com)

**From:** Kim Charney <bldvesl@aol.com>  
**Sent:** Tuesday, November 20, 2018 3:50 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

November 17, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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.

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?
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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.

Sincerely,

Kim James Charney M.D.

214 Evening Star Lane

Newport Beach, CA 92660

**From:** Kim Charney <bldvesl@aol.com>  
**Sent:** Wednesday, November 21, 2018 7:55 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** PastedGraphic-3.tiff; Scan 3.tiff

November 17, 2018

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[EIR627@ocair.com](mailto:EIR627@ocair.com)

Ms. Lea Choum

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3160 Airway Avenue

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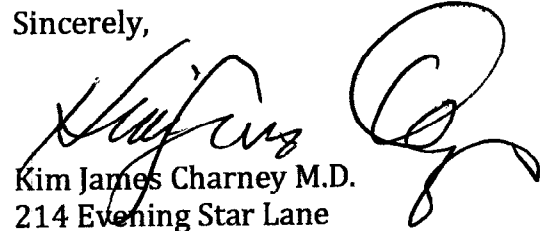
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Sincerely,

A handwritten signature in black ink, appearing to read "Kim James Charney". The signature is fluid and cursive, with a large, stylized initial "K" and "C".

Kim James Charney M.D.  
214 Evening Star Lane  
Newport Beach, CA 92660

**From:** mchu11583@aol.com  
**Sent:** Wednesday, November 21, 2018 11:36 AM  
**To:** EIR627  
**Subject:** GAIP and DEIR  
**Attachments:** 2018\_11\_21\_11\_26\_03.pdf

See Attachment

November 17, 2018

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

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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.

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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.

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.

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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.

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Min Chau (include your name, home and email addresses)

38 CORMORANT CIRCLE

NEWPORT BEACH, CA 92660

mchau11583@aol.com

**From:** mchu11583@aol.com  
**Sent:** Wednesday, November 21, 2018 11:37 AM  
**To:** EIR627  
**Subject:** Deir and Gaip  
**Attachments:** 2018\_11\_21\_11\_28\_02.pdf

See Attached

November 17, 2018

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

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1991 VISTA CAUDAL  
NEWPORT BEACH, CA 92660  
mchu11583@aol.com



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**Sent:** Wednesday, November 21, 2018 11:39 AM  
**To:** EIR627  
**Subject:** GAIP and DEIR  
**Attachments:** 2018\_11\_21\_11\_29\_43.pdf

See Attached

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Sincerely,

MIN CHU (include your name, home and email addresses)

42 HILLSDALE DR

NEWPORT BEACH, CA 92660

**From:** mchu11583@aol.com  
**Sent:** Wednesday, November 21, 2018 11:40 AM  
**To:** EIR627  
**Subject:** GAIP and DEIR  
**Attachments:** 2018\_11\_21\_11\_31\_38.pdf

See Attachment



November 17, 2018

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

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MICHAEL CHU (include your name, home and email addresses)

22 CORMORANT CIRCLE  
NEWPORT BEACH CA 92660  
mchu@westofhouse.com

**From:** Mary Citrano <marycitrano@gmail.com>  
**Sent:** Wednesday, November 21, 2018 3:20 PM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments (003).docx  
**Attachments:** 11.15.18 EIR Comments (003).docx

Please see attachment.

Thank you,  
Mary Citrano



Virus-free. [www.avast.com](http://www.avast.com)

November 17, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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Mary Citrano  
5509 Seashore Dr.  
Newport Beach, Ca. 92663

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Dan Clark <dcpcgm@gmail.com>  
**Sent:** Wednesday, November 21, 2018 2:58 PM  
**To:** EIR627  
**Subject:** Re:General Aviation Program-DEIR Report 2017031072

November 21, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto:EIR627@ocair.com)

Ms. Lea Choum  
Land Use Manager at JWA  
[3160 Airway Avenue](#)  
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Questions:

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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.

Sincerely,

Daniel Clark

415 San Bernardino Ave.  
NEWPORT Beach CA 92663  
[dcpcgm@gmail.com](mailto:dcpcgm@gmail.com)  
Sent from my iPhone

**From:** Dan Clark <dcpcgm@gmail.com>  
**Sent:** Wednesday, November 21, 2018 2:57 PM  
**To:** EIR627  
**Subject:** Re:General Aviation Program-DEIR Report 2017031072

November 21, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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”):

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Jean G. Clark

415 San Bernardino Avenue  
Newport Beach, CA 92663  
[dcpcgm@gmail.com](mailto:dcpcgm@gmail.com)

Sent from my iPhone

**From:** Teryn Clarke <teryndclarke@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 12:05 PM  
**To:** EIR627  
**Subject:** Private jet noise and no curfew

November 17, 2018

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

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

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Teryn Clarke  
1309 Mariners Dr  
Newport Beach CA 92660  
949-701-2811

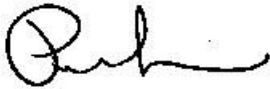
Best,  
Teryn

---

**Teryn Clarke, M.D.**  
**Neurology**

**From:** Paul M. Cohen <pmcohen@ccacpas.com>  
**Sent:** Wednesday, November 21, 2018 10:15 AM  
**To:** EIR627  
**Cc:** Bonnie O'Neil  
**Subject:** John Wayne Airport  
**Attachments:** 11.15.18 EIR Comments.docx

Please see the attached correspondence.  
Thank you

A handwritten signature in black ink, appearing to read 'Paul M. Cohen', with a stylized, cursive script.

Paul M. Cohen

November 17, 2018

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul M. Cohen". The signature is fluid and cursive, with a large initial "P" and "C".

Paul M. Cohen  
1226 Polaris Dr  
Newport Beach CA 92660

paul.cohen06@gmail.com

**From:** Terri Cohen <terriaco@gmail.com>  
**Sent:** Wednesday, November 21, 2018 3:41 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

November 21, 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:

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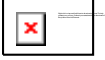
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Terri Cohen, 1226 Polaris Drive, Newport Beach, CA 92660



Virus-free. [www.avast.com](http://www.avast.com)

**From:** Judy Cooper <jcpr@pacbell.net>  
**Sent:** Tuesday, November 20, 2018 11:18 PM  
**To:** EIR627  
**Subject:** Letter to Ms. Choum  
**Attachments:** airport EIR.pdf; ATT00001.txt

Sent from the PDF Converter

November 17, 2018

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

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---

(include your name, home and email addresses

1

**From:** John Cotton <qtipnb@aol.com>  
**Sent:** Wednesday, November 21, 2018 2:59 PM  
**To:** EIR627  
**Subject:** GAIP EIR

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Via Electronic Mail  
EIR627@ocair.com

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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.

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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:

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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.

Sincerely,

John Cotton  
2123 Granada Ave.

Balboa, CA 92661

[qtipnb@aol.com](mailto:qtipnb@aol.com)

—

**From:** Carol Crane <cranos98@gmail.com>  
**Sent:** Tuesday, November 20, 2018 3:17 PM  
**To:** EIR627  
**Cc:** Carol Crane  
**Subject:** JWA- LARGER JET AIRCRAFT EXPANSION

November 17, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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”):

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3. 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?
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Sincerely,

Carol Crane and Gary Crane. 921 ALEPPO STREET Newport Beach, CA 92660

**From:** Victoria Cubeiro <mammacub2@reagan.com>  
**Sent:** Tuesday, November 20, 2018 10:46 AM  
**To:** EIR627  
**Subject:** JW Airport EIR  
**Attachments:** 11.15.18 EIR Comments.pages

November 17, 2018

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

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Victoria Cubeiro  
531 Harbor Island Drive  
Newport Beach, ca. 92660  
mamacub2@reagan.com



**From:** Tamara Current <tamaracurrent@mac.com>  
**Sent:** Tuesday, November 20, 2018 1:39 PM  
**To:** EIR627  
**Subject:** Excessive noise - private Jets

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

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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.

Sincerely,

Tamara and Jeff Current  
111 Via Zurich  
Newport Beach CA 92663

tamaracurrent@ [mac.com](mailto:tamaracurrent@mac.com)

~Sent remotely via iphone. Please forgive typos and dictation errors.

Tamara Current

Current Management Inc.  
160 W Santa Clara St #900  
San Jose, CA 95113  
Sent from my iPhone

**From:** Ed Danoff <eddanoff@msn.com>  
**Sent:** Wednesday, November 21, 2018 11:15 AM  
**To:** EIR627  
**Subject:** AIRPORT LETTER  
**Attachments:** AIRPORT LETTER.pdf

Dear Ms. Choum,

Please see my attached letter pertaining to the proposed changes at John Wayne Airport.

Sincerely,  
Ed Danoff

Ed Danoff, Attorney at Law  
Law Offices of Edward R. Danoff, Jr.  
1323 N. Broadway  
Santa Ana, CA 92706  
714/ 972-8355  
[eddanoff@msn.com](mailto:eddanoff@msn.com) e-mail  
[www.eddanoff.com](http://www.eddanoff.com) website  
Practice includes Personal Injuries, Divorce/Family Law,  
Bankruptcy, Real Estate & Criminal Law



Virus-free. [www.avg.com](http://www.avg.com)

November 20, 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)

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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”):

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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.

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Chris and Ed Danoff

55 Balboa Coves  
Newport Beach, CA 92663  
(949) 631-3727

*Chris & Al Wansoff*

**From:** Mary Allyn Dexter <maryallyn.dexter@gmail.com>  
**Sent:** Wednesday, November 21, 2018 8:08 AM  
**To:** EIR627  
**Subject:** DEIR

November 21, 2018

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

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

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Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Mary Jane Edalatpour <maryjaneedalatpour@me.com>  
**Sent:** Tuesday, November 20, 2018 3:10 PM  
**To:** EIR627  
**Subject:** Orange County Airport - Improvement Program

November 17, 2018

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

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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.

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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.

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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.

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.

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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.

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#### Questions:

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Sincerely,

\_\_\_\_\_ Mary Jane Edalatpour  
501 Morning Star Lane  
Newport Beach, CA. 92660  
maryjaneedalatpour@me.com \_\_\_\_\_ (include your name, home and email  
address)

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**Sent:** Tuesday, November 20, 2018 7:52 AM  
**To:** EIR627  
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Julia Edwards  
2121 Aralia Street  
Newport Beach, CA 92660  
[julia\\_macmillan@yahoo.com](mailto:julia_macmillan@yahoo.com)

Sent from my iPhone



**From:** Marilyn Elmer <marelmer@cox.net>  
**Sent:** Tuesday, November 20, 2018 9:32 PM  
**To:** EIR627  
**Subject:** Orange County Airport

November 17, 2018

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- 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?
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- 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.

Sincerely,

Marilyn Elmer, [marelmer@cox.net](mailto:marelmer@cox.net), 2 Overlook Drive Newport Beach, Ca. 92657

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Ronda Fay <rondajaneyfay@icloud.com>  
**Sent:** Tuesday, November 20, 2018 10:38 PM  
**To:** EIR627  
**Subject:** Proposed John Wayne Airport General Aviation Project

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”):

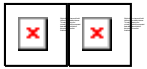
1. DEIR Complexity and Length Relative to Time Limitations for Comment: The DEIR was made available for public review on September 20, 2018, with comments due on November 6, 2018, with an extension until November 21, 2018. Comment: This is an incredibly complex and detailed document that is over 600 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. Question: Why can’t additional time be provided for the review and comment to the DEIR?

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- 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?
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- 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?
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- 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 hangars, 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?
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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. 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. 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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? 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. Sincerely, \_\_Ronda Fay 2686 Redlands Dr. Costa Mesa, Ca. 92627 Rondajanfay@gmail.com\_\_\_\_\_ (include your name, home and email address.



3 Thanks



**From:** Marsha Ferrall <marshaferrall@gmail.com>  
**Sent:** Tuesday, November 20, 2018 12:35 PM  
**To:** EIR627  
**Subject:** GAIP

november 17, 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”):

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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.

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

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Sincerely,

marsha ferrall  
107 via ravenna  
newport beach, ca 92663  
[marshaferrall@gmail.com](mailto:marshaferrall@gmail.com)

**From:** T. Robert Finlay <rfinlay@wrightlegal.net>  
**Sent:** Tuesday, November 20, 2018 12:58 PM  
**To:** EIR627  
**Subject:** Airport Expansion  
**Attachments:** --airport letter--.pdf

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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- 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?

5. Flight Patterns.

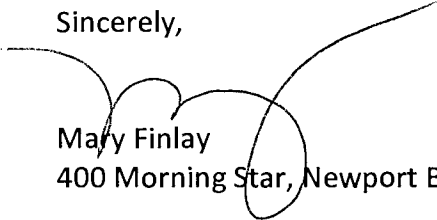
Comment: Although the DEIR states there will be no change in flight patterns, it is unclear as to the flight patterns that were used for its analysis. It is also unclear what flight patterns would be followed by GA jet aircraft upon approval of the GAIP. Clarification is needed to assess the differences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

Sincerely,



Mary Finlay  
400 Morning Star, Newport Beach 92660



**From:** T. Robert Finlay <rfinlay@wrightlegal.net>  
**Sent:** Tuesday, November 20, 2018 12:58 PM  
**To:** EIR627  
**Subject:** Airport Expansion  
**Attachments:** --airport letter--.pdf

November 17, 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.

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 hangars, 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?
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- q. How many overnight hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- r. What will be the economic benefit to JWA if the GAIP is approved?
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- 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.

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?
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- 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.

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?
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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.

Sincerely,



Robert Finlay

400 Morning Star, Newport Beach 92660

**From:** Rebecca Finney <rebecca.finney@yahoo.com>  
**Sent:** Wednesday, November 21, 2018 3:24 PM  
**To:** EIR627  
**Cc:** Jason Finney  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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

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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. 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? 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

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Sincerely,

Rebecca & Jason Finney (Newport Beach resident for 47 years)

Rebecca.finney@yahoo.com

3011 Cliff Drive  
Newport Beach, CA 92663

**From:** Dan Foley <danf@shewards.net>  
**Sent:** Wednesday, November 21, 2018 7:11 AM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments  
**Attachments:** 11.15.18 EIR Comments.docx

November 17, 2018

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

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- 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?
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Sincerely, Barbara Foley / barbifoley@hotmail.com

1124 Somerset Lane, Newport Beach, CA  
92660 \_\_\_\_\_ (include your name, home and email  
addresses



**From:** Dan Foley <danf@shewards.net>  
**Sent:** Wednesday, November 21, 2018 7:08 AM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments  
**Attachments:** 11.15.18 EIR Comments.docx

November 17, 2018

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

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1124 Somerset Lane, Newport Beach, CA  
92660 \_\_\_\_\_ (include your name, home and email  
addresses

**From:** JD Fox <jdfox@roadrunner.com>  
**Sent:** Wednesday, November 21, 2018 8:46 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)  
**Importance:** High

November 21, 2018

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Land Use Manager at JWA  
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Costa Mesa, CA 92626

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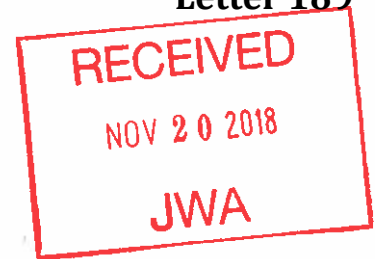
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Sincerely,

J. D. Fox  
509 Ventaja  
Newport Beach, CA 92660



Virus-free. [www.avast.com](http://www.avast.com)



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Via Electronic Mail  
EIR627@ocair.com

Ms. Lea Choum  
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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.

Sincerely,

Shirley Fox (include your name, home and email address)  
2640 Vista Orinda  
Newport Beach, Ca 92660  
SJFOXNB@gmail.com

Charles C. Deardorff  
2640 VISTA ORINDA  
Newport Beach, Ca 92660  
CDCDEARDORFF@gmail.com

**From:** Alastair Fraser <acsfraser@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 11:18 AM  
**To:** EIR627  
**Cc:** acsfraser@yahoo.com; 'Fiona Fraser'  
**Subject:** General Aviation Improvement Program - Draft Environmental Impact Report (SCH No. 2017031072)

November 17, 2018

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

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Alastair & Fiona Fraser  
[acsfraser@yahoo.com](mailto:acsfraser@yahoo.com)  
[fifraser@yahoo.com](mailto:fifraser@yahoo.com)  
838 Via Lido Soud  
Newport Beach CA 92663

**From:** Torben Frederiksen <tfrederiksen@bigtsfreightliner.net>  
**Sent:** Tuesday, November 20, 2018 2:11 PM  
**To:** EIR627  
**Subject:** GAIP Draft EIR JWA  
**Attachments:** CCF11202018.pdf

**Importance:** High

Dear Ms. Choun,

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Attached please find a letter stating some of my many concerns regarding this potential change at JWA. We are already exposed to significant health risks with the changes in flight patterns and altitudes as a result of the FAA's NEXTGEN So. Cal. Metroplex. I find it, at a minimum, irresponsible to even consider locating more and larger private jets at JWA.

AF-1

---

Sincerely,

Adrienne Frederiksen

November 17, 2018

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[EIR627@ocair.com](mailto:EIR627@ocair.com)

Ms. Lea Choum  
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Adrienne Frederiksen  
312 Evening Star Lane  
Newport Beach, CA 92660

**From:** Torben Frederiksen <tfrederiksen@bigtsfreightliner.net>  
**Sent:** Tuesday, November 20, 2018 2:33 PM  
**To:** EIR627  
**Cc:** jets shooter@aol.com  
**Subject:** JWA EIR627  
**Attachments:** airport11202018.pdf

Dear Ms. Choun,

---

The letter attached represents some of the many issues with the changes at JWA. We are being exposed to pollutants, carcinogens, specifically. After implementation of the NEXTGEN departure procedure those pollutants became much more serious and more concentrated. The noise pollution has dramatically changed with the abandonment of the “up and over” departure procedure. Clearly no one involved has given a thought to the impacts on the residents. To even consider locating more and larger private aircraft to the departure and arrival schedule is insane. If this continues, the already disproportionate number of resident cancer victims will escalate and a study will be done to show a direct correlation to the concentration of aviation fuel pollutants spewed on homeowners and residents, including children.

TF-1

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312 Evening Star Lane

November 17, 2018

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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.

Sincerely,

A handwritten signature in black ink, appearing to read "Torben Frederiksen", written over a horizontal line.

Torben Frederiksen  
312 Evening Star Lane  
Newport Beach, CA 92660

**From:** Carlita Fuller <carlitafuller@gmail.com>  
**Sent:** Wednesday, November 21, 2018 2:27 PM  
**To:** EIR627  
**Subject:** John Wayne Airport  
**Attachments:** 11.15.18 EIR Comments.docx

Attention Ms. Choun

November 17, 2018

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

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Carlita and Win Fuller  
[carlitafuller@gmail.com](mailto:carlitafuller@gmail.com)  
Wfuller1@pacbell.net

\_\_\_\_\_ (include your name, home and email  
addresses

**From:** Stacie Fults <stacie.fults@gmail.com>  
**Sent:** Tuesday, November 20, 2018 9:29 PM  
**To:** EIR627  
**Subject:** NO MORE: GAIP Concerns and Questions- Action Requested

November 17, 2018

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

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

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**Stacie Fults**  
519 Fullerton Avenue  
Newport Beach, CA 92663  
949-300-2060  
[Stacie.fults@gmail.com](mailto:Stacie.fults@gmail.com)

Stacie Fults | [stacie.fults@gmail.com](mailto:stacie.fults@gmail.com) | 949.300.2060

**From:** Matt Galt <mattgalt@roadrunner.com>  
**Sent:** Tuesday, November 20, 2018 5:03 PM  
**To:** EIR627  
**Subject:** See letter below

November 17, 2018

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

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**Matt Galt**

211 Via Koron  
Newport Beach, CA 92663  
949.554.4499  
[mattgalt@roadrunner.com](mailto:mattgalt@roadrunner.com)

**From:** Annette Giermann <balboalover@gmail.com>  
**Sent:** Tuesday, November 20, 2018 5:18 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program  
**Attachments:** Scan 2018-11-20 17.16.22.pdf

November 17, 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)

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949-673-5523





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949-673-5523

**From:** Kenny Goldberg <kenny@kennygoldberg.com>  
**Sent:** Tuesday, November 20, 2018 8:09 AM  
**To:** EIR627  
**Subject:** New JWA Flights  
**Attachments:** 11.15.18 EIR Comments.docx

Hello,

---

I have been a Back Bay residence since 1987 and the noise pollution from JWA is getting worse and worse to the point I have to pause my TV every few minutes sometimes to wait until plane fly's over.

KNG-1

I am attaching letter asking not to pass new changes.

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Thank You,

Kenny

Kenny Goldberg Photography  
[www.kennygoldberg.com](http://www.kennygoldberg.com)  
[www.instagram.com/kennygoldberg](https://www.instagram.com/kennygoldberg)  
[www.facebook.com/kennygoldbergphotography](https://www.facebook.com/kennygoldbergphotography)  
<https://www.thumbtack.com/-Costa-Mesa-CA/service/2876368>

November 17, 2018

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

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Kenny & Nyna Goldberg

356 Lourdes Lane, Costa Mesa CA 92627  
kennygoldberg@aol.com

\_\_\_\_\_ (include your name, home and email addresses)

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**Sent:** Tuesday, November 20, 2018 1:42 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** 11.15.18 EIR Comments.pages

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\_\_\_\_\_ (include your name, home and email  
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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.

Sincerely,

*Barb Weald*

41 Canyon Crest (include your name, home and email addresses)

CPM CA 92625

barbara.o.Piot@6mail.com

714-623-4141

**From:** Nancy Halvorsen <nhalvo@gmail.com>  
**Sent:** Tuesday, November 20, 2018 12:37 PM  
**To:** EIR627  
**Subject:** Fwd: IMMEDIATE RESPONSE NEEDED - BY TOMORROW!

Sent from my iPad

Begin forwarded message:

**From:** Lido Isle Community Association <[webmaster@lidoisle.org](mailto:webmaster@lidoisle.org)>  
**Date:** November 20, 2018 at 10:10:55 AM PST  
**To:** [nhalvo@gmail.com](mailto:nhalvo@gmail.com)  
**Subject:** IMMEDIATE RESPONSE NEEDED - BY TOMORROW!  
**Reply-To:** [webmaster@lidoisle.org](mailto:webmaster@lidoisle.org)

November 17, 2018

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

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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.

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Nancy Halvorsen  
125 Via Yella, Newport Beach, CA92663  
[Nhalvo@gmail.com](mailto:Nhalvo@gmail.com)

\_\_\_\_\_ (include your name, home and email addresses)

Lido Isle Community Association | 701 Via Lido Soud, Editor, Lido Islander, Newport Beach, CA 92663

[Unsubscribe nhalvo@gmail.com](mailto:Unsubscribe_nhalvo@gmail.com)

[Update Profile](#) | [About our service provider](#)

Sent by [webmaster@lidoisle.org](mailto:webmaster@lidoisle.org) in collaboration with



Try it free today

**From:** Jan Harriman <jfmck@aol.com>  
**Sent:** Wednesday, November 21, 2018 1:42 PM  
**To:** EIR627  
**Subject:** EIR627 --  
**Attachments:** EIR 627.pdf

Please find attached signed.. Walter Harriman, 24 Cormorant Circle, Newport Beach, CA 92660 949 322 0068



November 17, 2018

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

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

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Sincerely,

Walter Hamman

24 CORMORANT CIR (include your name, home and email addresses

NEWPORT BEACH, CA 92660

wharriman@aol.com

**From:** Kathy Harrison <kathyharrison1621@gmail.com>  
**Sent:** Wednesday, November 21, 2018 7:25 AM  
**To:** EIR627  
**Subject:** Fwd: New Development at John Wayne Airport  
**Attachments:** 11.15.18 EIR Comments.docx; ATT00001.htm

---

From Kathy Harrison. 1621 Lincoln Lane, NB 92660

Begin forwarded message:

**From:** Melinda Patton <[melindapattton6@gmail.com](mailto:melindapattton6@gmail.com)>  
**Date:** November 20, 2018 at 10:57:11 PM PST  
**To:** Phyllis Christensen <[pwchristensen@sbcglobal.net](mailto:pwchristensen@sbcglobal.net)>, Carolyn Johnson <[4carolee@cox.net](mailto:4carolee@cox.net)>, Carol MacDougall <[carolmmacd@gmail.com](mailto:carolmmacd@gmail.com)>, [carolynholder@msn.com](mailto:carolynholder@msn.com), Tim Carr <[tim@timcarrgroup.com](mailto:tim@timcarrgroup.com)>, "[heidihall@sbcglobal.net](mailto:heidihall@sbcglobal.net)" <[heidihall@sbcglobal.net](mailto:heidihall@sbcglobal.net)>, Julie Jenkins <[jdfritz@aol.com](mailto:jdfritz@aol.com)>, Andy Cies <[seeize@gmail.com](mailto:seeize@gmail.com)>, Betsy Schutz <[schutz@sbcglobal.net](mailto:schutz@sbcglobal.net)>, Maureen Lenihan <[maureenlenihan@msn.com](mailto:maureenlenihan@msn.com)>, "[maureenacole@gmail.com](mailto:maureenacole@gmail.com)" <[maureenacole@gmail.com](mailto:maureenacole@gmail.com)>, "[judylipton483@gmail.com](mailto:judylipton483@gmail.com)" <[judylipton483@gmail.com](mailto:judylipton483@gmail.com)>, Linda Hughes <[lindahughes@hughesinv.com](mailto:lindahughes@hughesinv.com)>, Linda Laugharn <[lindalaugharn@gmail.com](mailto:lindalaugharn@gmail.com)>, Robyn Hamilton <[robyn.hamilton15@gmail.com](mailto:robyn.hamilton15@gmail.com)>, Sue Robben <[suerobben@yahoo.com](mailto:suerobben@yahoo.com)>, Brooke Booth <[brookebooth@sbcglobal.net](mailto:brookebooth@sbcglobal.net)>, Bonnie O'Neil <[boneilseven@gmail.com](mailto:boneilseven@gmail.com)>, Bonnie and Gus Ganotis <[BonnieFMarshall@aol.com](mailto:BonnieFMarshall@aol.com)>, "Mr. and Mrs. Jeff Diercksmeier" <[diercksmeier@ca.rr.com](mailto:diercksmeier@ca.rr.com)>, "Mr. and Mrs. Travis Winsor" <[travisw@raymond-co.com](mailto:travisw@raymond-co.com)>, Kay Lea Turbeville Polovina <[kpolovina@aol.com](mailto:kpolovina@aol.com)>, Kay Polovina <[kpolovina@arborrealestate.com](mailto:kpolovina@arborrealestate.com)>, kathy harrison <[kathyharrison1621@gmail.com](mailto:kathyharrison1621@gmail.com)>, Kathy Robinson <[kathy@todd-rothgeb.com](mailto:kathy@todd-rothgeb.com)>, Kathryn Smith <[ksdesignmail@gmail.com](mailto:ksdesignmail@gmail.com)>, Kathy Schwarz <[schwarz.kathy@gmail.com](mailto:schwarz.kathy@gmail.com)>, "Dr. and Mrs. Richard Agnew" <[KathAgnew@aol.com](mailto:KathAgnew@aol.com)>, Margie Bill <[margiebill@cox.net](mailto:margiebill@cox.net)>, maryallyn Dexter <[maryallyn.dexter@gmail.com](mailto:maryallyn.dexter@gmail.com)>, Mary Coates <[mbcuscclady@gmail.com](mailto:mbcuscclady@gmail.com)>, Melanie Fitch <[irrelevantweek@aol.com](mailto:irrelevantweek@aol.com)>, Melinda Williams <[okasan4@gmail.com](mailto:okasan4@gmail.com)>, Melissa Martin <[pasthat@aol.com](mailto:pasthat@aol.com)>, "Mr. and Mrs. Ned Kriz" <[nancyrkriz@gmail.com](mailto:nancyrkriz@gmail.com)>, pat smith <[itsmepat@pacbell.net](mailto:itsmepat@pacbell.net)>, Setsuko Krickl <[skrickl@yahoo.com](mailto:skrickl@yahoo.com)>, Sheila Collins <[sheila@tccollins.com](mailto:sheila@tccollins.com)>, Cindy Cotton <[ctc2123@aol.com](mailto:ctc2123@aol.com)>, Cindy Hollern <[cmhollern@aol.com](mailto:cmhollern@aol.com)>, marlene chumo <[marnmavis@redlancemail.com](mailto:marnmavis@redlancemail.com)>, [lurlinetwist5050@aol.com](mailto:lurlinetwist5050@aol.com), Adrienne Garrison <[ahgarrison@gmail.com](mailto:ahgarrison@gmail.com)>, "Mr. and Mrs. Jason Cox" <[jmhansen@gmail.com](mailto:jmhansen@gmail.com)>, Billpatton <[Billpatton@aol.com](mailto:Billpatton@aol.com)>, bill hughes <[whughes@hughesinv.com](mailto:whughes@hughesinv.com)>, Patrick Patton <[patpatton86@gmail.com](mailto:patpatton86@gmail.com)>, Heather Carlino <[hcarlino@hotmail.com](mailto:hcarlino@hotmail.com)>, susan perry <[psalmssofarpraise@aol.com](mailto:psalmssofarpraise@aol.com)>, Anne Morrow <[annemor20@gmail.com](mailto:annemor20@gmail.com)>, Ann Herberts <[herbertshome@sbcglobal.net](mailto:herbertshome@sbcglobal.net)>, Cecile Going <[csginteriordesign@hotmail.com](mailto:csginteriordesign@hotmail.com)>  
**Subject:** New Development at John Wayne Airport

KH-1

Hi ALL! I received this letter today and was dismayed at the prospect of larger private jets flying at all hours from John Wayne Airport. Please read below and if you can send the letter to the email address highlighted below. The letter needs your name, address and email and MUST be sent Wednesday 11/21. Please send to as many people as you can think of to do the same. Of course, you probably have not heard about this like me and have to deal with it at the last minute!!!! So appreciate you sending the letter on.

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Happy Thanksgiving!

Begin forwarded message:

**From:** Anita Brown <[anitahbrown@gmail.com](mailto:anitahbrown@gmail.com)>  
**Subject:** New Development at John Wayne Airport  
**Date:** November 19, 2018 at 7:51:25 PM PST  
**To:** Anita Brown <[anitahbrown@gmail.com](mailto:anitahbrown@gmail.com)>

As you may know, Citizens Against Airport Noise and Pollution (CAANP) is an organization dedicated to a reduction in the noise and pollution generated from John Wayne Airport.

We want to make you aware that 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.

KH-1 cont.

The County has already filed its Draft Environmental Impact Report for the GAIP. (See <https://www.ocair.com/deir627>). It is important that residents of Newport Beach respond to the draft EIR and make our feelings known regarding the negative impact the GAIP program could have on our quality of life.

For your convenience, attached is a letter prepared by one of our members which details questions and comments regarding the Draft EIR. Feel free to sign and email the attached letter (or any other you may want to write) to **Ms. Choum at [EIR627@ocair.com](mailto:EIR627@ocair.com)**. Be sure to include to include your own name, address, etc. at the bottom of the letter. **The letter must be received no later than Wednesday, November 21st to be considered.**

Thank you for your help. It will make a great impact on the County to receive many emails in opposition to their planned GAIP.

---



November 17, 2018

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

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 hangars, 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 hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- 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.

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.

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?
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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?
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- 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.

Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Tabitha Hasin <tmhwriter@sbcglobal.net>  
**Sent:** Tuesday, November 20, 2018 6:02 PM  
**To:** EIR627  
**Subject:** John Wayne Airport

November 20, 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:

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Sincerely,

Tabitha May Hasin  
Home: 1101 Estelle Lane, Newport Beach, CA 92660  
Email: tmhwriter@sbcglobal.net

**From:** ghauser@roadrunner.com  
**Sent:** Tuesday, November 20, 2018 5:22 PM  
**To:** EIR627  
**Subject:** Aisrport

November 17, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

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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.

Sincerely,

George Hauser  
2575 Crestview Drive  
Newport Beach, CA 92663  
November 17, 2018

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

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2575 Crestview Drive  
Newport Beach, CA92663

**From:** Bill Hughes <whughes@hughesinv.com>  
**Sent:** Wednesday, November 21, 2018 9:12 AM  
**To:** EIR627  
**Subject:** GAIP - OC airport

November 17, 2018

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

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Land Use Manager at JWA  
3160 Airway Avenue  
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Newport Beach, CA 92660  
whughes@hughesinv.



**From:** Carolee Johnson <4carolee@cox.net>  
**Sent:** Wednesday, November 21, 2018 12:16 PM  
**To:** EIR627  
**Subject:** Emailing: airport letter-1.docx  
**Attachments:** airport letter-1.docx

Your message is ready to be sent with the following file or link attachments:  
airport letter-1.docx

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November 17, 2018

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

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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.

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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.

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Sincerely,  
Carolyn G. Johnson  
400 Villa Point Drive  
Newport Beach, CA 92660  
4carolee@cox.net

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Julie Johnson <juliestewartjohnson@gmail.com>  
**Sent:** Tuesday, November 20, 2018 7:01 PM  
**To:** EIR627  
**Cc:** Gaskins, Nikolas [JWA]  
**Subject:** GA EIR Comments to answer

November 20, 2018

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1424 serenade terrace  
cdm ca 92625

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**Sent:** Wednesday, November 21, 2018 1:14 PM  
**To:** EIR627  
**Subject:** Airport  
**Attachments:** Scan\_0006.pdf

Please find attached our signed letter.

Thank you,  
Clifton and Gail Jones

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- 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?

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.

Sincerely,

Clifton J. Jones Jr (include your name, home and email address)

GAIL@JONESINDUSTRY.COM

219 EVENING STAR  
NEWPORT BEACH, CA 92660

**From:** Jim Jordan <jimcjordan@gmail.com>  
**Sent:** Monday, November 19, 2018 10:14 PM  
**To:** EIR627  
**Subject:** Concerns about increased traffic

November 19, 2018

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

I had initially planned to write a letter to you in my own words, but could not improve on the letter below. It states my questions and concerns quite explicitly!

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.

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 hangars, 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 hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- 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.

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.

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?
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Questions:

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- 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 regard to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

James Jordan  
85 Linda Isle  
Newport Beach, CA 92660  
jimcjordan@gmail.com



**From:** Marsha Kendall <pmd81@icloud.com>  
**Sent:** Tuesday, November 20, 2018 6:23 PM  
**To:** EIR627  
**Subject:** General Aviation Program for JWA

November 20, 2018

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

First, why can’t additional time be provided for the review and comment to the DEIR?

Is the GAIP for the benefit of non resident corporate jets?

Will the GAIP result in a decrease of smaller privately owned piston-powered aircraft at JWA?

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?

Will the GAIP result in an increase of international flights to JWA via GA jet aircraft? 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.

How many GA privately owned jets will JWA be capable of handling during a 24-hour period if the GAIP is approved? What will be the economic benefit to JWA if the GAIP is approved?-hour period be established?

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.**

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.

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?

Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?

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?

**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?**

**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?**

#### **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.

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.

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? 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?

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?

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?

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?

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?

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.

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?

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?

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.

Sincerely,

Marsha and Pat Kendall

**From:** Liz Kennedy <lizkennedynb@gmail.com>  
**Sent:** Tuesday, November 20, 2018 3:28 PM  
**To:** EIR627  
**Subject:** GA Improvement Program Concerns.

November 17, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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.

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?
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- 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?
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- q. How many overnight hangers or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
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- 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).**

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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.

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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?
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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?
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- 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?

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.

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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.

Sincerely,

Ray and Elizabeth Kennedy

[lizkennedynb@gmail.com](mailto:lizkennedynb@gmail.com)

1717 Bayadere Terrace Corona del Mar

**From:** Linda Geller <linda@avacap.com>  
**Sent:** Tuesday, November 20, 2018 12:25 PM  
**To:** EIR627  
**Subject:** Regarding the General Aviation Improvement Program, for Ms. Lea Choum.  
**Attachments:** Airport Matter.pdf

From: Linda Geller Kensey  
305 East Bay Front  
Balboa Island, CA 92662-1317

[linda@avacap.com](mailto:linda@avacap.com)

November 17, 2018

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

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?
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**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.

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.

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**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.

**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?
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- 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?
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**5. Flight Patterns.**

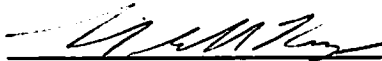
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

 \_\_\_\_\_ (include your name, home and email addresses)

*Linda Geller Kenney  
305 East Bay Front  
Belton Island, CA 92662*

*linda@avacop.com*



**From:** Mark Knaeps <mknaeps@sbcglobal.net>  
**Sent:** Tuesday, November 20, 2018 4:17 PM  
**To:** EIR627  
**Subject:** GAIP  
**Attachments:** 11.15.18 EIR Comments.pdf

Dear Ms. Choum.

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Please, read the attached.

We are very concerned about the health impacts of your GAIP.

We have lived in Dover Shores for about 30 years and feel that these type of programs violate our rights we obtained when purchasing our house.

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MK-1

Regards,

Mark Knaeps  
1127 Berkshire Lane  
Newport Beach, CA 92660

November 17, 2018

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

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Sincerely,

Mark Knaeps

1127 Berkshire Lane  
Newport Beach, CA 92660  
mknaeps@sbcglobal.net

**From:** Stacy Kramer <stacyjkramer@yahoo.com>  
**Sent:** Wednesday, November 21, 2018 4:12 PM  
**To:** EIR627  
**Subject:** NO Airport NOISE increase over our homes PLEASE!!!

November 21, 2018 Via Electronic Mail [EIR627@ocair.com](mailto: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. 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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.

\*\*\*\*\*I write you this with dark circles under my eyes and a splitting headache due to increased air traffic. We have tried earplugs, windows closed, increased insulation - but to no avail. The overhead planes vibrate our home at all hours. A decent night sleep is something we should be able to reasonably expect for our family and neighbors.

Please help reduce the noise - NOT increase it. Sincerely,

Stacy Kramer and Nathanael Singer

54 Crooked Stick

Newport Beach CA 92660

stacyjkramer@yahoo.com

**From:** Michele Lovenduski <mloven4u@gmail.com>  
**Sent:** Monday, November 19, 2018 8:56 PM  
**To:** EIR627  
**Subject:** Citizen Input to DEIR 627

November 17, 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”):

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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:

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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.

Sincerely,

Michele Lovenduski  
207 Topaz Ave  
Newport Beach CA 92662  
[Mloven4u@gmail.com](mailto:Mloven4u@gmail.com)

Sent from my iPhone

**From:** Linda <queenmom1@gmail.com>  
**Sent:** Tuesday, November 20, 2018 6:38 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** 11.15.18 EIR Comments LJM 11-20-18.pdf; 11.15.18 EIR Comments NDM 11-20-18.pdf

Please see attached letters from my daughter and myself.

Sincerely,

Linda Martin



**Linda J. Martin**  
**1312 S. Bayfront**  
**Balboa Island, California**  
**92662**

November 20, 2018

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

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

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Sincerely,

A handwritten signature in blue ink is written over a solid horizontal line. The signature is cursive and appears to read 'Linda J. Martin'.

Linda J. Martin  
1312 S. Bayfront  
Balboa Island, CA 92662  
Queenmom1@gmail.com

**Nicole D. Martin  
1312 S. Bayfront  
Balboa Island, California  
92662**

**Letter 218**

November 20, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

Sincerely,

Nicole D. Martin

Nicole D. Martin  
1312 S. Bayfront  
Balboa Island, CA 92662  
Queenmom1@gmail.com

**From:** James E. McCormick <kmccormick@kimolaw.com>  
**Sent:** Tuesday, November 20, 2018 10:32 AM  
**To:** EIR627  
**Cc:** James E. McCormick III; Alison L. McCormick; webmaster@lidoisle.org  
**Subject:** General Aviation Improvement Program--Draft Environmental Impact Rerport (SCH No. 2017031072)

November 17, 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”):

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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.

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For your information, the flight path for commercial aviation jets (and for GA flights, if the same) in Santa Ana conditions is directly over our property. Any increase in flights, commercial or GA, will directly affect us and our property in terms of noise and environmental quality of life and cannot possibly be viewed as an "improvement."

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.

Sincerely,

James E. and Alison L. McCormick III  
808 Via Lido Soud  
Newport Beach, CA 92663  
kmccormick@kimolaw.com  
Alison.mccormick@elliman.com

**From:** Manal Real Estate <manal@manalre.com>  
**Sent:** Tuesday, November 20, 2018 6:06 PM  
**To:** webmaster@lidoisle.org  
**Cc:** EIR627  
**Subject:** Re: IMMEDIATE RESPONSE NEEDED - BY TOMORROW!

---

Please answer this email (below) , and keep me informed on the answers.

Note as a homeowner in Newport Beach, I do not agree with increased (or current) airport traffic. It is not right for the El Toro marine base that was planned to be an international airport to be used as a "great park" while more pressure is put on SNA....stop.

MG-1

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Please re-read:

"...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."

MG-2

---

Any questions, feel free to contact me.

**Manal Bozarth** | Senior Associate Broker  
McMonigle Group | Results Matter  
tel [949.412.3699](tel:949.412.3699) | BRE#[01029319](https://www.sos.ca.gov/real-estate/bre/#01029319)  
[M Group](#) | [M Mag](#) | [Meet Manal](#)

[What is my Home Worth?](#)

On Nov 20, 2018, at 10:10 AM, Lido Isle Community Association <[webmaster@lidoisle.org](mailto:webmaster@lidoisle.org)> wrote:

November 17, 2018

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

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



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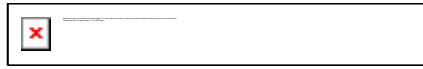
Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

[Unsubscribe manal@manalre.com](mailto:manal@manalre.com)

[Update Profile](#) | [About our service provider](#)

Sent by [webmaster@lidoisle.org](mailto:webmaster@lidoisle.org) in collaboration with



Try it free today

**From:** John Meindl <jmeindl@meindllaw.com>  
**Sent:** Wednesday, November 21, 2018 12:24 PM  
**To:** EIR627  
**Subject:** GAIP  
**Attachments:** 2018-11-21 121927.pdf

Ms Choum – Please see attached public comment.

**John M. Meindl**  
Law Office of John M. Meindl  
4675 MacArthur Court  
Suite 550  
Newport Beach, CA 92660  
949-679-8370  
jmeindl@meindllaw.com

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

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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.

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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.

Sincerely,



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(include your name, home and email addresses

1

John Meindl  
1957 Vista Caudal  
Newport Beach CA 92660  
jmeindl@meindl.com

**From:** Susan Lee <susanlee404@gmail.com>  
**Sent:** Tuesday, November 20, 2018 10:57 AM  
**To:** EIR627  
**Subject:** comments on GAIP  
**Attachments:** 11.15.18 EIR Comments.pages

the attached letter represents my thoughts/comments on GAIP.

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as a 30-year resident of the bluffs, which is directly under the departure path, we have already experienced a drastic increase in noise and pollution due to implementation of NextGen. these concerns have not yet been addressed. please DO NOT inflict any more noise or health/safety issues on residents of newport beach in the interest of generating more income for JWA.

---

SM-1

thank you,

susan menning

November 17, 2018

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

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Sincerely,

Susan Menning  
404 Vista Flora (right under the departure path)  
NB 92660  
(949) 640-1516

**From:** Whitney Moad <whitneymcgovern@gmail.com>  
**Sent:** Tuesday, November 20, 2018 1:20 PM  
**To:** EIR627  
**Subject:** Draft Environmental Impact Report  
**Attachments:** EIR.pdf

Hello,

Please see the attached correspondence.

Best,  
Whitney Moad

November 17, 2018

Via Electronic Mail  
EIR627@oçair.com

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

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Sincerely,

A handwritten signature in blue ink that reads "Whitney Moad" with a long horizontal stroke extending to the right.

Whitney Moad  
4316 Shorecrest Lane  
Corona del Mar, CA 92625  
619-587-4826  
whitneymcgovern@gmail.com

**From:** Beverly Blais <bblaisesq@gmail.com>  
**Sent:** Monday, November 19, 2018 5:37 PM  
**To:** EIR627  
**Subject:** Comments to General Aviation Improvement Plan Draft EIR  
**Attachments:** 11.15.18 EIR Comments.docx

Dear Ms. Lea Choum:

Attached please find my comments to the GAIP Draft EIR.

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](mailto: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”):

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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.

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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.

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.

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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.

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Sincerely,

Beverly Moosmann

**From:** Robert Moosmann <bobmoosmann@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 10:02 AM  
**To:** EIR627  
**Subject:** EIR Question regarding GAIP

November 17, 2018

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Bob Moosmann  
544 Vista Grande  
Newport Beach, CA 92660

Bobmoosmann@yahoo.com

**From:** Robert Murphy <robertmurphe@aol.com>  
**Sent:** Tuesday, November 20, 2018 10:32 AM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments.docx  
**Attachments:** 11.15.18 EIR Comments.docx; ATT00001.txt

Please consider the attached comments and questions.

Respectively

Home Owner:  
Robert H. Murphy  
1014 Polaris Drive  
Newport Beach, Ca  
92660

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

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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.

Sincerely,

\_\_\_\_\_ (include your name, home and email address)

**From:** sales@nauticalluxuries.com  
**Sent:** Tuesday, November 20, 2018 11:11 AM  
**To:** EIR627  
**Subject:** Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

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

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Sincerely,

Daisy Cathcart  
101 Via Lido Nord  
Newport Beach, CA 92663  
[chasingjones@gmail.com](mailto:chasingjones@gmail.com)

## NAUTICAL LUXURIES ~ EQUINE LUXURIES

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TEL: (949)419-6686 FAX: (949)419-6641  
EMAIL: Sales@NauticalLuxuries.com  
[www.NauticalLuxuries.com](http://www.NauticalLuxuries.com)  
[www.EquineLuxuries.com](http://www.EquineLuxuries.com)

**From:** Dave New <dave1@basinmarine.com>  
**Sent:** Thursday, November 22, 2018 8:30 AM  
**To:** EIR627  
**Cc:** 'Jan New'  
**Subject:** DEIR  
**Attachments:** GAIP.pdf

Dear Ms. Choum:  
Please see attached, thank you very much  
Dave & Jan New

November 20, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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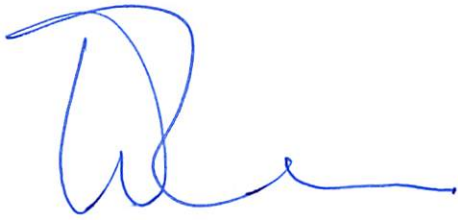
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Sincerely,



David + Jen New

304 Morning Star Lane

Newport Beach CA 92660

949-722-1700

Dave I @ Basinmarine.com

Jen E New 123 @ gmail.com



**From:** Randall Nunnely <nunnely1817@gmail.com>  
**Sent:** Tuesday, November 20, 2018 8:22 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program  
**Attachments:** Gen Aviation Imp.pdf

Ms. Choum:

Please see the attached letter.

November 17, 2018

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

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

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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.

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?
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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.

Sincerely,



*Carol Nunnelly*

Randall Nunnelly  
Carol Nunnelly  
1100 Santiago Dr.  
Newport Beach, CA 92660

**From:** Carey O'Bryan <careyobryan@newportheart.com>  
**Sent:** Tuesday, November 20, 2018 1:17 PM  
**To:** EIR627  
**Subject:** Concerns

November 17, 2018 Via Electronic Mail [EIR627@ocair.com](mailto: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”):

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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. 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? 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*Carey L. O'Bryan IV, MD*

Newport Heart Medical Group

415 Old Newport Blvd, Suite 200

Newport Beach, CA 92663

Phone: (949) 548-9611

Fax: (949) 548-9958

[careyobryan@newportheart.com](mailto:careyobryan@newportheart.com)

[www.newportheart.com](http://www.newportheart.com)

**From:** Margo O'Connor <margo949@icloud.com>  
**Sent:** Tuesday, November 20, 2018 11:23 AM  
**To:** EIR627  
**Subject:** Increased Noise and Air Pollution  
**Attachments:** 11.15.18 EIR Comments.docx

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Dear Ms. Choum:

I have been a resident of Newport Beach for more than 20 years and I am very concerned about the ever increasing Noise and Pollution from jet aircraft flying over my residence. The proposed GAIP is no "improvement" to those of us residing in this city as the larger private aircraft would not be subject to the present curfew. It makes a bad situation worse!!

MO-1

I agree with all the concerns voiced in the attached letter sent to you by another concerned citizen.

Please keep me informed as to future developments.

---

Thank you,  
Margo O'Connor  
90 Linda Isle  
Newport Beach, CA 92660  
moconn949@gmail.com

Sent from my iPad

November 17, 2018

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

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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”):

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Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** annhafeyo@aol.com  
**Sent:** Wednesday, November 21, 2018 4:24 PM  
**To:** EIR627  
**Subject:** GAIP-DEIR SCH#2017031072

Please consider my letter as it relates to the GAIP-DEIR.

November 20, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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- 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?
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- d. Why wasn't the negative impact of an additional 5-10% noise generating Back Bay departure patterns by 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 could replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
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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 elevated cancer risk. Similarly, research studies have concluded that the adverse health effects from airport pollution are present within 10 miles of an airport. There are thousands of children in schools within 10 miles from the JWA departure paths and thousands of people who live under the flight paths.

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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 in close proximity and under the flight paths of JWA? If the impact on these populations has not been considered, why not?
- b. Although noise is discussed in the Sensitive Receptors section of the DEIR and its impact on schools, why isn’t an in-depth discussion of health concerns, especially as they relate to children, included?
- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within close proximity of airports? With the eight communities located within 10 miles of JWA? What were the findings on the specific communities?
- d. What is the true net increase in pollutants from the new aircraft population departures from JWA as the fuel mix 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?

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## 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.

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

Sincerely,

Ann O'Neil  
1101 Granville Drive  
Newport Beach, CA  
92660

**From:** Bonnie O'Neil <boneilseven@gmail.com>  
**Sent:** Tuesday, November 20, 2018 11:51 AM  
**To:** EIR627  
**Subject:** Aviation Improvement Program

November 17, 2018

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

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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.

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

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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?
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Sincerely,

Bonnie and Dan O’Neil  
 314 Morning Star  
 Newport Beach  
[boneil@me.com](mailto:boneil@me.com) and [dan@oneilstorage.com](mailto:dan@oneilstorage.com)

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Firooz Oskooi <froskooi@att.net>  
**Sent:** Wednesday, November 21, 2018 10:51 AM  
**To:** EIR627  
**Subject:** John Wayne Airport

November 21, 2018

Via Electronic Mail

EIR627@ocair.com

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

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Sincerely,

Firooz R Oskooi, M.D.

1945 Santiago Dr., Newport Beach, CA

92660 \_\_\_\_\_ (include your name, home and email addresses)



**From:** Peggy Palmer <pvpalmer@icloud.com>  
**Sent:** Tuesday, November 20, 2018 12:07 PM  
**To:** EIR627  
**Subject:** JWA Expansion - Two Signatures Opposing Plan  
**Attachments:** Scan 2018-11-20 12.04.29.pdf

Ms. Lea Choum,

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Peggy & Michael Palmer oppose the expansion of larger aircraft, we can no tolerate any more noise, pollution and health issues impacting our children, schools and neighborhoods.

---

PMP-1

Thank you for your time,

Peggy & Michael Palmer  
1701 Kings Road  
Newport Beach, CA 92663

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.

Sincerely, *Peggy V. Palmer*

*1701 Kings Rd.* (include your name, home and email addresses

*Newport Beach, CA 92663*

*pvpalmer@icloud.com*

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.

Sincerely, *Michael Palmer*

*1701 Kings Rd* (include your name, home and email addresses

*Newport Beach, CA*

*92663*

*MC Palmer@me.com*

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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**From:** Jon B. Patton <jonbpatt@gmail.com>  
**Sent:** Tuesday, November 20, 2018 11:07 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 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:

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Sincerely,

Jon B. Patton  
36 Cormorant Circle  
Newport Beach, CA 92660

**From:** William Patton <WRPatton@pacificnewport.com>  
**Sent:** Wednesday, November 21, 2018 2:40 PM  
**To:** EIR627  
**Subject:** Proposed New Development at John Wayne Airport  
**Attachments:** WRP North Star.doc

Dear Ms. **Ms. Choum**:

Please see the attached signed letter.

Thank you,

*Bill Patton*

William R. Patton  
**301 North Star Lane**  
**Newport Beach, CA 92660**  
Email: billpatton@aol.com  
Cell: 714.321.0000

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## William R. Patton

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301 North Star Lane  
Newport Beach, CA 92660

November 21, 2018

Page 1 of 4

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

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

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**301 North Star Lane, Newport Beach, CA 92660**  
**Cell: 714-321-0000; email: billpatton@aol.com**

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**From:** William Patton <WRPatton@pacificnewport.com>  
**Sent:** Wednesday, November 21, 2018 2:45 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** Patton Airport Letter 11-21-18.pdf

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*Bill Patton*

William R. Patton  
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# William R. Patton

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

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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.

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?

**301 North Star Lane, Newport Beach, CA 92660**  
**Cell: 714-321-0000; email: billpatton@aol.com**

- 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?
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- j. 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?
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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.

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#### 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.

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?

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5. Flight Patterns.

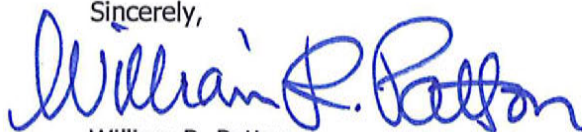
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices in regards to the GAIP and the Notice of Availability of the Final EIR.

Sincerely,



William R. Patton  
301 North Star Lane, Newport Beach, CA 92660  
[billpatton@aol.com](mailto:billpatton@aol.com)

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**From:** Lorian Petry <lorianpetry@hotmail.com>  
**Sent:** Tuesday, November 20, 2018 4:49 PM  
**To:** EIR627  
**Subject:** GAIP-DEIR SCH#2017031072  
**Attachments:** 11-20-18 EIR Comments - Corporate Jet Hangars.docx

Dear Ms. Choum,

Please consider my letter (attached) as it relates to the GAIP-DEIR.

Thank you,

Lorian Petry



November 20, 2018

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

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

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(SCH No. 2017031072)

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Sincerely,

Lorian K. Petry  
1239 Bayside Drive  
Corona del Mar, CA 92625  
949-721-1922

**From:** Darcy Post <darcypost@gmail.com>  
**Sent:** Tuesday, November 20, 2018 7:29 AM  
**To:** EIR627  
**Subject:** JWA proposal  
**Attachments:** 11.15.18 EIR Comment Letter.pdf

Hello Ms. Choum.  
Please see the attached letter as a response to your Nov 21 deadline.  
Thank you,  
Darcy Post

**Darcy Post**  
newport beach, california  
949.395.9566

November 20, 2018

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

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

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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.

Sincerely,

Name: Darcy Post

E-mail: darcypost@gmail.com

Home Address: 2 Hampshire Court, Newport Beach, CA 92660



**From:** Ned Post <ned@nedtpost.com>  
**Sent:** Tuesday, November 20, 2018 11:44 AM  
**To:** EIR627  
**Subject:** Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

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

**When is the greed going to stop.** JWA should serve the residents of Orange County in a non-intrusive manner that preserves the lifestyle, health and comfort the residents expect and deserve. JWA should serve the residents who live here and not the companies or corporate entities based here. We, the residents, are already paying a small fortune for this privilege by way of, what all believe to be, outrageous county taxes.

ETP-1

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”):

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Sincerely,

Edward T. Post  
2 Hampshire Ct.  
Newport Beach, CA  
92660

[ned@nedTpost.com](mailto:ned@nedTpost.com)  
*cell: 208-720-0695*



**From:** Prasad Photography <prasadportraits@gmail.com>  
**Sent:** Tuesday, November 20, 2018 1:50 PM  
**To:** EIR627  
**Subject:** John Wayne Airport

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)

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Warmly,

Nrapendra Prasad

340 Cherry Tree Lane,

Newport Beach, CA 92660

[info@prasadphoto.com](mailto:info@prasadphoto.com)

**From:** Janet Probst <janethprobst@gmail.com>  
**Sent:** Tuesday, November 20, 2018 2:14 PM  
**To:** EIR627  
**Subject:** GAIP Draft EIR - SCH No. 2017031072  
**Attachments:** img203.pdf

Dear Ms. Choum,

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Attached is a detailed list of concerns and questions regarding the GAIP EIR draft. The contents of this letter are of major concern to the residence who live under current JWA flight pattern and live in close proximity to the airport and need to be addressed by the County.

It appears from the EIR that the County is completely ignoring the noise, health, and safety of the residence who live under and near the flights taking-off from and landing at JWA. This cannot happen. JP-1

Looking forward to hearing from you.

---

Sincerely,  
Janet H. Probst  
1984 Vista Caudal  
Newport Beach. CA 92660

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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Sincerely,

A handwritten signature in cursive script, appearing to read "Janet H. Probst". The signature is written in black ink and is positioned above the typed name.

Janet H. Probst, Esq.  
1984 Vista Caudal  
Newport Beach, CA 92660

**From:** Stephanie Rados <l8bloomr@roadrunner.com>  
**Sent:** Tuesday, November 20, 2018 7:32 PM  
**To:** EIR627  
**Subject:** SCH No.2017031072

November 17, 2018

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

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

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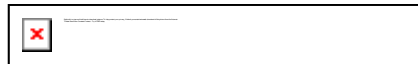
Stephanie, Steve, Lauren and Chase Rados  
661 Via Lido Soud  
Newport Beach, CA 92663

Lido Isle Community Association | 701 Via Lido Soud, Editor, Lido Islander, Newport Beach, CA 92663

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**From:** RG ltd <rg@ransomgroupltd.com>  
**Sent:** Wednesday, November 21, 2018 12:55 PM  
**To:** EIR627  
**Subject:** New EIR Changes-John Wayne Airport re: Private aircraft flight restrictions, pollution, noise  
**Attachments:** Ms Lea Choum-John Wayne Airport EIR Comments.docx

November 21, 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)

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Dale Ransom  
Board of Directors, Bayview Terrace  
Chair, Architectural Review Committee, Bayview Terrace  
62 Cormorant Circle  
Newport Beach, CA. 92660  
rg@ransomgrouppltd.com

**From:** Gail Reisman <gailreisman@hotmail.com>  
**Sent:** Tuesday, November 20, 2018 5:00 PM  
**To:** EIR627  
**Subject:** Aviation Improvement Program

November 17, 2018

Via Electronic Mail  
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Land Use Manager at JWA  
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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.

Sincerely,  
Drs. Gail and Sorel Reisman  
112 Via Havre  
Lido Isle

**From:** Nicole Reynolds <nfreyolds@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 7:43 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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:

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Sincerely,

Nicole F Reynolds

1509 Dolphin Terrace

Corona del Mar, CA 92625

(949) 466-9551

**From:** Gmail <catherinerichards234@gmail.com>  
**Sent:** Tuesday, November 20, 2018 12:51 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 20, 2018

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[EIR627@ocair.com](mailto:EIR627@ocair.com)

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Land Use Manager at JWA  
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Costa Mesa, CA 92626

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Catherine Richards  
2562 Fairway Drive  
Costa Mesa, CA 92627  
[Richardsclan@sbcglobal.net](mailto:Richardsclan@sbcglobal.net)

Sent from my iPhone

**From:** Janni Richardson <jsrv@sbcglobal.net>  
**Sent:** Tuesday, November 20, 2018 3:45 PM  
**To:** EIR627  
**Subject:** Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

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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; I await your response!

Sincerely,

Janni Richardson  
714.310.4664

**From:** GINNY RILEY <griley145@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 11:34 AM  
**To:** EIR627  
**Subject:** Airport  
**Attachments:** 11.15.18 EIR Comments.docx

November 17, 2018

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

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Ginny Riley  
1529 Dolphin Terrace  
Corona del Mar, CA 92625

griley145@yahoo.com\_\_\_\_\_ (include your name,  
home and email addresses

**From:** Vicki Ronaldson <v.ronaldson@gmail.com>  
**Sent:** Wednesday, November 21, 2018 8:30 AM  
**To:** EIR627  
**Subject:** my comments

November 21, 2018

Via Electronic Mail

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Land Use Manager at JWA  
[3160 Airway Avenue](#)  
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Sincerely,

Vicki and Don Ronaldson  
506 San Bernardino Ave  
NB CA 92663

[v.ronaldson@gmail.com](mailto:v.ronaldson@gmail.com)  
[sallybeardog@gmail.com](mailto:sallybeardog@gmail.com)

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**vicki**

**949-933-2332c**

**From:** Paul Root <paul@madisonstreetpartners.net>  
**Sent:** Wednesday, November 21, 2018 10:45 AM  
**To:** EIR627  
**Subject:** JWA  
**Attachments:** JWA.pdf

Dear Ms. Choum-

Please see the attached letter in reference to the recent proposition regarding JWA.

Thank you,

Paul

**Paul Root** Partner Lic. 01250765  
MADISON STREET PARTNERS Broker Lic. 01478228  
4100 MacArthur Boulevard, Suite 350 | Newport Beach, CA 92660  
T 949 468 2243 | F 949 585 9866 | C 949 874 5698  
[paul@mस्पcre.com](mailto:paul@mस्पcre.com) | [www.mस्पcre.com](http://www.mस्पcre.com)

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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.

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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.



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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.

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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?
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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.

Sincerely,

A handwritten signature in black ink, appearing to read 'PR', with a long horizontal line extending to the right.

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Paul Root  
341 Riviera Drive  
Costa Mesa, CA 92627

**From:** John Carlos Rowe <johnrowe@usc.edu>  
**Sent:** Tuesday, November 20, 2018 4:21 PM  
**To:** EIR627  
**Subject:** Letter concerning General Aviation Plan at JWA  
**Attachments:** 11 15 18 EIR Comments.docx

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Our letter protesting the draft EIR and the General Aviation Plan is attached. Please take special note of the first paragraph, which differs from the other letters you will receive. Thank you, John and Kristin Rowe, 700 Kings Rd., Newport Beach, CA 92663.

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JKR-1

November 17, 2018

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

We are sharing a letter drafted on behalf of our community in protest of the proposed General Aviation Improvement Program, but we want to add personal observations about the air pollution in our neighborhood, Kings Road, Newport Beach 92663. As residents on this street for fourteen years, we have observed regular pollution from jet fuel that adheres to our decks, driveways, and other outdoor surfaces. This pollution is not the same as what is associated with automobile and truck traffic. It is a sticky substance that adheres to surfaces, rather than the black, carbon-like material identifiable with the exhaust from vehicles. Never does this form of air pollution get recognized in Environmental Impact Reports, and every effort we have made to bring such pollution to the attention of the local press and governments have been ignored. It is real, and we are sure it is a carcinogen. We wish to add our voices to our neighbors' protests of this hastily drafted and incomplete EIR, and we want to note specifically the importance of considering the direct pollution of incomplete jet fuel combustion and its negative impact on the lives of residents living in the paths of commercial airliners arriving and departing JWA. Please take this complaint seriously; the pollution is real and specific to the operation of airplanes.

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Sincerely,

John C. and Kristin H. Rowe  
700 Kings Rd.  
Newport Beach, CA 92663

**From:** Elisabeth Schutz <esopbetsy@gmail.com>  
**Sent:** Wednesday, November 21, 2018 6:18 PM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments.docx  
**Attachments:** 11.15.18 EIR Comments.docx; ATT00001.txt

Hello, Anita

My husband and I approve of this letter. We are out of town and unable to sign it, but please consider this message our approval.

Thank you,

Elisabeth and Andrew Schutz  
69 Old Course Drive  
Newport Beach, CA 92660  
949 219-0093  
schutz@sbcglobal.net

November 17, 2018

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

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

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(SCH No. 2017031072)

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- 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?
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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.

Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Christina Schwindt <christina.schwindt@yahoo.com>  
**Sent:** Tuesday, November 20, 2018 10:53 AM  
**To:** EIR627  
**Subject:** Opposition to Airport Expansion  
**Attachments:** Opposition to Airport Expansion.pdf

Dear Ms. Choum,

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Please find attached my letter opposing the expansion of John Wayne Airport.

CS-1

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Sincerely,  
Christina Schwindt

November 17, 2018

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

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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.

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Christina Schwindt  
629 Vista Bonita  
Newport Beach, CA 92660  
(949) 903-9089  
Christina.Schwindt@yahoo.com

**From:** John Sciarra <johnsciarraca@gmail.com>  
**Sent:** Tuesday, November 20, 2018 10:51 AM  
**To:** EIR627  
**Subject:** JWA / Airport  
**Attachments:** Ronnie Airport.jpg; Ronnie Airport1.jpg; Ronnie Airport2.jpg; Ronnie Air.jpg; Ronnie Air1.jpg; Ronnie Air2.jpg

Dear Ms. Choum: Please see very import attachments. Thank you.  
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November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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Sincerely,

Mr. & Mrs. John M. Scania (include your name, home and email address)

4104 MORNING STAR LANE  
NEWPORT BEACH, CA, 92660

**From:** Matthew Shaw <mjshaw07@gmail.com>  
**Sent:** Tuesday, November 20, 2018 10:35 AM  
**To:** EIR627  
**Subject:** EIR - JWA  
**Attachments:** 11.15.18 EIR Comments letter.docx

**Dear Ms. Choum - please see the attached letter.**

**Matthew Shaw  
Newport Beach, CA**

November 17, 2018

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

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

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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.

Sincerely,

Matthew Shaw, 1600 Anita Lane, Newport Beach – mjshaw07@gmail.com



**From:** Terry Shea <ctsoilandgas@earthlink.net>  
**Sent:** Tuesday, November 20, 2018 4:25 PM  
**To:** EIR627  
**Attachments:** 11.15.18 EIR Comments.docx

See attached,

Thanks,  
Terry P Shea

**Coastal Technical Sales, LLC**  
**Office Phone # 949-515-9101**  
**Cell Phone # 714-299-8210**  
**Fax # 949-515-9123**

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November 17, 2018

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

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*Terry P. Shea*

\_\_\_\_\_ (include your name, home and email)

Terry. Patrick Shea

Addresses: 471 Walnut Place, Costa Mesa, Ca. 92627

Email: ctsoilandgas@earthlink.net



November 17, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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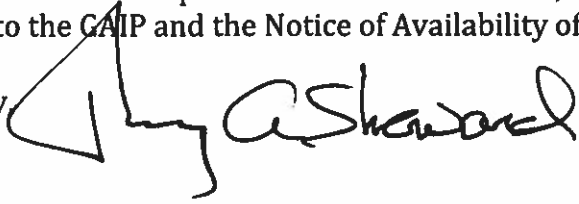
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Terry A. Sheward (include your name, home and email addresses)

1231 Bayside Dr  
Carmel del Mar, CA 92625

terry@shewards.com

**From:** Carrie Slayback <carrieslayback@gmail.com>  
**Sent:** Wednesday, November 21, 2018 12:19 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

November 21, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

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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.

Sincerely, Carrie Slayback

[carrieslayback@gmail.com](mailto:carrieslayback@gmail.com)

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Brad Smith <bradsmith406@outlook.com>  
**Sent:** Tuesday, November 20, 2018 10:44 AM  
**To:** EIR627  
**Subject:** RE: GAIP-Draft Environmental Impact Report (SCH No. 2017031072)

November 17, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto: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”):

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Sincerely,

**Brad Smith, 132 Via Waziers, Newport Beach, CA 92663**

**From:** Greg Smith <gmsmith10@gmail.com>  
**Sent:** Wednesday, November 21, 2018 11:13 AM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments  
**Attachments:** 11.15.18 EIR Comments.pdf

Hello Ms Choum,

We are located in East Bluff and are significantly impacted by the aircraft noise... Unfairly I/we might add as they continue to fly either far to one side of the bay or, recently, overhead directly.

Please review my document and comment

Best Regards,  
Gregory M Smith

November 17, 2018

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

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

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(SCH No. 2017031072)

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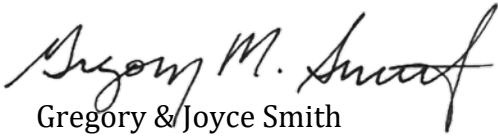
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Sincerely,

A handwritten signature in black ink that reads "Gregory M. Smith". The signature is written in a cursive style with a large, sweeping initial 'G'.

Gregory & Joyce Smith  
2142 Vista Dorado  
Newport Beach, CA 92660

[Gmsmith10@gmail.com](mailto:Gmsmith10@gmail.com)

714-743-2438

**From:** Marion Smith <newportmarion@hotmail.com>  
**Sent:** Tuesday, November 20, 2018 8:13 PM  
**To:** EIR627  
**Subject:** John Wayne Airport Aviation study  
**Attachments:** John Wayne Airport Aviation study.docx

---

Letting non commercial flights/ general aviation utilize JWA at any time of the day and night will impact the neighborhoods.

We are NOT in agreement for this to be approved in the city of Newport Beach or flying over residential properties.  
Please do more study on this. Kindly, Ms Smith

---

MS-1

November 17, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
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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.

Sincerely, Marion Smith

110 Via Quito, Newport Beach, Lido Isle  
92663

\_\_\_\_\_ (include your name, home and email  
addresses

**From:** Alan Ayria <alanayria@yahoo.com>  
**Sent:** Wednesday, November 21, 2018 8:49 AM  
**To:** EIR627  
**Cc:** Goli Soulati; Fraidoun Soulati  
**Subject:** JWA EIR commnets  
**Attachments:** Letter to JWA Land Use Mgr re Comments on EIR.21Nov2018.docx

Please see attached letter

November 20, 2018

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

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

Re: General Aviation Improvement Program – Draft EIR (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”):

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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.

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Dr. F Soulati and Mrs. G. Soulati  
328 Vista Trucha, 000 Vista Cajon, NB 92660; [gsoulati@yahoo.com](mailto:gsoulati@yahoo.com)



**From:** Tracy Specter <tracyelmer@yahoo.com>  
**Sent:** Wednesday, November 21, 2018 5:40 AM  
**To:** EIR627  
**Subject:** Airplane noise, curfew, pollution

November 17, 2018

Via Electronic Mail  
EIR627@ocair.com

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

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Tracy Specter

2515 Blackthorn St.  
Newport Beach, CA 92660

[tracyelmer@yahoo.com](mailto:tracyelmer@yahoo.com)

Sent from my iPhone

**From:** Lisa Stanton <lisabstanton@gmail.com>  
**Sent:** Tuesday, November 20, 2018 1:28 PM  
**To:** EIR627  
**Subject:** Resident Comments, DEIR, GAIP

November 20, 2018

Via Electronic Mail  
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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”):

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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.

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

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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

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- 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?
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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.

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.

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- b. Is an increase in GA jet aircraft nighttime arrivals and departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
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**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.

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?
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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.

Sincerely,

**Lisa Stanton**

2692 Circle Drive

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Newport Beach, CA 92663

Sent from my iPhone

**From:** jpstavale@aol.com  
**Sent:** Tuesday, November 20, 2018 7:38 AM  
**To:** EIR627  
**Subject:** JWA - Airport Noise  
**Attachments:** Aviation Letter.pdf

Please read attached and respond.

Thank you,  
Joani Stavale  
23 Canyon Crest Dr.  
92625

November 17, 2018

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

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Land Use Manager at JWA  
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Sincerely,

JOAN F. STAVALE

*JF Stavale*

addresses

(include your name, home and email

23 Canyon Crest Dr.  
Corona del Mar, CA

92625

*jfstavale@aol.com*

NOV. 20, 2018

**From:** Louis Stavale <ljstavale@aol.com>  
**Sent:** Tuesday, November 20, 2018 9:07 AM  
**To:** EIR627  
**Cc:** William O'Neill  
**Subject:** Please Listen  
**Attachments:** scan.pdf

November 20, 2018

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Land Use Manager at JWA

3160 Airway Avenue

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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.

Sincerely,

Louis J Stavale

23 Canyon Crest Drive

Corona Del Mar, CA 92625

[ljstavale@aol.com](mailto:ljstavale@aol.com)

(949) 355-1992

November 17, 2018

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

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23 Canyon Crest Drive  
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[lstavale@cox.net](mailto:lstavale@cox.net)  
(949) 355-1992

**From:** Julie Stephenson <julie4re@roadrunner.com>  
**Sent:** Wednesday, November 21, 2018 3:02 PM  
**To:** EIR627  
**Subject:** Fw: New Development at John Wayne Airport  
**Attachments:** 11.15.18 EIR Comments.docx

See attached signed petition



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)

November 17, 2018

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

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\_\_\_\_\_ (include your name, home and email addresses)

**From:** Rick Strack <rick.strack@gmail.com>  
**Sent:** Tuesday, November 20, 2018 11:09 AM  
**To:** EIR627  
**Subject:** Environmental Impact Report  
**Attachments:** 11.15.18 EIR Comments (1).docx

Please see attached letter.

Thank You  
Rick Strack  
949/ 697-2610  
[rick.strack@gmail.com](mailto:rick.strack@gmail.com)

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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.

Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Rick Strack <rick.strack@gmail.com>  
**Sent:** Tuesday, November 20, 2018 11:13 AM  
**To:** EIR627  
**Subject:** Environmental Impact Report  
**Attachments:** 11.15.18 EIR Comments.docx

Please see attached letter. Thank You.

Rick Strack

949/ 697-2610

[rick.strack@gmail.com](mailto:rick.strack@gmail.com)

CalBRE License # 00579544

November 17, 2018

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

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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”):

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Richard D. Strack  
2005 Baja  
Newport Beach, CA 92660

[rick.strack@gmail.com](mailto:rick.strack@gmail.com)

**From:** Louise Stuart <lstuart@stuart-davis.net>  
**Sent:** Monday, November 19, 2018 8:35 PM  
**To:** EIR627  
**Subject:** Draft Environmental Impact Report 627 for the GAIP  
**Attachments:** 11.15.18 EIR Comments.pdf

Please see attached regarding our concerns in connection with the Draft Environmental Impact Report 627 for the GAIP.

Thank you for your consideration.

Louise J. Stuart  
Craig S. Davis

November 19, 2018

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

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Sincerely,

Louise J. Stuart  
Craig S. Davis  
554 Vista Flora  
Newport Beach CA 92660  
[lstuart@stuart-davis.net](mailto:lstuart@stuart-davis.net)

**From:** Vikki Swanson <vikki@vikkiswanson.com>  
**Sent:** Wednesday, November 21, 2018 1:56 PM  
**To:** EIR627  
**Subject:** JWA Private Jet craft EIR comments  
**Attachments:** Swanson 11 15 18 EIR Comments.docx

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Please see attached comments re: the EIR regarding the proposed changes to the rules pertaining to private jets at JWA. VS-1

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-Vikki Swanson

419 Marguerite Ave  
Corona del Mar, CA 92625

November 17, 2018

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

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Land Use Manager at JWA  
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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.

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.

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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.

Obviously this is a pre-written letter. I have read the letter above and while I have not taken the time to read the EIR in its entirety, I can say that the letter echos my sentiments on this issue.

Sincerely,

*Vikki Swanson*

[vikki@vikkiswanson.com](mailto:vikki@vikkiswanson.com)



**From:** Shannon Tarnutzer <smtarnutzer@gmail.com>  
**Sent:** Tuesday, November 20, 2018 4:29 PM  
**To:** EIR627  
**Cc:** Pfg1941@gmail.com  
**Subject:** JWA Aircraft Noise Letter  
**Attachments:** OC Airport.pdf

Dear Ms. Choum,

Attached please find a letter regarding the airport noise.

Shannon Tarnutzer  
[smtarnutzer@gmail.com](mailto:smtarnutzer@gmail.com)  
949-939-1557 cell

November 17, 2018

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

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**From:** Karen Taylor <ktaylor01@roadrunner.com>  
**Sent:** Wednesday, November 21, 2018 2:50 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

November 17, 2018

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

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Sincerely,

Karen Taylor  
 1100 Devon Lane  
 Newport Beach, CA 92660  
 ktaylor01@roadrunner.com



**From:** Elizabeth Thamer <elizabeth.thamer@gmail.com>  
**Sent:** Wednesday, November 21, 2018 7:14 PM  
**To:** EIR627  
**Subject:** John Wayne Airport Proposed Changes  
**Attachments:** 11.15.18 EIR Comments.pdf

For your consideration!

Elizabeth Thamer

--

Elizabeth Thamer REAL ESTATE PROFESSIONAL [elizabeth.thamer@gmail.com](mailto:elizabeth.thamer@gmail.com) M. 949.433.5011 T. 949.698.1323 F. 949.698.1322 VILLA REAL ESTATE 450 NEWPORT CENTER DRIVE, SUITE 100 NEWPORT BEACH, CA 92660  
[VILLAREALESTATE.COM](http://VILLAREALESTATE.COM) CAL BRE No. 01169245

November 17, 2018

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

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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?
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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.

Sincerely,



\_\_\_\_\_ (include your name, home and email address)

Elizabeth Thamer  
351 Vista Madera  
Newport Beach, CA 92660

**From:** Laura Thomson <Nbjacks@aol.com>  
**Sent:** Tuesday, November 20, 2018 1:13 PM  
**To:** EIR627  
**Subject:** DEIR

Sent from my iPhone Laura

November 17, 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”):

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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.

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Sincerely,

Laura Thomson  
[Nbjacks@aol.com](mailto:Nbjacks@aol.com)  
853 Via Lido Soud  
Newport Beach, CA 92663

**From:** Shelly Trainor (via Google Docs) <mathtrainor@gmail.com>  
**Sent:** Wednesday, November 21, 2018 11:06 AM  
**To:** EIR627  
**Subject:** 11.15.18 EIR Comments

mathtrainor@gmail.com has shared a link to the following document:



11.15.18 EIR Comments

[Open in Docs](#)

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



November 21, 2018

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

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Shelly Trainor  
202 Pearl Ave  
Newport Beach, CA 92662  
d4md4m@gmail.com

**From:** S Trainor <d4md4m@gmail.com>  
**Sent:** Wednesday, November 21, 2018 11:06 AM  
**To:** EIR627  
**Subject:** EIR Comments

 [11.15.18 EIR Comments](#)

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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.

Sincerely,

Shelly Trainor  
202 Pearl Ave  
Newport Beach, CA 92662  
d4md4m@gmail.com

**From:** QueenMom <queenmom@the-castle.net>  
**Sent:** Tuesday, November 20, 2018 6:45 AM  
**To:** EIR627  
**Subject:** Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)  
**Attachments:** 11.15.18 EIR Comments FV 11-20-18.pdf

Please see attached letter.

Sincerely,

Fini Van Natta

*Fini Van Natta*  
*902 S. Bayfront*  
*Balboa Island, California*  
*92662*

November 20, 2018

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

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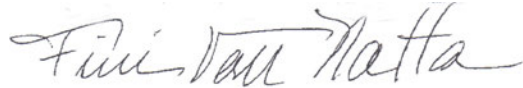
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---

Fini Van Natta  
902 S. Bayfront  
Balboa Island, CA 92662  
Queenmom@the-castle.net



**From:** Earl Votolato <earlv@spellboundinc.com>  
**Sent:** Wednesday, November 21, 2018 8:22 AM  
**To:** EIR627  
**Subject:** EIR627 letter- please respond

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)

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Earl Votolato. 2908 Cliff Dr, Newport Beach, Ca 92663. [Earlv@sbcglobal.net](mailto:Earlv@sbcglobal.net)<mailto:Earlv@sbcglobal.net>  
\_\_\_\_\_ (include your name, home and email addresses)

**From:** Kimberly Votolato <votolato01@sbcglobal.net>  
**Sent:** Wednesday, November 21, 2018 8:55 AM  
**To:** EIR627  
**Subject:** EIR627 please address all questions

Ms. Lea Choum

Land Use Manager at JWA  
3160 Airway Avenue  
Costa Mesa, CA 92626

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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.

Sincerely

Kimberly Votolato

Email me or send answers via mail. [votolato01@sbcglobal.net](mailto:votolato01@sbcglobal.net)

Address

2908 Cliff Dr

Newport Beach, Ca 92663

**From:** Ronnie Weinstein <ronnie\_weinstein@comcast.net>  
**Sent:** Tuesday, November 20, 2018 10:28 PM  
**To:** EIR627  
**Subject:** GAIP  
**Attachments:** 11.15.18 EIR Comments.docx

November 17, 2018

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

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Sincerely,

Ronnie & Cathy Weinstein  
505 Evening Star Lane  
Newport Beach, CA 92660

Ronnie\_weinstein@comcast.net

**From:** Portia Weiss <portiaweiss@gmail.com>  
**Sent:** Tuesday, November 20, 2018 9:34 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program  
**Attachments:** 11.15.18 EIR Comments.pdf

November 20, 2018

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

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

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Sincerely,

Portia Weiss

[portiaweiss@gmail.com](mailto:portiaweiss@gmail.com)

421 San Bernardino Avenue  
Newport Beach, CA 92663



**From:** Richard Weiss <rickweissmd@gmail.com> on behalf of Richard Weiss <drweiss@drweiss.com>  
**Sent:** Wednesday, November 21, 2018 8:41 AM  
**To:** EIR627  
**Subject:** Re: General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 21, 2018

Via Electronic Mail

[EIR627@ocair.com](mailto:EIR627@ocair.com)

Ms. Lea Choum  
Land Use Manager at JWA  
3160 Airway Avenue  
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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.

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If no, why not?

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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.

Sincerely,

Richard Weiss

[drweiss@drweiss.com](mailto:drweiss@drweiss.com)

421 San Bernardino Avenue  
Newport Beach, CA 092663

\_\_\_\_\_ (include your name, home and email addresses)

**From:** Laura White <lalakwhite@gmail.com>  
**Sent:** Wednesday, November 21, 2018 2:56 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program - signed copies  
**Attachments:** Doc.pdf; ATT00001.htm

Lea,

---

This is in regards to the General Aviation Improvement Program. I have attached my husband and my signed copy. TLW-1

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Thanks,

November 17, 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:**

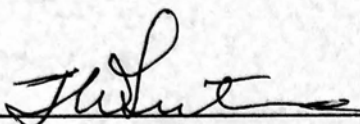
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**Comment:** This is an incredibly complex and detailed document that is over 600 pages in length, with 2,200 pages of appendices. Although members of the general public are invited to “comment” on the DEIR, it is submitted that most members of the 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.

TLW-2

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.

Sincerely,

  
\_\_\_\_\_  
(include your name, home and email address)

<sup>1</sup> 400 Warming Star Ln  
Newport Beach CA. 92660



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.

Sincerely,

Laura White (include your name, home and email address)

1 400 Evening STAR LN  
Newport Beach, CA 92660  
lalakwhite@gmail.com

November 21, 2018

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

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

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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.

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Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Wilson'.

Kammi & Steve Wilson  
1532 Highland Drive  
Newport Beach CA 92660  
kgenova@hotmail.com

**From:** Kammi Wilson <kgenova@hotmail.com>  
**Sent:** Wednesday, November 21, 2018 12:53 PM  
**To:** EIR627  
**Subject:** GAIP  
**Attachments:** 11-21-18 EIR Comments.pdf

November 17, 2018

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5. 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?
6. 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?

#### 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:

1. 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?
2. 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?
3. 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 us 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.

Sincerely,  
Steve & Kammi Wilson  
152 Highland Drive  
Newport Beach CA 92660

**Comments Made at the  
September 26, 2018 Public Meeting**

### **3.7 COMMENTS MADE AT THE SEPTEMBER 26, 2018 PUBLIC MEETING**

The County of Orange conducted a public meeting during the public review period on the Draft Program Environmental Impact Report ("EIR"). The meeting was held on September 26, 2018, in the City of Costa Mesa at the John Wayne Airport Commission Hearing Room. There were a total of 8 speakers who made a total of 28 comments during the comment period of the public meeting. In addition, 18 comments were made by members of the audience during the public presentation portion of the meeting, for a total of 46 comments. The meeting was recorded and a transcript made, including the recorded comments provided by the public at the meeting. As with the comment letters, the transcript is bracketed and numbered to identify each comment, with the corresponding responses provided after the transcript.

For those comments made during the formal comment period of the public meeting (Responses 19 through 47), the name of the speaker is listed under the response number. For those comments made during the public presentation portion of the meeting, the names of the commenters are not known because it was not the designated portion of the meeting for making comments. As a result, these speakers did not introduce themselves.

**John Wayne Airport**

Public Meeting

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5 Public meeting on: )  
6 Draft Program Environmental Impact Report 627 ) JWA Draft EIR  
7 for John Wayne Airport ) Meeting Recording  
8 General Aviation Improvement Program ) 09/26/18  
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15 Transcription of digitally recorded

16 public meeting on

17 Draft Program Environmental Impact Report No. 627

18 for the John Wayne Airport General Aviation Improvement Program

19 (PUBLIC COMMENTS SECTION)

20 Transcribed by Martha McCool  
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28

1 John Wayne Airport

2 Public Meeting

3 JWA Draft Program EIR 627 Meeting Recording 09/26/18

4  
5 LEA CHOUM: The easiest way out is the way you came in, through the  
6 doors or through the kitchen.

7 At the back table where you came in there is a sign in sheet. If  
8 you haven't signed it, please do so before you leave. We are also  
9 providing some handouts at the back table. There are comment cards if  
10 you'd like to write your comments and leave them in the box in the back  
11 tonight, which is fine. Or you can take the comment cards with you and  
12 send them in later. Ok, comment cards, we also have some handouts on  
13 the back table as well. There are some exhibits and some general  
14 information on the EIR, so go ahead and take those with you and they  
15 will be helpful for you as Kathleen goes through her presentation, and  
16 I think with that let's get started.

17 KATHLEEN BRADY: Thank you, Lea. As Lea indicated, my name is Kathleen  
18 Brady, I am with Psomas and we are a consulting firm and I am in the  
19 Environmental Group, and so also working on this project was Landrum  
20 and Brown, providing technical studies and is actually the prime  
21 consultant and then AECOM, that did a lot of the engineering concept  
22 plans and the aviation component of the project.

23 So we tested this earlier and the little buttons, As far as what  
24 we are going to talk about tonight, I figured I'd just give you a quick  
25 run through as to what the topics that we are going to be addressing  
26 and that we're going to be reviewing as Lea indicated, the EIR, which  
27 was prepared consistent with the California Environmental Quality Act,  
28 or CEQA. We are going to be discussing the development of the General

1 Aviation Improvement Program or GAIP for short and that includes the  
2 process and the objectives that were developed, the findings of the EIR  
3 and then how to review and provide comments on the document.

4 So here is the Airport, the image, is basically owned and  
5 operated by the County of Orange. It's on a total of 503 acres,  
6 approximately 400 of those are dedicated to the airfield area. There is  
7 areas for parking north of the freeway and also a component of the golf  
8 course south of the Airport and it is bordered by the cities of Costa  
9 Mesa, Irvine and Newport Beach and two runways, one for commercial and  
10 one for general aviation.

11 The, just an overview of the General Aviation facilities that are  
12 out there now. There is capacity for 596 general aviation aircraft and  
13 it is home base to about 400. There are others that come in as  
14 transient, they are here just for a few days or a few hours even and  
15 the general aviation has consistently represented the majority of the  
16 operations at the Airport.

17 In 2016, which is our base year, because when we started this  
18 study that was the first year with full data and so general aviation  
19 represented 67 percent of the total operations out of the Airport. So  
20 general aviation is a big component here at John Wayne Airport and so  
21 the general aviation services that are offered at the Airport are  
22 listed up here, the aircraft storage and fueling, charter services,  
23 aircraft rental, maintenance, flying lessons, sales and aviation  
24 related supplies and then ground transportation and catering may also  
25 be available through some of the fixed based operators.

26 The reasons for the GAIP, is this is the first time since 1990  
27 that a comprehensive study of the general aviation facilities has been  
28 conducted and as I will show you in a few minutes, the general aviation



1 takes up a good part of the geography of the Airport as well. Since  
2 1990, there has been a lot of changes in the GA operations,  
3 communities, the type of aircraft that are out there, and the fleet mix  
4 being used out of the Airport, and then also the advanced age of the  
5 facilities - a lot of these are quite old and have reached the end of  
6 their useful life and so they need to be replaced. Some of the old  
7 hangars and such. And then a component of the project also is to comply  
8 with the FAA standards related to proximity of buildings to runways.  
9 There is like four improvements that are proposed that are non-standard  
10 features now. Also, the general aviation, a lot of the long term leases  
11 are up or going to be up and this is a great opportunity to do a  
12 comprehensive look so that it can be the most long-range looking study  
13 that they can, as far as what the real needs are rather than trying to  
14 piecemeal things together.

15 So the study started in 2015 and Airport staff conducted a series  
16 of meetings with the general aviation tenants and stakeholders, to  
17 identify what the general aviation community wanted to see at the  
18 Airport and what the issues are that should be addressed in the GAIP.  
19 And that actually as I get into some of the common elements, you will  
20 see that those are the things that were identified and then  
21 alternatives were developed and a consultant team was brought in and  
22 then coordinated with the stakeholders on the development of those  
23 alternatives. And then the EIR process started in 2017 with the  
24 release of the Notice of Preparation and I will get into that a little  
25 bit later.

26 So these are the objectives that were development for the project  
27 and to ensure that the facilities were safe and secure and to enhance  
28 that, given how small the Airport is, as Airports go, this is a postage

1 stamp size Airport. And so, a lot of demands on the Airport for various  
2 uses and desires and so to most efficiently accommodate those uses and  
3 to have a compatibility between the general aviation and the commercial  
4 aviation components of the operations that are out at the Airport and  
5 to embrace flexibility as a lot of things have changed since 1990, the  
6 last time that the comprehensive study was done. And, there will be  
7 continued changes in the future, so to try to have it as flexible as  
8 possible. And to recognize what the market trends are, and to be sure  
9 that the plan is economic and self-sustaining for the Airport from a  
10 revenue perspective. And to assess the ability of the existing  
11 infrastructure to support the general aviation facilities.

12 The preliminary review as I indicated that came up with the  
13 number of alternatives, the preliminary review was in conformance with  
14 FAA standards, pretty self-explanatory to be sure that any of the  
15 improvements and such were meeting FAA standards. To be sure that the  
16 operational characteristics such as the ground taxi flows and such like  
17 that, and the impacts for air traffic controllers and then to be sure  
18 that the layouts of the facilities were going to be effective for the  
19 FBO and I will get to that in a minute, it is fixed base operators,  
20 they are the people that have the leases out at the Airport for  
21 providing some of the services and so to be sure that what was planned  
22 also works for the people who would be using it.

23 So as I said, I will show you the physical areas of the Airport.  
24 So what you see there is the outline of the Airport and the area shaded  
25 in yellow is the portion that we've studied in our GAIP. This is the  
26 area that is focused for general aviation, there is two little cutouts  
27 one at the southeastern corner of the Airport and that's the fuel farm  
28 area and we are not doing anything to the fuel farms, and then over at

1 the Lyon Air Museum area the Lyon, or the Martin Aviation leasehold  
2 area that has a lease until 2036, so that was excluded from the study  
3 as well.

4 And so now, the fun part, CEQA. So we have prepared a Program  
5 EIR and what a Program EIR is, it addresses a larger scale component of  
6 a project where there is multiple aspects of it and when we are looking  
7 at it as a whole. We are looking at it at the 30,000 foot level - of  
8 what the impacts of the GAIP would be. And, CEQA encourages you to do a  
9 Program EIR when the projects are all part of a larger component so you  
10 are not piecemealing the project, because you can take one little  
11 aspect and you can start doing all these little projects, but you have  
12 never looked at the comprehensive plan as a whole. So, what this  
13 project is doing is looking at the comprehensive plan and it allows you  
14 to look at those cumulative impacts which are added all up together. It  
15 may be more than the parts than looked at individually, and then to  
16 avoid duplication of effort and to reduce paperwork so that if there is  
17 14 or 15 phases on a project and various aspects being implemented,  
18 that you are not doing 14 or 15 Environmental Impact Reports. I do  
19 Environmental Impact Reports, you don't want to do them, 14 or 15 of  
20 them.

21 As far as what the project description is, this EIR, CEQA lots of  
22 times has you look at the project, or proposed project and then there  
23 is an alternatives section. This EIR is a little different, in that we  
24 took two alternatives, one called the Proposed Project and one called  
25 Alternative One. We looked at them at equal level of consideration. So,  
26 as you go through each of the technical topics, we address Proposed  
27 Project and Alternative One all at an equivalent level. But there is a  
28 number of, excuse me, of common components of them and they both have

1 provisions of full service and limited service fixed base operators.  
2 And, as I said, an FBO is a business that has a grant by the Airport to  
3 operate aeronautical services, for the fueling, hangar, tie down  
4 parking, aircraft rental, aircraft maintenance and flight instruction  
5 and a full service one offers a wider range, where a limited services  
6 is going to be more focused.

7 And both of the projects have a place for the flight schools,  
8 which are out there now and their use would continue. They both correct  
9 the four nonstandard features that are currently out there, that I  
10 mentioned earlier. They are both proposing that there will be a general  
11 aviation terminal, which would be at one of the FBO's but shared by all  
12 of them and this would be a place for pilots to come or for people who  
13 are going to be on a charter flight or something to meet. And then also  
14 have a general aviation facility which is for customs, for a general  
15 aviation plane coming in from out of the country, so right now what  
16 those planes need to do is, they need to land somewhere else like Brown  
17 Field and go through customs, and then fly up here. And this way they  
18 would be able to fly in directly from out of the country. And, they all  
19 would have a facility for self-service fueling at the Airport, right  
20 now the Airport does not have the capacity for self-service fueling.

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21 **PUBLIC QUESTION DURING PRESENTATION:** So customs cannot be called out?

1

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22 KATHLEEN BRADY: I do not believe that they do that for general  
23 aviation.

24 So as far as what we are calling the Proposed Project and I am,  
25 you know what did, nope I got them right here, I'm going to point to  
26 some of the handouts. Some of this stuff is in the 11x17 handout and  
27 then the one that is stapled does have a, shows exhibits of each of  
28 these alternatives, which I have been presenting there as well as a

1 table in the back that does a comparison of the key features and that  
2 will be a handy reference if you want it. It's all in one place and as  
3 the handout indicates, the exhibit numbers and the table numbers are  
4 the references of the EIR, because these are directly from the EIR.

5 So the Proposed Project has a full service west FBO and a full  
6 service east FBO and so there is a total of two which is basically what  
7 is operating at the Airport now. There would be one limited service FBO  
8 and that is in addition to the Martin Aviation, that I mentioned  
9 earlier that there lease extends to 2036. And the total aircraft  
10 storage capacity would be reduced to 354 aircraft and because of the  
11 reduction in number of aircraft that could be based here there would  
12 also be a reduction in the number of general aviation flights. So it  
13 shows that the projections which came from AECOM, they did that aspect  
14 of the project as well, 167,900 annual flights compared to the 192,800  
15 in 2016. And this would be completed in 14 primary phases, and  
16 construction would be expected to be completed by 2026, and there is  
17 the exhibit and as I said from the size.

18 **PUBLIC QUESTION DURING PRESENTATION:** Yes, (inaudible questions)

2

19 KATHLEEN BRADY: There is a capacity for 596, there's 480 that are out  
20 there right now. So it would be a reduction from not only of capacity  
21 but from compared to what is actually out there now.

22 **PUBLIC QUESTION DURING PRESENTATION:** You said a consultant did the  
23 preliminary with the GA community, so 200 aircraft.

3

24 KATHLEEN BRADY: I think for the type of facilities, in order to fit in  
25 the facilities. The type of facilities that the demand is, I personally  
26 was not involved in these meetings.

27 **PUBLIC QUESTION DURING PRESENTATION:** That was in the introduction that  
28 you consulted?

4

1 2	KATHLEEN BRADY: That the Airport and the consultant AECOM did consult with them and.	
3	<b>PUBLIC QUESTION DURING PRESENTATION:</b> Somehow that came up as desirable?	5
4 5 6 7 8 9 10 11	<p>KATHLEEN BRADY: I believe it was so they can have the type of facility the hangars and such as requested.</p> <p>Yes, so and then Alternative One, has three full service FBO's. One would be on the west side, and two would be on the east side and there will still be the one limited service FBO in addition to Martin Aviation and that would be on the southwest side of the Airport. The total aircraft storage capacity here would be 356 aircraft and the number of flights would be 168,600.</p>	
12 13	<b>PUBLIC QUESTION DURING PRESENTATION:</b> What is the difference between a full service FBO and a limited service FBO?	6
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>KATHLEEN BRADY: Like Jay's aircraft is out there and is limited service and they do maintenance and they are much more focused as opposed to having a lot more services for the pilots and giving the whole suite of services.</p> <p>And this would all be implemented in 15 primary phases, and some of the phasing is because it is so small and needing to be moving aircraft around. So as they are doing construction of one area, recognizing that they are not going to be able do everything on the west side because there is not capacity to move the people around and the exhibit, which as I said is in the handout, which is probably the easiest one to look at.</p> <p>So what have we done so far, for as far as outreach for the public. We had a what is called the scoping meeting. We sent out a Notice of Preparation which was an initial study that goes through all the topics on the CEQA checklist. There are 18 topical areas and I want</p>	

1 to say it is 86 questions and where there could potentially be impacts.  
2 That was distributed, CEQA actually calls for you to send them to  
3 public agencies, the Airport actually elected to send them to, provide  
4 them to, a much larger circulation and have them on their website and  
5 such. And we had a scoping meeting right here in this room, back in  
6 April of last year. And there was, they received 13 letters, and the  
7 distribution are there - some from state agencies, three from regional  
8 agencies, five from local agencies, one from an organization and two  
9 from individuals. And so those letters are all in the, included in the  
10 EIR as part of Appendix A as is the Notice of Preparation. Based on  
11 that analysis, the EIR addressed the 11 topical areas as well as the  
12 cumulative and long term implications of the project and the  
13 alternatives. In addition to the Proposed Project and Alternative One,  
14 there was still an alternatives section in the EIR.

15 So as a result of that, one of the big things to remember when  
16 assessing the impacts, is that a lot of this stuff is happening out  
17 there now, so it's basically replacing facilities. It's not like we are  
18 going in and taking areas that have never been developed with aviation  
19 uses and putting them on there. So we are going to be taking down old  
20 hangars and be putting up new hangars and a lot of that there's not a  
21 lot of impacts.

22 One of the only significant unavoidable impacts was tied to land  
23 use compatibility and I will get to that as I go through all the  
24 topical areas, and it was tied to homes that are, would be exposed to  
25 the 65 CNEL that have not taken advantage of the sound insulation  
26 program and there is no aviation easement. The only other impacts  
27 could be reduced to insignificant.

1	<b>PUBLIC QUESTION DURING PRESENTATION:</b> Those two programs, were upgrading	7	
2	the housing for noise impact with windows?		
3	KATHLEEN BRADY: Yes, and so as far as the topical areas for Aesthetics,		
4	it was basically found that construction activities would have a short		
5	term visual impact and there could also be some nighttime construction		
6	which would result in the need for lighting, night lighting and those		
7	impacts were the same for both alternatives. And then we also		
8	identified that if one of the projects came in and proposed solar		
9	panels that there could be glint and glare which is a big deal when it		
10	is at an Airport.		
11	So associated with that we have measures addressing both of those		
12	things. As far as for the staging areas, put in visual screening and		
13	that they have to do the solar studies pursuant to the FAA		
14	requirements. So based on that, the impacts would be less than		
15	significant.		
16	<b>PUBLIC QUESTION DURING PRESENTATION:</b> Just to be clear your document		8
17	indicates you did not consider Aesthetics?		
18	KATHLEEN BRADY: Well we evaluated Aesthetics		
19	<b>PUBLIC QUESTION DURING PRESENTATION:</b> But you did not provide an	9	
20	Aesthetics study?		
21	KATHLEEN BRADY: There is not a separate technical study, the analysis		
22	is in the EIR.		
23	<b>PUBLIC QUESTION DURING PRESENTATION:</b> There is general confusion.	10	
24	KATHLEEN BRADY: If you look at the document, there is a fair amount in		
25	there, we talk about. I don't have a design of the projects so at this		
26	point it is program level, so I can't tell you that the.		
27	<b>PUBLIC QUESTION DURING PRESENTATION:</b> Can you tell us why you chose not	11	
28	to do an Aesthetics study?		



1	KATHLEEN BRADY: Because at this point I don't have a design so I can't	
2	tell you that the Northwest FBO is going to have a rock facing or a	
3	rock façade, or it's going to have, what it's going to look like.	
4	<b>PUBLIC QUESTION DURING PRESENTATION:</b> So you will do an Aesthetics	12
5	study?	
6	KATHLEEN BRADY: Those issues will be addressed as each element comes	
7	in. So from Aesthetics from the CEQA it looks at the sensitive view	
8	sheds, who the actual people are that are seeing the facilities and to	
9	be honest with you the Airport does not have a lot of sensitive view	
10	sheds.	
11	<b>PUBLIC QUESTION DURING PRESENTATION:</b> That is up for debate, at this	13
12	stage of the game you have not addressed any of the viewsheds	
13	whatsoever.	
14	KATHLEEN BRADY: We, as you look in there, there is a lot of photographs	
15	that show what the views are from surrounding the Airport.	
16	<b>PUBLIC QUESTION DURING PRESENTATION:</b> I actually have some of the	14
17	photographs from the existing conditions that you have provided and yet	
18	several of the items you didn't address as part of those findings?	
19	KATHLEEN BRADY: That would be a great comment to make and then we can	
20	respond to it in writing for you.	
21	<b>PUBLIC QUESTION DURING PRESENTATION:</b> We'd like to do that.	15
22	KATHLEEN BRADY: Yes, that would be great, and that is what Lea was	
23	talking about, being able to provide the comments.	
24	KATHLEEN BRADY: For the Air Quality, studies were done and the	
25	construction impacts did identify a potential significant impact for	
26	nitrogen oxides or NOx prior to mitigation, and that was to both	
27	alternatives. Mitigation was applied, it required tier 4, the highest	
28	most advanced level of equipment for the construction. Yes	

**PUBLIC QUESTION DURING PRESENTATION:** In regards to air quality, when you were looking at the fuel farm, are you looking at the impact on unleaded fuel?

16

KATHLEEN BRADY: To be honest with you I did not do that study, I can research and get back to you on that.

LEA CHOUM: If it is okay with everyone, let's hold our questions until the actual comment period so we can get through the presentation.

KATHLEEN BRADY: Ok, sounds good.

And that the operational emissions would be less than significant. The, as I said, the mitigation measures would be tied to the construction equipment that would be used that would be requiring the most advanced equipment.

For Cultural Resources, the area, the airfield is very disturbed already, it's been constructed already, fields that we don't anticipate impacts to archeological, paleontological and there is no historic resources on the Airport. However, the County does have standard conditions of approval that they apply to all projects that would require monitoring by an archeologist or paleontologist. When it is in native soils and that way if there is something that is found during construction they would be able to appropriately handle the finding.

Greenhouse gases is another technical study that was completed, it was done to the South Coast Air Quality Management District standards and impacts would be less than significant and there is a lot more detail obviously in the EIR on all of this. The document is just about 600 pages, plus another 2200 and something or other in appendices. So if you really want to get into the detail, that is all in the document.

13

1 For Hazardous Materials the construction impacts were found to be  
2 less than significant. Hazardous Materials is an area that is highly  
3 regulated and I have listed some of the compliance requirements that  
4 the Airport operates under now and those would obviously continue.

5 For Land Use and Planning, there would be a reduction in the  
6 number of GA aircraft based at the Airport and there would be  
7 additional units exposed to the 65 CNEL standard used for when there is  
8 a noise impact. And, that three of those units do not have aviation  
9 easements. And, I must point out that is the case with the Proposed  
10 Project, Alternative One and the No Project Alternative. Those three  
11 additional homes are predicted to be exposed to the increase noise just  
12 because of the difference between 2016 and 2026. And, that there is a  
13 sound insulation program in place that was adopted in 1985 with the  
14 Master Plan and then in 2014 there was an updated one with the  
15 Settlement Agreement Amendment that was processed and that it is  
16 recognized that, as with those three, there is going to be people that  
17 choose not to participate and so you can end up with homes that are  
18 exposed to higher noise levels. Than the general plan interior noise  
19 standards, so it's a conservative approach but that is kind of the  
20 standard the Airport has used.

21 For Noise, there is a minor increase in general aviation, in the  
22 noise at the Airport compared to the baseline. However based on the  
23 thresholds that have been adopted, the incremental increase would not  
24 be significant and as I've indicated before, there would be additional  
25 homes exposed, but they would be able to apply for the sound insulation  
26 program.

---

27 **PUBLIC QUESTION DURING PRESENTATION:** Is that a change in your  
28 measurement or the type of aircraft?

---

1 KATHLEEN BRADY: This has nothing to do with commercial, so all of our  
2 studies when we say to the no project, if you look at the projections,  
3 a change just even in general aviation - and that is something that  
4 really actually is a great point - is that this study is focused on  
5 General Aviation. We are not doing anything for changing commercial  
6 carriers or their operating procedures or anything with flight tracks.

7 **PUBLIC QUESTION DURING PRESENTATION:** I appreciate it. I have one more  
8 question for you. I'm confused because you said 30,000 less flights and  
9 an increase in noise levels is not quite?

18

10 KATHLEEN BRADY: Yes, it is because of the projected type of aircraft.  
11 And in the EIR it does do a distribution of aircraft by general  
12 categories.

13 Ok, Transportation, there would actually be slightly fewer trips  
14 and that goes back to the fact that there would be slightly fewer  
15 aircraft. But, there would be a slight redistribution of more to the  
16 west side because you'd have a complete full service Fixed Base  
17 Operator over on this side. But, the impacts, are, were not  
18 significant.

19 Tribal Culture Resources, a new topic that CEQA requires we  
20 address. This is slightly different than archeology, and so again  
21 because of the disturbed nature of the site, that it is not expected  
22 that they are going to find any significant, Tribal Cultural Resources.  
23 But there is a provision that when they get into native soil that the  
24 tribes would be asked to participate in monitoring and so we call it a  
25 minimization measure because there is no real impact there. But they  
26 would still be required to comply, it does go into the Mitigation  
27 monitoring program of the project.  
28

15

1           And Utilities, there would be new connections with new buildings  
2 and such, but the overall usage demand is not expected to be  
3 substantial and when evaluating what the assumptions are as far as the  
4 number of people and the water supplies and the sewer capacity that is  
5 for the Airport as a whole, it is still within that envelope and the  
6 impact and the project.

7           One of the actual benefits of the project is a lot of these  
8 facilities are pretty old and that as they rebuild they would need to  
9 comply with the California Green Building Code and the current  
10 standards as opposed to the ones that were in place at the time that  
11 they were built.

12           Water Quality. It's not expected to exceed the capacity of the  
13 storm drain system. The Airport is predominantly an impervious surface.  
14 There is a few dirt areas that we aren't going to be affecting, like  
15 between the runways. It's mostly an impervious surface and the flood  
16 control channels and the basins for water quality treatment have all  
17 been sized to accommodate all the flows at the Airport. And here again  
18 are a listing of some of the requirements that they are required to  
19 meet.

20           And, so as far as where the document is, you can look at it here  
21 during business hours, here at the Airport, and they also have a  
22 hardcopy, and they also have a computer set up where you are able to  
23 come in and look at it. It's in 11 libraries and the addresses of the  
24 libraries are listed on the inside of the larger handout there. You  
25 can provide comments on the comment card, which are back there, or you  
26 can just write letters. The comment cards can get turned in tonight or  
27 you can, they are a tri-fold where if you fold it, it has Lea's address  
28 on it so it will come directly to her. And the document is also online.

1 Here is the website - you don't need to write it down, it is in the  
2 handout. This one here, it is listed, the place to send the comments,  
3 the address is listed. And, under how can I access it, the web address  
4 is in the handout. So this is just repeating where the comments can be  
5 sent, this is on the comment cards. It's also in your handout, and we  
6 actually very much encourage you to go ahead and submit comments in  
7 writing. We will be taking in all the comments that we receive and we  
8 will be responding to the comments pertaining to environmental issues  
9 in writing. All comments do get forwarded as part of the final package  
10 to the decision makers. So even if you are just expressing an opinion  
11 on the project, you like it you don't like it, or what have you, that  
12 will get forwarded to the decision makers. And as far as when the  
13 comments are due, as Lea indicated, they are due November 6, so that  
14 gives you a fair amount of time to get in your comments. And then she  
15 also mentioned there will be an opportunity to present comments to the  
16 Airport Commission and the Board of Supervisors on the project and that  
17 is in the first quarter of 2019. Guessing, late February and then  
18 updates on the project are provided at the website there.

19 So if people want to get up here and make comments, you are  
20 welcome to it. Generally, we do ask that you try to keep your comments  
21 to three minutes, so that people, that it gives everyone the  
22 opportunity to make a comment and I am starting.

1 PUBLIC COMMENTS:

2 **DANIEL FREEDMAN:** Hi, My name is Daniel Freedman and I am a pilot and a  
3 user of the Airport both commercial and general aviation and I am the  
4 owner of one of the airplanes that is based here. I'm delighted that  
5 the project is going ahead to modernize the facilities of the Airport.  
6 I am very concerned however, that about 25 percent of the airplanes  
7 that are based here are going to be asked to leave. And I recognize  
8 that this is an environmental hearing and perhaps not the right forum  
9 to express concerns generally but I do have those concerns. From an  
10 environmental perspective I'm wondering whether the impact of where  
11 those aircraft are going to go and whether the environmental impacts we  
12 have had here are, the commutes, etc., etc., that are going to be  
13 required, is that being taken into account?

19

14 KATHLEEN BRADY: It was, it was identified, we identified that like  
15 Fullerton has currently about 200 aircraft based there and they have  
16 capacity for 600. We looked at Long Beach, and there was an estimate on  
17 the amount of vehicle miles that would need to be traveled for aircraft  
18 that are displaced, to be going there. As far as the issues such as,  
19 air emissions and stuff it's all in the same air basin, so it would be  
20 pretty much the same there.

21 **DANIEL FREEDMAN:** Thank you for that, that is all I had but I am very,  
22 very concerned that 25 percent of the aircraft are going to be asked to  
23 leave.

19 cont.

24 KATHLEEN BRADY: That is a great comment to put down  
25  
26  
27  
28

18

1 **DANIEL FREEDMAN:** Thank you very much.

2 KATHLEEN BRADY: Ok, Thank you.

3 **GARY SCHANK, COTO DE CAZA:** Hi, my name is Gary Schank, I live in Coto  
4 de Caza. I am an airline pilot as well as an owner of an aircraft here.  
5 One of my concerns, I look at this and see one of the studies has to do  
6 with how it affects Native Americans, and I get that it is about  
7 diversity and inclusivity and I hope you bring that same philosophy to  
8 the diversity and inclusivity of the type of airplanes that operate  
9 here, because I think you are lumping in general aviation and in that  
10 I think when you talk about for instance, well was that desirable and  
11 they said yes for those facilities and I think the people who desire  
12 those things were biz jets, and you include biz jets in this GA large  
13 group, this diverse aircraft, biz jets in effect are commercial  
14 aircraft, they are operated by pilots that are paid to fly them and  
15 they are operated for the purpose of going somewhere and conducting  
16 business and making money. That is not the same as our airplanes, our  
17 small airplanes. So the concern is that, when you look at general  
18 aviation, you are looking at biz jets. I get it, they are nice and  
19 profitable, they make a lot of money at the Airport. But I hope you  
20 take into consideration, the diversity includes the small airplanes

20

21 KATHLEEN BRADY: Yes.

22 **GARY SCHANK:** And an indication of that is when you started the program  
23 you said well the 20 Right is for the commercial airplanes and 20 left  
24 is for GA airplanes, and I assure you that a GA airplane has to shoot  
25 an instrument approach because he can't get in here otherwise, 20 right  
26 is for us too.

21

27 KATHLEEN BRADY: That's true, that is an excellent point, thank you.

28

19



<p>1 2 3 4 5 6 7 8 9 10 11 12</p>	<p><b>GARY SCHANK:</b> Ok so that's what we are hoping, that diversity expands to the little guys.</p> <p>KATHLEEN BRADY: Yes.</p> <p><b>GARY SCHANK:</b> Thanks.</p> <p>KATHLEEN BRADY: One thing, just to comment on that is the EIR does break down as far as what the projections are, by the type of aircraft in various categories and there is actually a table in Section 5, I want to say it's table 5-2, but I am kind of going by memory, that will show what all the assumptions are. There is a series of tables in section 5 which is alternatives which shows a comparison of the number of flights, the number of aircraft by type and so you might be interested in looking at that</p>	
<p>13 14 15 16 17</p>	<p><b>GARY SCHANK:</b> Ok, because you look at that for instance and the difference in the amount of airplanes here it goes from 596 to whatever it was but you call it a general aviation improvement program but to the 242 who got booted out I don't think improvement is the word they'd be looking at.</p>	<p>22</p>
<p>18 19 20</p>	<p>KATHLEEN BRADY: Now, what thing to remember, is of the, there is capacity for 596, but there is only 480 that are out there, there is a lot of empty spaces out there</p>	
<p>21 22</p>	<p><b>GARY SCHANK:</b> Do you know how it would be determined who gets the boot and who doesn't?</p>	<p>23</p>
<p>23 24</p>	<p>KATHLEEN BRADY: I do not</p> <p><b>GARY SCHANK:</b> Ok</p>	
<p>25 26 27 28</p>	<p><b>FRED FOURCHER, CORONA DEL MAR:</b> I am Fred Fourcher, and I live in Corona Del Mar. I've had my aircraft on the field here for about 30 years, and I am also the founder of the Orange County Pilots Association and as a representative of the general aviation piston community, our needs are</p>	<p>24</p>

1 to not have our numbers reduced but also more hangars, when we look at  
2 the waiting list for tie downs there isn't one, but when we look at the  
3 waiting list for hangars, it's 35 years. So, it's anything we can do to  
4 improve the number of hangars that are in the plan, we'd be in favor of  
5 that and we also respect that the FBO's need to have newer and better  
6 facilities, I think moving things around the field and optimizing the  
7 space on the field based upon the heights that are allowed in areas and  
8 setbacks, that we could achieve the number of aircraft in hangars,  
9 general aviation piston and also jet aircraft and we could optimize  
10 that space for both communities. What I am not seeing in these plans is  
11 an attempt to optimize the space. I am seeing 3 different plans but  
12 none that are a step ahead. It really helps us for both what is called  
13 the turbine community and the piston community, so what I would like to  
14 see is an alternative that shows how we improve it for both. Thank  
15 you.

24 cont.

16 **KREG GROAT:** Hello my name is Kreg Groat and I represent the CPF Airway  
17 Associates, we are adjacent property owners on the Airport, we own 2990  
18 Airway as well as 3000 Airway and in addition to our support to general  
19 aviation, a couple of my comments, we wanted to just get on record here  
20 this evening. We will be submitting our final comments during the  
21 review period and to the approving agency, however we did feel as  
22 though it is important to realize that you have provided a document  
23 that is first of all 600 pages. There is over 2000 ancillary pages.  
24 California Regulations, Section 14-\*15 141 limits an EIR to 300 pages.

25

25 KATHLEEN BRADY: Recommended

26 **KREG GROAT:** It is recommended. CEQA should follow those guidelines or  
27 if nothing else, provide the general public an opportunity for a more  
28 thorough review of these documents. These are thousands of pages and

21

1 2	so I anticipate that any request would be reasonably be met with an extension, if that was appropriate.	25 cont.
3	KATHLEEN BRADY: Yes I am a consultant and I won't answer that	
4 5 6 7 8 9 10 11 12	<b>KREG GROAT:</b> That is interesting as a consultant. The actual outline of the EIR itself, several of the existing conditions were not addressed. In fact, if you went on our property and took a photo of a freight gate that is the only freight gate that currently serves John Wayne Airport and yet it appears as though by your dimensions and plans you intend to eliminate that gate which serves the commercial aviation market and as well as provides access for all of our tenants to the Airport. Nothing was mentioned, nothing was mentioned about the existing heliport on one of the buildings and what impact your structures would have on those general aviation activities,	26
13 14 15 16 17 18	the aesthetics, we talked about that a minute ago. You said it didn't seem to be impactful yet you placed all your buildings in front of other adjacent property owners that have window views and you didn't place your buildings in front of properties that don't have any window views. It just seems like some of this was quickly assessed or quickly done or somebody chose to overlook some of these issues. We would like to have those addressed.	27
19 20 21 22 23 24 25	Furthermore, I also think, you made the comment that there would be slightly fewer trips for general aviation. I'm not so sure but our math indicates 20%, I don't know if that is slightly. KATHLEEN BRADY: Fewer vehicle trips <b>KREG GROAT:</b> No you said fewer aircraft, you said 190,000 to 160,000, yes that is 20 percent.	28
26 27 28	KATHLEEN BRADY: When I was talking about traffic, I was talking about the number of automobiles.	22
		3-1178

<p>1 2 3 4 5 6 7 8 9 10</p>	<p><b>KREG GROAT:</b> I see, well general aviation obviously built this Airport and I think we should continue to support it. I understand everybody's needs for hangars and those types of things, which we all encourage but it does seem as though there maybe a little more attention given to some of the placement where those hangars and general aviation aircraft are being located so as to utilize the space more efficiently. I noticed the first phase of your construction suggest tearing down all of the covered hangars for all the general aviation airplanes and don't provide any kind of subsequent coverings other than hangars. Is that correct that was evaluated?</p>	<p>29</p>
<p>11 12</p>	<p><b>KATHLEEN BRADY:</b> As far as other shade structures, yes I believe at this point there are no shade structures proposed.</p>	
<p>13 14</p>	<p><b>KREG GROAT:</b> Well we will provide our comments and hopefully you will be reasonable in requesting additional time to review the documents.</p>	<p>30</p>
<p>15 16 17</p>	<p><b>KATHLEEN BRADY:</b> That request should also be submitted to Lea in writing.</p> <p><b>KREG GROAT:</b> Thank you very much.</p>	
<p>18 19 20 21 22 23 24 25</p>	<p><b>JOE DAICHEIDT:</b> Good Evening, my name is Joe Daicheidt, I am with ACI Jet, pilot here, learned to fly at John Wayne Airport 12 years ago. Got 2,000 hours flying. I live in Ladera Ranch and I love John Wayne Airport, learned to fly with Sunrise Aviation, Michael Church. I want to start out by saying that general aviation is thriving again at John Wayne Airport and I see every reason for that trend to continue in spite of the data and the analysis from 2016 forward. I think it is critical for the success of Orange County that the Airport remains as</p>	<p>31</p>
<p>26 27 28</p>	<p>the front door to business aviation. I know I am stating the obvious and not addressing the items here, but there are some factually inaccurate forecasting that is going on where we already have the</p>	<p>32</p>
		<p>23</p> <p>3-1179</p>

1 benefit of two years of data that shows that this was wrong. The  
2 numbers are increasing so we cannot reduce GA aircraft at John Wayne.  
3 In fact we either got to maintain it or increase it. JWA for the  
4 business side needs new hangars, there is no way today to put a global  
5 7000 in a hangar today on jacks if it needs repairs, so this plane has  
6 been designed, tested and engineered and flown, yet we don't have  
7 hangars today to even house it and that product is already alive and  
8 real in the business community. Piston aircraft, there has been a surge  
9 in this at John Wayne Airport and the piston aircraft, the tie downs  
10 are starting to get filled up again. It wasn't long ago there was a  
11 two year wait list for tie downs and then it went very vacant and bare  
12 and now they are filling up again.

32 cont.

13 So it's important we have self-  
14 service fuel farms and that we have full service at a very low cost but

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15 my top comment is a quicker and faster and more clear approach to the  
16 completion of the process. A document that I prepared was just taking a  
17 look at JWA's website beginning 16 months ago about when the timelines  
18 of the entire GAIP was complete and I know there is a lot of work going  
19 into this. I know there is a ton of people working a lot of different  
20 ways, but this analyzed 16 months and I'd like to submit this for the  
21 record. If you look at the deadlines that were there back in mid-2017  
22 to where they are today, in a period of 16 months, they've all been  
23 pushed back about 12 months' worth of delays, so the trend is rough,  
24 it's difficult to see that we are going to arrive at a final product  
25 anytime soon. So I would ask that we get a more focused approach, that  
26 we not look at 12 steps of phasing but 3 steps of phasing, not 3 FBO's  
27 but 2 FBO's, not wasting space where airplanes can be parked inside not  
28 outside, we don't need to triplicate places that can be done more  
efficiently. But that's it, I really appreciate the time today.

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24

1 KATHLEEN BRADY: Thank you, any other comments.

2 **JOE FINELL:** These tall guys, that's better, thank you. My name is Joe  
3 Finnell. I've had an airplane tie down here since 2000 and since the  
4 time I brought it here, I actually, it was here when I bought it. It  
5 was occupying a space in the tie down area, the open area and at that  
6 time there was a waiting list for people just to get a tie down and due  
7 to the influx of, I don't know if I'd say money grabbers but  
8 essentially it turns out, it was too expensive to keep my airplane  
9 here. And, I think a number of people over the years have realized  
10 that and they actually have moved their airplanes off the Airport. 35  
11 And, it hasn't been that long ago that you can drive to the Airport and  
12 see a number of vacancies out there. Now you mentioned that right now  
13 you have the capacity and with the number of airplanes that are there,  
14 you intend to decrease the capacity. Now how long do you think it's  
15 going to be before you exceed that capacity and again you are forcing  
16 airplanes to not park here and that to me is something that is really  
17 important. I can't afford a hangar myself. I would love to have one but  
18 I can't so I am forced to use the tie down space and I am happy to have  
19 that. It's convenient for me. And, by the way there are a number of

20 issues I take with this impact, this environment program but I'm not  
21 going to go through those at this point, but essentially I want to let

22 you know that our association, the So Cal Pilots Association, is very  
23 much aware of what is going on here and we've been involved in some of  
24 the early meetings of what has developed here, and however we seem to  
25 be left out of some of those meetings. So I think that I'd like to  
26 make a point that we'd like to be more involved and would like to have  
27 a say in what is happening at the Airport. You probably were here and

28 remember when the shades were an issue. Our association actually made a

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1 2 3	<p>move to get those shades built. We were very happy when that occurred and essentially it would really be a blow to us to see those shades torn down. I will be making further written comments.</p>	38 cont.
4 5	<p>KATHLEEN BRADY: Ok, thank you I appreciate that it, thank you very much.</p>	
6 7 8 9 10 11	<p><b>JIM MOSHER, NEWPORT BEACH:</b> Thank you, my name is Jim Mosher. I am a resident of Newport Beach, I am not a pilot. I do live near the flight path for the commercial planes, so my concern is about how this improvement project is going to affect the number of what has been called biz jets here. I am not sure if those are constrained, if the same flight paths are the same as the commercial ones, next gen change</p>	39
12 13 14 15 16 17 18 19 20	<p>or not. But many of them seem to depart over Newport Beach and according to the quarterly noise reports released by the Airport, we currently have about 3,000 per month of those general aviation biz jet operations per month, which figure to a hundred per day, landings per day, so that is about 50 departures. The EIR was released so soon to this meeting I haven't had time to look through the 600 pages let alone the 2,200 so I'm wondering if in the EIR it analyzes, of those 50 departures per day how many of those are coming from the based aircraft here and how many are coming from visiting jets.</p>	40
21 22 23	<p>KATHLEEN BRADY: I do not believe so, but put it in writing, and I will, as I said there was an aviation consultant and those sort of questions will be directed to them.</p>	
24 25 26 27 28	<p><b>JIM MOSHER:</b> Then the particular concern is how this new configuration in the future, in the long range not just 10 years from now in 2026 but in the longer range from now, how that is going to affect the ultimate number of biz jets that will be based here as well as visiting and how that will affect the likely frequency which, will they operate. You</p>	41
		3-1182

1 have indicated in your report that the general aviation numbers have  
2 fluctuated greatly like from 500,000 operations down to 200,000 down to  
3 100,000, at one time. I assume that is not due to the number, is not  
4 because of convenience or easy enough to operate. So if the same number  
5 of planes is operating more frequently, so if the EIR is just saying  
6 many jets will be here, my concern is how frequently those planes are  
7 going to be operating, and I have no idea if those things are addressed  
8 in the EIR or not or how the new configuration will encourage more or  
9 less frequency.

41 cont.

10 KATHLEEN BRADY: There was forecast, flight forecast and that was the  
11 information that we used, that we took through our study.

12 **JIM MOSHER:** Without reading that I cannot understand what that is based  
13 on and the biggest question I have is the EIR has been delayed by many  
14 months, 3 months. It was expected to be released in June, we are in  
15 September and it is being release now. The Airport Commission which  
16 meets in this room, asked the Airport Director what the reason for the  
17 delay is and I hope I am not misquoting him, but I believe the Airport  
18 Director said something about the initial noise results were not what  
19 the Airport expected to see and there was a delay so they could go back  
20 and get a different noise model. The original one was too generic or  
21 something like that and you wanted something that gave more accurate  
22 results for John Wayne Airport and I am wondering if you can explain  
23 what that is. Why was the noise study that you didn't like the results  
24 and you came back with one that you did?

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25 KATHLEEN BRADY: No, and that is a good question to put in writing  
26 because it's going to be one that will be better responded to, by the  
27 noise consultant. The FAA has adopted a new noise model and so there  
28 was some calibration issues that needed to be taken care of and someone

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1 who knows a lot more about the specifics will be able to answer that  
2 for you.

3 **BOB LANGE:** My name is Bob Lange, I am a pilot here at the Airport and I  
4 am an aircraft owner and representative from the Pilots Association for  
5 John Wayne Airport. We have been following this closely. I am a  
6 general aviation pilot and I want to mimic Captain Schank's comment.  
7 This really isn't about General Aviation, this is about Corporate  
8 Aviation, when people think about general aviation they think of my  
9 little Cessna. But really this is about biz jets, this is about more  
10 biz jets and fewer smaller airplanes. When we closed down tie downs for  
11 smaller airplanes here it is unrealistic to think that somebody who  
12 lives in South County or anywhere near this Airport are going to get in  
13 their car and drive to Long Beach to go clean the wings of their Cessna  
14 some Friday afternoon, or to Fullerton. So really it means they are  
15 being taken out of the question. When we look at a fuel service and we

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16 don't look at unleaded gasoline we go in the face of the environmental  
17 warning that is on the gate of this Airport warns you that leaded  
18 gasoline is toxic and we are raining that leaded gasoline all over our  
19 neighbors at the Airport. To look at the future of General Aviation  
20 here and not look at an unleaded gas is not right and I am not sure  
21 it's moral. In every aviation Airport that I go to in Europe, two

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22 bladed props like I have on my airplane are illegal because they put  
23 out about a third more noise than a three bladed prop. To not look at  
24 the noise impact of our two bladed props in this area and to look at  
25 where we have a phase for clean idle truck during construction and is  
26 looking at a grain of sand on the beach and is avoiding the 500 pound  
27 gorilla in the room. Naturally, I will put all of these things in  
28 writing and so that we can comment on them. But my hope is that other

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1 people in the audience will take up some of these bigger picture ideas  
2 along with customs facilities. This is not about the maybe 30 pilots a  
3 month that are going to go down to Mexico or fly home from Cuba like I  
4 do and want to go through customs facilities here. This is about having  
5 customs facilities here so we can piggyback on international flights on  
6 the other side of the Airport. Thanks for your time.

7 KATHLEEN BRADY: Thank you, anybody else want to comment tonight? Well,  
8 as I said, comment period closes November 6. You can submit comments  
9 in writing, just letters, or on the comment cards, or via email and  
10 they will all be reviewed and responded to. And that package will then  
11 go to the Airport Commission and to the Board of Supervisors. So  
12 unless there is anything else, or if you want to say anything ok. Thank  
13 you so much for coming.



**Comments Received After  
the Public Review Period**

### 3.8 COMMENTS RECEIVED AFTER THE PUBLIC REVIEW PERIOD

After the public review period ended on November 21, 2018, the County received 28 additional comment letters/emails. Although the State CEQA Guidelines do not require that the County respond to these late comments, the County has elected to prepare written responses because they were received within the timeframe when responses were being prepared. The names of those submitting late comments are listed below.

Of the 28 comment letters received after the public review period, 10 are the standardized letter. In the listing below, those with **(sl)** after the name submitted the standardized letter. The bracketed standardized letter is included in Section 3.6. If supplemental comments were included with the standardized letter, those comments are bracketed on the individual letter. Those with supplemental comments are noted with **(sc)** after their name.

- Kathryn Anderson **(sl)**
- Susan and Sam Anderson
- Camille and Matthew Beehler
- Matthew Christensen **(sl)(sc)**
- CPF Airway Associates
- CPF Airway Associates
- Scott Fischer **(sl)**
- Marilyn Henry
- Roger Hughes **(sl)**
- Janssen **(sl)**<sup>5</sup>
- Julie Johnson (2 through 9)
- Holly Kincaid **(sl)**
- David and Cathy Lichodziejewski
- Beverly Blais Moosmann
- Beverly Blais Mossmann
- Christine Northridge **(sl)**
- Bonnie and Dan O'Neil **(sl)**
- City of Santa Ana
- SCL Equipment Finance submitted by Barbara Griffith **(sl)**
- Myriam Shapiro
- Veronica Sheward **(sl)**

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<sup>5</sup> Letter not signed and only what appears to be a last name is indicated on the envelope.

**From:** Kathryn Anderson <mkathryna@gmail.com>  
**Sent:** Friday, November 23, 2018 7:29 AM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

Via Electronic Mail [EIR627@ocair.com](mailto: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 Costa Mesa who lives under the flight path, 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. 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 hangars, 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 hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved? 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. 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. 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? 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. Sincerely,

Kathryn Anderson  
2674 Riverside Drive (across from Newport Beach Golf Course)  
Costa Mesa, CA 92627

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**From:** Susan Anderson <susananderson10@me.com>  
**Sent:** Thursday, November 22, 2018 2:20 PM  
**To:** EIR627  
**Cc:** Sam Anderson; ann Stevenson; mkathryna@gmail.com; gobruins42@yahoo.com; Cheryl Kyle  
**Subject:** Expansion of John Wayne Airport, Santa Ana, CA

---

As residents of Newport Beach in Beacon Bay, we live directly under the pathway of departing planes. Needless to say this highly impacts the quality of our lives and all the residents in Newport Beach. Most of the residential neighborhoods were established prior to the initial expansion of our airport. SSA-1

---

We highly oppose any expansion or additions to our airport, especially in the private plane area allowing corporate jets! SSA-2

---

All planes departing John Wayne Airport should adhere and be required to honor the time restrictions of no departures after 11pm or prior to 7 am! NO EXCEPTIONS! SSA-3

---

We are not a international airport!!! SSA-4

Sincerely,  
Susan & Sam Anderson  
63 Beacon Bay  
Newport Beach, CA 92660  
949-887-0823  
susananderson10@me.com

Sent from my iPhone



---

**From:** Matthew Beehler <matthew@mega-la.com>  
**Sent:** Thursday, November 29, 2018 9:40 AM  
**To:** EIR627 <eir627@ocair.com>  
**Subject:** Expansion of John Wayne Airport, Santa Ana, CA

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As residents of Costa Mesa, we live directly under the pathway of departing planes. Needless to say this highly impacts the quality of our lives and all the residents in Newport Beach. Most of the residential neighborhoods were established prior to the initial expansion of our airport.	CMB-1
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We highly oppose any expansion or additions to our airport, especially in the private plane area allowing corporate jets!	CMB -2
---	--------

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All planes departing John Wayne Airport should adhere and be required to honor the time restrictions of no departures after 11pm or prior to 7 am! NO EXCEPTIONS!	CMB -3
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We are not a international airport!!!	CMB -4
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Sincerely,  
Camille & Matthew Beehler  
370 Esther Street  
Costa Mesa, CA 92627  
949-878-7167

**Matthew Beehler**  
Foundr | Creative Director

**MEGA**  
Urban Design | Planning | Landscape

+1 949 878 7167  
[www.MEGA-LA.com](http://www.MEGA-LA.com)

**From:** Matthew Christensen <christensen.mj@gmail.com>  
**Sent:** Monday, November 26, 2018 11:28 AM  
**To:** EIR627  
**Subject:** Draft EIR Comments  
**Attachments:** 20181126112728191.pdf

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Good morning Ms. Choum... My apologize for not submitting this email prior to November 21st, but was out of town this past week. As both a resident of Dover Shores since 2006 and an airplane owner/pilot (plane hangared at Executive Aircraft), I have an interesting view of John Wayne Airport loving the convenience and service it provides while also noticing a large increase in aircraft noise. Airline patterns off 20R are incredibly inconsistent as some properly depart heading over Back Bay and offsetting correctly whereas many pilots ignore the offset flying directly over my house, which is 3 streets up from the bay. Attached is my signed letter and hope you can still consider it even though the deadline was November 21st. Thanks very much.

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MC-1

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**Matthew Christensen**  
**USC Trojans Athletic Board of Directors**  
Website: <http://TrojanBOD.com>  
Like us on Facebook: <http://facebook.com/TrojanBOD>

---

**From:** Karen Wigylus <karen.wigylus@msrlegal.com >  
**Sent:** Wednesday, February 27, 2019 9:28 AM  
**To:** EIR627  
**Cc:** Matt Henderson  
**Subject:** Letter to Lea Choum, County of Orange dated 2/27/2019 re: John Wayne Airport  
**Attachments:** 2019-02-27 Ltr to Lea 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](mailto:matthew.henderson@msrlegal.com).  
Thank you, Karen.

---

CPF 5-1

**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](mailto:karen.wigylus@msrlegal.com) | [www.msrlegal.com](http://www.msrlegal.com)



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

February 27, 2019

**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 letter is sent on behalf of CPF Airway Associates, LLC (CPF). It concerns the Draft Program Environmental Impact Report 627 (DEIR) prepared by the County of Orange (County) for the proposed General Aviation Improvement Program (GAIP) at John Wayne Airport (Airport).

On November 6, 2018 I submitted a request to the County under the Public Records Act (Government Code section 6250 et seq.) for documents relating to the GAIP. This was done with the pending comment deadline for the DEIR of November 21, 2018 in mind. On November 29, 2018 counsel for the County contacted me to indicate that the response to my request would be voluminous. Subsequently we agreed that the request could be narrowed, and the County produced documents on January 15, 2019.

CPF 5-2

Having had the opportunity to review the documents produced by the County, I am writing to express my client's continued concern that the DEIR does not fully address the potentially significant impacts arising from the GAIP. As noted in my letter dated October 25, 2018, the DEIR does not analyze the existence or operation of the heliport at 3000 Airway Avenue, directly adjacent to the Airport, or the existence or operation of the 24 hour secured entry gate along my client's property. This omission is all the more glaring given that the County's consultant was expressly tasked with analyzing both of these important features. The contract between the County and Aecom Technical Services, Inc. (Aecom) entitled "Agreement for Architect-Engineer Services" dated September 27, 2016 includes the following within Aecom's scope of work:

- “Understand Historic CMA Market, including: 1. Demand – General Aviation based aircraft by type, general aviation operations, including HeliStream operations at facilities adjacent to JWA.” (Task 4.1, item ii, p. 44.)
- “Define helicopter operating requirements and based helicopter area for a potential consolidated helicopter operating area. This includes a review of baseline conditions including the number of current helicopter operators, operations and based helicopters. Current helicopter traffic patterns will be defined, inclusive of HeliStream’s traffic and interaction with JWA based helicopters. A-E will interview ATC to determine current challenges and confirm traffic patterns. Opportunities for new traffic patterns and integration of traffic patterns that would facilitate easier operations based on potential helicopter operating areas will be defined.” (Task 5.1.3, pp. 52-53.)
- “Identify location of existing access gates and the proposed gates.” (Task 5.2, item iv, p. 53.)

Aecom prepared the “General Aviation Opportunities Facilities Layout Report,” the “General Aviation Forecasting and Analysis Technical Report,” and the “Orange County/John Wayne Airport (JWA) General Aviation Improvement Program (GAIP) Based Aircraft Parking-Capacity Analysis and General Aviation Constrained Forecasts,” appendices B, C, and D to the DEIR (as well as the “General Aviation Facility Requirements Technical Report”). Aecom is also identified as one of the preparers of the DEIR, and would seem to be the consultant with the greatest amount of aviation-related expertise. (DEIR, p. 8-1.)

CPF 5-2  
cont.

It is therefore clear that Aecom’s reports comprise the backbone of the DEIR’s analysis. Yet in spite of the mandate that Aecom take both the heliport and gate into account in its reports, neither the DEIR nor the appendices do so. This lapse is unfortunate as there are serious concerns relating to traffic, air traffic, airport operations, noise, air pollution, and other potential impacts relating to any proposed changes to (let alone the potential cessation of use of) the heliport and/or gate. Moreover, the absence of these features in the DEIR means that its project description and baseline analysis are incomplete. The fact that the County specifically required that the heliport and gate be included in Aecom’s reports demonstrates that they are important factors in the environmental analysis. Their omission from the DEIR puts the legal adequacy of that document into serious question, both for its substantive analysis and its role in informing the public and the County’s decisionmakers as to the effects of the GAIP and its advisability as a matter of policy.

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Thank you for your attention to this matter.

CPF 5-2  
cont.

---

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw

CPFA\55481\2063063.1



**MILLER STARR  
REGALIA**

**Letter 294**

1331 N. California Blvd.  
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Matthew C. Henderson  
Direct Dial: 925 941 3271  
matthew.henderson@msrlgal.com

February 27, 2019



**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

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Having had the opportunity to review the documents produced by the County, I am writing to express my client's continued concern that the DEIR does not fully address the potentially significant impacts arising from the GAIP. As noted in my letter dated October 25, 2018, the DEIR does not analyze the existence or operation of the heliport at 3000 Airway Avenue, directly adjacent to the Airport, or the existence or operation of the 24 hour secured entry gate along my client's property. This omission is all the more glaring given that the County's consultant was expressly tasked with analyzing both of these important features. The contract between the County and Aecom Technical Services, Inc. (Aecom) entitled "Agreement for Architect-Engineer Services" dated September 27, 2016 includes the following within Aecom's scope of work:

3-1197

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It is therefore clear that Aecom's reports comprise the backbone of the DEIR's analysis. Yet in spite of the mandate that Aecom take both the heliport and gate into account in its reports, neither the DEIR nor the appendices do so. This lapse is unfortunate as there are serious concerns relating to traffic, air traffic, airport operations, noise, air pollution, and other potential impacts relating to any proposed changes to (let alone the potential cessation of use of) the heliport and/or gate. Moreover, the absence of these features in the DEIR means that its project description and baseline analysis are incomplete. The fact that the County specifically required that the heliport and gate be included in Aecom's reports demonstrates that they are important factors in the environmental analysis. Their omission from the DEIR puts the legal adequacy of that document into serious question, both for its substantive analysis and its role in informing the public and the County's decisionmakers as to the effects of the GAIP and its advisability as a matter of policy.



Lea Choum  
County of Orange  
February 27, 2019  
Page 3

Thank you for your attention to this matter.

Very truly yours,

MILLER STARR REGALIA



Matthew C. Henderson

MCH:klw

**From:** Scott Fischer <spfischer2@gmail.com>  
**Sent:** Friday, November 23, 2018 5:11 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program – Draft Environmental Impact Report (SCH No. 2017031072)

November 17, 2018

Via Electronic Mail  
[EIR627@ocair.com](mailto: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.
2. **DEIR Complexity and Length**
3. **Relative to Time Limitations for Comment:**
- 4.

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.

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

- 2.
3. **Project Objectives (Section**
4. **3).**
- 5.

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.
- b. Is the GAIP for the benefit of nonresident corporate jet
- c. aircraft?
- d.
- e.
- f. Is the GAIP for the benefit of local corporate jet aircraft?
- g.
- h.
- i. Have local corporations been surveyed regarding their
- j. interest in housing their jets at JWA? If no, why not? If yes, what have been their responses?
- k.
- l.
- m. Does the GAIP benefit the exiting fleet of privately owned
- n. piston-powered driven aircraft owners who have historically based their aircraft at JWA? If yes, how?
- o.
- p.
- q.
- r. Will the GAIP result in a decrease of smaller privately
- s. owned piston-powered aircraft at JWA?
- t.
- u.
- v. How does a decrease in the number of smaller privately
- w. owned piston- powered aircraft based at JWA and an increase in larger GA jet aircraft, benefit Newport Beach and neighboring communities?
- x.
- y.
- z. What is the basis for the assumptions of daily departure
- aa. and arrival of GA jet traffic, including larger corporate aircraft, which will be displacing smaller GA private planes?
- bb.
- cc.
- dd. Has it been determined how many additional GA jet aircraft
- ee. departures will occur in a 24-hour period under the GAIP? If yes, how many? If no, why not?
- ff.
- gg.
- hh. Will there be a cap or a maximum number of GA jet aircraft
- ii. departures allowable during a 24-hour period? If yes, how many? If no, why not?
- jj.

- kk.
- ll. How does the GAIP, with its goal of accommodating large
- mm. corporate jet aircraft at JWA through building additional hangers, benefit Newport Beach and other neighboring communities?
- nn.
- oo.
- pp. Will the GAIP result in an increase of international flights
- qq. to JWA via GA jet aircraft?
- rr.
- ss.
- tt. If the GAIP increases the number of international flights
- uu. 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?
- vv.
- ww.
- xx. How many international flights are anticipated to arrive
- yy. at JWA on a daily or weekly basis?
- zz.
- aaa.
- bbb. What type of TSA-type security screening will be conducted
- ccc. regarding the increasing numbers of larger international GA aircraft if the GAIP is approved? Please describe in detail.
- ddd.
- eee.
- fff. What is the predicted net average daily change in aircraft
- ggg. departures and arrivals if the GAIP is approved?
- hhh.
- iii.
- jjj. How many GA privately owned jets will JWA be capable of
- kkk. handling during a 24-hour period if the GAIP is approved?
- lll.
- mmm.
- nnn. How many overnight hangers or other spaces will be made
- ooo. available for GA privately owned jet aircraft if the GAIP is approved?
- ppp.
- qqq.
- rrr. What will be the economic benefit to JWA if the GAIP is
- sss. approved?
- ttt.
- uuu.
- vvv. If the GAIP is approved, will existing flight schools
- www. be permitted to continue their operations? If not, will flight school(s) specializing in jet aircraft flight instruction replace existing flight schools?
- xxx.
- yyy.
- zzz. If any flight schools specializing in jet aircraft flight
- aaaa. 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?
- bbbb.
- cccc.

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

- 3.
- 4. **DEIR Conclusions that Environmental Impacts are Insignificant**
- 5. **(Section 4).**
- 6.

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.

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.
- b. As GA jet aircraft have a long history of violating noise
- c. limits, how will this be better controlled, especially given the current lack of regulation of the GA jet aircraft fleet?
- d.
- e.
- f. Is an increase in GA jet aircraft nighttime arrivals and
- g. departures anticipated? If yes, how many nighttime arrivals and departures are anticipated?
- h.
- i.
- j. Will JWA place a cap or limit on the number of nighttime
- k. arrivals and departures of GA jet aircraft? If yes, what limitations will be established? If no, why not?
- l.
- m.
- n. Why wasn't the negative impact of an additional 5-10%
- o. 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
- p. that would replace aircraft that were previously fanning after takeoff and not impacting these neighbors, why wasn't this considered?
- q.

- r.
- s.
- t. If the GAIP is approved, what would be the largest GA jet aircraft that would be accommodated by JWA?
- u.
- v.
- w.
- x. 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?
- y.
- z.
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- bb.
- cc. Will there be a limitation on large GA jet departures?
- dd. Will there be any such limitation specifically during the existing curfew hours? If yes, what will be the limitations? If no, why not?
- ee.
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- gg. 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?
- hh.
- ii.

- 4.
- 5. **Health Risk Analysis (Section**
- 6. **4).**
- 7.

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.

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Questions:

- a.
- b. In arriving at the conclusion that the environmental impact
- c. 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,
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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.

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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.

Sincerely,

Scott Fischer  
34 Cape Andover  
Newport Beach, CA. 92660  
[spfischer2@gmail.com](mailto:spfischer2@gmail.com)

Scott P. Fischer, M.D.  
Shoulder Reconstruction Surgery  
Orthopaedic Specialty Institute of Orange County  
16300 Sand Canyon Avenue, Suite 511  
Irvine, CA 92618  
(949) 255-9738  
[www.scottfischermd.com](http://www.scottfischermd.com)



**From:** Marilyn Henry <mleeh@pacbell.net>  
**Sent:** Saturday, November 24, 2018 12:49 PM  
**To:** EIR627  
**Subject:** Jets Flying

Over Newport  
Beach and surrounding areas

Sent from my iPhone

---

I am opposed to  
Building more hangers to allow jets to fly over Newport Beach And surrounding Areas increasing Pollution and noise!

---

MH-1

Marilynn Henry  
2525 E 16th St  
Newport Beach, Calif.  
92663  
949-212-8190

November 17, 2018

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

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?
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### **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.

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

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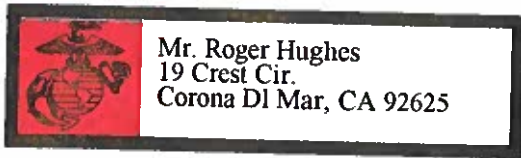
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*ROGER@RogerLHughes.com*

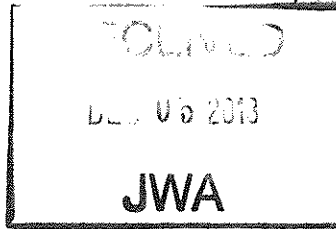
email addresses

(include your name, home and



November 17, 2018

Via Electronic Mail  
EIR627@ocair.com



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

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(SCH No. 2017031072)

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Questions:

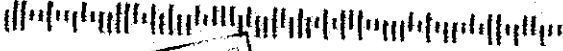
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Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

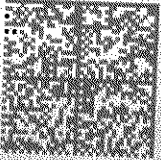
92626-460860



RECEIVED  
DEC 04 2018

MS. LEA CHOM  
LABOR MGR MGR & JWA  
3100 AIRWAY AVE  
COSTA MESA, CA 92626

MAILED FROM ZIP CODE 92682  
DEC 03 2018  
0001156692  
02 1P  
\$ 000.470



FIRST-CLASS



Janssen  
P.O. Box 5380  
Balboa Island, CA 92662

**From:** Julie Johnson <juliestewartjohnson@gmail.com>  
**Sent:** Tuesday, January 29, 2019 8:33 AM  
**To:** EIR627  
**Subject:** GA EIR comments

---

Hi Lea,  
Did the commercial airlines at JWA provide comments on the GA EIR?

---

JJ 2-1

Thank you,  
Julie

**From:** Julie Johnson <juliestewartjohnson@gmail.com>  
**Sent:** Wednesday, January 30, 2019 4:49 PM  
**To:** EIR627  
**Subject:** FAA Standards

Hi Lea,

---

Can you tell me what the FAA standards specifically are for Alternative #3 please? I believe it involves building heights, clearing spaces and widening taxi areas. Is there a FAA reference to review?

JJ 3-1

---

Also you said that there were new community hangers and I would like to know how many and where for Alternative #3. I don't see them on your hand out map.

JJ 3-2

---

Thanks,  
Julie



**From:** Julie Johnson <juliestewartjohnson@gmail.com>  
**Sent:** Monday, February 4, 2019 12:44 PM  
**To:** EIR627  
**Subject:** FW: FAA Standards

---

Hi Lea,  
Can you please respond to my email below from last Wednesday?  
Thanks,  
Julie

---

**From:** Julie Johnson <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>  
**Date:** Wednesday, January 30, 2019 at 4:48 PM  
**To:** <[eir627@ocair.com](mailto:eir627@ocair.com)>  
**Subject:** FAA Standards

JJ 4-1

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---

Thanks,  
Julie

---

**From:** juliestewartjohnson@gmail.com  
**Sent:** Tuesday, February 5, 2019 10:29 AM  
**To:** EIR627  
**Subject:** Re: FAA Standards

---

Hi Lea  
Thanks!  
Julie

JJ 5-1

---

Sent from my iPhone

On Feb 5, 2019, at 9:29 AM, EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)> wrote:

Hi Julie,

Sorry for the delay. Let me put a response together and I will get back to you.

Thanks,  
Lea

---

**From:** Julie Johnson <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>  
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**From:** Julie Johnson <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>  
**Date:** Wednesday, January 30, 2019 at 4:48 PM  
**To:** <[eir627@ocair.com](mailto:eir627@ocair.com)>  
**Subject:** FAA Standards

Hi Lea,

Can you tell me what the FAA standards specifically are for Alternative #3 please? I believe it involves building heights, clearing spaces and widening taxi areas. Is there a FAA reference to review?

Also you said that their were new community hangers and I would like to know how many and where for Alternative #3. I don't see them on you hand out map.

Thanks,  
Julie

---

**From:** juliestewartjohnson@gmail.com  
**Sent:** Tuesday, February 5, 2019 7:34 PM  
**To:** EIR627  
**Subject:** Re: FAA Standards

---

Hi Lea

Just reviewing all of this but are the two community hangers in alternative three new or existing? Are they being remodeled to accommodate larger jets?

JJ 6-1

Thanks  
Julie

---

Sent from my iPhone

On Feb 5, 2019, at 3:43 PM, EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)> wrote:

Hi Julie,

Per our last phone conversation we discussed Alternative 3 and the improvements and changes that would be undertaken to correct existing nonstandard conditions.

Under Alternative 3, the following improvements and changes would be undertaken to correct existing nonstandard conditions:

- (1) Relocate the Vehicle Service Road (also known as Perimeter Road) along Taxiway A to comply with FAA clearance standard dimensions for Group V aircraft;
- (2) Remove obstructions (two community hangars from the Full Service Southeast FBO) to comply with FAA height restrictions; and
- (3) Remove 31 transient aircraft apron parking spaces from within the extended object-free area ("OFA") in the approach to Runway 2L.

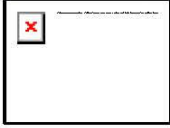
Below are the FAA references related to those nonstandard conditions:

- 1) FAA Advisory Circular AC 150/5300-13A. Here is the link to the document that discusses OFA. See Chapter 3 Runway Design  
[https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/draft\\_150\\_5300\\_13a.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/draft_150_5300_13a.pdf)
  
- 2) FAA FAR Part 77 Safe and Efficient Use, and Preservation of the Navigable Airspace (Subpart C discusses obstructions). Here is link to that document:  
<https://www.govinfo.gov/content/pkg/CFR-2012-title14-vol2/xml/CFR-2012-title14-vol2-part77.xml>

I've attached the Conceptual Facilities Layout Plan – Alternative 3 and circled the proposed community hangars. They are colored purple per the legend.

Thank you,  
Lea

**Lea Choum** | Land Use Manager, Facilities  
*John Wayne Airport, Orange County*  
3160 Airway Avenue | Costa Mesa, CA 92626  
O 949.252.5123  
[ocair.com](#) [Facebook](#) [Twitter](#)



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**From:** Julie Johnson <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>  
**Sent:** Wednesday, January 30, 2019 4:49 PM  
**To:** EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)>  
**Subject:** FAA Standards

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Thanks,  
Julie

<Conceptual Facilities Layout - Alternative 3.pdf>

---

**From:** juliestewartjohnson@gmail.com  
**Sent:** Thursday, February 7, 2019 3:14 PM  
**To:** EIR627  
**Subject:** Re: FAA Standards

---

Thanks Lea!  
Do you know when all the comments to be submitted in the supervisors will be voting?  
I appreciate all your help and getting back to me!  
Thanks  
Julie

---

JJ 7-1

Sent from my iPhone

On Feb 7, 2019, at 2:38 PM, EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)> wrote:

Hi Julie,

The two community hangars in alternative 3 are existing.

As stated in Draft Program EIR 627, no improvements are proposed in Alternative 3 except for three projects that are needed to comply with FAA standards for airport design.

Under Alternative 3, the following improvements and changes would be undertaken to correct existing nonstandard conditions:

- (1) Relocate the Vehicle Service Road (also known as Perimeter Road) along Taxiway A to comply with FAA clearance standard dimensions for Group V aircraft;
- (2) Remove obstructions (two community hangars from the Full Service Southeast FBO) to comply with FAA height restrictions; and
- (3) Remove 31 transient aircraft apron parking spaces from within the extended object-free area (“OFA”) in the approach to Runway 2L.

Thank you,  
Lea

**Lea Choum** | Land Use Manager, Facilities  
*John Wayne Airport, Orange County*  
3160 Airway Avenue | Costa Mesa, CA 92626  
📞 949.252.5123  
[ocair.com](http://ocair.com) [Facebook](#) [Twitter](#)  
<image001.png>

---

**From:** [juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com) <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>  
**Sent:** Tuesday, February 5, 2019 7:34 PM  
**To:** EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)>  
**Subject:** Re: FAA Standards

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Are they being remodeled to accommodate larger jets?

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Julie

Sent from my iPhone

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Below are the FAA references related to those nonstandard conditions:

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[https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/draft\\_150\\_5300\\_13a.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/draft_150_5300_13a.pdf)
- 2) FAA FAR Part 77 Safe and Efficient Use, and Preservation of the Navigable Airspace (Subpart C discusses obstructions). Here is link to that document:  
<https://www.govinfo.gov/content/pkg/CFR-2012-title14-vol2/xml/CFR-2012-title14-vol2-part77.xml>

I've attached the Conceptual Facilities Layout Plan – Alternative 3 and circled the proposed community hangars. They are colored purple per the legend.

Thank you,  
Lea

**Lea Choum** | Land Use Manager, Facilities  
*John Wayne Airport, Orange County*  
3160 Airway Avenue | Costa Mesa, CA 92626  
☎ 949.252.5123

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



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**From:** Julie Johnson <[juliestewartjohnson@gmail.com](mailto:juliestewartjohnson@gmail.com)>

**Sent:** Wednesday, January 30, 2019 4:49 PM

**To:** EIR627 <[eir627@ocair.com](mailto:eir627@ocair.com)>

**Subject:** FAA Standards

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Thanks,  
Julie

<Conceptual Facilities Layout - Alternative 3.pdf>

**From:** juliestewartjohnson@gmail.com  
**Sent:** Wednesday, February 27, 2019 10:26 AM  
**To:** EIR627  
**Subject:** Law firms

---

Hi Lea

Can you please provide or refer me to a list of all the consultants and law firms that the County has used for the GAIP please? JJ 8-1

---

Thanks

Julie

Sent from my iPhone



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**From:** juliestewartjohnson@gmail.com  
**Sent:** Wednesday, February 27, 2019 8:17 PM  
**To:** EIR627  
**Subject:** Re: Law firms

---

Thank you!

JJ 9-1

---

Sent from my iPhone

> On Feb 27, 2019, at 3:41 PM, EIR627 <eir627@ocair.com> wrote:  
>  
> Hi Julie,  
>  
> The list of consultants that the County has used for the GAIP are:  
>  
> AECOM  
> Landrum & Brown  
> Psomas  
> Austin Transportation Consulting  
> Wood  
>  
> Law Firm used:  
>  
> Gatzke Dillon & Balance  
>  
>  
> Thank you,  
> Lea  
>  
>  
> Lea Choum | Land Use Manager, Facilities John Wayne Airport, Orange  
> County  
> 3160 Airway Avenue | Costa Mesa, CA 92626 O 949.252.5123  
> ocair.com Facebook Twitter  
>  
>  
>  
> -----Original Message-----  
> From: juliestewartjohnson@gmail.com <juliestewartjohnson@gmail.com>  
> Sent: Wednesday, February 27, 2019 10:26 AM  
> To: EIR627 <eir627@ocair.com>  
> Subject: Law firms  
>  
> Hi Lea  
> Can you please provide or refer me to a list of all the consultants and law firms that the County has used for the GAIP  
please?  
> Thanks

> Julie  
>  
> Sent from my iPhone

**From:** Holly Kincaid <kincaidrealty@aol.com>  
**Sent:** Saturday, November 24, 2018 11:53 AM  
**To:** EIR627  
**Subject:** Airport Issues

November 4, 2018

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

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 existing 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 hangars, 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 hangars or other spaces will be made available for GA privately owned jet aircraft if the GAIP is approved?
- 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.

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.

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?

## 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.

Sincerely,

Holly Kincaid  
1511 Santiago Drive  
Newport Beach, CA 92660  
[Kincaidrealty@aol.com](mailto:Kincaidrealty@aol.com)

**From:** Leo Lichodziejewski <llichodziejewski@gmail.com>  
**Sent:** Sunday, November 25, 2018 8:38 PM  
**To:** EIR627  
**Subject:** General Aviation Improvement Program

David and Cathy Lichodziejewski  
16671 Silktree St.  
Fountain Valley, CA 92708

To John Wayne Airport Manager,

---

We are aircraft owners based at John Wayne Airport and have great concerns about the ongoing General Aviation Improvement Program. I have learned that ultimately the general aviation community at John Wayne will lose many tie-down and covered parking areas. In fact, the airport will lose so many parking spots that it will no longer be able to support the community currently based at John Wayne!

DCL-1

The planned "General Aviation Improvements" are NOT great improvements for what is typically called General Aviation but improvements optimized for private for hire business jet aircraft, these are really small commercial aircraft and should not displace the vibrant general aviation community at John Wayne airport.

---

I understand that revenue is important to Orange County and some expansion and improvements to the airport are overdue. Please plan your improvements to include all interested parties not just favoring small commercial jet operations thinly disguised as "General Aviation". Please retain enough "General Aviation" parking to include the current residents of John Wayne Airport in tie-down, covered, and hangared areas.

DCL-2

---

Please don't evict us from our airport!

Sincerely,

David Lichodziejewski, N7561E, #249

**From:** Beverly Blais <bblaisesq@gmail.com>  
**Sent:** Wednesday, December 5, 2018 5:36 PM  
**To:** EIR627  
**Subject:** GAIP DEIR

Dear Ms. Choum:

---

I submitted comments to the DEIR on behalf of Citizens Against Airport Noise and Pollution (CAANP). Please advise as to when we can receive a response to the comments we have made or some verification as any consideration of our comments.

BBM 2-1

---

Thank you very much. I look forward to your response.

Sincerely,

Beverly Blais Moosmann  
Citizens Against Airport Noise and Pollution



**From:** Beverly Blais <bblaisesq@gmail.com>  
**Sent:** Friday, December 7, 2018 4:04 PM  
**To:** EIR627  
**Subject:** Re: GAIP DEIR  
**Attachments:** image001.png

Dear Lea,

---

Thank you for your response and the information you have shared regarding the process.

BBM 3-1

Sincerely,  
Beverly Moosmann

On Fri, Dec 7, 2018 at 2:25 PM EIR627 <eir627@ocair.com <mailto:eir627@ocair.com> > wrote:

Dear Ms. Moosmann,

Thank you for your email. Due to the volume of comments received, response to comments will take some time. All responses will be released at the same time and at least 10 days prior to certifying the Environmental Impact Report. We are anticipating that response to comments will be released within the next few months. We will be sure to include any updates on our webpage at <<http://www.ocair.com/deir627>> <http://www.ocair.com/deir627>.

Thank you,

Lea

Lea Choum | Land Use Manager, Facilities

John Wayne Airport, Orange County

3160 Airway Avenue | Costa Mesa, CA 92626

O 949.252.5123

<<http://ocair.com/>> ocair.com <<http://facebook.com/johnwayneairport>> Facebook  
<<http://twitter.com/johnwayneair>> Twitter

From: Beverly Blais [mailto:bblaisesq@gmail.com <mailto:bblaisesq@gmail.com> ]  
Sent: Wednesday, December 05, 2018 5:36 PM  
To: EIR627 <eir627@ocair.com <mailto:eir627@ocair.com> >  
Subject: GAIP DEIR

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Thank you very much. I look forward to your response.

Sincerely,

Beverly Blais Moosmann

Citizens Against Airport Noise and Pollution

**From:** Dcn212 <dcn212@aol.com>  
**Sent:** Thursday, November 22, 2018 9:06 PM  
**To:** EIR627  
**Subject:** GAIP-DEIR SCH#2017031072  
**Attachments:** #11-20-18 EIR Comments - Corporate Jet Hangars.docx

Dear Ms. Choum,

Please consider my letter (attached) as it relates to the GAIP-DEIR.

Thank you,

Chris Northridge

November 20, 2018

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

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**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 to the efficiency and economic 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?
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- m. How many international flights are anticipated to arrive at JWA on a daily or weekly basis?
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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 in close proximity and under the flight paths of JWA? If the impact on these populations has not been considered, why not?
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- c. Did the County in the preparation of the DEIR review and consider recent research concerning the health and welfare of populations living within close proximity of airports? With the eight communities located within 10 miles of JWA? What were the findings on the specific communities?
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Thank you for your consideration of my comments and questions. Please keep me informed of all developments related to this DEIR, including public notices regarding the GAIP and the Notice of Availability of the Final EIR.

Sincerely,

Christine Northridge  
310 Avenida Cumbre  
Newport Beach CA. 92660  
714-401-0660

Dan O'Neil

**From:** Bonnie O'Neil <boneil@me.com>  
**Sent:** Tuesday, December 11, 2018 5:25 AM  
**To:** Dan O'Neil  
**Subject:** Dan, please copy and send to Ms Choum (below)



November 17, 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.

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?
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- 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?
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Sincerely,

Bonnie and Dan O'Neil  
314 Morning Star  
Newport Beach  
[boneil@me.com](mailto:boneil@me.com) and [dan@oneilstorage.com](mailto:dan@oneilstorage.com)

MAYOR  
Miguel A. Pulido  
MAYOR PRO TEM  
Michele Martinez  
COUNCILMEMBERS  
P. David Benavides  
Vicente F. Sarmiento  
Jose Solorio  
Sal Tinajero  
Juan Villegas



CITY MANAGER  
Raul Godinez II  
CITY ATTORNEY  
Sonia R. Carvalho  
CLERK OF THE COUNCIL  
Maria D. Huizar

**CITY OF SANTA ANA**  
**PLANNING & BUILDING AGENCY**  
20 Civic Center Plaza  
P.O. Box 1988 • Santa Ana, California 92702  
[www.santa-ana.org/pba](http://www.santa-ana.org/pba)

**RECEIVED**  
**DEC 03 2018**  
**JWA**

November 19, 2018

Lea Choum  
3160 Airway Avenue  
Costa Mesa, CA 92626

RE: Public Notice of Comment Period Extension for Draft Program Environmental Impact Report (DEIR)  
627

Dear Ms. Choum:

Thank you for your letter regarding the extension of the comment period for the Draft Environmental Impact Report for the John Wayne Airport General Aviation Improvement Program. Staff has reviewed the DEIR and has no comments to provide at this time.

SA-1

Please continue to keep the City apprised of any proposed changes or developments at John Wayne Airport (SNA).

Sincerely,

Ali Pezeshkpour, AICP  
Senior Planner

SANTA ANA CITY COUNCIL

Miguel A. Pulido  
Mayor  
[mpulido@santa-ana.org](mailto:mpulido@santa-ana.org)

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Sal Tinajero  
Ward 6  
[stinajero@santa-ana.org](mailto:stinajero@santa-ana.org)

**From:** Barbara Griffith <bgriffith@socalleasing.com>  
**Sent:** Monday, November 26, 2018 9:46 AM  
**To:** EIR627  
**Subject:** DEIR  
**Attachments:** 11.15.18 EIR Comments.docx

Letter regarding the attachment

**Barbara Griffith**

President



714-573-9804 x 101

[bgriffith@sclfinance.com](mailto:bgriffith@sclfinance.com)  
[www.sclfinance.com](http://www.sclfinance.com)

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*"Southern California Leasing provides affordable funding options to businesses so they can grow."*

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November 17, 2018

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

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

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- 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.

Sincerely,

\_\_\_\_\_ (include your name, home and email addresses)

**From:** mimi newport <dancingms@gmail.com>  
**Sent:** Friday, November 23, 2018 6:42 AM  
**To:** EIR627  
**Subject:** OC airport

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Please do not allow private corporate jets expansion at our airport. Our quality of life would be very much affected by the noise level generated by these aircrafts day and night and would make our community less desirable to live in. It is not a wise decision to allow expansion. Please vote against it. Myriam Shapiro 2825 port Sheffield place. Newport Beach 93660

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MS-1

November 17, 2018

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

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 hangars, 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?
  - 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.

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.

**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 effects 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?

### 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.

Sincerely,

*Vernice Howard - 1231 Cypress Dr. Colton 92425*  
(include your name, home and email addresses)  
1  
*NICASHAW@EMAIL.COM*



**Comments on the  
Environmental Impact Report  
Sent to Others**

### **3.9 COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT SENT TO OTHERS**

To ensure all comments on the Draft Program Environmental Impact Report (“EIR”) are properly responded to, the directions on the website, all hand-out materials, and in the Draft Program EIR identified that comments were to be directed to Ms. Lea Choum at the Airport or submitted to the Airport email address EIR627@ocair.com. This allowed there to be a central location at the County for all comments. There was one letter sent directly to Supervisor Bartlett and the Airport was not copied. Supervisor Bartlett forwarded the comment letter to the Airport. Although it may not have been intended as a comment on the Draft Program EIR, because the County received it during the public review period, written responses have been prepared to the issues raised in the comment letter.

Andy Couch  
1906 Dover Drive  
Newport Beach, CA 92660  
andrew@andrewcouch.com

November 21, 2018

Lisa A. Bartlett  
Supervisor, 5<sup>th</sup> District  
County of Orange  
333 W. Santa Ana Blvd., 5<sup>th</sup> Floor  
Santa Ana, CA 92701

Re: John Wayne Airport General Aviation Improvement Plan

Dear Supervisor Bartlett:

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Now that the elections are over, I hope that you will be able to devote attention 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 2-1

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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 2-2

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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 2-3

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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 2-4

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I urge you to oppose the Proposed Project and Alternatives 1 and 2. Any required updates to the airport can be accomplished through Alternative 3.

AC 2-5

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Yours very truly,  
