



AGENDA STAFF REPORT

ASR Control 22-000036

**MEETING DATE:** 03/08/22  
**LEGAL ENTITY TAKING ACTION:** Board of Supervisors  
**BOARD OF SUPERVISORS DISTRICT(S):** 5  
**SUBMITTING AGENCY/DEPARTMENT:** John Wayne Airport (Approved)  
**DEPARTMENT CONTACT PERSON(S):** Richard Francis (949) 252-5166  
 Evanna Barbic (949) 252-5232

**SUBJECT:** Approve Second Amendment to Fixed Base Operator Lease with Clay Lacy Aviation

<b>CEO CONCUR</b> Pending Review	<b>COUNTY COUNSEL REVIEW</b> Approved Agreement to Form	<b>CLERK OF THE BOARD</b> Discussion 3 Votes Board Majority
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**Budgeted:** N/A                                      **Current Year Cost:** N/A                                      **Annual Cost:** N/A

**Staffing Impact:** No                                      **# of Positions:**                                      **Sole Source:** No

**Current Fiscal Year Revenue:** N/A

**Funding Source:** See Financial Impact Section                                      **County Audit in last 3 years:** No

**Prior Board Action:** 1/12/2021 #S42B, 9/15/2020 #S21A, 8/11/2020 #11, 9/10/2019 #18, 6/25/2019 #45

**RECOMMENDED ACTION(S):**

- Find that Final Program Environmental Impact Report (EIR) No. 627 for the John Wayne Airport General Aviation Improvement Program, previously certified by the Board of Supervisors on June 25, 2019, and Addendum No. PP-22-0001, adequately address the effects of the proposed Project, reflect the independent judgment of the County of Orange and are approved for the proposed project based on the following additional findings:
  - The circumstances of the project are substantially the same as described in EIR No. 627 and Addendum No. PP-22-0001 adequately address the effects of the proposed project. No substantial changes have been made in the project, no substantial changes have occurred in the circumstances under which the project is being undertaken, and no new information of substantial importance to the project which was not known or could not have been known when EIR No. 627 was certified has become known, and no further environmental review is required.
- Adopt Addendum No. PP-22-0001 for Amendment No. 1 to EIR No. 627.
- The CEQA Findings of Fact, Mitigation Monitoring and Reporting Program and Statement of Overriding Considerations have been incorporated into the project and all mitigation measures are fully enforceable pursuant to CEQA (Public Resources Code) Section 21081.6(b) and have either been adopted as conditions, incorporated as part of the project design, or included in the procedures of project implementation.

4. Approve and execute Second Amendment to the Fixed Based Operator Lease with Clay Lacy Aviation, Inc. to modify the site plan for the Northwest parcel.

### **SUMMARY:**

Approval of the second lease amendment will allow Clay Lacy Aviation, Inc. to modify its site plan so that the Fixed Base Operators may move forward with the General Aviation Improvement Program to develop self-sustaining general aviation operations and enhance service, safety, security and efficiency for general aviation services and activities at John Wayne Airport.

### **BACKGROUND INFORMATION:**

On June 25, 2019, the Board of Supervisors (Board) certified Final Program Environmental Impact Report 627 (EIR No. 627), including related CEQA Findings of Fact, Mitigation Monitoring and Reporting Program and Statement of Overriding Considerations, and approved the Proposed Project with certain specified land use requirements. On September 10, 2019, the Board authorized the issuance of the Request for Proposal (RFP) and model leases for Fixed Base Operators (FBO) for: Parcel (1) Northeast Full-Service FBO; Parcel (2) Northwest Full-Service FBO; and Parcel (3) Southwest Limited-Service FBO. Nine proposals were received on December 19, 2019. Five-panel members participated in the review and scoring of the proposals received.

### **Selection and Award of Full and Limited-Service FBOs**

On August 11, 2020, the Board considered the proposals received and selected three FBOs to negotiate with: Clay Lacy Aviation, Inc. (Clay Lacy) for the Northwest Full-Service FBO, Aviation Consultants, Inc., doing business as ACI Jet (ACI Jet) for the Northeast Full-Service FBO, and Jay's Aircraft Maintenance, Inc. for the Southwest Limited-Service FBO.

After selection by the Board, John Wayne Airport (JWA) met with each FBO to negotiate and finalize the lease terms and phasing plan for the development of each parcel. On September 15, 2020, the Board awarded Clay Lacy the Northwest Full-Service FBO Lease and ACI Jet the Northeast Full-Service FBO Lease, commencing January 1, 2021, and continuing for 35 years through December 31, 2055. On November 3, 2020, the Limited-Service FBO lease was awarded to Jay's Aircraft Maintenance, Inc., commencing on January 1, 2021, and continuing for 30 years through December 31, 2050.

### **First Amendment to Lease**

On January 12, 2021, the Board directed the Airport Director to amend and execute revised FBO leases with ACI Jet, Clay Lacy and Jay's Aircraft Maintenance, Inc. deleting the following language: "LESSEE shall not permit the operation of a Regularly Scheduled Commercial User as defined in section 2.40 of John Wayne Airport's Phase 2 Commercial Airline Access Plan and Regulation, as may be amended from time to time." The First Amendment to each FBO lease was subsequently executed.

### **Clay Lacy Aviation Modification to Site Plan**

Clay Lacy's RFP proposal on the west parcel (approximately 14 acres) provided for an initial capital investment in the amount of \$57,897,531.00. Their original development plans included approximately 110,429 square feet of hangar space, over 300,000 square feet of ramp space and a state-of-the-art two-story FBO facility with over 43,000 square feet of office space.

Clay Lacy was required to offer a right of first refusal to the Orange County Sheriff's Department (OCSD) and Orange County Fire Authority (OCFA) to sublease an Air Support Facility, which would be constructed and maintained by Clay Lacy on the leased premises in accordance with a mutually agreed design providing for operations and administrative support functions, an aircraft hangar and apron area for OCSD's and OCFA's helicopters and auto parking. Subsequently, OCFA provided written confirmation to decline to participate in the development of a joint facility.

Upon award of the Clay Lacy Northwest Full-Service FBO Lease, initial meetings between OCSD and Clay Lacy were positive and collaborative. The originally proposed facility for OCSD provided a dedicated facility with 11,429 square feet of hangar space, 13,050 square feet of office space, 31,000 square feet of ramp apron space and 14,000 square feet for 42 vehicle parking spaces. The anticipated and projected rents that Clay Lacy provided to OCSD were a combined total of \$189,802 monthly or \$2,277,624 annually.

OCSD declined the proposed rents and the amount of dedicated space, which necessitated adjustments to the Clay Lacy site plan. Over the course of several months, the modified site plan was developed to accommodate OCSD needs. The modified plan maintains the five buildings identified for the Northwest FBO but with modified sizes and configurations. The space allocated for the OCSD will no longer be in an exclusive use building but is proposed to be part of a new community hangar. The new configuration allows for a net increase of 27,716 square feet (25 percent) of hangar space, accommodating four additional based aircraft in hangars. The community hangars would also have space for built-out storage. However, the modified site plan would decrease the square footage of the apron area that would accommodate aircraft, resulting in a net decrease of three based aircraft on the apron area. Overall, the modified Clay Lacy FBO site plan results in an increase of 6,452 square feet of combined hangar and apron space, which equates to approximately two percent of the total project area and accommodates one (1) additional aircraft. The modified site plan, because it is at a greater level of detail than the General Aviation Improvement Program (GAIP) documents, identifies a specific location for ground support equipment, which reduces the area on the apron available for aircraft storage. Additionally, the plan provides for office space attached to the community hangar buildings, which was not identified in the GAIP. There is also a slight reduction in the overall number of vehicle parking spaces (263 rather than 277).

On November 16, 2021, Clay Lacy submitted a memorandum prepared by Coffman Associates, "Review of Clay Lacy Northwest Fixed Base Operator Development and Final Environmental Impact Report (EIR) No. 627, John Wayne Airport General Aviation Improvement Program" (Attachment B), which provides a summary of the modifications made to the site plan and layout of facilities and an analysis of whether there were any new or more severe environmental impacts than what was analyzed in EIR No. 627. The Addendum was reviewed by JWA staff and environmental consultant, Psomas, and comments were integrated by Clay Lacy. The Addendum concludes that no new or more severe environmental impacts result from the modified site plan, and thus, no further environmental review is required.

Approval of the Second Amendment will allow Clay Lacy to modify Exhibit F (Conceptual Plans) to their Lease to incorporate the changes discussed above.

## **Development and Construction**

Prior to any FBO construction activities, Federal Aviation Administration (FAA) approval of JWA's Airport Layout Plan (ALP) and National Environmental Policy Act (NEPA) documentation is required. FAA is currently reviewing the ALP and the GAIP and still needs to make a determination with respect to their federal action and NEPA documentation required. With Board approval of the Second Amendment, JWA intends to proceed with getting the necessary approvals for the GAIP to move forward.

Clay Lacy's development and construction of the originally proposed project was estimated to take 24 months to complete, in addition to time for pre-construction planning and permitting. The newly proposed site plan is estimated to take 24 to 28 months to complete. Clay Lacy and the Limited-Service FBO on the west side of JWA are scheduled to commence construction first. Upon completion, ACI Jet will commence its development and construction, which is estimated to take 66 months, in addition to time for pre-construction planning and permitting. In order to address the operational needs of JWA, the development and phasing plan for construction may be modified or amended by the Airport Director in consultation with the FBOs.

**Compliance with CEQA:** This project is a necessarily included element of the project considered in Final EIR No. 627, certified by the Board on June 25, 2019, which adequately addressed the effects of this action. Addendum No. PP-22-0001 for Amendment No. 1 to EIR No. 627 was prepared, which documented that there are no substantial changes have been made in the project, no substantial changes have occurred in the circumstances under which the project is being undertaken and no new information of substantial importance to the project that was not known or could not have been known when the Final EIR No. 627 was certified has become known and the Mitigation Monitoring and Reporting Program was adopted; therefore, no further environmental review is required.

**FINANCIAL IMPACT:**

Clay Lacy will assume full responsibility for redevelopment and construction costs related to the complete development of their leased premises, inclusive of any cost associated with the proposed modifications.

**STAFFING IMPACT:**

N/A

**ATTACHMENT(S):**

Attachment A – Second Amendment to Northwest Full-Service FBO Lease with Clay Lacy Aviation, Inc.  
Attachment B – Memorandum by Coffman Associates dated January 5, 2022, “Review of Clay Lacy Northwest Fixed Base Operator Development and Final Environmental Impact Report No. 627, John Wayne Airport General Aviation Improvement Program.”

**SECOND AMENDMENT TO  
FBO LEASE**

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THIS SECOND AMENDMENT TO THE NORTHWEST FULL-SERVICE FIXED BASE OPERATION LEASE (“Second Amendment”) is made and entered into on \_\_\_\_\_, by and between the COUNTY OF ORANGE, a political subdivision of the State of California (“COUNTY”), and CLAY LACY AVIATION, INC., (“LESSEE”).

**RECITALS**

WHEREAS, COUNTY and LESSEE entered into the Northwest Full-Service Fixed Base Operation Lease (“FBO Lease”) for fixed based operator services, effective January 1, 2021 through December 31, 2055; and

WHEREAS, COUNTY and LESSEE entered into a First Amendment to the FBO Lease (“First Amendment”) dated January 14, 2021, amending Section 5.01 of the Lease entitled “Use” to delete the following language: “LESSEE shall not permit the operation of a Regularly Scheduled Commercial User as defined in section 2.40 of John Wayne Airport’s Phase 2 Commercial Airline Access Plan and Regulation, as may be amended from time to time.”; and

WHEREAS, LESSEE indicates that its conceptual plans set forth in Exhibit F require modification due to a reduction in space allotted to the Orange County Sheriff’s Department’s Air Support Facility; and

WHEREAS, COUNTY and LESSEE now desire to amend the FBO Lease to modify the site plan and corresponding conceptual plans for LESSEE’s leasehold in order to meet the objectives of the General Aviation Improvement Program.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, COUNTY and LESSEE hereby agree as follows:

**AGREEMENTS**

- A. Exhibit F, “Conceptual Plans,” is hereby deleted and replaced in its entirety with Exhibit F attached hereto and incorporated herein by reference.
- B. This Second Amendment sets forth all of the agreements and understandings of the parties with regard to its subject matter and any modification must be in writing and properly executed by both parties.
- C. All other terms and conditions of the FBO Lease, as amended, shall remain unchanged and in full force and effect.



PM 1121-0223-0032  
John Wayne Airport

In witness whereof, the parties have executed this Second Amendment to the FBO Lease the day and year first written above.

TENANT: Clay Lacy Aviation, Inc.

By: [Signature]  
Its: CEO  
Name: BRIAN KIRKPOFFER

By: [Signature]  
Its: CHIEF FINANCIAL OFFICER  
Name: BRADFORD W. WRIGHT

APPROVED AS TO FORM:

County Counsel  
By: [Signature]

APPROVED AS TO AUDIT AND ACCOUNTING:

Auditor-Controller  
By: [Signature]

RECOMMENDED FOR APPROVAL:

John Wayne Airport  
By: [Signature]  
Richard Francis  
Interim Airport Director

Signed and certified that a copy of this document has been delivered to the Chair of the Board per G.C. Sec. 25103, Reso 79-1535  
Attest:

COUNTY

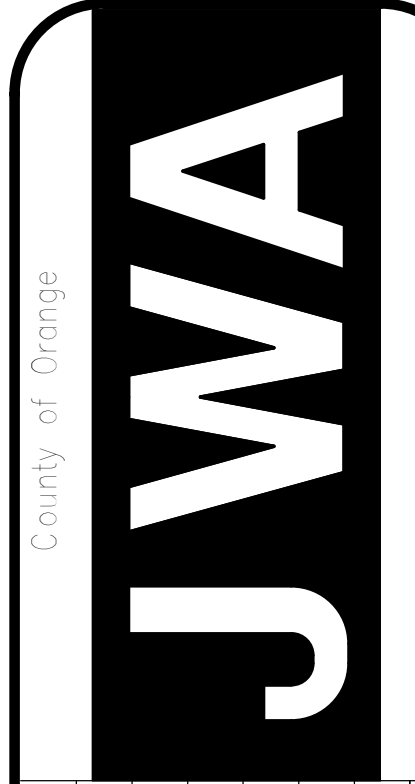
COUNTY OF ORANGE

By: \_\_\_\_\_  
Chairman, Board of Supervisors

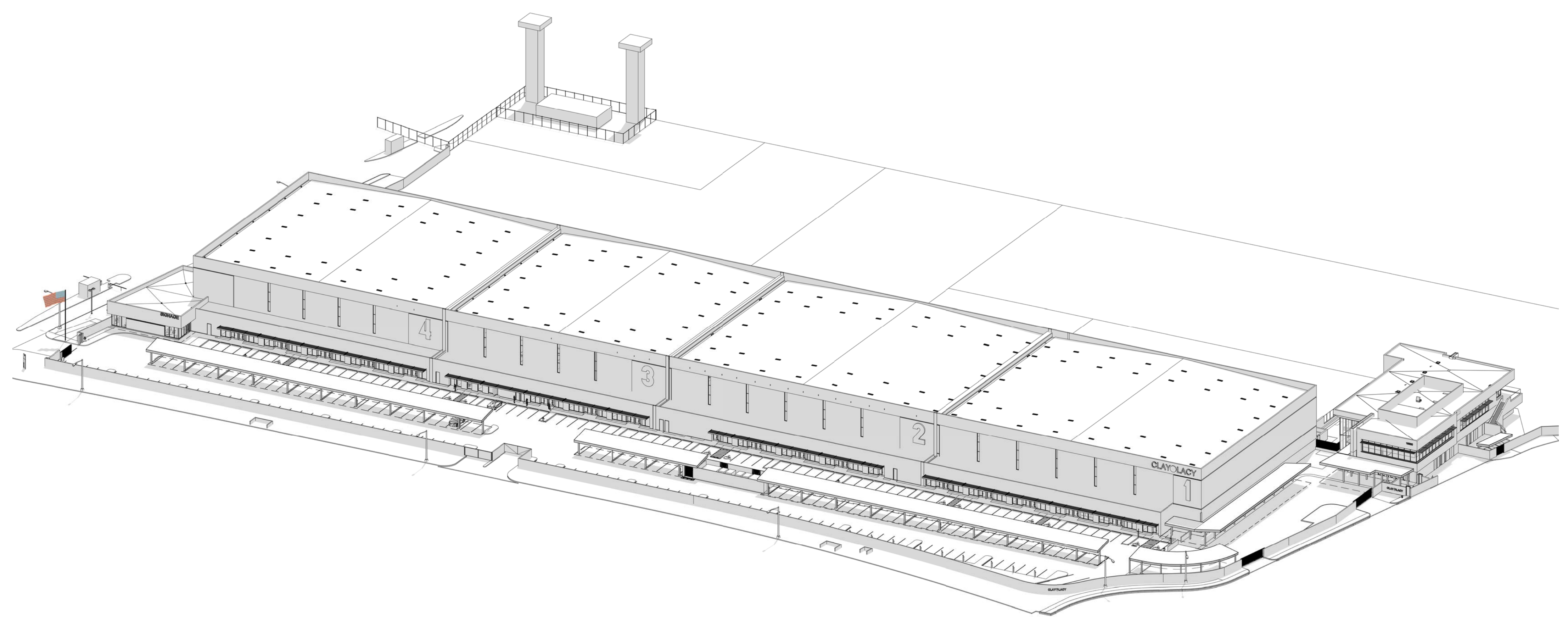
\_\_\_\_\_  
Robin Stieler  
Clerk of the Board of Supervisors

**EXHIBIT F**

**Conceptual Plans**




County of Orange



SHEET INDEX - NW

Sheet Number	Sheet Name
01 - GENERAL	NW PROJECT INFO
G0.00	
02 - CIVIL	TITLE SHEET
1-C0.0	SURVEY (FOR REFERENCE ONLY)
1-C2.00	DEMOLITION PLAN
1-C2.21	DEMOLITION PLAN
1-C2.22	DEMOLITION PLAN
1-C2.23	DEMOLITION PLAN
1-C2.40	GRADING PLAN
1-C2.41	GRADING PLAN
1-C2.42	GRADING PLAN
1-C2.43	GRADING PLAN
1-C2.46	GRADING SECTIONS
1-C2.50	STORM DRAIN AND SANITARY SEWER
1-C2.51	STORM DRAIN AND SANITARY SEWER
1-C2.52	STORM DRAIN AND SANITARY SEWER
1-C2.53	STORM DRAIN AND SANITARY SEWER
1-C2.60	PAVING PLAN
1-C2.61	PAVING PLAN
1-C2.62	PAVING PLAN
1-C2.63	PAVING PLAN
1-C8.00	DETAILS
1-C8.01	DETAILS
1-C8.02	DETAILS
A0.01	NW SITE PLAN
A0.02A	NW DEMO PLAN - SEGMENT A
A0.02B	NW DEMO PLAN - SEGMENT B
A0.61	NW SITE SECTIONS
A1.21	NW FBO - FLOOR PLANS
A1.51	NW FBO - EXTERIOR ELEVATIONS
A1.61	NW FBO - BUILDING SECTIONS
A2.2A	NW HANGAR 1 & 2 - FLOOR PLAN
A2.2B	NW HANGAR 3 & 4 - FLOOR PLAN
A2.2C	NW HANGAR 3 - ENLARGED FLOOR PLAN
A2.51	NW HANGARS - OVERALL EXTERIOR ELEVATIONS
A2.51A	NW HANGAR 1 & 2 - EXTERIOR ELEVATIONS
A2.51B	NW HANGAR 3 & 4 - EXTERIOR ELEVATIONS
A2.61	NW HANGARS - BUILDING SECTIONS

# CLAY LACY



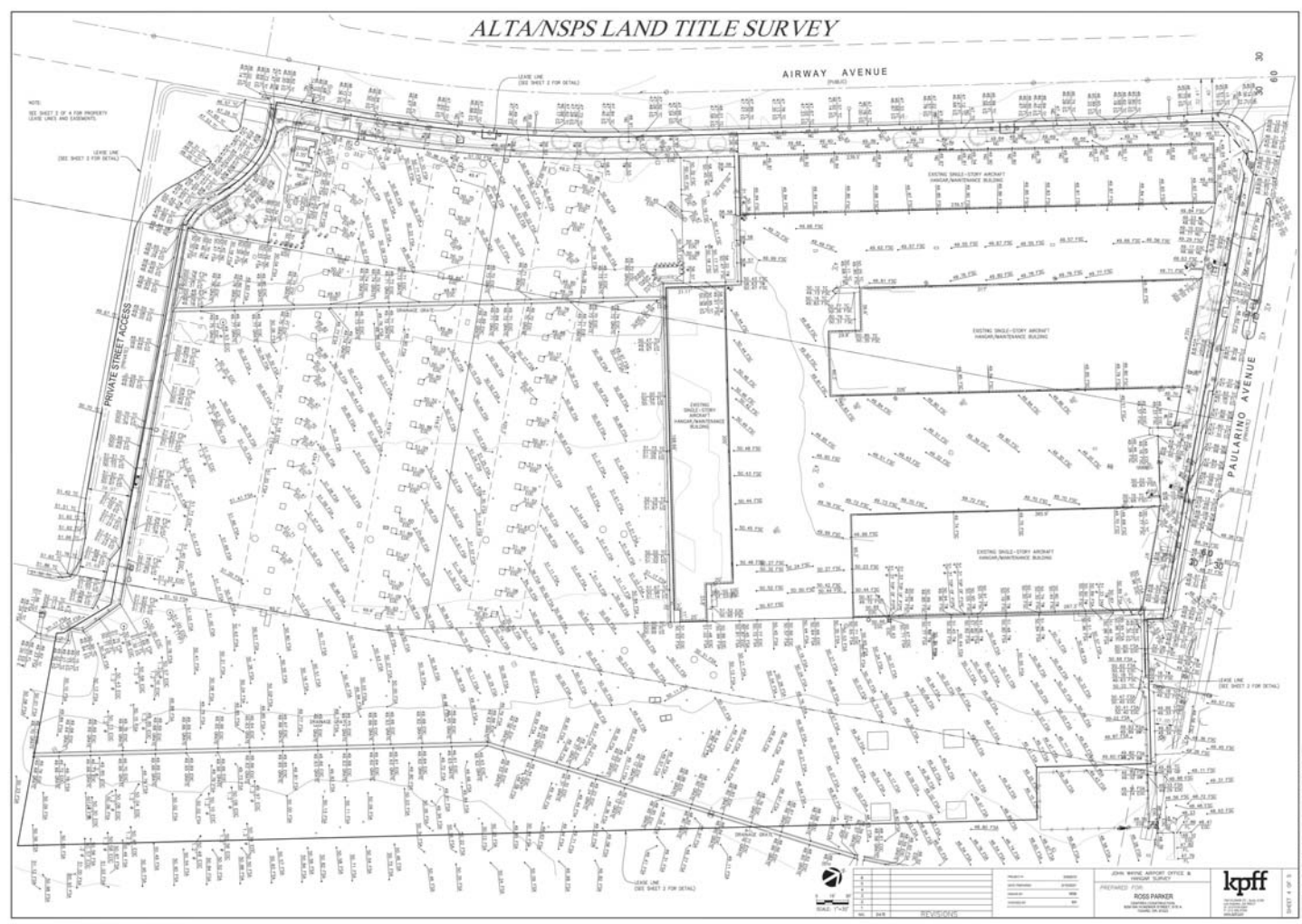
# LACY

## A V I A T I O N

County of Orange		JWA	
Revisions	SEAL	Author	Checker
		Gensler	
		500 S. Figueroa St. Los Angeles, CA 90071 Tel: 213.527.3988	
Project Title: NW PROJECT INFO		Project: CLAY LACY FBO	
		JOHN WAYNE AIRPORT ORANGE COUNTY, CALIFORNIA	
Project No.   SET PROJECT INFO NUMBER PARAMETER		Date	
Approvals		Date	
PM		Plan No.	
Manager, Airport Development		41023-J090	
Date		Sheet	
		G0.00	







FOR REFERENCE ONLY

GENERAL NOTES

SHEET NOTES

LEGEND

KEY PLAN



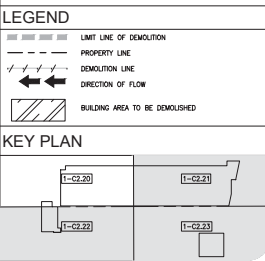
<p><b>RECORD DRAWING STATEMENT</b>                  I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that the foregoing is a true and correct copy of the original drawing as shown to me by the person or persons who claim to be the owner or owners of the same, and that the same is a true and correct copy of the original drawing as shown to me by the person or persons who claim to be the owner or owners of the same. I have no objection to the same being used for any purpose for which it may be used.</p>	<p><b>REVISIONS</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th>No.</th> <th>Description</th> <th>Date</th> </tr> <tr> <td>1</td> <td>ISSUED FOR PERMITS</td> <td>05/09/21</td> </tr> <tr> <td>2</td> <td>FOR PERMITS SET</td> <td>12/03/21</td> </tr> </table> <p><b>LEASE UPDATE</b> 1/14/21</p>	No.	Description	Date	1	ISSUED FOR PERMITS	05/09/21	2	FOR PERMITS SET	12/03/21
No.	Description	Date								
1	ISSUED FOR PERMITS	05/09/21								
2	FOR PERMITS SET	12/03/21								
	<p><b>kpff</b></p>									
<p><b>CLAY LACY FBO</b>                  JOHN WAYNE AIRPORT                  ORANGE COUNTY, CALIFORNIA</p>	<p><b>AE</b></p>									
<p><b>Survey (For Reference Only)</b></p>	<p><b>Drawn</b> _____  <b>Date</b> _____</p>									
<p><b>Project Manager</b> _____  <b>Section Manager</b> _____</p>	<p><b>Approvals</b></p>									
<p><b>Date</b> _____  <b>Form No.</b>                  J140</p>	<p><b>Sheet</b>  <b>1-C0.01</b></p>									



- ### GENERAL NOTES
- CONTRACTOR TO CLEAR PROJECT SITE AREA WITHIN THE CONFINES OF THE DEMOLITION LIMIT LINE. THE CONTRACTOR SHALL DEMOLISH AND REMOVE FROM THE SITE ALL EXISTING UTILITIES, STRUCTURES, PLANTERS, TREES, AND ALL OTHER SITE FEATURES, UNLESS OTHERWISE NOTED ON THE PLAN.
  - REMOVAL OF LANDSCAPING SHALL INCLUDE ROOTS AND ORGANIC MATERIALS.
  - THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ANY AND ALL PERMITS AND SHALL PAY ALL FEES NECESSARY FOR ENCROACHMENT, GRADING, DEMOLITION AND DISPOSAL OF SAID MATERIALS AS REQUIRED BY PRIVATE, LOCAL AND STATE JURISDICTIONS.
  - THE CONTRACTOR SHALL BE RESPONSIBLE FOR A SITE INSPECTION TO FULLY ACKNOWLEDGE THE EXTENT OF THE DEMOLITION WORK.
  - THE CONTRACTOR SHALL VERIFY AND LOCATE ALL EXISTING ABOVE AND UNDERGROUND UTILITIES, LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE AND ARE SHOWN FOR GENERAL INFORMATION ONLY.
  - DAMAGE TO ANY EXISTING UTILITIES AND SERVICES TO REMAIN SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. CONTRACTOR SHALL REPAIR AND/OR REPLACE IN KIND.
  - EROSION CONTROL MEASURES SHALL BE IMPLEMENTED TO PREVENT SEDGES AND UNSUITABLE MATERIALS FROM ENTERING STORM DRAINS, SANITARY SEWERS AND STREETS.
  - DUST CONTROL SHALL BE IMPLEMENTED DURING DEMOLITION.
  - DEMOLITION IS LIMITED TO WITHIN DEMOLITION LIMIT LINE UNLESS NOTED OTHERWISE.
  - THE CONTRACTOR SHALL VERIFY THE LOCATION AND QUANTITY OF EXISTING SURFACE STRUCTURES AND SHALL BE SOLELY RESPONSIBLE FOR ANY UNIDENTIFIED UTILITIES, IMPROVEMENTS, TREES, ETC. TO BE DEMOLISHED AND REMOVED WITHIN THE DEMOLITION LIMIT LINE, INCLUDING APPURTENANT FOUNDATIONS OR SUPPORTS.
  - DEMOLITION CALLOUTS IN THIS SECTION ARE REPRESENTATIVE OF WHAT IS TO BE DONE, NOT AN ITEMIZED ACCOUNTING FOR EACH PIPE, CATCH TRAP, MANHOLE, VALVE, ETC. THAT IS TO BE DEMOLISHED, REMOVED AND DISPOSED OF.

### SHEET NOTES

NOTE:  
ALL SITE EXISTING FEATURES SHOWN HOLD AND/OR DISCONTINUED WITHIN THE LIMIT OF WORK ARE TO BE DEMOLISHED.



- ### DEMOLITION NOTES:
- |  |   |
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| <p><b>PROTECT-IN-PLACE</b></p> <ol style="list-style-type: none"> <li>PROTECT-IN-PLACE EXISTING CLARIFIER.</li> <li>PROTECT-IN-PLACE EXISTING CONCRETE WALL.</li> <li>PROTECT-IN-PLACE EXISTING STREET LIGHT AND BASE.</li> <li>PROTECT-IN-PLACE EXISTING ELECTRICAL PULLBOX.</li> <li>PROTECT-IN-PLACE EXISTING MASONRY WALL.</li> <li>PROTECT-IN-PLACE EXISTING WATER METER AND VALVE.</li> <li>PROTECT-IN-PLACE EXISTING VENTS.</li> <li>PROTECT-IN-PLACE EXISTING IRRIGATION VALVE. WORK TO BE COORDINATED WITH LANDSCAPE ARCHITECT.</li> <li>PROTECT-IN-PLACE EXISTING MONITORING TRENCH.</li> <li>PROTECT-IN-PLACE EXISTING MONITORING WELL.</li> <li>PROTECT-IN-PLACE EXISTING WATER LINE.</li> <li>PROTECT-IN-PLACE EXISTING CURB AND GUTTER.</li> <li>PROTECT-IN-PLACE EXISTING DRAIN LINE.</li> <li>PROTECT-IN-PLACE EXISTING STORM DRAIN MANHOLE STRUCTURE.</li> </ol> <p><b>REMOVE &amp; REPLACE</b></p> <ol style="list-style-type: none"> <li>REMOVE &amp; REPLACE IN KIND EXISTING BACKFLOW PREVENTER.</li> <li>REPLACE TRENCH DRAIN IN KIND. LOCATION AND SIZE TO MATCH EXISTING.</li> </ol> | <p><b>DEMOLISH &amp; REMOVE</b></p> <ol style="list-style-type: none"> <li>DEMOLISH &amp; REMOVE EXISTING ASPHALT CONCRETE AND BASE.</li> <li>DEMOLISH &amp; REMOVE EXISTING TIE-DOWN SHAKE STRUCTURE AND STEEL COLUMNS.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN TRENCH.</li> <li>DEMOLISH &amp; REMOVE EXISTING LANDSCAPE AREA CROSS REFERENCED WITH LANDSCAPE DRAWINGS FOR TREE AND LANDSCAPE REMOVAL AND DETAIL GAS CLEANUP.</li> <li>DEMOLISH &amp; REMOVE EXISTING CONCRETE CURB.</li> <li>DEMOLISH &amp; REMOVE EXISTING BOLLARDS.</li> <li>DEMOLISH &amp; REMOVE EXISTING CHAIN LINK FENCE.</li> <li>DEMOLISH &amp; REMOVE EXISTING CONCRETE WALKWAY.</li> <li>DEMOLISH &amp; REMOVE EXISTING FIRE HYDRANT.</li> <li>DEMOLISH &amp; REMOVE EXISTING ELECTRICAL PULLBOX.</li> <li>DEMOLISH &amp; REMOVE EXISTING STREET LIGHT AND BASE.</li> <li>DEMOLISH &amp; REMOVE EXISTING MASONRY WALL.</li> <li>DEMOLISH &amp; REMOVE EXISTING WASTE STORAGE AREA.</li> <li>DEMOLISH &amp; REMOVE EXISTING HOSE BIB.</li> <li>DEMOLISH &amp; REMOVE EXISTING GAS CLEANUP.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN INLET.</li> <li>DEMOLISH &amp; REMOVE EXISTING WATER METER.</li> <li>DEMOLISH &amp; REMOVE EXISTING SECURITY GATE.</li> <li>DEMOLISH &amp; REMOVE EXISTING IRRIGATION VALVE.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN MANHOLE.</li> <li>CUT AND CAP EXISTING STORM DRAIN LINE.</li> </ol> |
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JWA

County of Orange

REVISIONS		Date	By
NO. <td>DESCRIPTION <td></td> <td></td> </td>	DESCRIPTION <td></td> <td></td>		
1	ISSUED FOR PERMITS	05/09/21	
2	FOR GROUND SET	11/03/21	
3	LEASE UPDATE	11/02/21	

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<p><b>RECORD DRAWING STATEMENT</b></p> <p>I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that I am the author of the above described drawing, and that I am a duly Licensed Professional Engineer in the State of California, License No. 68822, and that I am the Designer of Record for the project shown on this drawing. I am not aware of any other persons who have prepared or caused to be prepared any other drawings for the same project as shown on this drawing.</p> <p>DATE: 02/22/21</p>	<p>DATE: 02/22/21</p> <p>DATE: 02/22/21</p> <p>DATE: 02/22/21</p> <p>DATE: 02/22/21</p>
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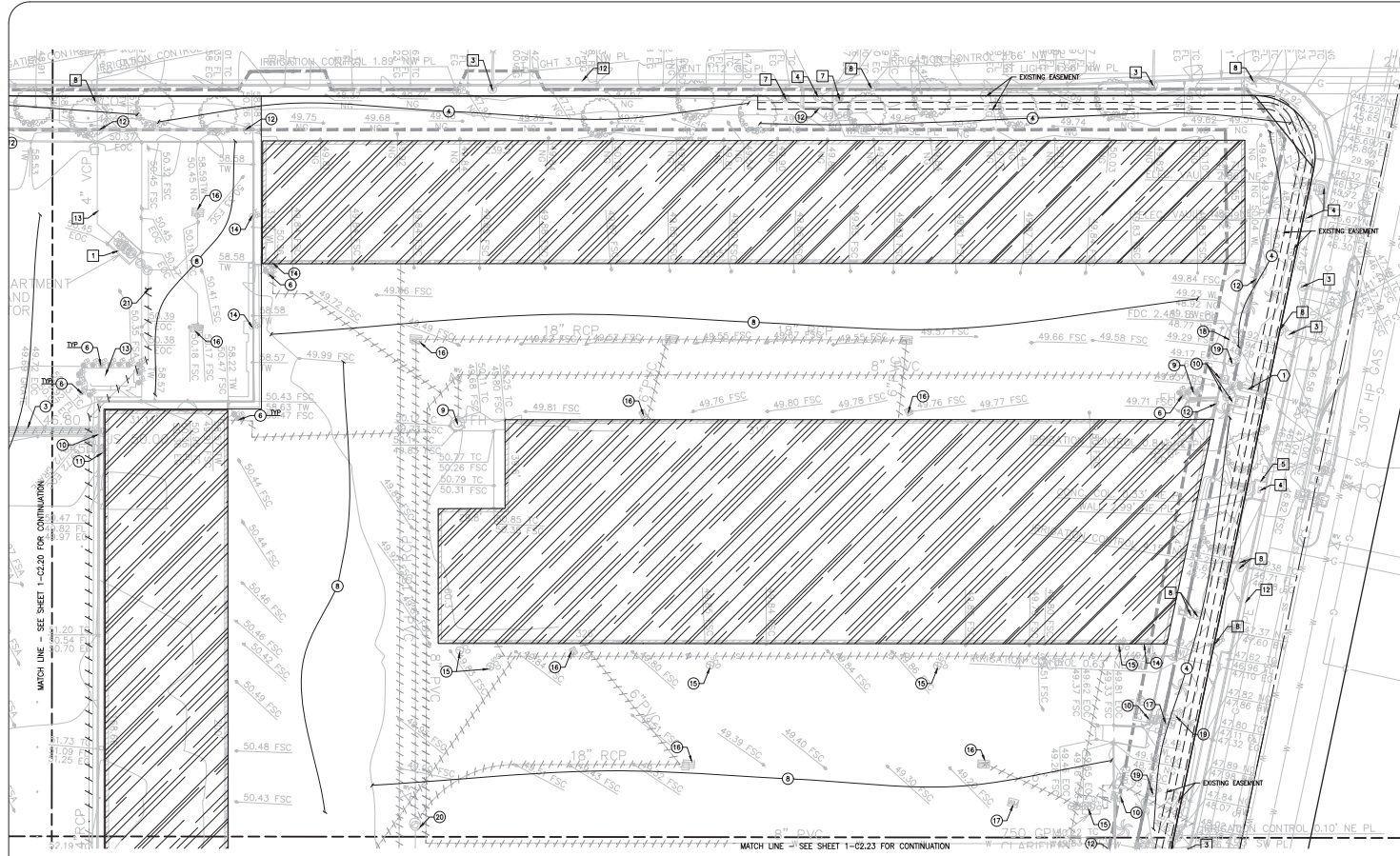
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CLAY LACY FBO

JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Project:	Drawn By:
Approvals:	Date:
Project Manager:	Print No.:
Section Manager:	Sheet:
Date:	SCALE: 1"=30'

1-C2-20

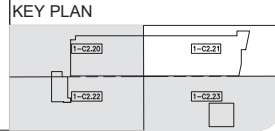
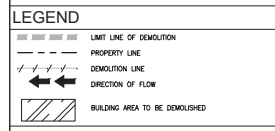


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  - THE CONTRACTOR SHALL VERIFY THE LOCATION AND QUANTITY OF EXISTING SURFACE STRUCTURES AND SHALL BE SOLELY RESPONSIBLE FOR ANY UNIDENTIFIED UTILITIES, IMPROVEMENTS, TREES, ETC. TO BE DEMOLISHED AND REMOVED WITHIN THE DEMOLITION LIMIT LINE, INCLUDING APURTAINMENT FOUNDATIONS OR SUPPORTS.
  - DEMOLITION CALLOUTS IN THIS SECTION ARE REPRESENTATIVE OF WHAT IS TO BE DONE, NOT AN ITEMIZED ACCOUNTING FOR EACH PIPE, CATCH BASIN, MANHOLE, VAULT, ETC. THAT IS TO BE DEMOLISHED, REMOVED AND DISPOSED OF.

### SHEET NOTES

**NOTE:**  
ALL SITE EXISTING FEATURES SHOWN HOLD AND/OR CROSSHATCHED WITHIN THE LIMIT OF WORK ARE TO BE DEMOLISHED.

- ### DEMOLITION NOTES:
- |   |   |
|---|---|
| <p><b>PROTECT-IN-PLACE</b></p> <ol style="list-style-type: none"> <li>PROTECT-IN-PLACE EXISTING CLARIFIER.</li> <li>PROTECT-IN-PLACE EXISTING CONCRETE WALL.</li> <li>PROTECT-IN-PLACE EXISTING STREET LIGHT AND BASE.</li> <li>PROTECT-IN-PLACE EXISTING ELECTRIC PULLBOX.</li> <li>PROTECT-IN-PLACE EXISTING MASONRY WALL.</li> <li>PROTECT-IN-PLACE EXISTING WATER METER AND VALVE.</li> <li>PROTECT-IN-PLACE EXISTING VENTS.</li> <li>PROTECT-IN-PLACE EXISTING IRRIGATION VALVE. WORK TO BE COORDINATED WITH LANDSCAPE ARCHITECT.</li> <li>PROTECT-IN-PLACE EXISTING STORM DRAIN TRENCH.</li> <li>PROTECT-IN-PLACE EXISTING MONITORING WELL.</li> <li>PROTECT-IN-PLACE EXISTING WATER LINE.</li> <li>PROTECT-IN-PLACE EXISTING CURB AND GUTTER.</li> <li>PROTECT-IN-PLACE EXISTING DRAIN LINE.</li> <li>PROTECT-IN-PLACE EXISTING STORM DRAIN MANHOLE STRUCTURE.</li> </ol> <p><b>REMOVE &amp; REPLACE</b></p> <ol style="list-style-type: none"> <li>REMOVE &amp; REPLACE IN KIND EXISTING BACKFLOW PREVENTER.</li> <li>REPLACE TRENCH DRAIN IN KIND. LOCATION AND SIZE TO MATCH EXISTING.</li> </ol> | <p><b>DEMOLISH &amp; REMOVE</b></p> <ol style="list-style-type: none"> <li>DEMOLISH &amp; REMOVE EXISTING ASPHALT CONCRETE AND BASE.</li> <li>DEMOLISH &amp; REMOVE EXISTING TIE-DOWN SHAKE STRUCTURE AND STEEL COLUMNS.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN TRENCH.</li> <li>DEMOLISH &amp; REMOVE EXISTING LANDSCAPE AREA CROSS REFERENCED WITH LANDSCAPE DRAWINGS FOR TREE AND LANDSCAPE REMOVAL AND DETAIL GAS CLEANUP.</li> <li>DEMOLISH &amp; REMOVE EXISTING CONCRETE CURB.</li> <li>DEMOLISH &amp; REMOVE EXISTING BOLLARDS.</li> <li>DEMOLISH &amp; REMOVE EXISTING CHAIN LINK FENCE.</li> <li>DEMOLISH &amp; REMOVE EXISTING CONCRETE WALKWAY.</li> <li>DEMOLISH &amp; REMOVE EXISTING FIRE HYDRANT.</li> <li>DEMOLISH &amp; REMOVE EXISTING ELECTRICAL PULLBOX.</li> <li>DEMOLISH &amp; REMOVE EXISTING STREET LIGHT AND BASE.</li> <li>DEMOLISH &amp; REMOVE EXISTING MASONRY WALL.</li> <li>DEMOLISH &amp; REMOVE EXISTING WATER METER.</li> <li>DEMOLISH &amp; REMOVE EXISTING GAS CLEANUP.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN INLET.</li> <li>DEMOLISH &amp; REMOVE EXISTING WATER STORAGE AREA.</li> <li>DEMOLISH &amp; REMOVE EXISTING SECURITY GATE.</li> <li>DEMOLISH &amp; REMOVE EXISTING STORM DRAIN MANHOLE.</li> <li>CUT AND CAP EXISTING STORM DRAIN LINE.</li> </ol> |
|---|---|



REVISIONS

NO.	DATE	DESCRIPTION
1	05/09/21	ISSUE FOR PERMITS
2	12/03/21	REVISED PERMITS

LEASE/UPDATE: 1/14/23



**kpff**  
KPMG PETERSON FOSTER & PARTNERS LLP  
100 South Main Street  
Los Angeles, CA 90012  
Tel: 213.691.1000  
Fax: 213.691.1001

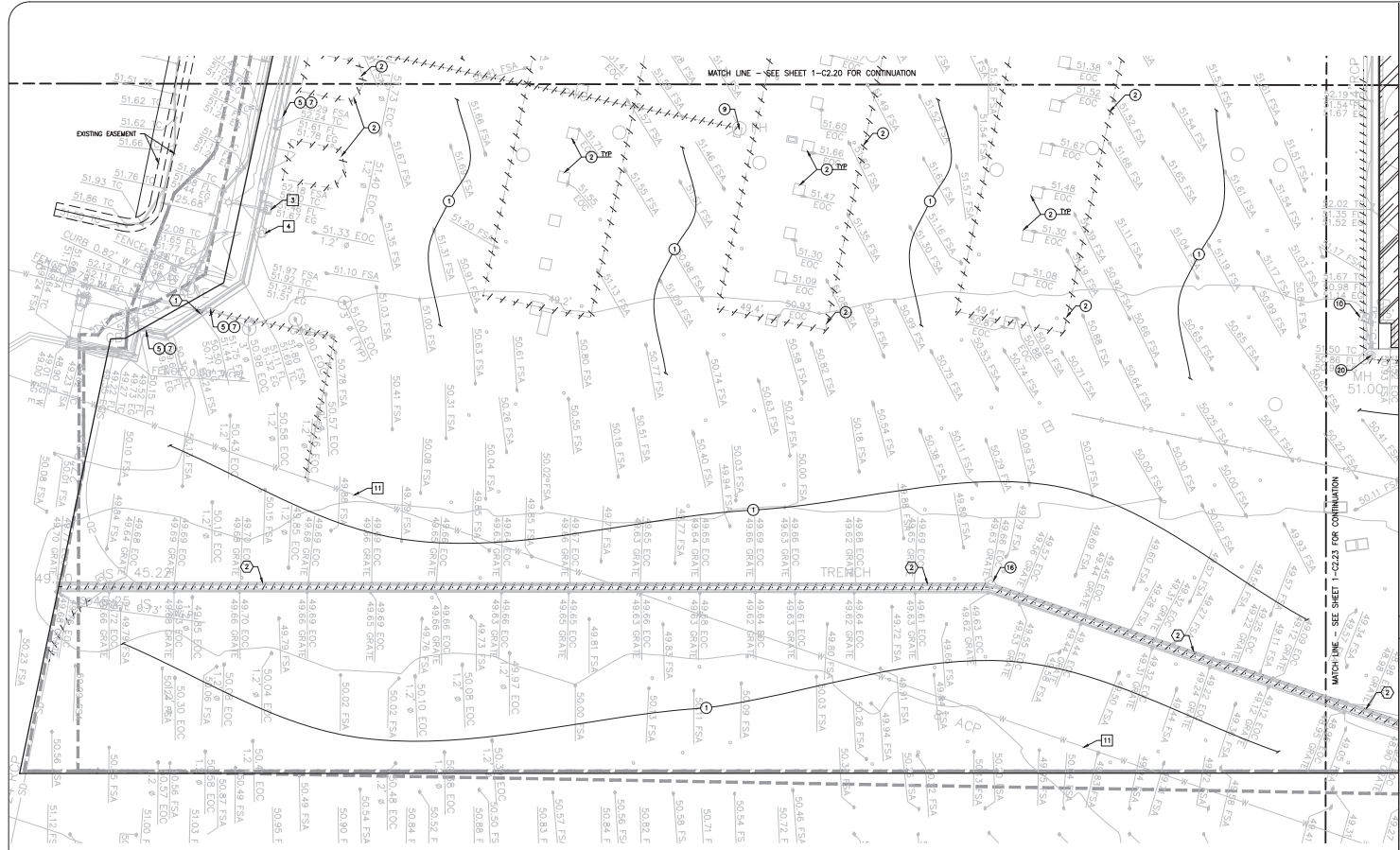
**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Project: **DEMOLITION PLAN**

Approved: \_\_\_\_\_  
Project Manager: \_\_\_\_\_  
Section Manager: \_\_\_\_\_

Date: \_\_\_\_\_  
Print No.: J140  
Sheet: **1-C2.21**

P:\2021\10070108\_000\_WmWayneAirport\_PFD05 CAD\Drawings\DWG\10070108\_000\10070108\_000\_10070108\_000\_10070108\_000\_10070108\_000\_10070108\_000\_10070108\_000\_10070108\_000.dwg, 2021 - 12/03/21



**GENERAL NOTES**

- CONTRACTOR TO CLEAR PROJECT SITE AREA WITHIN THE CONFINES OF THE DEMOLITION LIMIT LINE. THE CONTRACTOR SHALL DEMOLISH AND REMOVE FROM THE SITE ALL EXISTING UTILITIES, STRUCTURES, PLANTERS, TREES, AND ALL OTHER SITE FEATURES, UNLESS OTHERWISE NOTED ON THE PLAN.
- REMOVAL OF LANDSCAPING SHALL INCLUDE ROOTS AND ORGANIC MATERIALS.
- THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ANY AND ALL PERMITS AND SHALL PAY ALL FEES NECESSARY FOR ENCROACHMENT, GRADING, DEMOLITION AND DISPOSAL OF SAID MATERIALS AS REQUIRED BY PRIVATE, LOCAL AND STATE JURISDICTIONS.
- THE CONTRACTOR SHALL BE RESPONSIBLE FOR A SITE INSPECTION TO FULLY ACKNOWLEDGE THE EXTENT OF THE DEMOLITION WORK.
- THE CONTRACTOR SHALL VERIFY AND LOCATE ALL EXISTING ABOVE AND UNDERGROUND UTILITIES. LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE AND ARE SHOWN FOR GENERAL INFORMATION ONLY.
- DAMAGE TO ANY EXISTING UTILITIES AND SERVICES TO REMAIN SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. CONTRACTOR SHALL REPAIR AND/OR REPLACE IN KIND.
- EROSION CONTROL MEASURES SHALL BE IMPLEMENTED TO PREVENT SEDGES AND UNSATURABLE MATERIALS FROM ENTERING STORM DRAINS, SANITARY SEWERS AND STREETS.
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**SHEET NOTES**

**NOTE:** ALL EXISTING FEATURES SHOWN HOLD AND/OR CROSSHATCHED WITHIN THE LIMIT OF WORK ARE TO BE DEMOLISHED.

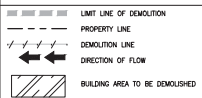
**DEMOLITION NOTES:**

- PROTECT-IN-PLACE**
- PROTECT-IN-PLACE EXISTING CLARIFIER.
  - PROTECT-IN-PLACE EXISTING CONCRETE WALL.
  - PROTECT-IN-PLACE EXISTING STREET LIGHT AND BASE.
  - PROTECT-IN-PLACE EXISTING ELECTRIC PULLBOX.
  - PROTECT-IN-PLACE EXISTING MASONRY WALL.
  - PROTECT-IN-PLACE EXISTING WATER METER AND VALVE.
  - PROTECT-IN-PLACE EXISTING VENTS.
  - PROTECT-IN-PLACE EXISTING IRRIGATION VALVE. WORK TO BE COORDINATED WITH LANDSCAPE ARCHITECT.
  - PROTECT-IN-PLACE EXISTING STORM DRAIN TRENCH.
  - PROTECT-IN-PLACE EXISTING MONITORING WELL.
  - PROTECT-IN-PLACE EXISTING WATER LINE.
  - PROTECT-IN-PLACE EXISTING CURB AND GUTTER.
  - PROTECT-IN-PLACE EXISTING DRAIN LINE.
  - PROTECT-IN-PLACE EXISTING STORM DRAIN MANHOLE STRUCTURE.
- REMOVE & REPLACE**
- REMOVE & REPLACE IN KIND EXISTING BACKFLOW PREVENTER.
  - REPLACE TRENCH DRAIN IN KIND. LOCATION AND SIZE TO MATCH EXISTING.

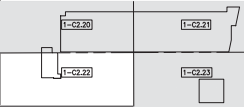
**DEMOLISH & REMOVE**

- DEMOLISH & REMOVE EXISTING ASPHALT CONCRETE AND BASE.
- DEMOLISH & REMOVE EXISTING TIE-DOWN SHAKE STRUCTURE AND STEEL COLUMNS.
- DEMOLISH & REMOVE EXISTING STORM DRAIN TRENCH.
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- DEMOLISH & REMOVE EXISTING CHAIN LINK FENCE.
- DEMOLISH & REMOVE EXISTING CONCRETE WALLBANK.
- DEMOLISH & REMOVE EXISTING FIRE HYDRANT.
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- DEMOLISH & REMOVE EXISTING WATER STORAGE AREA.
- DEMOLISH & REMOVE EXISTING GAS CLEARWAY.
- DEMOLISH & REMOVE EXISTING STORM DRAIN INLET.
- DEMOLISH & REMOVE EXISTING WATER METER.
- DEMOLISH & REMOVE EXISTING SECURITY GATE.
- DEMOLISH & REMOVE EXISTING STORM DRAIN MANHOLE.
- CUT AND CAP EXISTING STORM DRAIN LINE.

**LEGEND**



**KEY PLAN**



NO.	DESCRIPTION	DATE	BY
1	ISSUED FOR PERMIT	05/09/21	
2	REVISIONS	12/03/21	
	LEAVE UPDATE	11/24/21	

NO.	DATE	CHG.	DRWN.	CHKD.
1	05/09/21			
2	12/03/21			
3	12/03/21			



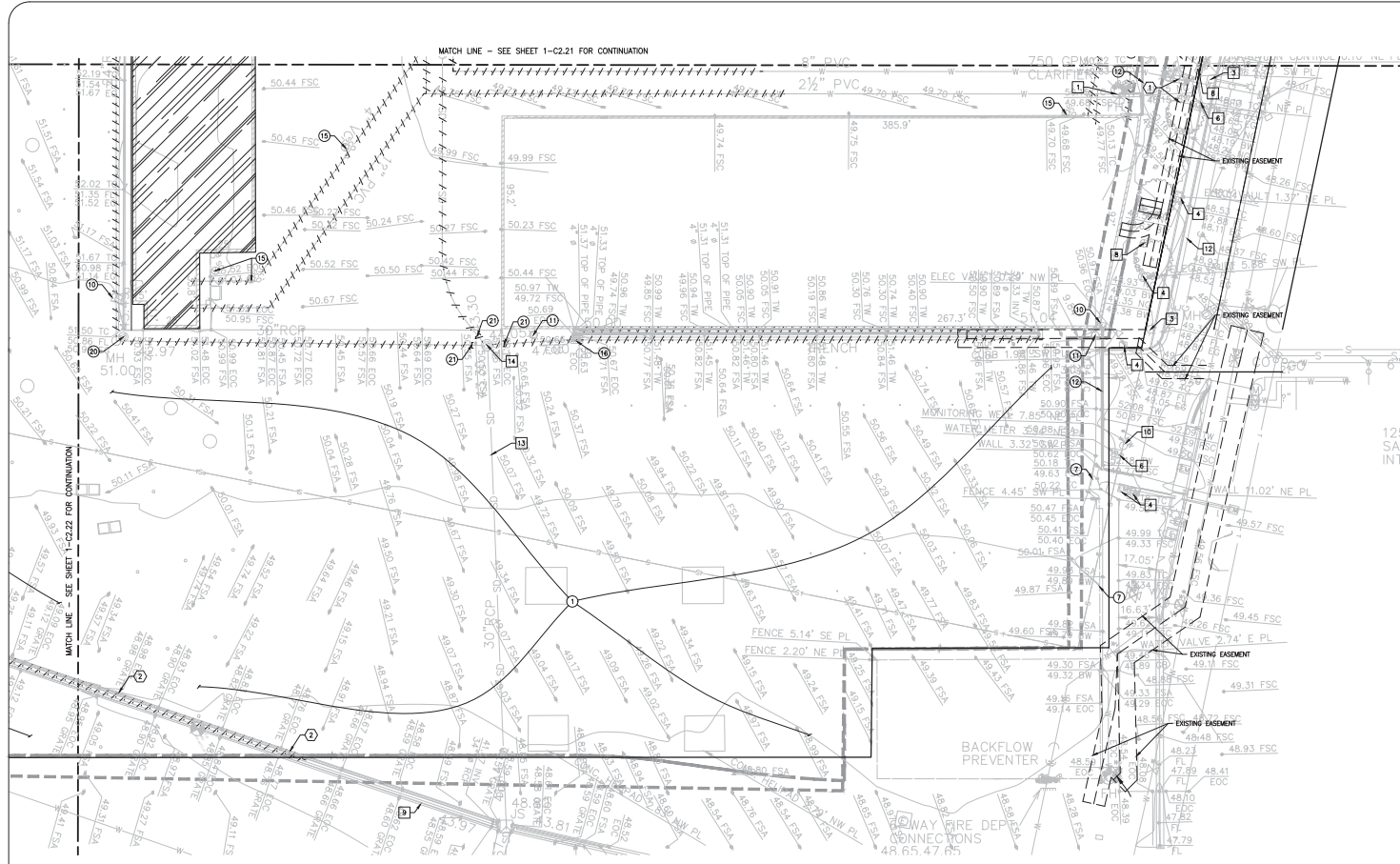
**kpff**  
 201 South Tower Street  
 Los Angeles, CA 90025  
 P: 213.200.0000  
 F: 213.200.0001

**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Project: **1-C2-22**  
 Drawn: **AE**  
 Checked: **AE**  
 Date: **12/03/21**

Sheet: **1-C2.22**  
 Form No. **J140**  
 Date: **12/03/21**

Plot: 20211020108 - John Wayne Airport - 11025 CAD (Sheet) - WWP (3/24/21) - 10/20/21 - 12/03/21 - 12/03/21

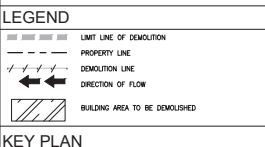


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|---|--|



County of Orange

# JWA

---

REVISIONS	DATE	BY	DESCRPTION

---

<p>RECORD DRAWING STATEMENT</p> <p>I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that I am the author of the design and/or design professional seal on this drawing. I am not providing my professional seal for use on any drawing for which I am not the author or designer, and I am not allowing my professional seal to be used on any drawing for which I am not the author or designer.</p>	<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>
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<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>	<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>	<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>	<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>
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CLAY LACY FBO

JOHN WAYNE AIRPORT

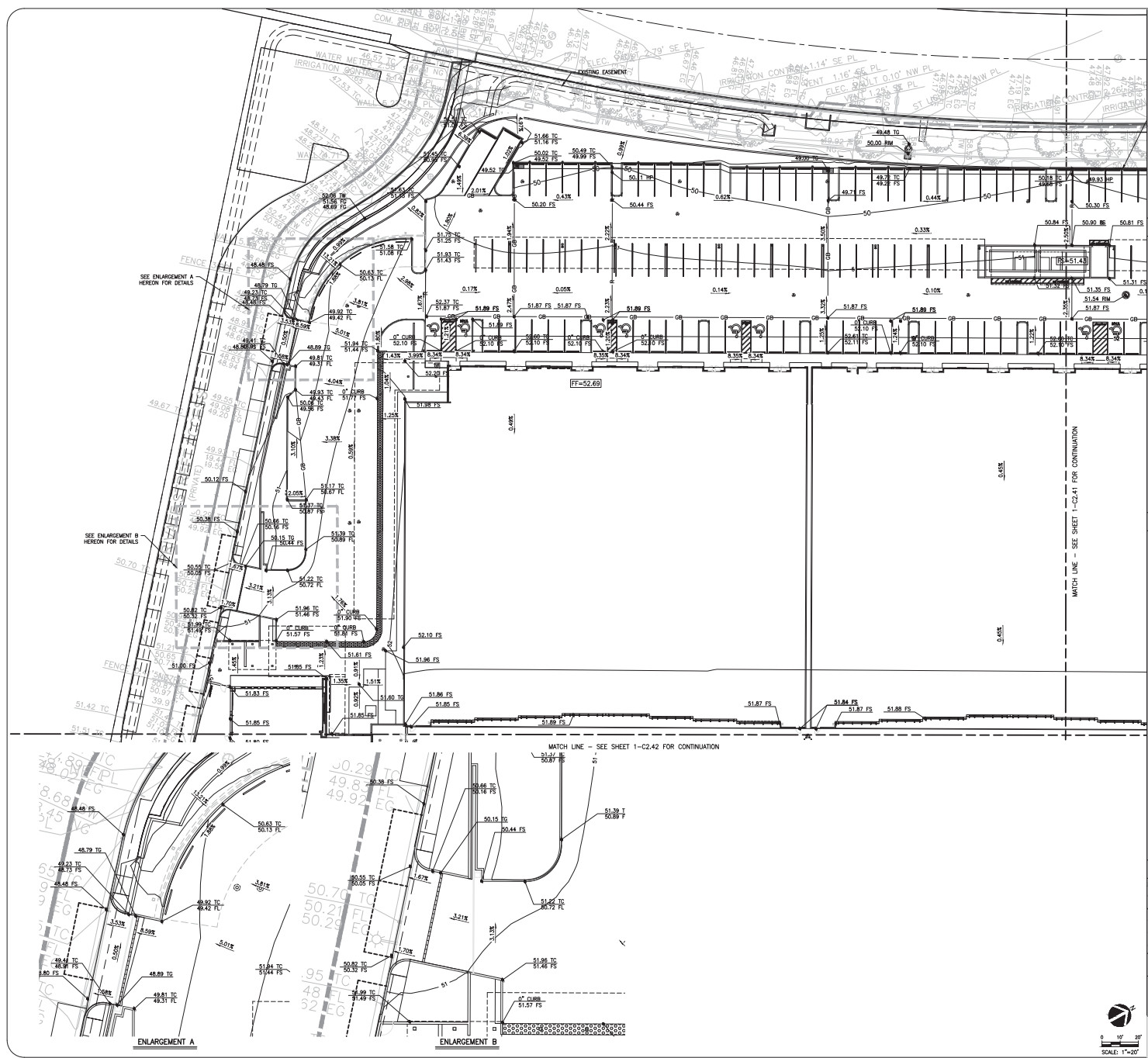
ORANGE COUNTY, CALIFORNIA

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<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>	<p>DATE: 11/14/21</p> <p>BY: [Signature]</p>
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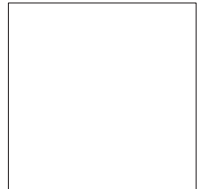
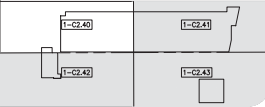
GENERAL NOTES

SHEET NOTES

LEGEND

- LIMIT OF WORK
- PROPERTY LINE
- FLOW LINE
- GRADE BREAK
- RIDGE LINE
- SARKOUT AND JOIN
- 100 --- PROPOSED MAJOR CONTOUR
- 102 --- PROPOSED MINOR CONTOUR

KEY PLAN



County of Orange

# JWA

---

**REVISIONS**

No.	Description	Date

---

**RECORD DRAWING STATEMENT**

I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that I am the author of the design and/or the designer of the design shown on the drawings herein and that I am a duly Licensed Professional Engineer in the State of California. I am not providing my services as a contractor or as an agent of a contractor. I am not responsible for any damage or injury to persons or property caused by the use of the drawings herein for any purpose other than that for which they were prepared.

Date: 02/22/21  
Drawn: [Signature]  
Checked: [Signature]  
Date: 05/09/21  
Design: [Signature]

---

**PROJECT INFORMATION**

Project: **CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

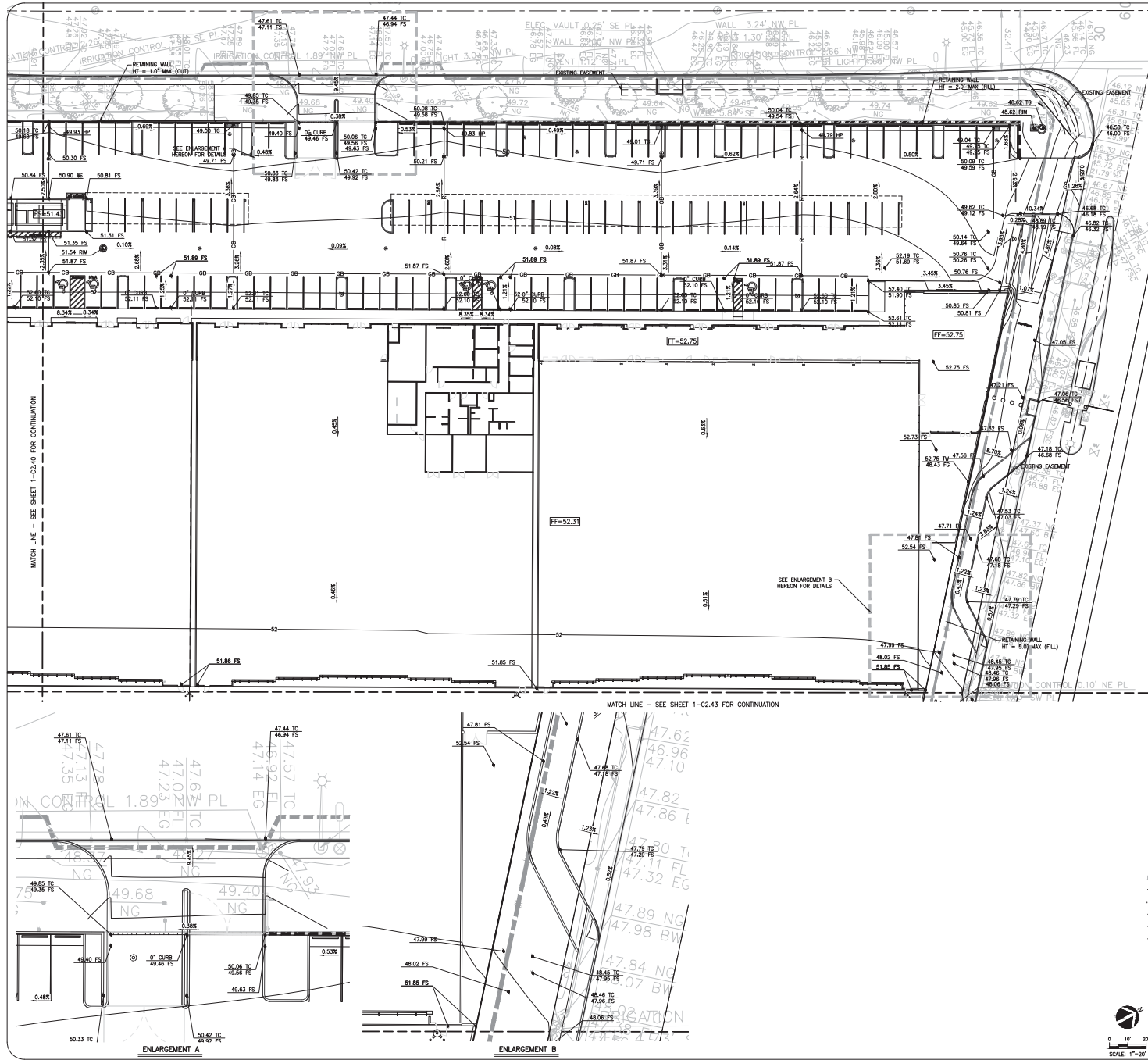
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Date: 02/22/21

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**APPROVALS**

Project Manager: \_\_\_\_\_  
Section Manager: \_\_\_\_\_

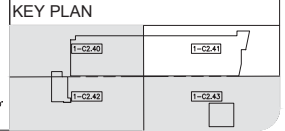
Date: \_\_\_\_\_  
Print No.: J140  
Sheet: \_\_\_\_\_  
**1-C2.40**



GENERAL NOTES

SHEET NOTES

- LEGEND**
- PROPOSED MAJOR CONTOUR
  - PROPOSED MINOR CONTOUR
  - FLOW LINE
  - GRADE BREAK
  - ROCE LINE
  - SAWCUT AND JOIN



County of Orange

# JWA

REVISIONS	DATE	BY

RECORD DRAWING STATEMENT  
 I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that I am the author of the design and/or design professional seal and stamp appearing on this drawing. I am a duly Licensed Professional Engineer in the State of California, License No. 49722. I have not been disciplined for any reason.  
 Date: 02/22/21 Drawn: Chd Date: 02/22/21  
 Date: 02/22/21 Drawn: Chd Date: 02/22/21

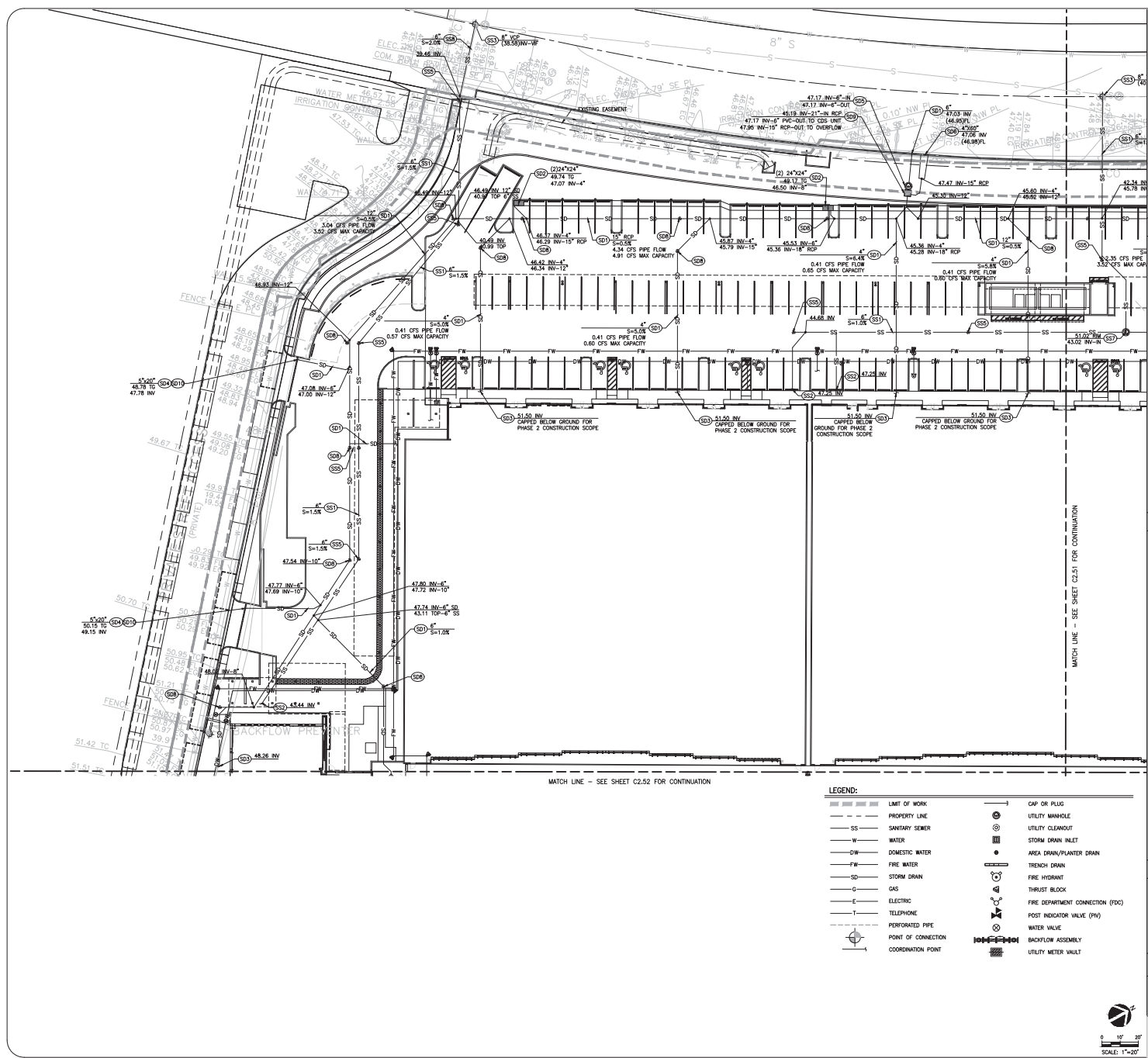
**kpff**  
 A/E  
**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA  
 Project No. \_\_\_\_\_ Date \_\_\_\_\_  
 Approvals  
 Project Manager \_\_\_\_\_  
 Section Manager \_\_\_\_\_  
 Date \_\_\_\_\_  
 Print No. J140  
 Sheet  
**1-C2.41**











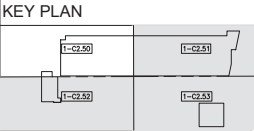
**GENERAL NOTES**

NOTE: PRIOR TO THE INSTALLATION OF ALL STORM DRAIN AND SEWER MAIN LINE CONNECTIONS, THE CONTRACTOR SHALL POTHOLE AND VERIFY THE HORIZONTAL AND VERTICAL LOCATION OF THE MAIN LINE. IF CONDITIONS DIFFER FROM THOSE ON THE PLAN, THE CONTRACTOR SHALL NOTIFY THE ENGINEER AND SHALL NOT BEGIN CONSTRUCTION UNTIL THE CHANGED CONDITION HAS BEEN EVALUATED.

- SHEET NOTES**
- (SD) PVC 300-36 STORM DRAIN PIPE PER DETAIL 4, SHEET C8.00. SIZE AND SLOPE PER PLAN.
  - (PC) PRECAST CONCRETE CATCH BASIN, JENSEN PRECAST PRODUCTS OR APPROVED EQUIVALENT. SIZE AND GRATE BEARING TYPE PER PLAN.
  - (PC) POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING DRAWINGS FOR CONTINUATION.
  - (TD) TRENCH DRAIN PER DETAIL 13, SHEET C8.01. SIZE PER PLAN.
  - (CCL) CONTECH COS UNIT OR APPROVED EQUIVALENT PER DETAIL 3, SHEET C8.02. SIZE PER PLAN.
  - (SD) STORM DRAIN OUTLET PER CITY STANDARD SIZE AND SLOPE PER PLAN. SEE 2021 SPPWC 151-3 FOR ADDITIONAL DETAILS.
  - (TR) REPLACE TRENCH DRAIN IN KIND. LOCATION AND SIZE TO MATCH EXISTING.
  - (AL) CLEANOUT, PER DETAIL 2, SHEET C8.00.
  - (HO) HOLE IN PLACE CONCRETE OPEN BOTTOM BUBBLER STRUCTURE SIZE PER PLAN, PER DETAIL 5, SHEET C8.01.
  - (FI) TRENCH DRAIN FILTER INSERT.
  - (PD) PLANTER DRAIN PER DETAIL 2, SHEET C8.02. SIZE PER PLAN.

- SANITARY SEWER**
- (SS) PVC 300-36 SANITARY SEWER PIPE PER DETAIL 4, SHEET C8.00. SIZE AND SLOPE PER PLAN. SEWER LINES WITHIN 10 FEET OF WATER LINES SHALL BE DROGGED.
  - (PC) POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING DRAWINGS FOR CONTINUATION.
  - (EC) POINT OF CONNECTION TO EXISTING SEWER LINE.
  - (WC) CONNECT TO WASH RACK GREASE INTERCEPTOR. SEE PLUMBING DRAWINGS.
  - (AL) CLEANOUT, PER DETAIL 2, SHEET C8.00.
  - (PC) POINT OF CONNECTION TO EXISTING MANHOLE.
  - (PC) PRECAST CONCRETE MANHOLE PER APWA STANDARD PLAN 200-2.
  - (MCP) MCP, SANITARY SEWER PIPE, PER CITY STANDARD, SIZE AND SLOPE PER PLAN.

- LEGEND**
- LIMIT OF WORK
  - - - - - PROPERTY LINE
  - - - - - SANITARY SEWER
  - - - - - WATER
  - - - - - DW - DOMESTIC WATER
  - - - - - FW - FIRE WATER
  - - - - - SD - STORM DRAIN
  - - - - - G - GAS
  - - - - - E - ELECTRIC
  - - - - - T - TELEPHONE
  - - - - - PERFORATED PIPE
  - POINT OF CONNECTION
  - COORDINATION POINT
  - CAP OR PLUG
  - UTILITY MANHOLE
  - UTILITY CLEANOUT
  - STORM DRAIN INLET
  - AREA DRAIN/PLANTER DRAIN
  - TRENCH DRAIN
  - FIRE HYDRANT
  - THRUST BLOCK
  - FIRE DEPARTMENT CONNECTION (FDC)
  - POST INDICATOR VALVE (PIV)
  - WATER VALVE
  - BACKFLOW ASSEMBLY
  - UTILITY METER VAULT



County of Orange

# JWA

REVISIONS

NO.	DESCRIPTION	DATE	BY
1	ISSUE FOR PERMITS SET	05/09/21	
2	ISSUE FOR PERMITS SET	11/03/21	

LEAVE/UPDATE: T1/14/21

---

**RECORD DRAWINGS STATEMENT**

I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that I am the author of the design and/or the designer of the design shown on the drawings herein and that I am a duly Licensed Professional Engineer in the State of California. I am not providing my professional services as an independent contractor. I am providing my professional services as an employee of the firm named herein. I am not providing my professional services as a consultant or as an independent contractor. I am not providing my professional services as a consultant or as an independent contractor. I am not providing my professional services as a consultant or as an independent contractor.

Project: **CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Drawn: **kpff**  
Checked: **kpff**

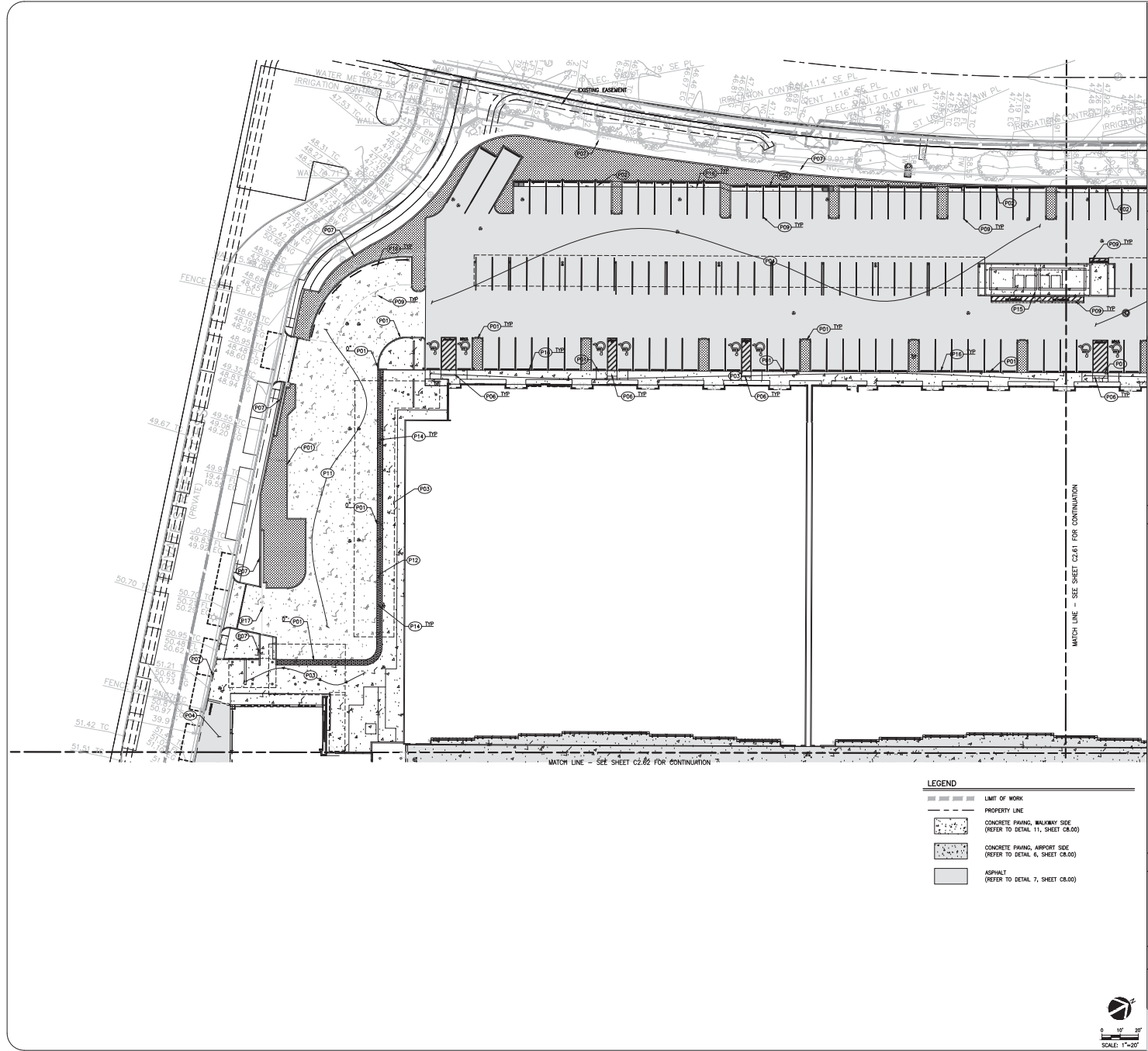
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Sheet: **1-C2.50**









**LEGEND**

	LIMIT OF WORK
	PROPERTY LINE
	CONCRETE PAVING, WALKWAY SIDE (REFER TO DETAIL 11, SHEET C8.00)
	CONCRETE PAVING, AIRPORT SIDE (REFER TO DETAIL 6, SHEET C8.00)
	ASPHALT (REFER TO DETAIL 7, SHEET C8.00)

**GENERAL NOTES**

**NOTE TO CONTRACTOR/CONSTRUCTION SURVEYOR:**  
CONSTRUCTION STAKING FOR IMPROVEMENTS SHOWN ON THESE PLANS SHALL BE PERFORMED BY A LICENSED LAND SURVEYOR. CONSTRUCTION STAKING SURVEYOR SHALL BE RESPONSIBLE FOR COORDINATION OF THESE PLANS WITH SOURCE DRAWINGS PREPARED BY ARCHITECT, LANDSCAPE ARCHITECT, STRUCTURAL ENGINEER, MEP CONSULTANT AND ANY OTHER DISCIPLINE PRIOR TO START OF STAKING AND CONSTRUCTION. ANY DISCREPANCIES THAT OCCUR SHALL BE BROUGHT TO THE ATTENTION OF THE ARCHITECT PRIOR TO THE START OF CONSTRUCTION SO THAT A CLARIFICATION CAN BE ISSUED.

- SHEET NOTES**
- P01 CONCRETE CURB, PER DETAIL 3 ON SHEET C8.00.
  - P02 CONCRETE CURB AND GUTTER, PER DETAIL 3, SHEET C8.01.
  - P03 CONCRETE PAVEMENT FOR WALKWAY, PER DETAIL 11, SHEET C8.00.
  - P04 ASPHALT CONCRETE PAVEMENT, PER DETAIL 7, SHEET C8.00.
  - P05 CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 6, SHEET C8.00.
  - P06 CURB RAMP.
  - P07 SITE WALL PER STRUCTURAL PLANS.
  - P08 4" CRUSHED MISCELLANEOUS BASE WITHIN PHASE 1 AREA.
  - P09 PAVEMENT STRIPING.
  - P10 8" ADA FENCE PER ARCHITECTURAL PLANS.
  - P11 CONCRETE PAVEMENT FOR DRIVE AISLE, PER DETAIL 10, SHEET C8.01. REFER TO LANDSCAPE PLANS FOR CONCRETE SPECIALTY FINISH.
  - P12 FINISHED JONES PER DETAIL 2, SHEET C8.01.
  - P13 ACCESSIBLE PARKING STALL PER DETAIL 12, SHEET C8.01.
  - P14 HOLLAND REFER TO ARCHITECTURAL PLANS FOR DETAILS.
  - P15 ELECTRICAL EQUIPMENT WARD WALL PER ELECTRICAL PLANS.
  - P16 PRE-CAST WHEEL STOP PER ARCHITECTURAL PLANS.
  - P17 GATE PER ARCHITECTURAL PLANS.
  - P18 STAIRS PER ARCHITECTURAL PLANS.
  - P19 MESH OFF PAD.
  - P20 ASPHALT CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 7, SHEET C8.00.

**LEGEND**

**KEY PLAN**

County of Orange

# JWA

<b>REVISIONS</b>	<b>DATE</b>	<b>BY</b>	

**RECORD DRAWING STATEMENT**

I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that the above described drawing was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer in the State of California. I am not aware of any false or misleading information contained herein. I am not aware of any false or misleading information contained herein. I am not aware of any false or misleading information contained herein.

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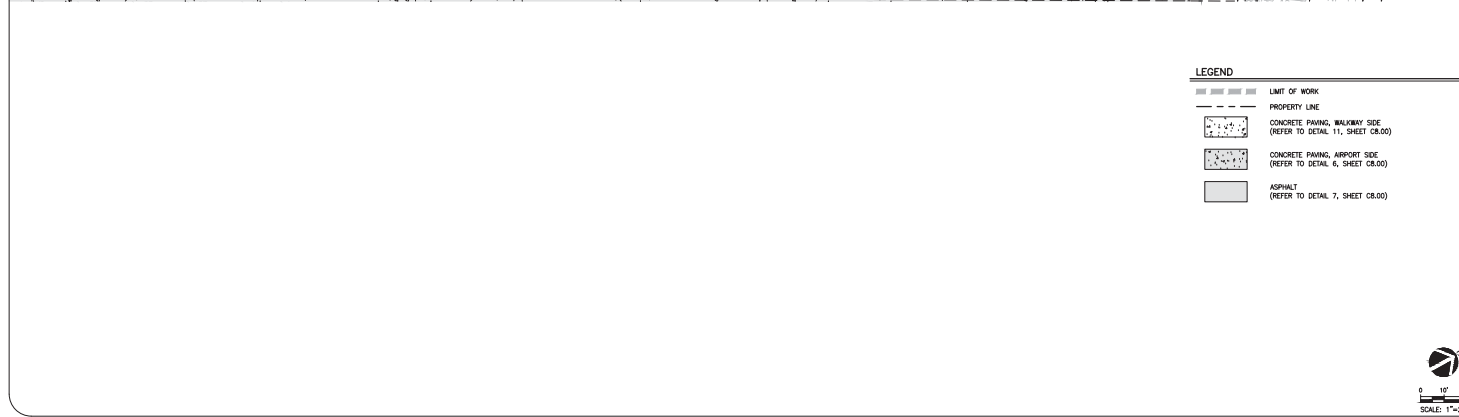
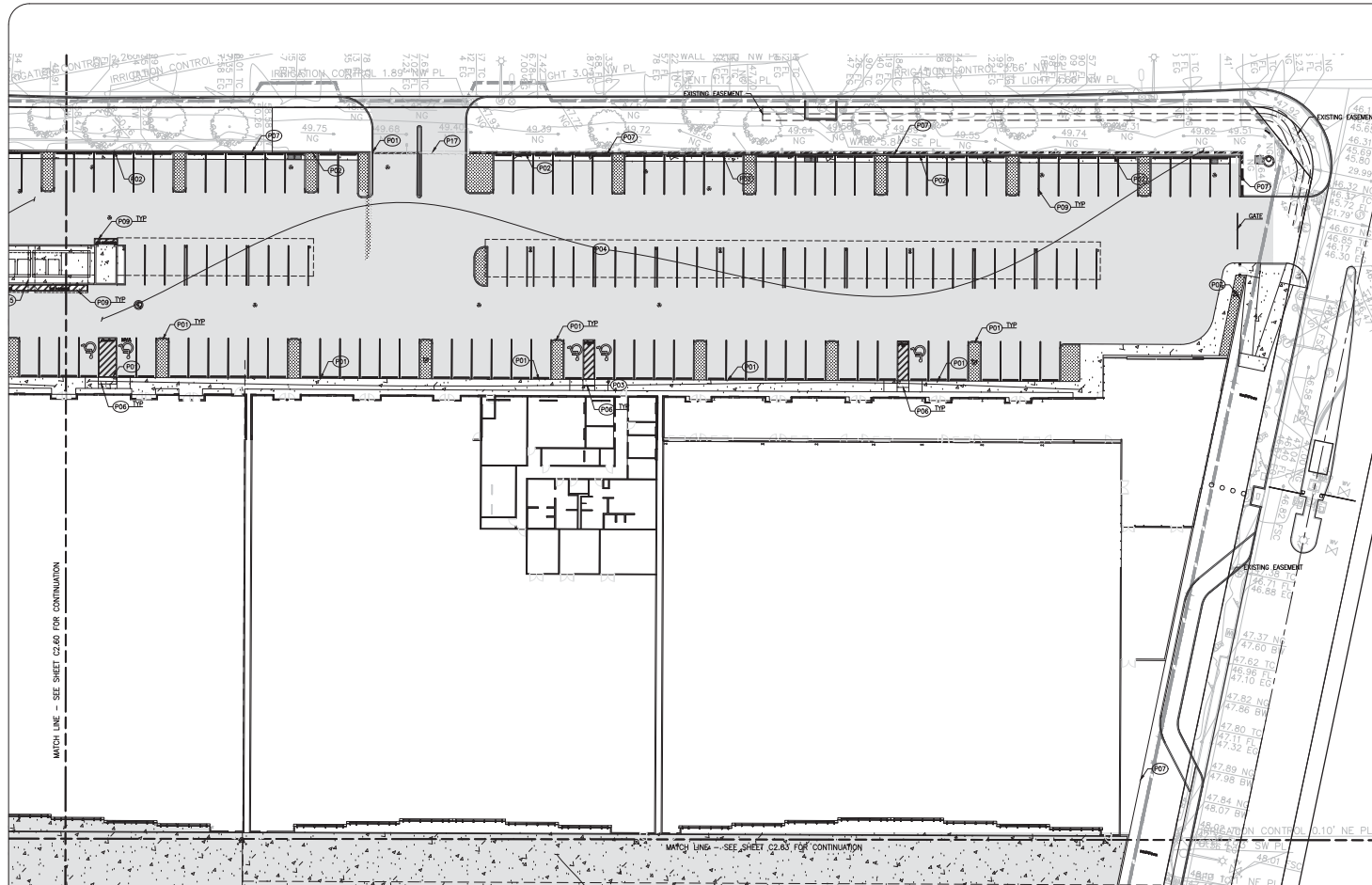
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**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Date: \_\_\_\_\_  
Print No: J140  
Sheet  
**1-C2.60**

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**LEGEND**

	LIMIT OF WORK
	PROPERTY LINE
	CONCRETE PAVING, WALKWAY SIDE (REFER TO DETAIL 11, SHEET C8.00)
	CONCRETE PAVING, AIRPORT SIDE (REFER TO DETAIL 6, SHEET C8.00)
	ASPHALT (REFER TO DETAIL 7, SHEET C8.00)

**GENERAL NOTES**

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- SHEET NOTES**
- (P1) CONCRETE CURB, PER DETAIL 3 ON SHEET C8.00.
  - (P2) CONCRETE CURB AND GUTTER, PER DETAIL 3, SHEET C8.01.
  - (P3) CONCRETE PAVEMENT FOR WALKWAY, PER DETAIL 11, SHEET C8.00.
  - (P4) ASPHALT CONCRETE PAVEMENT, PER DETAIL 7, SHEET C8.00.
  - (P5) CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 6, SHEET C8.00.
  - (P6) CURB RAMP.
  - (P7) SITE WALL PER STRUCTURAL PLANS.
  - (P8) 4" CRUSHED MISCELLANEOUS BASE WITHIN PHASE 1 AREA.
  - (P9) PAVEMENT STRIPING.
  - (P10) 8' ADA FENCE PER ARCHITECTURAL PLANS.
  - (P11) CONCRETE PAVEMENT FOR DRIVE AISLE, PER DETAIL 10, SHEET C8.01. REFER TO LANDSCAPE PLANS FOR CONCRETE SPECIALTY FINISH.
  - (P12) PROTECTED ZONES PER DETAIL 2, SHEET C8.01.
  - (P13) ACCESSIBLE PARKING STALL PER DETAIL 12, SHEET C8.01.
  - (P14) ROLLER REFER TO ARCHITECTURAL PLANS FOR DETAILS.
  - (P15) ELECTRICAL EQUIPMENT WARD WALL PER ELECTRICAL PLANS.
  - (P16) PRE-CAST WHEEL STOP PER ARCHITECTURAL PLANS.
  - (P17) GATE PER ARCHITECTURAL PLANS.
  - (P18) STAIRS PER ARCHITECTURAL PLANS.
  - (P19) MASH OFF PAD.
  - (P20) ASPHALT CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 1, SHEET C8.02.

**LEGEND**

**KEY PLAN**

County of Orange

REVISIONS	DATE	BY

RECORD DRAWING STATEMENT  
I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that the above described project was designed by me or under my direct supervision and that I am a duly Licensed Professional Engineer in the State of California. I am not providing my professional services as a contractor. I am not providing my professional services as a contractor. I am not providing my professional services as a contractor. I am not providing my professional services as a contractor.

kpff

Kathleen P. Felt  
Professional Engineer  
No. 50763  
Civil  
San Diego, CA 92107  
Tel: 619.444.8920  
Fax: 619.444.8920  
www.kpff.com

Sht Title: PAVING PLAN  
Project: CLAY LACY FBO  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

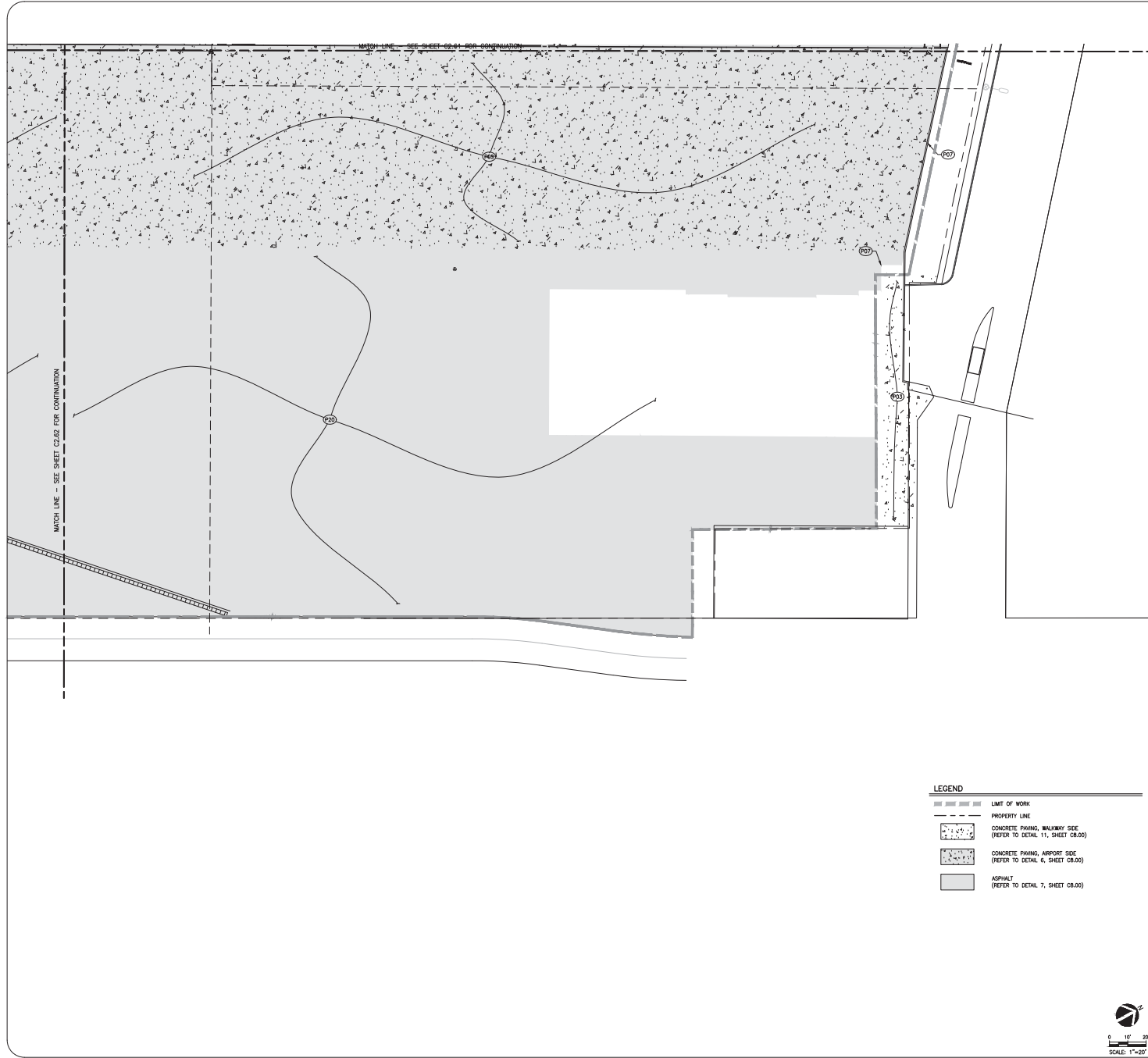
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Drawn: \_\_\_\_\_  
Checked: \_\_\_\_\_

Approvals  
Project Manager: \_\_\_\_\_  
Section Manager: \_\_\_\_\_

Date: \_\_\_\_\_  
Print No.: J140  
Sheet  
**1-C2.61**

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**LEGEND**

	LIMIT OF WORK
	PROPERTY LINE
	CONCRETE PAVING, WALKWAY SIDE (REFER TO DETAIL 11, SHEET C8.00)
	CONCRETE PAVING, AIRPORT SIDE (REFER TO DETAIL 6, SHEET C8.00)
	ASPHALT (REFER TO DETAIL 7, SHEET C8.00)

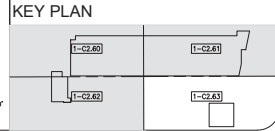
**GENERAL NOTES**

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- (P1) CONCRETE CURB, PER DETAIL 3 ON SHEET C8.00.
  - (P2) CONCRETE CURB AND GUTTER, PER DETAIL 3, SHEET C8.01.
  - (P3) CONCRETE PAVEMENT FOR WALKWAY, PER DETAIL 11, SHEET C8.00.
  - (P4) ASPHALT CONCRETE PAVEMENT, PER DETAIL 7, SHEET C8.00.
  - (P5) CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 6, SHEET C8.00.
  - (P6) CURB RAMP.
  - (P7) SITE WALL PER STRUCTURAL PLANS.
  - (P8) 4" CRUSHED MISCELLANEOUS BASE WITHIN PHASE 1 AREA.
  - (P9) PAVEMENT STRIPING.
  - (P10) 8' ADA FENCE PER ARCHITECTURAL PLANS.
  - (P11) CONCRETE PAVEMENT FOR DRIVE AISLE, PER DETAIL 10, SHEET C8.01. REFER TO LANDSCAPE PLANS FOR CONCRETE SPECIALTY FINISH.
  - (P12) FINISHED JONES PER DETAIL 2, SHEET C8.01.
  - (P13) ACCESSIBLE PARKING STALL PER DETAIL 12, SHEET C8.01.
  - (P14) HOLLARD REFER TO ARCHITECTURAL PLANS FOR DETAILS.
  - (P15) ELECTRICAL EQUIPMENT WARD WALL PER ELECTRICAL PLANS.
  - (P16) PRE-CAST WHEEL STOP PER ARCHITECTURAL PLANS.
  - (P17) GATE PER ARCHITECTURAL PLANS.
  - (P18) STAIRS PER ARCHITECTURAL PLANS.
  - (P19) WASH OFF PAID.
  - (P20) ASPHALT CONCRETE PAVEMENT FOR AIRPORT, PER DETAIL 1, SHEET C8.02.

**LEGEND**

	1-C2.60
	1-C2.61
	1-C2.62
	1-C2.63



**REVISIONS**

NO.	DATE	DESCRIPTION	BY
1	05/09/21		
2	12/03/21		

**RECORD DRAWING STATEMENT**  
I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that the above described drawings were prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer in the State of California. I am not providing my professional seal for any other purpose than to certify that the drawings were prepared by me or under my direct supervision.

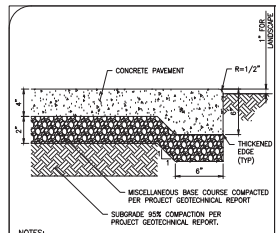


**kpff**  
KPMG PROFESSIONAL  
CORPORATION  
10100 Wilshire Blvd  
Suite 2000  
Los Angeles, CA 90024  
Tel: 310.552.2000  
Fax: 310.552.2001

**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

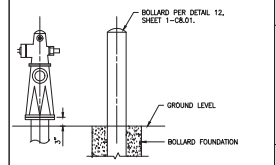
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Date	J140
Sheet	1-C2.63

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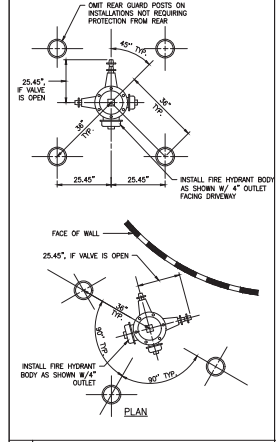


**NOTES:**  
 1. ALL TREAD SURFACES SHALL BE SLIP-RESISTANT.  
 2. REFER TO ARCHITECTURAL DRAWINGS FOR COLOR, PATTERN, TEXTURE, AND FINISH.  
 3. SEE PLAN FOR LOCATION OF CONTROL JOINTS.

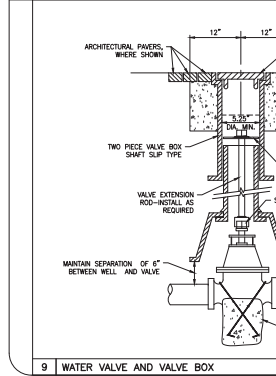
11 CONCRETE WALK SECTION N.15



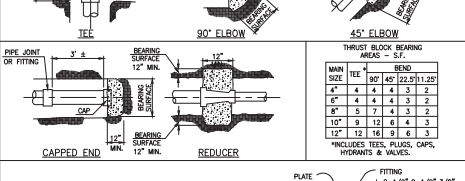
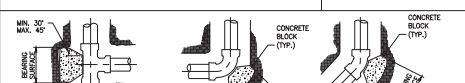
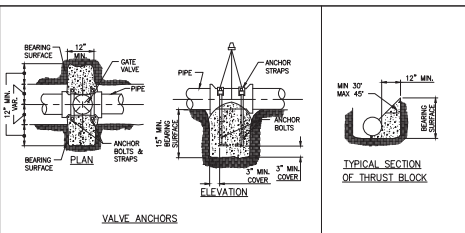
10 FIRE HYDRANT BOLLARDS N.15



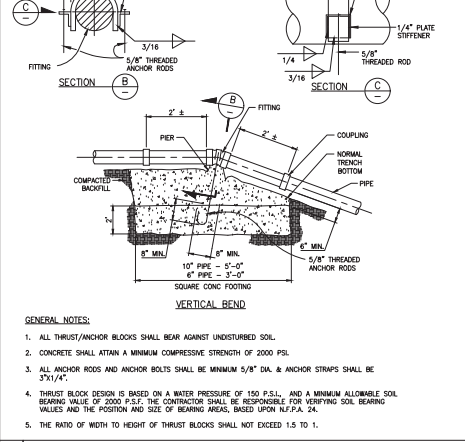
9 WATER VALVE AND VALVE BOX N.15



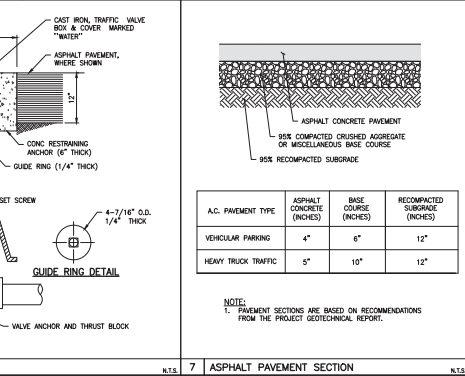
8 THRUST AND ANCHOR BLOCK DETAILS N.15



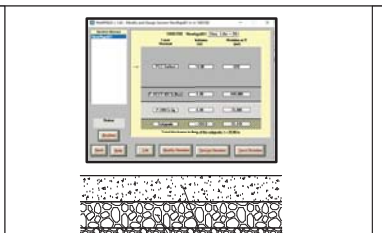
7 ASPHALT PAVEMENT SECTION N.15



6 PORTLAND CEMENT CONCRETE N.15



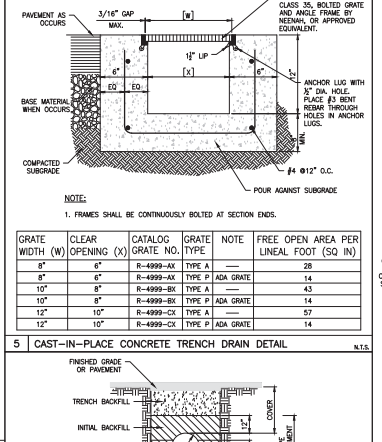
5 CAST-IN-PLACE CONCRETE TRENCH DRAIN DETAIL N.15



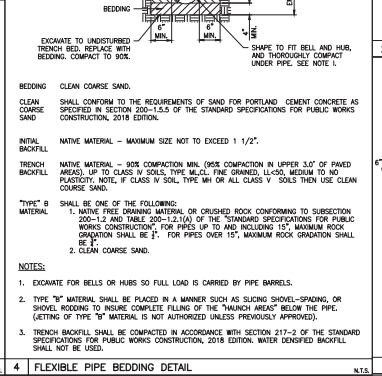
P.C.C. PAVEMENT TYPE	CONCRETE (INCHES)	BASE COURSE (INCHES)	SUBBASE COURSE (INCHES)	RECOMPACTED SUBGRADE (INCHES)
APPROX SIDE	4"	5"	6"	-

GRATE WIDTH (W)	CLEAR OPENING (X)	CATALOG GRATE NO.	NOTE	FREE OPEN AREA PER LINEAL FOOT (SQ IN)
8"	6"	R-4999-AX	TYPE A	28
8"	8"	R-4999-AX	TYPE A ADA GRATE	14
10"	8"	R-4999-BX	TYPE B ADA GRATE	43
10"	10"	R-4999-BX	TYPE B ADA GRATE	14
12"	10"	R-4999-CX	TYPE A ADA GRATE	37
12"	12"	R-4999-CX	TYPE A ADA GRATE	14

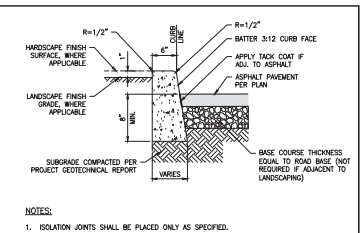
4 FLEXIBLE PIPE BEDDING DETAIL N.15



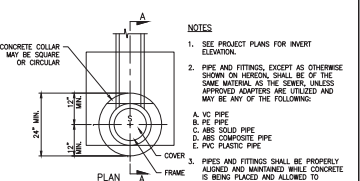
3 CONCRETE CURB N.15



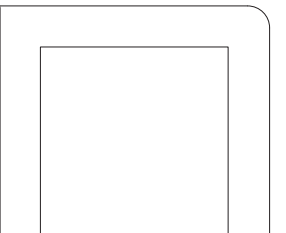
2 STANDARD CLEANOUT N.15



**NOTES:**  
 1. ISOLATION JOINTS SHALL BE PLACED ONLY AS SPECIFIED.  
 2. CONTROL JOINTS CONSISTING OF 1" DEEP SCORES SHALL BE PLACED AT 10' INTERVALS O.C.  
 3. WHERE A WALK IS ADJACENT TO THE CURB, THE JOINTS SHALL ALIGN WITH JOINTS IN THE WALK.



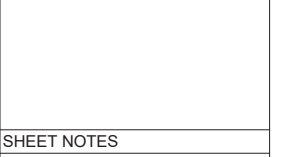
1 FIRE HYDRANT ASSEMBLY N.15



**GENERAL NOTES**



**SHEET NOTES**



**LEGEND**



**KEY PLAN**

County of Orange  
**JWA**

**REVISIONS**

NO.	DESCRIPTION	DATE	BY
1	ISSUED FOR PERMITS	05/09/21	JWA
2	ISSUED FOR PERMITS	12/03/21	JWA

LEASE/UPDATE: 1/14/21

**RECORD DRAWING STATEMENT**

I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that the above is a true and correct copy of the original drawing as submitted to me for record.

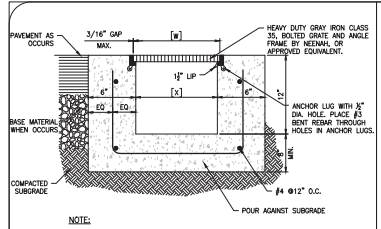
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 CHECKED: [Name]

**kpff**

CLAY LACY FBO  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

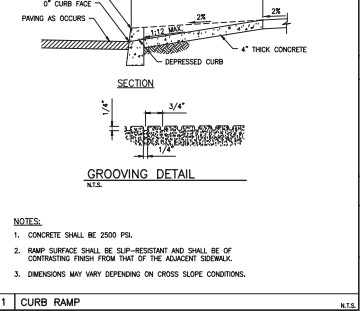
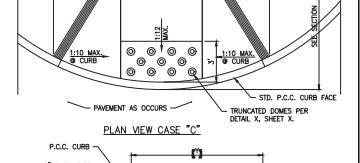
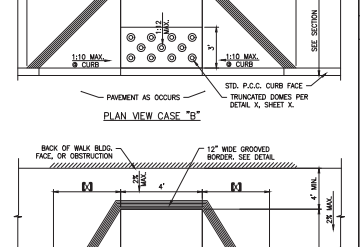
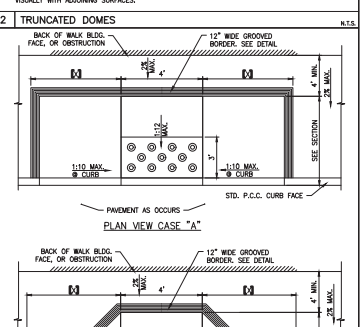
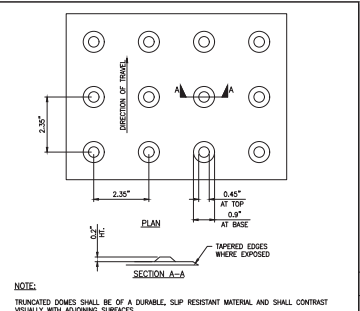
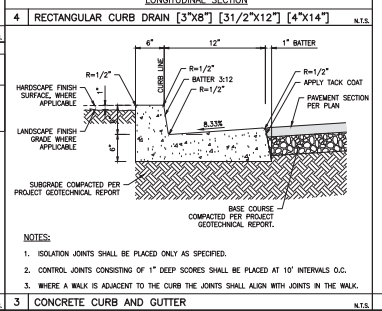
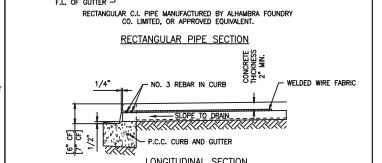
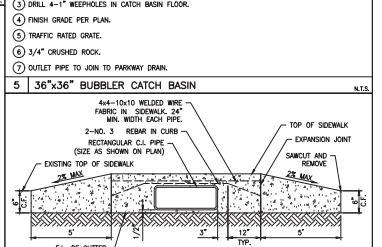
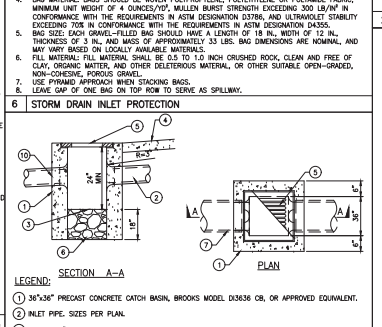
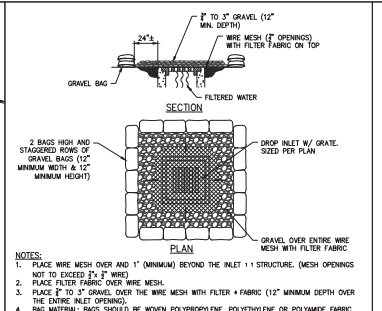
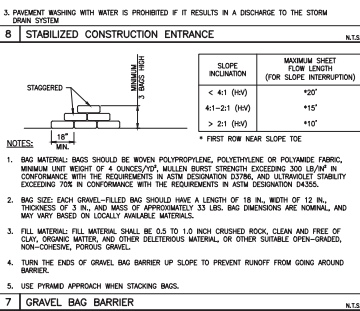
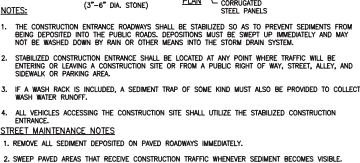
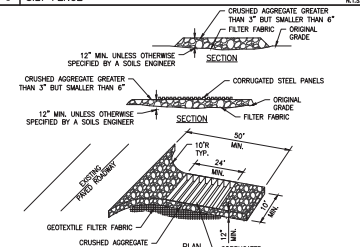
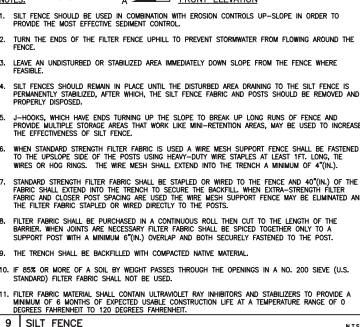
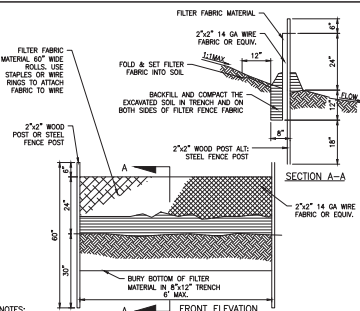
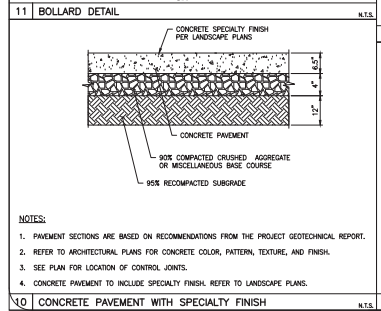
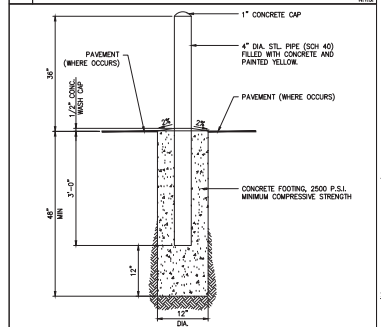
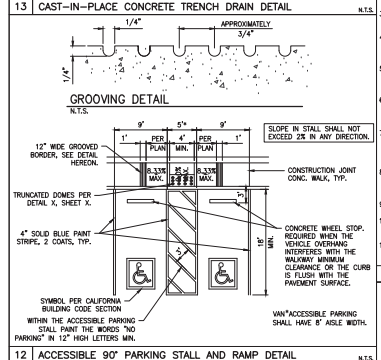
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 Section Manager: [Name]  
 Date: [Date]  
 Sheet: [Number]



NOTE: 1. FRAMES SHALL BE CONTINUOUSLY BOLTED AT SECTION ENDS.

GRATE WIDTH (W)	CLEAR OPENING (X)	CATALOG GRATE NO.	GRATE TYPE	NOTE	FREE OPEN AREA PER SQUARE FOOT (SQ IN)
8"	6"	R-4999-AX	TYPE A		28
8"	6"	R-4999-AX	TYPE A	ADA GRATE	14
10"	8"	R-4999-BX	TYPE-B		43
10"	8"	R-4999-BX	TYPE-B	ADA GRATE	19
12"	10"	R-4999-CX	TYPE-C		57
12"	10"	R-4999-CX	TYPE-C	ADA GRATE	14



**GENERAL NOTES**

**SHEET NOTES**

**LEGEND**

**KEY PLAN**

1. PAVEMENT SECTIONS ARE BASED ON RECOMMENDATIONS FROM THE PROJECT GEOTECHNICAL REPORT.

2. REFER TO ARCHITECTURAL PLANS FOR CONCRETE COLOR, PATTERN, TEXTURE, AND FINISH.

3. SEE PLAN FOR LOCATION OF CONTROL JOINTS.

4. CONCRETE PAVEMENT TO INCLUDE SPECIALLY FINISH. REFER TO LANDSCAPE PLANS.

1. BAG MATERIAL: BAGS SHOULD BE WOVEN POLYPROPYLENE, POLYETHYLENE OR POLYAMIDE FABRIC, MINIMUM UNIT WEIGHT OF 4 OUNCES/SQ. YARD, Mullen BURST STRENGTH EXCEEDING 300 LB/IN<sup>2</sup> IN CONFORMANCE WITH THE REQUIREMENTS IN ASTM DESIGNATION D3356, AND ULTRAVIOLET STABILITY EXCEEDING 70% IN CONFORMANCE WITH THE REQUIREMENTS IN ASTM DESIGNATION D3356.

2. BAG SIZE: EACH GRATE-FILLED BAG SHOULD HAVE A LENGTH OF 18 IN., WIDTH OF 12 IN., THICKNESS OF 3 IN., AND MASS OF APPROXIMATELY 33 LBS. BAG DIMENSIONS ARE NOMINAL, AND MAY VARY BASED ON LOCALLY AVAILABLE MATERIALS.

3. FILL MATERIAL: FILL MATERIAL SHALL BE 0.5 TO 1.0 INCH CRUSHED ROCK, CLEAN AND FREE OF CLAY, ORGANIC MATTER, AND OTHER DELETERIOUS MATERIAL, OR OTHER SUITABLE OPEN-GRADED, NON-COHESIVE, POROUS GRAVEL.

4. TURN THE ENDS OF GRATE BAG BARRIER UP SLOPE TO PREVENT RUNOFF FROM COMING AROUND BARRIERS.

5. USE PYRAMID APPROACH WHEN STACKING BAGS.

1. ISOLATION JOINTS SHALL BE PLACED ONLY AS SPECIFIED.

2. CONTROL JOINTS CONSISTING OF 1\"/>

County of Orange

**JWA**

REVISIONS

NO.	DESCRIPTION	DATE
1	ISSUED FOR PERMIT	05/09/21
2	FOR GROUND SET	12/03/21

LEASE/UPDATE: T/M/21

DATE: 02/22/21

PROJECT: JOHN WAYNE AIRPORT

CITY: ORANGE COUNTY, CALIFORNIA

CLAY LACY FBO

1-C8.01

P:\2015\10371018\_10m\Work\Report - 11025 CAD Details\DWG\10371018-1-2015.dwg, Date: 12/11/14 2:29pm

**3 CONTECH DETAIL** N.T.S.

**CDG4030-B-C DESIGN NOTES**

DESIGNED AT SERVICE TREATMENT CAPACITY OF 0.1 CFS PER S.I. GAL. SERVICE CAPACITY. IF THE SITE COMPLETION EXCEEDS DESIGN CAPACITY, AN APPROPRIATE STRUCTURE IS REQUIRED.

DESIGNED AT STANDARD CONDITIONS UNLESS NOTED OTHERWISE.

THESE NOTES REFLECT THE DESIGNER'S BEST PROFESSIONAL JUDGMENT FOR APPROVED CONDITIONS.

SITE SPECIFIC DATA REQUIREMENTS			
NO.	DESCRIPTION	REMARKS	STATUS
1	CONCRETE STRENGTH		
2	SOIL BEARING CAPACITY		
3	GROUNDWATER TABLE		
4	ADDITIONAL COMMENTS		

**CONTECH**  
CONTECH CONSTRUCTION SYSTEMS, INC.  
CONTECH CONSTRUCTION SYSTEMS, INC.  
CONTECH CONSTRUCTION SYSTEMS, INC.

**CDG4030-B-C**  
ONLINE COG  
STANDARD DETAIL

**1 ASPHALT PAVEMENT SECTION** N.T.S.

AC PAVEMENT TYPE	ASPHALT CONCRETE (INCHES)	BASE COURSE (INCHES)	SUBBASE COURSE (INCHES)	RECOMPACTED SUBGRADE (INCHES)
PORTLAND SIDE	4"	5"	6.5"	-

**NOTE:**

- PAVEMENT SECTIONS ARE BASED ON RECOMMENDATIONS FROM THE PROJECT GEOTECHNICAL REPORT.
- SUBBASE COURSE AGGREGATE P-209 OR AG WILL HAVE 100% COMPACTION FOR THE UPPER 6 INCHES. THE FOLLOWING 6 INCHES BELOW WILL HAVE A 92% COMPACTION RATE.
- SUBGRADE TO MEET THE CALIFORNIA BEARING RATIO (CBR) OF 17% OR A MODULUS OF SUBGRADE REACTION 200 PCL.

**2 PLANTER DRAIN DETAIL** N.T.S.

**LEGEND:**

- ① GALVANIZED CAST IRON BODY AND GRATE AREA DRAIN.
- ② 2,500 PSI PORTLAND CEMENT CONCRETE PAD (PAD MAY BE EITHER ROUND OR SQUARE IN PLAN VIEW).
- ③ OUTLET PIPE TO MATCH PIPE SIZE PER PLAN.
- ④ TOP OF DRAIN ELEVATION PER PLAN.
- ⑤ FINISH GRADE PER PLAN.
- ⑥ DOME TOP WHERE INDICATED ON PLAN (SEE TABLE BELOW)

SIZE	TYPE	ITEM DESCRIPTION	MODEL NO.	FREE AREA (SQ IN)
8" DIA.	DOME	JAY B. SMITH MFG. CO. OR APPROVED EQUIVALENT	2671-U-G	25

**GENERAL NOTES**

**SHEET NOTES**

**LEGEND**

**KEY PLAN**

**GENERAL NOTES**

**SHEET NOTES**

**LEGEND**

**KEY PLAN**

**REVISIONS**

NO.	DESCRIPTION	DATE	BY
1	ISSUED FOR PERMIT	05/09/21	
2	REVISIONS SET	12/03/21	
		<b>LEASE UPDATE</b>	<b>1/14/21</b>

**RECORD DRAWING STATEMENT**

I, the undersigned, being a duly Licensed Professional Engineer in the State of California, do hereby certify that this drawing was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer in the State of California. I am not providing my services to the client for any other project or for any other purpose than that stated on this drawing. I am not providing my services to the client for any other project or for any other purpose than that stated on this drawing.

**PROFESSIONAL SEAL**

**JWA**

John W. Adams, P.E.  
Professional Engineer  
No. 10176  
Civil Engineering  
State of California  
Exp. 12/31/2025

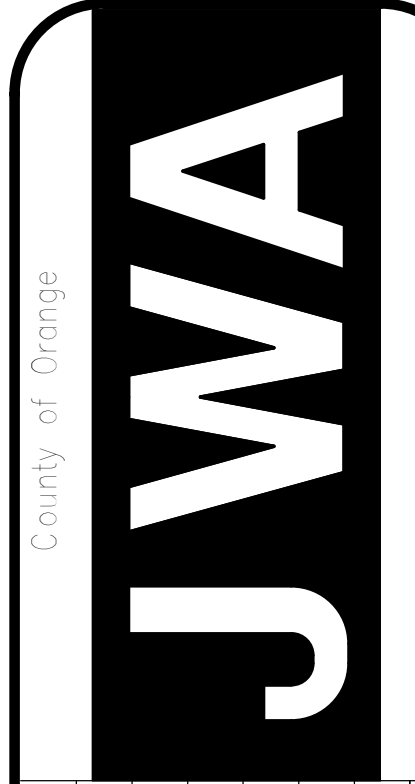
**kpff**

KPMG PROFESSIONAL SERVICES, INC.  
10000 Wilshire Blvd., Suite 1000  
Beverly Hills, CA 90210  
Tel: (310) 271-6000  
Fax: (310) 271-6001

**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Project No. **1-C8.02**





County of Orange

Revisions	Author	Checker	Date	Descr.	Sym.
			12/11/20	JWA CADX SUBMISSION	
			1/14/21	LEASE UPDATE	

**Gensler**  
 500 S. Figueroa St.  
 Los Angeles, CA 90071  
 Tel: 213.527.3988

**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

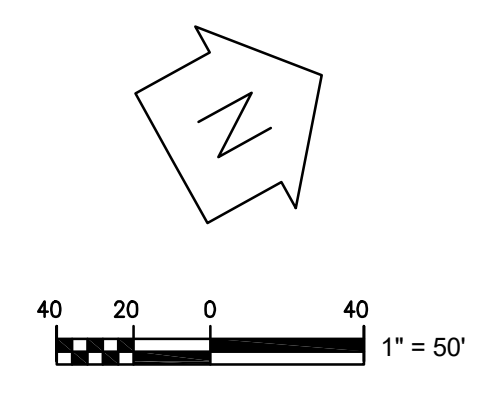
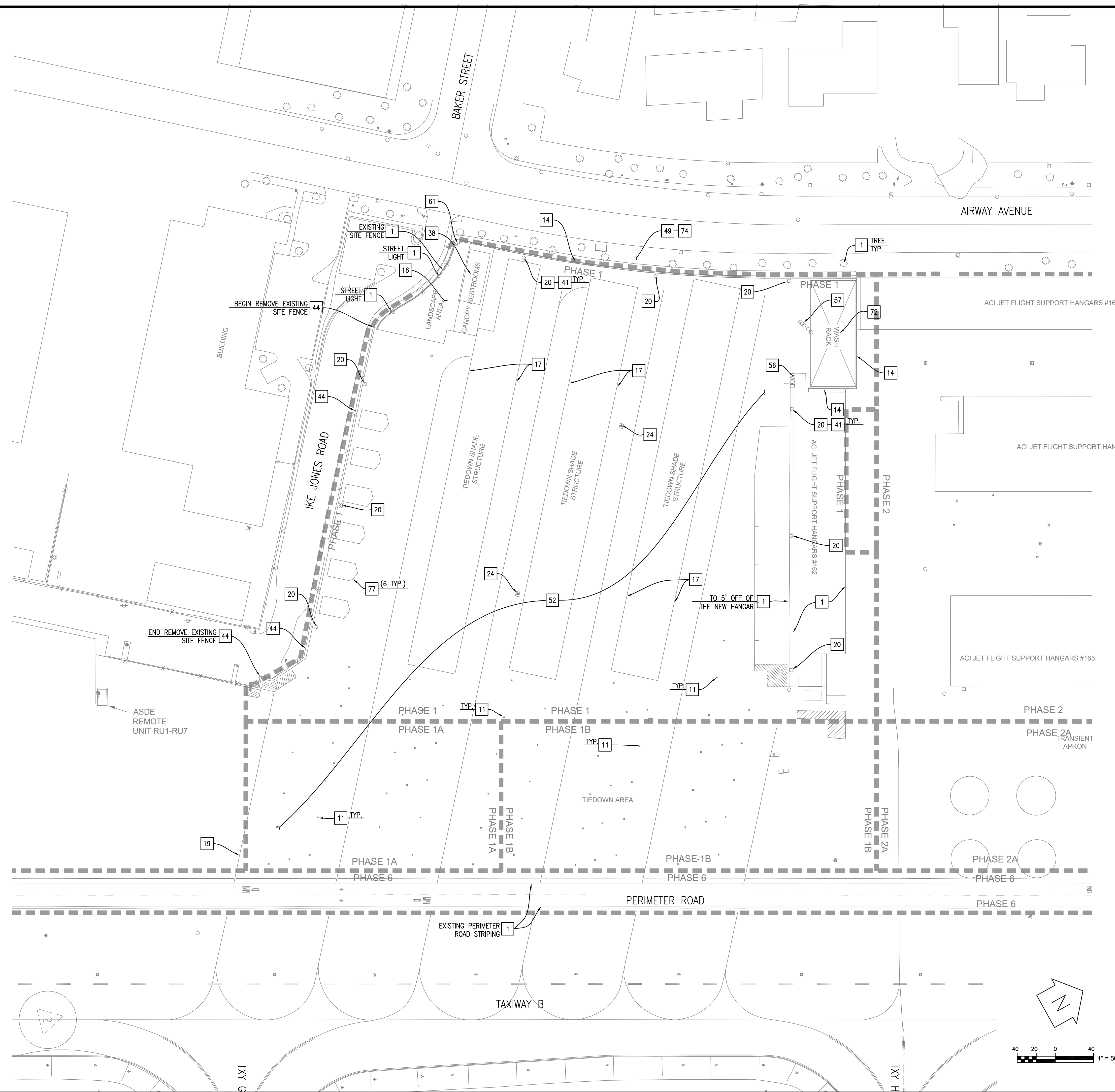
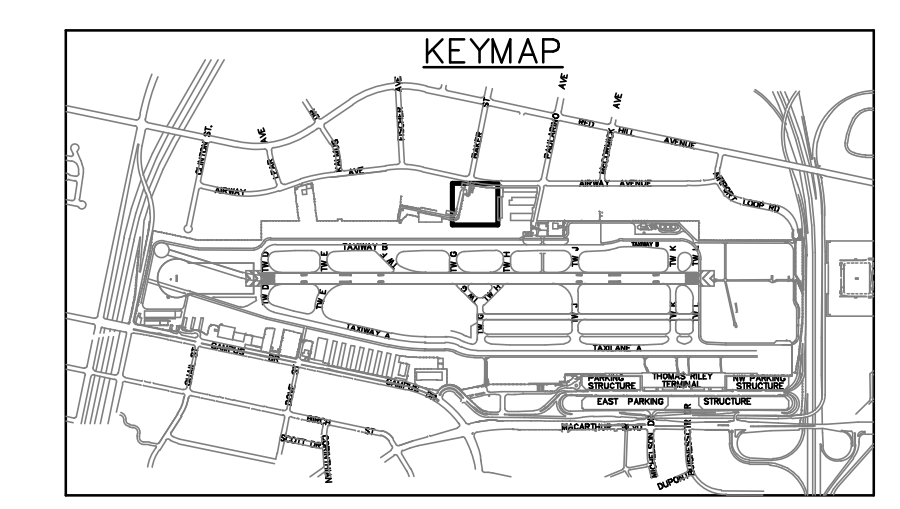
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 Project: **CLAY LACY FBO**  
 Author: \_\_\_\_\_  
 Checker: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Plan No. 41023-J090  
 Sheet **A0.02A**

**DEMOLITION/DISPOSITION NOTES:**

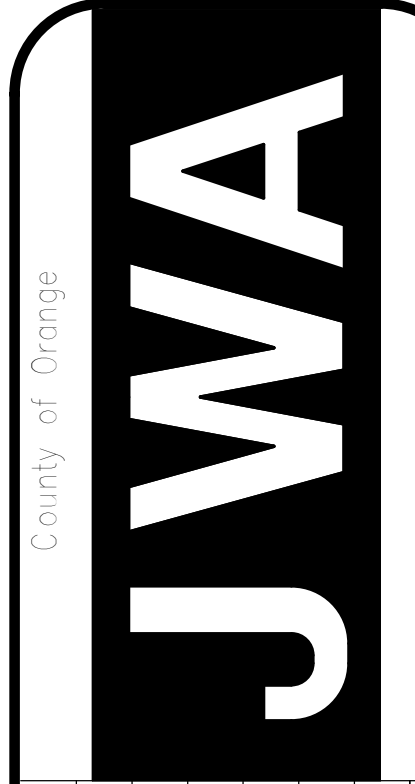
- 1 PROTECT IN PLACE. (ITEM AS INDICATED)
- 11 REMOVE TIE DOWN.
- 14 REMOVE CONCRETE BLOCK WALL.
- 15 REMOVE FENCE AND GATE.
- 16 REMOVE LANDSCAPING.
- 17 REMOVE AND SALVAGE STEEL-FRAMED AIRCRAFT SHADE STRUCTURES.
- 19 REMOVE TAXIWAY CENTERLINE STRIPING.
- 20 REMOVE LIGHT POLE, FIXTURE, CONCRETE BASE AND WIRING.
- 24 REMOVE UNDERGROUND FIRE HYDRANT.
- 38 DEMOLISH AND REMOVE BUILDING/HANGAR.
- 41 SEE ELECTRICAL PLANS FOR DISPOSITION OF ELECTRICAL LINES.
- 44 REMOVE FENCE.
- 49 REMOVE TREE.
- 52 REMOVE AC PAVEMENT.
- 53 REMOVE PCC PAVEMENT.
- 56 REMOVE ABOVE GROUND WASTE OIL STORAGE FACILITY.
- 61 PROTECT IN PLACE CURB RETAINING WALL AND FENCE.
- 72 REMOVE PCC PAVEMENT/WASHRACK FACILITIES.
- 73 REMOVE SEWER MANHOLE.
- 74 REESTABLISH LANDSCAPE AREA.
- 77 REMOVE AND SALVAGE METAL CARPORT-STYLE SHADE STRUCTURES.

**LEGEND**

- x - x - EXISTING FENCE
- o - o - EXISTING WALL-FENCE
- - - - - LIMIT OF WORK, UNLESS NOTED
- - - - - PHASING LIMIT
- x - CONSTRUCTION FENCE (TEMPORARY)
- x - CONSTRUCTION FENCE ON K-RAIL (TEMPORARY)
- - - - - LOW PROFILE BARRICADES
- - - - - PROPERTY LINE







Revisions	Author	Checker	Date
LEAVE UPDATE	JWA CADIX SUBMISSION		1/14/21
			12/11/20

SEAL	Date

**Gensler**  
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 Los Angeles, CA 90071  
 Tel: 213.527.3988

**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Project Title: NW DEMO PLAN - SEGMENT B

Author: [ ] Checker: [ ]  
 Date: [ ]

Plan No. 41023-J090

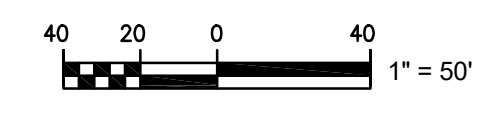
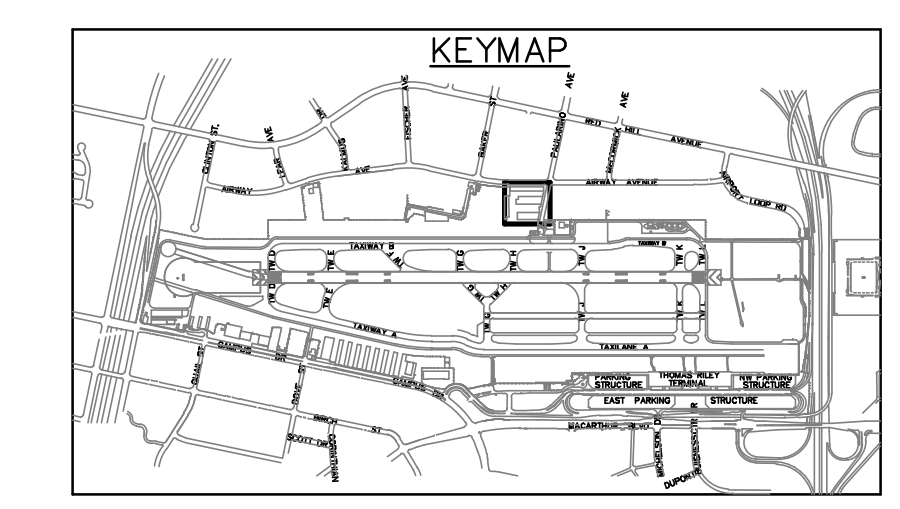
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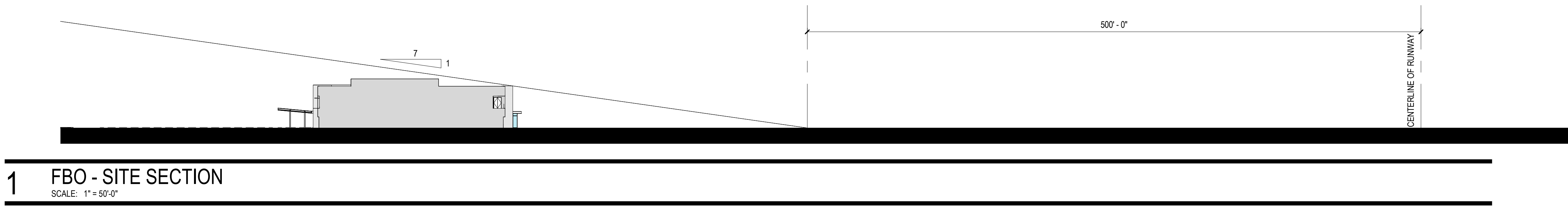
**DEMOLITION/DISPOSITION NOTES:**

- 1 PROTECT IN PLACE. (ITEM AS INDICATED)
- 11 REMOVE TIE DOWN.
- 14 REMOVE CONCRETE BLOCK WALL.
- 15 REMOVE FENCE AND GATE.
- 16 REMOVE LANDSCAPING.
- 17 REMOVE AND SALVAGE STEEL-FRAMED AIRCRAFT SHADE STRUCTURES.
- 19 REMOVE TAXIWAY CENTERLINE STRIPING.
- 20 REMOVE LIGHT POLE, FIXTURE, CONCRETE BASE AND WIRING.
- 23 REMOVE DRIVEWAY
- 24 REMOVE UNDERGROUND FIRE HYDRANT.
- 32 PROTECT IN PLACE MANHOLE.
- 34 REMOVE STORM DRAIN MANHOLE.
- 38 DEMOLISH AND REMOVE BUILDING/HANGAR.
- 44 REMOVE FENCE.
- 47 REMOVE STORM DRAIN INLET.
- 49 REMOVE TREE.
- 52 REMOVE AC PAVEMENT.
- 53 REMOVE PCC PAVEMENT.
- 56 REMOVE ABOVE GROUND WASTE OIL STORAGE/FACILITY.
- 60 ADJUST TO GRADE.
- 66 REMOVE CURB AND SIDEWALK.
- 67 PROTECT IN PLACE COMMUNICATION PULL BOX.
- 68 REMOVE MAILBOX
- 70 PROTECT IN PLACE PULLBOX.
- 73 REMOVE SEWER MANHOLE.
- 74 REESTABLISH LANDSCAPE AREA.
- 77 REMOVE AND SALVAGE METAL CARPORT-STYLE SHADE STRUCTURES.

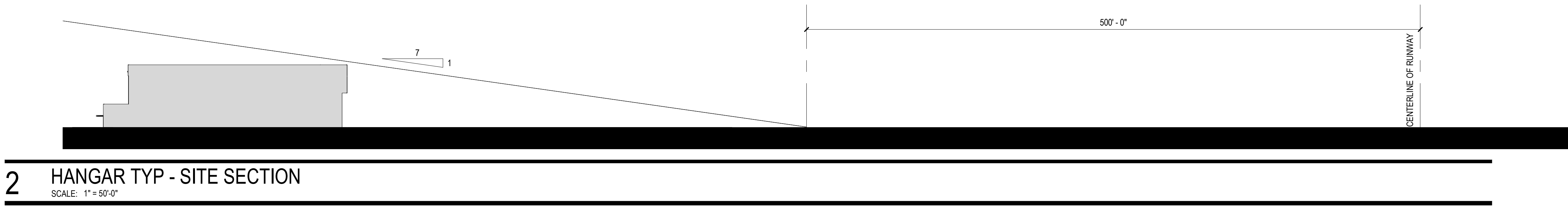
**LEGEND**

- x - x - EXISTING FENCE
- o - o - EXISTING WALL-FENCE
- - - - - LIMIT OF WORK, UNLESS NOTED
- - - - - PHASING LIMIT
- x - CONSTRUCTION FENCE (TEMPORARY)
- x - CONSTRUCTION FENCE ON K-RAIL (TEMPORARY)
- - - - - LOW PROFILE BARRICADES
- - - - - PROPERTY LINE





**1 FBO - SITE SECTION**  
SCALE: 1" = 50'-0"



**2 HANGAR TYP - SITE SECTION**  
SCALE: 1" = 50'-0"

County of Orange

# JWA

Revisions	Date	Sym.	Descr.
LEASE UPDATE	1/14/21		JWA CADIX SUBMISSION
	12/11/20		

**Gensler**  
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Author: \_\_\_\_\_  
Chkd.: \_\_\_\_\_  
Checker: \_\_\_\_\_  
Date: \_\_\_\_\_

**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Proj. No. | SET PROJECT INFO NUMBER PARAMETER |

Site Title: **NW SITE SECTIONS**

Approvals

PM  
Manager, Airport  
Development

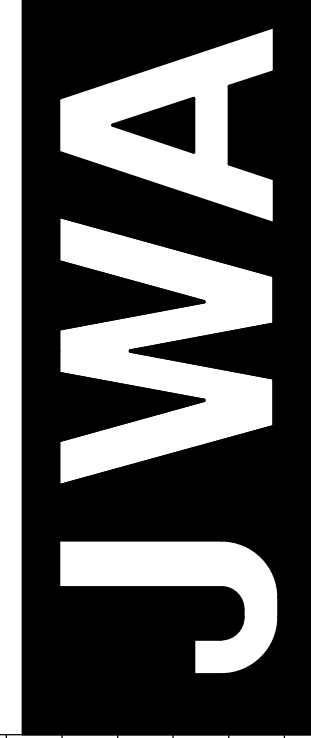
Date

Plan No.  
41023-J090

Sheet

## A0.61

County of Orange



Revisions	Author	Checker	Date	Descr.	Sym.	Date
LEASE UPDATE			1/14/21	JWA CADIX SUBMISSION		12/11/20

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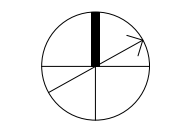
Project: **CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Proj. No. | SET PROJECT INFO NUMBER PARAMETER |  
 Author | Chkd. | Checker | Date

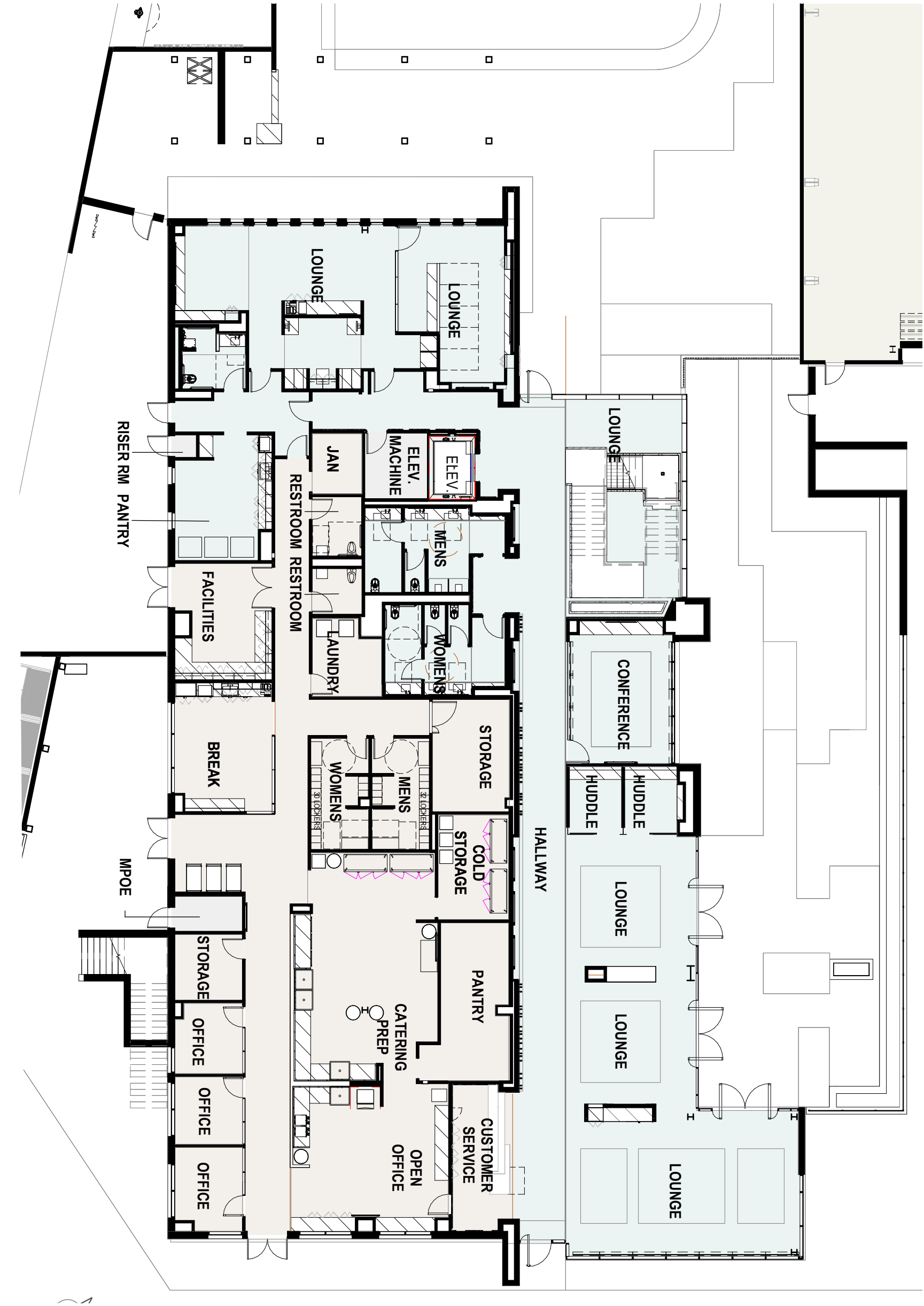
Approvals  
 PM  
 Manager, Airport Development

Date  
 Plan No.  
 41023-J090

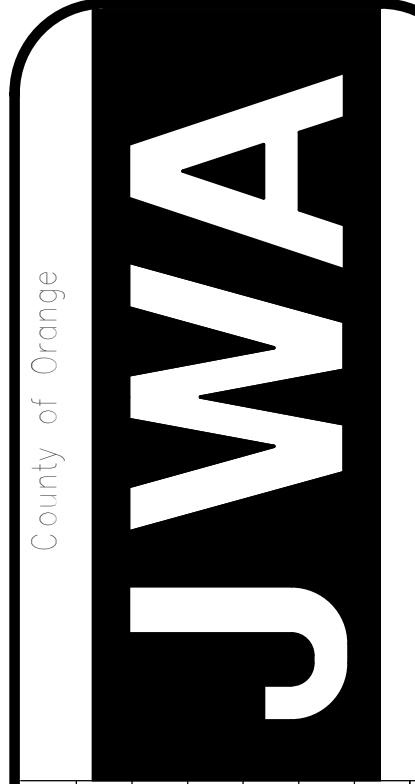
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**A1.21**



**2** FBO - FLOOR PLAN - LEVEL 2  
 SCALE: 1/16" = 1'-0"



**1** FBO - FLOOR PLAN - LEVEL 1  
 SCALE: 1/16" = 1'-0"



County of Orange



**1 FBO - EXTERIOR ELEVATION - NORTH**  
SCALE: 1/16" = 1'-0"



**2 FBO - EXTERIOR ELEVATION - EAST**  
SCALE: 1/16" = 1'-0"



**3 FBO - EXTERIOR ELEVATION - SOUTH**  
SCALE: 1/16" = 1'-0"



**4 FBO - EXTERIOR ELEVATION - WEST**  
SCALE: 1/16" = 1'-0"

Revisions	Author	Checker	Date
LEAVE UPDATE	JWA	CADIX	12/11/20
JWA CADIX SUBMISSION			12/11/20

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**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Proj. No. [ SET PROJECT INFO NUMBER PARAMETER ]

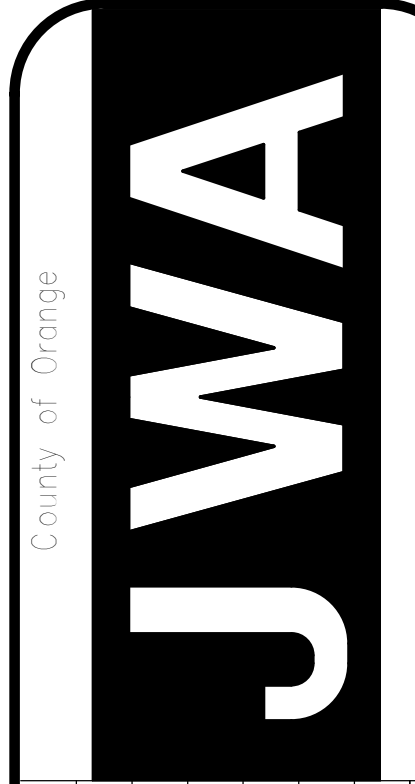
Approvals

PM  
Manager, Airport Development

Date

Plan No.  
41023-J090

Sheet  
**A1.51**



County of Orange

Revisions	Author	Checker	Date
LEASE UPDATE			1/14/21
JWA CADIX SUBMISSION			12/11/20

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 500 S. Figueroa St.  
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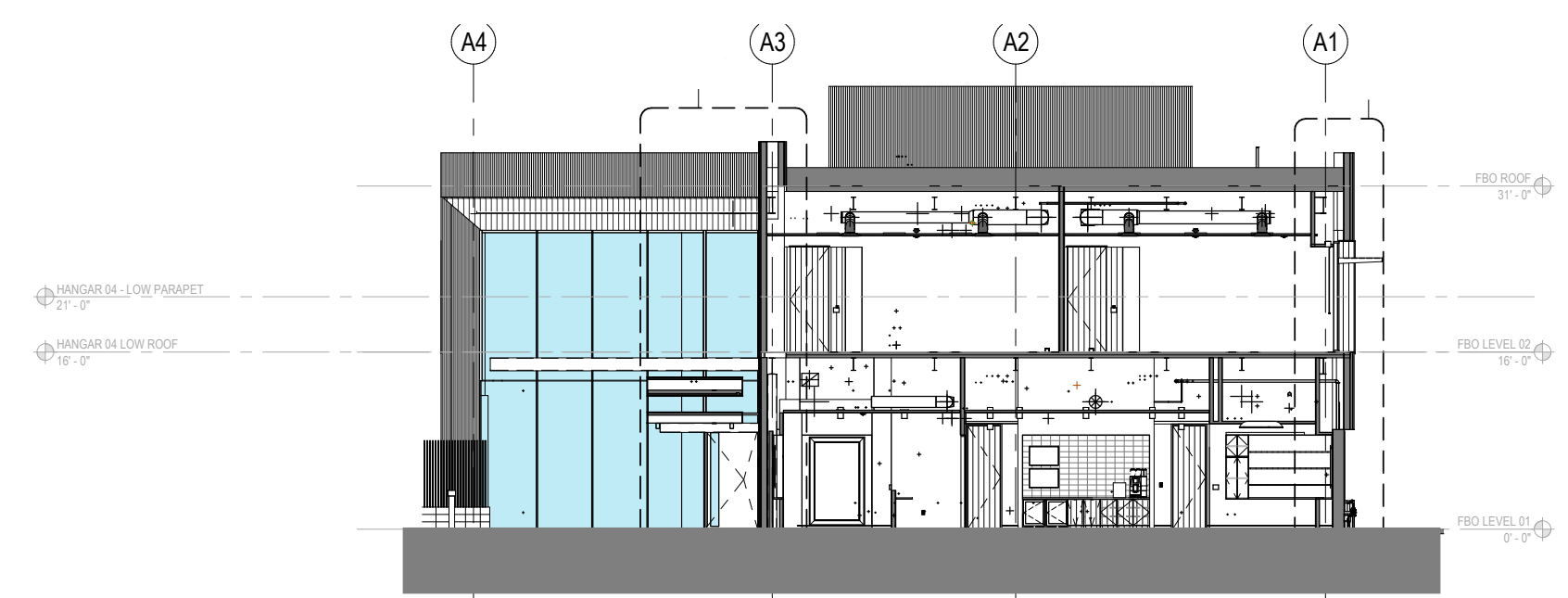
**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Proj. Title: **NW FBO - BUILDING SECTIONS**  
 Project: **CLAY LACY FBO**  
 Proj. No.: [ SET PROJECT INFO NUMBER PARAMETER ]

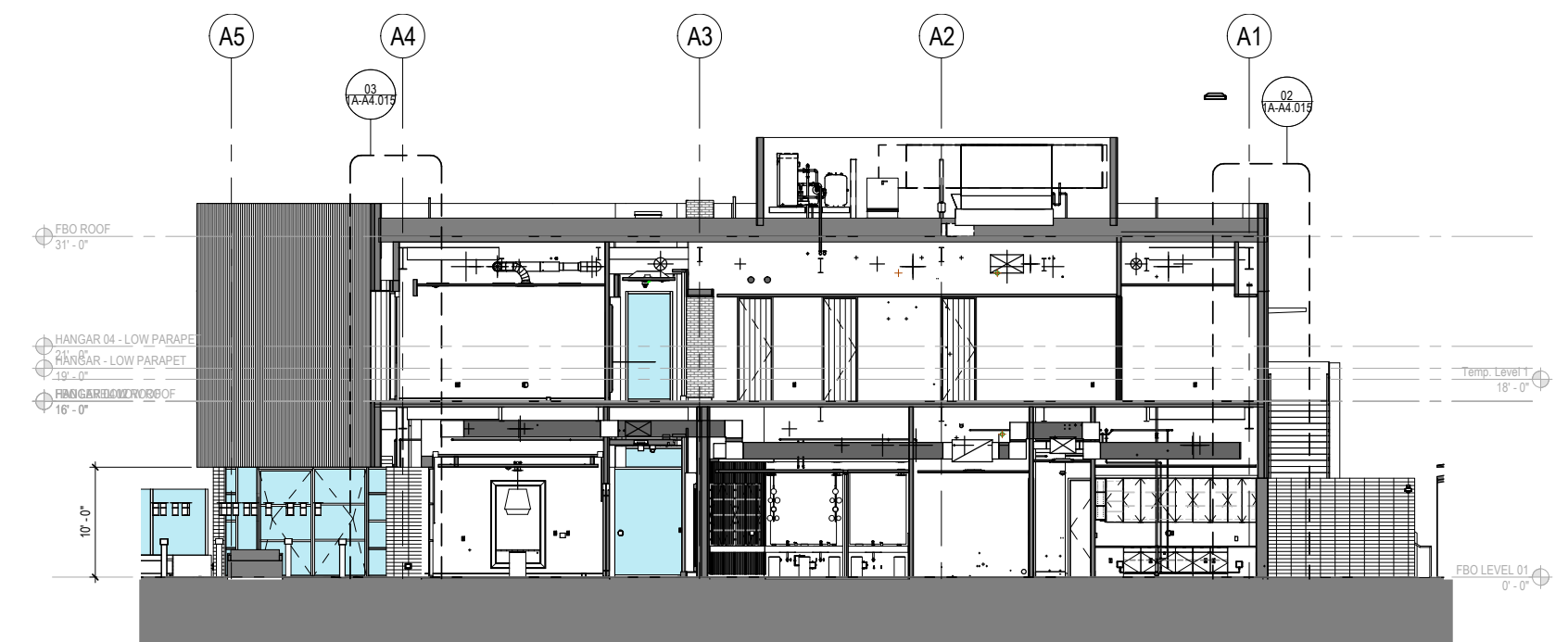
Approvals  
 PM  
 Manager, Airport Development

Date  
 Plan No.  
 41023-J090

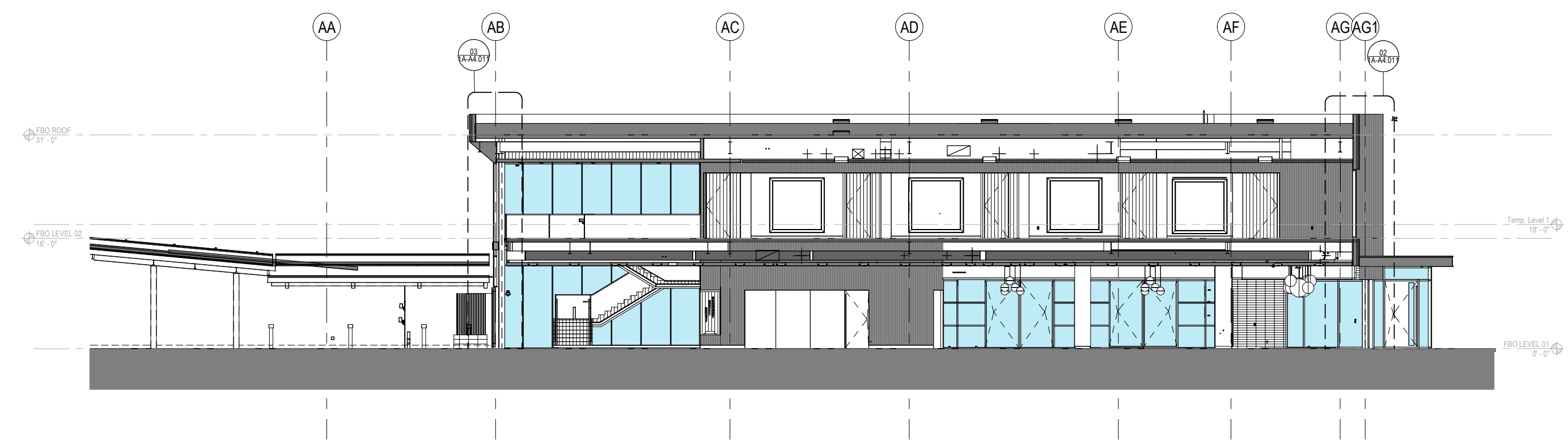
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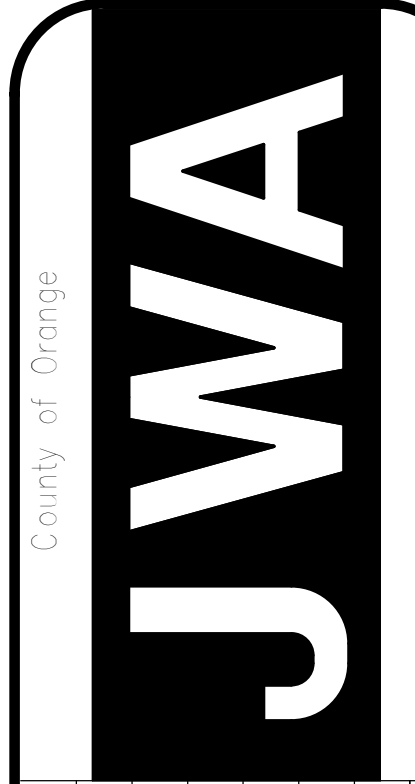
**1 FBO - BUILDING SECTION - SHORT - ENTRY**  
 SCALE: 1/16" = 1'-0"



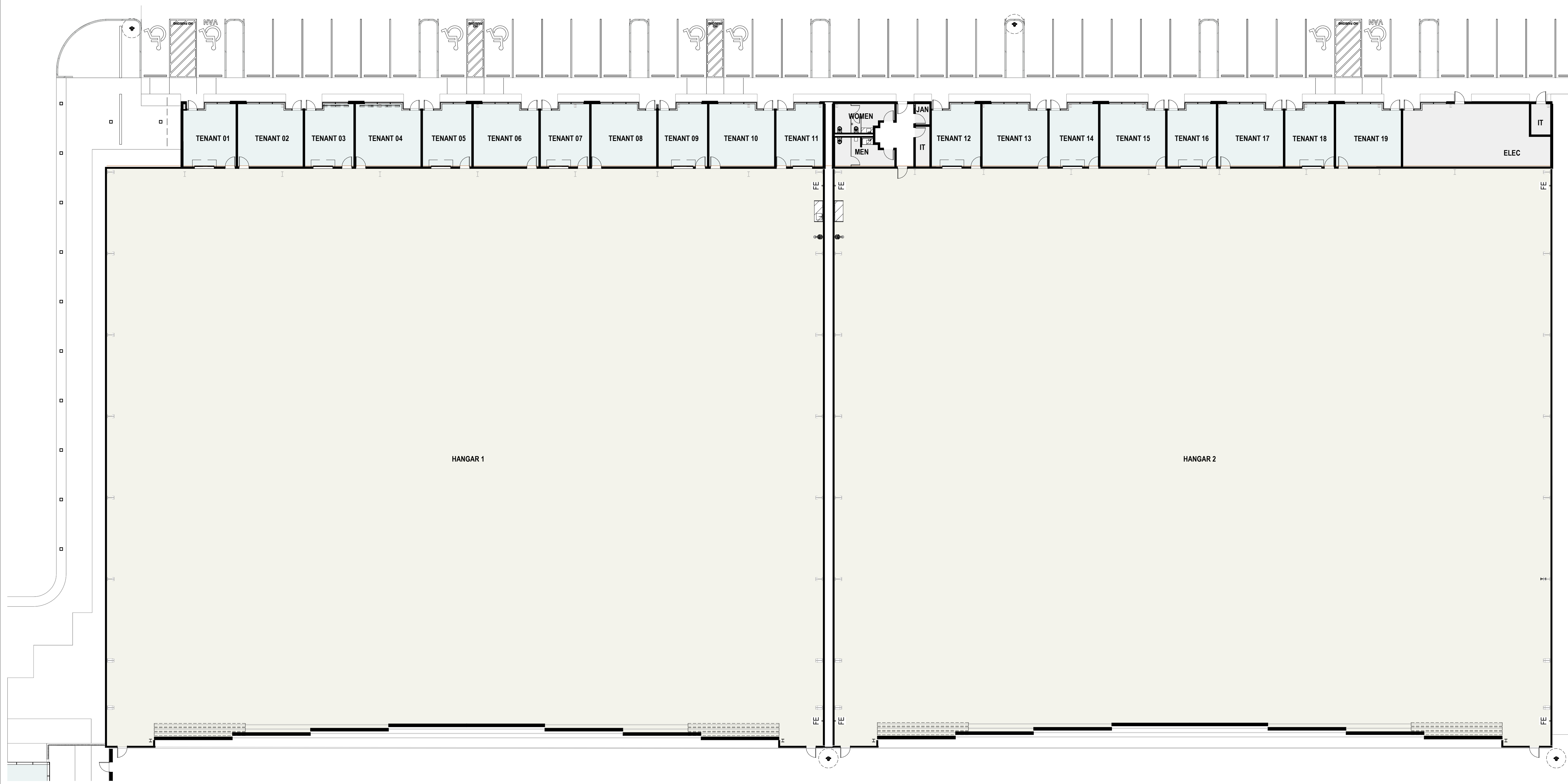
**2 FBO - BUILDING SECTION - SHORT - WAITING LOUNGE**  
 SCALE: 1/16" = 1'-0"



**3 FBO - BUILDING SECTION - LONG**  
 SCALE: 1/16" = 1'-0"



County of Orange



**1** HANGAR 1 & 2 - FLOOR PLAN  
SCALE: 1/16" = 1'-0"

Revisions	Author	Checker	Date
LEASE UPDATE			1/14/21
JWA CADIX SUBMISSION			12/11/20

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 500 S. Figueroa St.  
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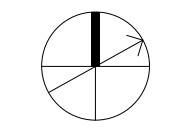
**NW HANGAR 1 - FLOOR PLAN**  
**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

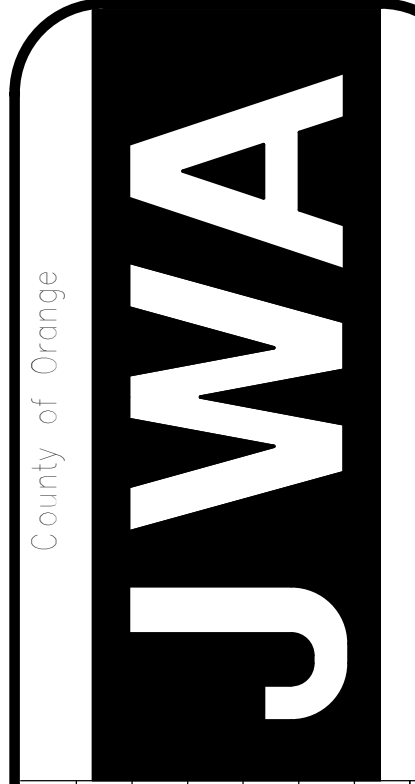
Approvals

PM  
Manager, Airport Development

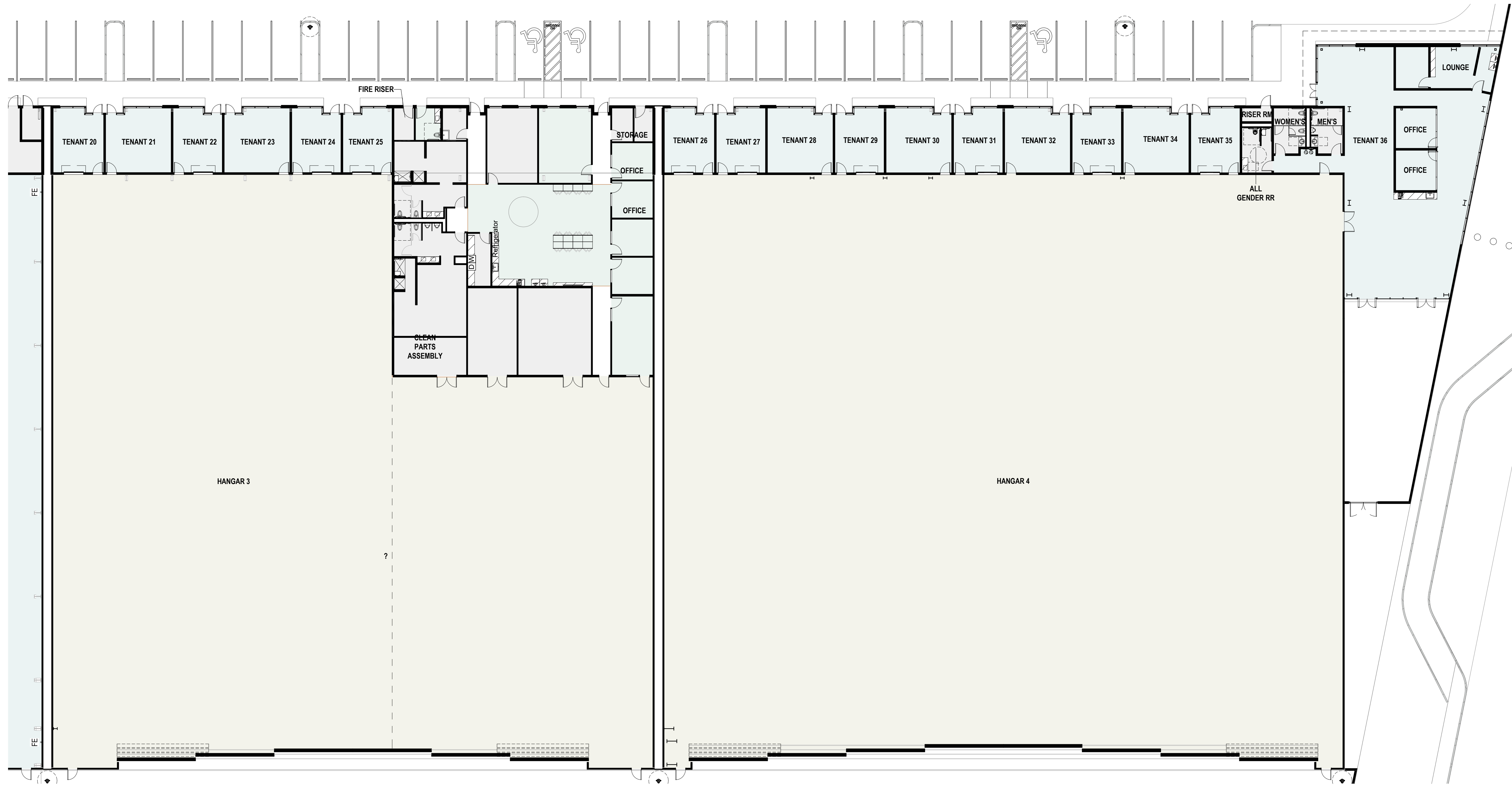
Date  
Plan No. 41023-J090

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**A2.2A**





County of Orange



Revisions	Author	Chkd.	Checker	Date	Descr.	Sym.
				12/11/20	JWA CADIX SUBMISSION	
				1/14/21	LEASE UPDATE	

SEAL

Date

**Gensler**  
 500 S. Figueroa St.  
 Los Angeles, CA 90071  
 Tel: 213.327.3988

Author

Chkd.

Checker

Date

Proj. No. [ SET PROJECT INFO NUMBER PARAMETER ]

Approvals

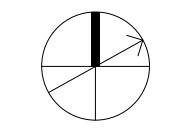
PM  
 Manager, Airport  
 Development

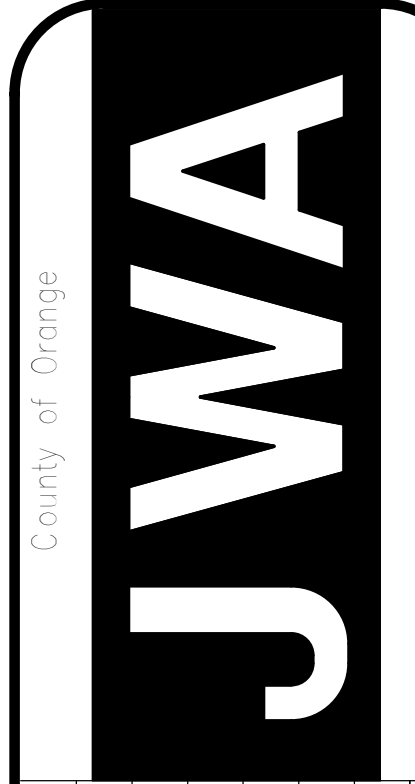
Date

Plan No.  
 41023-J090

Sheet  
**A2.2B**

**1 HANGAR 3 & 4 - FLOOR PLAN**  
 SCALE: 1/16" = 1'-0"





County of Orange

Revisions	Descr.	Sym.	Date
1	LEASE UPDATE		1/14/21
2	JWA CADIX SUBMISSION		12/11/20

SEAL	Date

**Gensler**  
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 Los Angeles, CA 90071  
 Tel: 213.527.3988

A-E  
 Author: [ ]  
 Chkd.: [ ]  
 Checker: [ ]  
 Date: [ ]

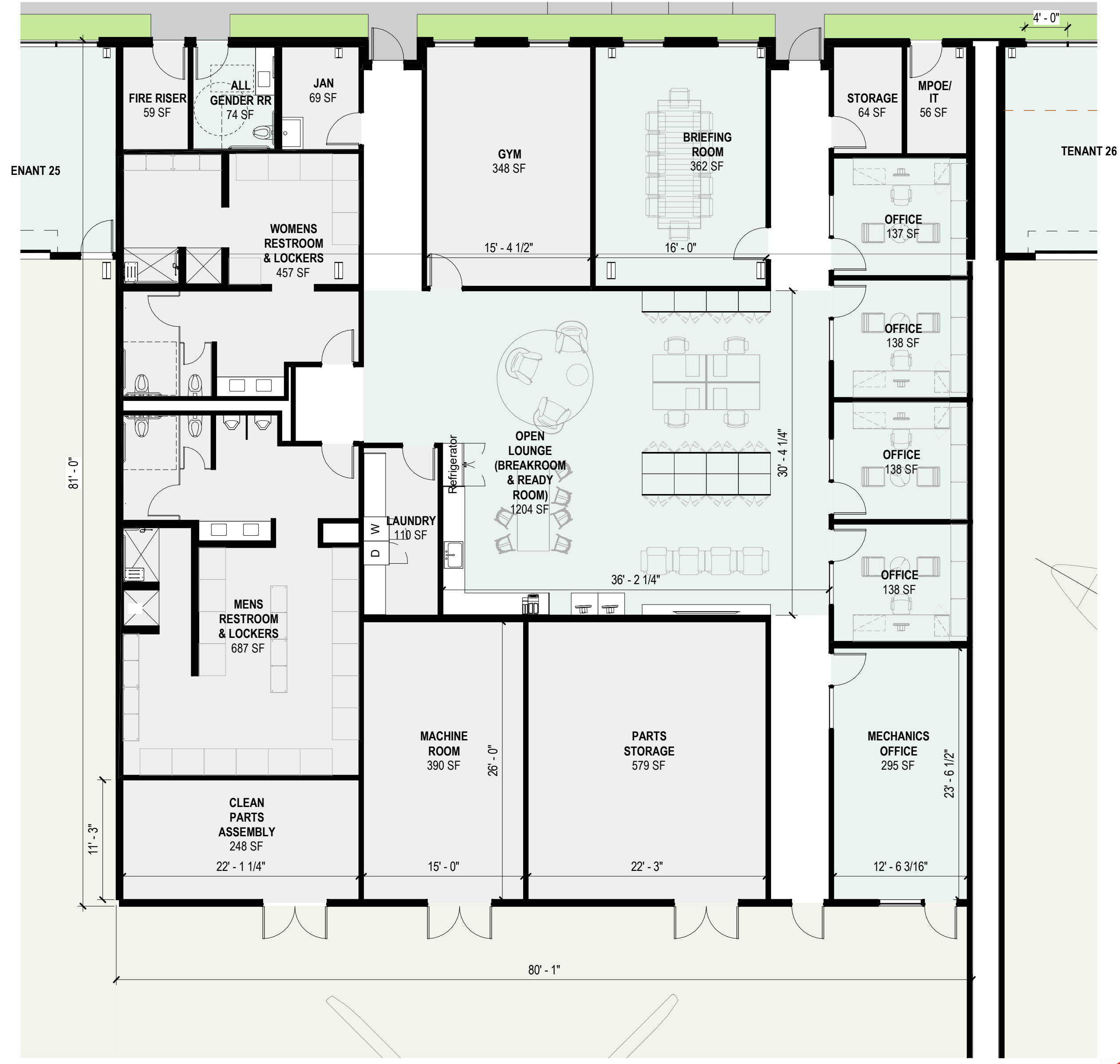
Site Title: **NW HANGAR 3 - FLOOR PLAN**  
 Project: **CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Approvals

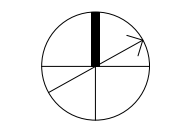
PM  
 Manager, Airport  
 Development

Date  
 Plan No.  
 41023-J090

Sheet  
**A2.2C**



**1 HANGAR 3 - ENLARGED OCSD FLOOR PLAN**  
 SCALE: 1/8" = 1'-0"







**1** HANGARS 1-4 - OVERALL WEST EXTERIOR ELEVATION  
SCALE: 1" = 32'-0"



**2** HANGARS 1-4 - OVERALL EAST EXTERIOR ELEVATION  
SCALE: 1" = 32'-0"

County of Orange

JWA

Revisions	Date	Descr.	Sym.	Date	Checker	Author	Proj. No.	SET PROJECT INFO NUMBER PARAMETER
	12/11/20	JWA CADIX SUBMISSION						
	1/14/21	LEASE UPDATE						

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CLAY LACY FBO

JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Sheet Title: **NW HANGARS - OVERALL EXTERIOR ELEVATIONS A-E**

Project: **CLAY LACY FBO**

Approvals

PM  
Manager, Airport Development

Date \_\_\_\_\_

Plan No.  
41023-J090

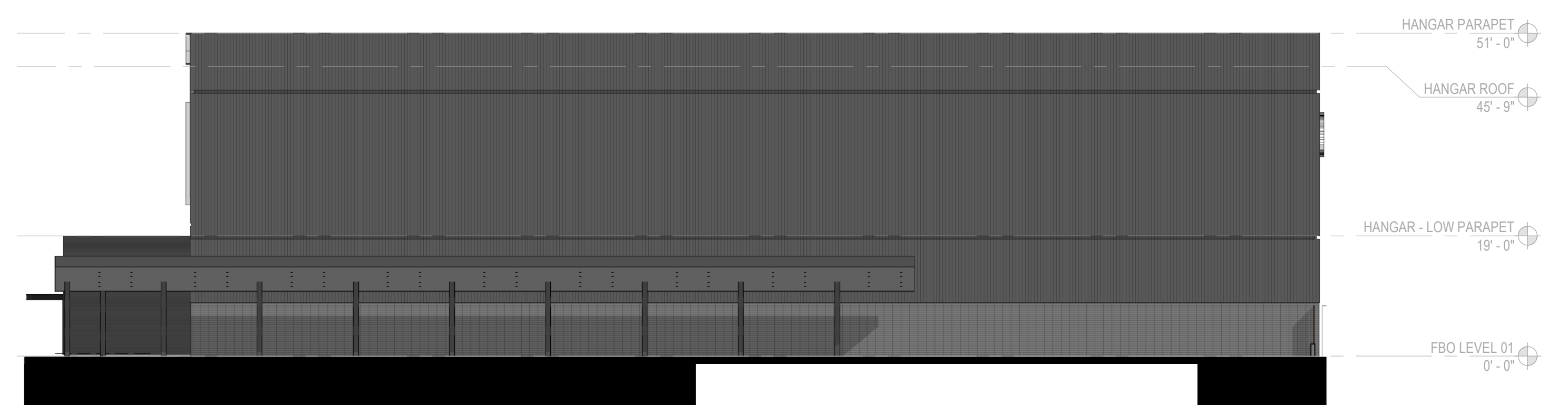
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**A2.51**



1 HANGAR 1 & 2 TYP - EXTERIOR ELEVATION - WEST  
SCALE: 1/16" = 1'-0"



2 HANGAR 1 & 2 TYP - EXTERIOR ELEVATION - EAST  
SCALE: 1/16" = 1'-0"



3 HANGAR 1 - EXTERIOR ELEVATION - SOUTH  
SCALE: 1/16" = 1'-0"

JWA

County of Orange

Revisions	Date	Sym.	Descr.
LEAVE UPDATE	1/14/21		JWA CADIX SUBMISSION
	12/11/20		

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**CLAY LACY FBO**  
 JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Proj. No. [ SET PROJECT INFO NUMBER PARAMETER ]

Author: [ ] Checker: [ ] Date: [ ]

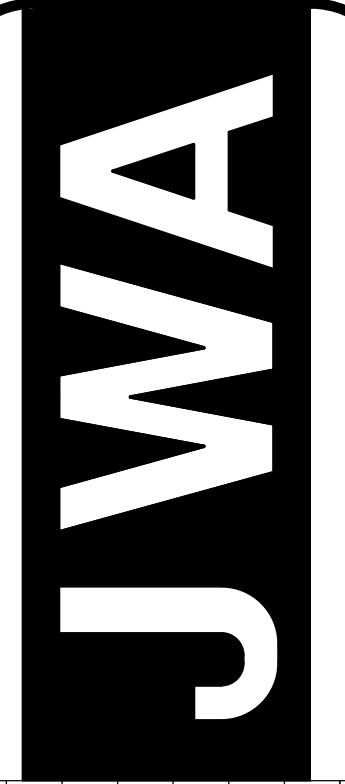
Approvals

PM  
 Manager, Airport Development

Date

Plan No.  
 41023-J090

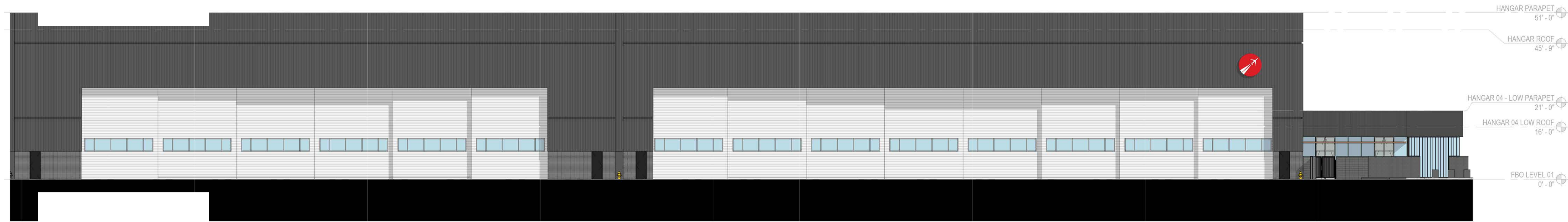
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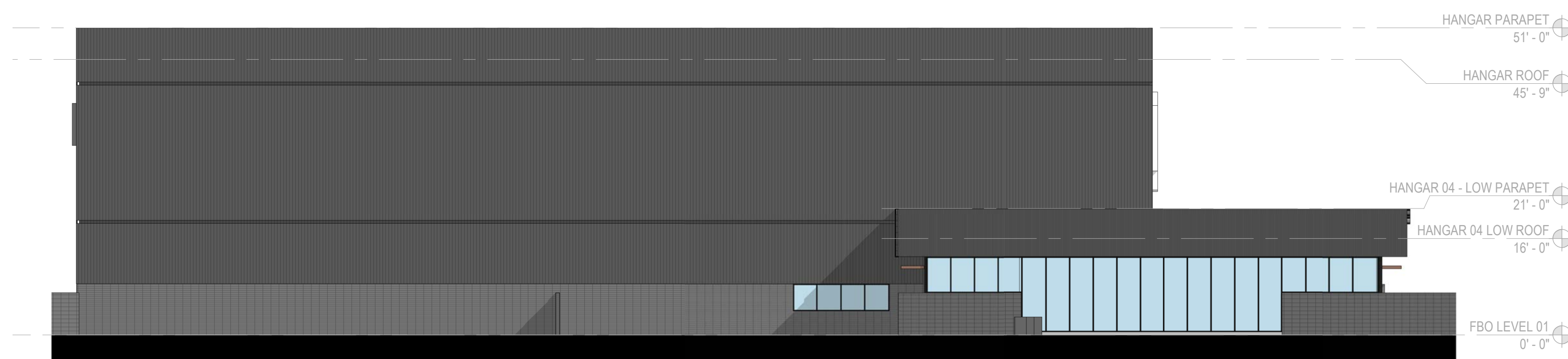
County of Orange



**1** HANGAR 3 & 4 - EXTERIOR ELEVATION - WEST  
SCALE: 1/16" = 1'-0"



**2** HANGAR 3 & 4 - EXTERIOR ELEVATION - EAST  
SCALE: 1/16" = 1'-0"



**3** HANGAR 4 - EXTERIOR ELEVATION - NORTH  
SCALE: 1/16" = 1'-0"

Revisions	Date	Descr.	Sym.
LEAVE UPDATE	1/14/21	JWA CADIX SUBMISSION	

SEAL

Date

**Gensler**  
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 Los Angeles, CA 90071  
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Author

Checker

**CLAY LACY FBO**

JOHN WAYNE AIRPORT  
 ORANGE COUNTY, CALIFORNIA

Proj. No. | SET PROJECT INFO NUMBER PARAMETER

Approvals

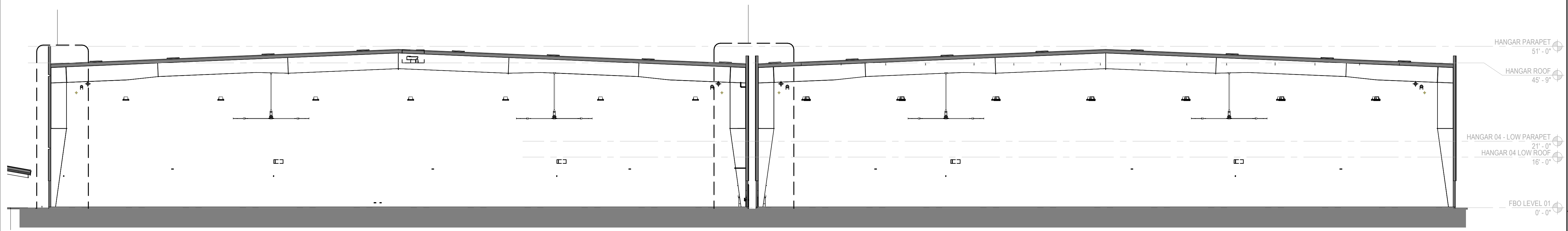
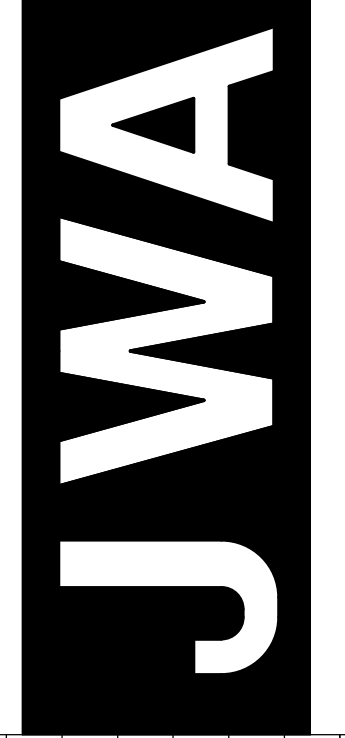
PM  
 Manager, Airport Development

Date

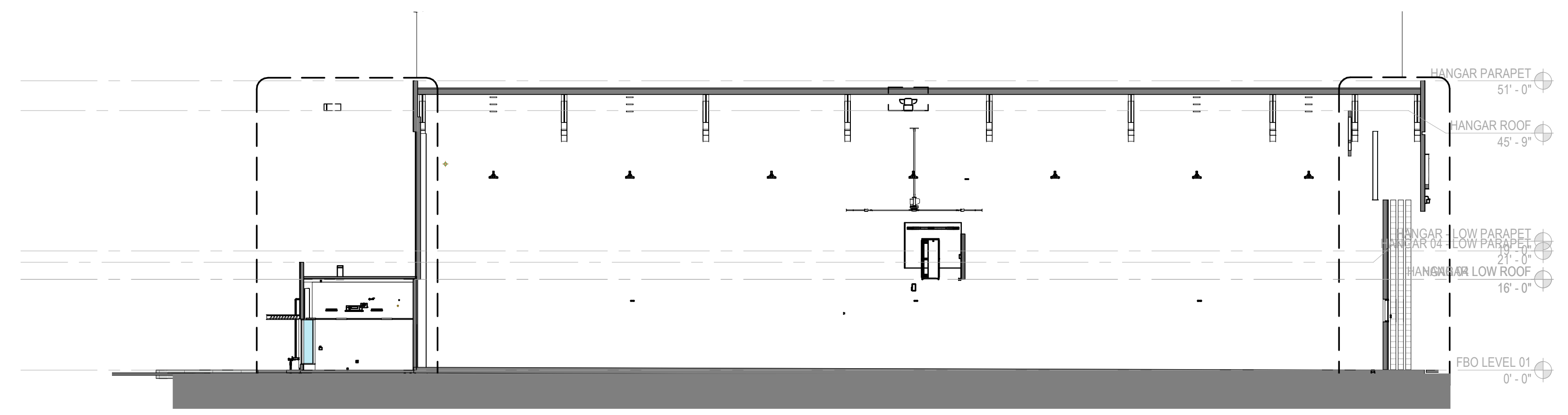
Plan No.  
 41023-J090

Sheet  
**A2.51B**

County of Orange



**2 HANGAR - TYP BUILDING SECTION - LONG**  
SCALE: 1/16" = 1'-0"



**3 HANGAR TYP - BUILDING SECTION - SHORT**  
SCALE: 1/16" = 1'-0"

Revisions	Author	Checker	Date
LEAVE UPDATE	JWA CADIX SUBMISSION		12/11/20

SEAL	Date

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**CLAY LACY FBO**  
JOHN WAYNE AIRPORT  
ORANGE COUNTY, CALIFORNIA

Project Title: **NW HANGARS - BUILDING SECTIONS**  
Project: **CLAY LACY FBO**  
Author: [ ]  
Checker: [ ]  
Date: [ ]  
Plan No. 41023-J090

Sheet  
**A2.61**



# AERIAL VIEW – OVERALL NORTHWEST SITE – LOOKING NORTHEAST





ARIEL VIEW – OVERALL NORTHWEST SITE – FRONT WITH FLIGHT SCHOOL – LOOKING SOUTH EAST

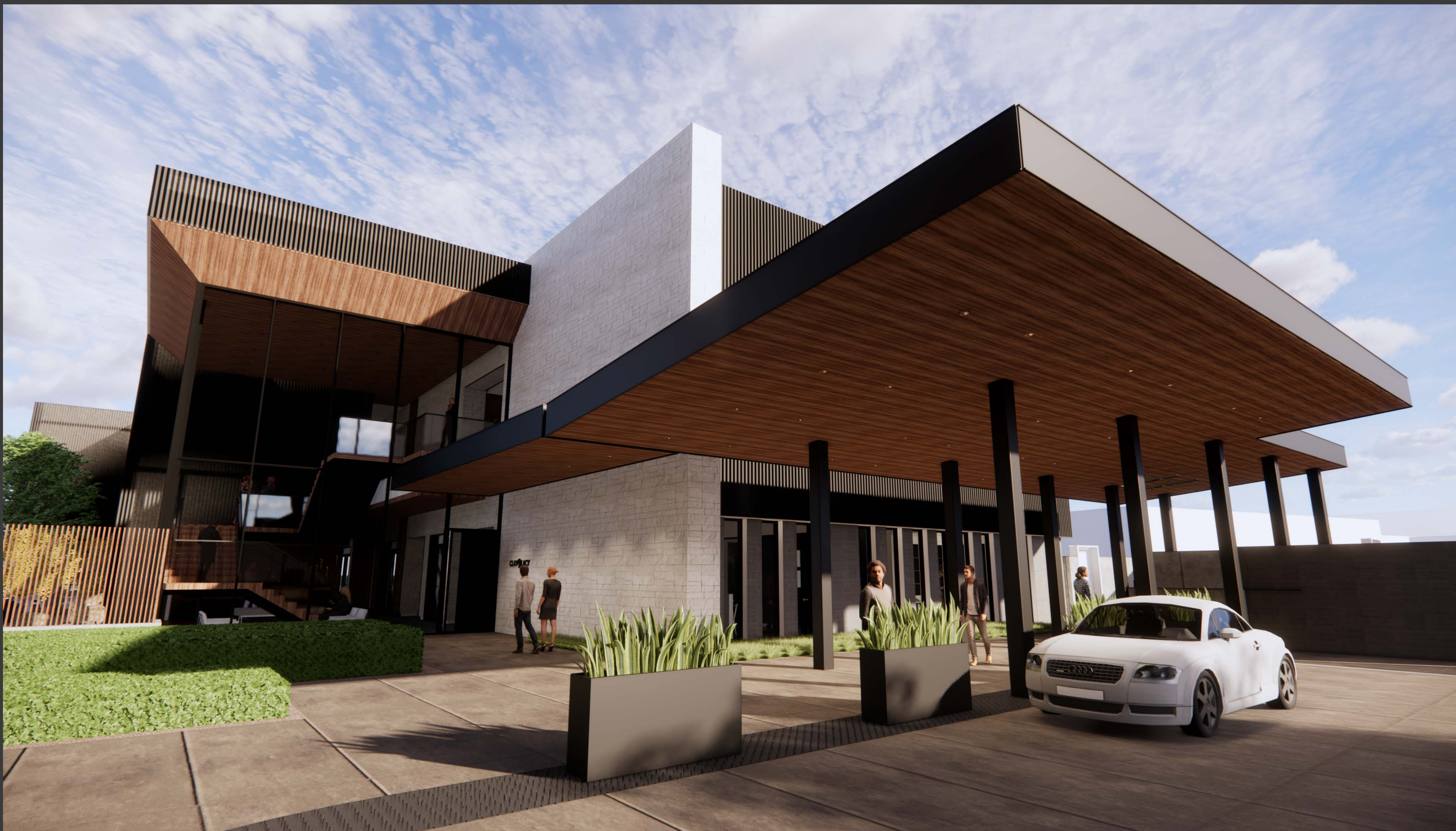


AERIAL VIEW – OVERALL NORTHWEST SITE – LOOKING SWATHWEST





EXTERIOR VIEW – FBO FRONT



INTERIOR VIEW – FRONT ENTRY





# INTERIOR VIEW – GARDEN LOUNGE



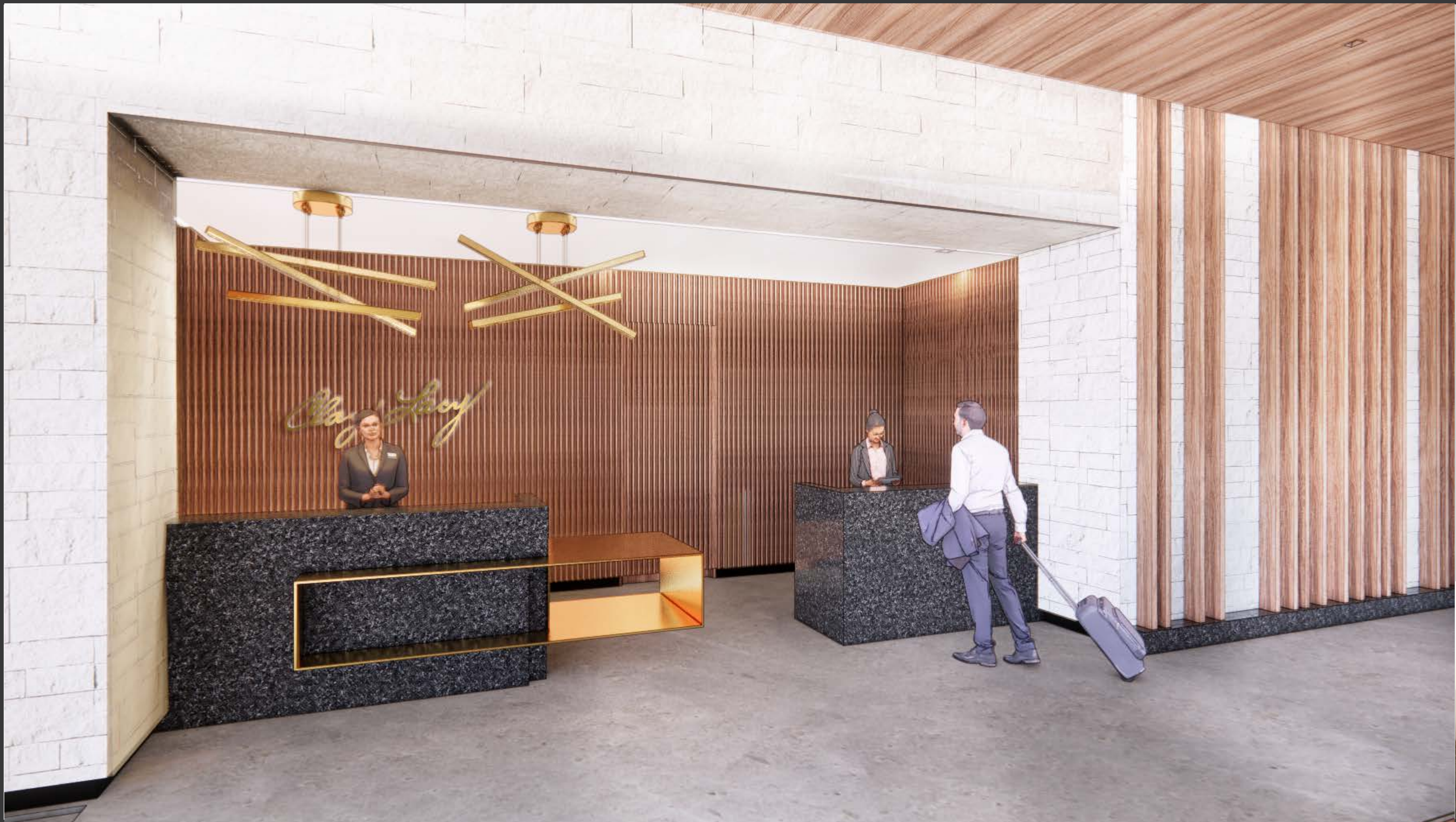
# INTERIOR VIEW – LOUNGE







# INTERIOR VIEW – CUSTOMER SERVICE DESK

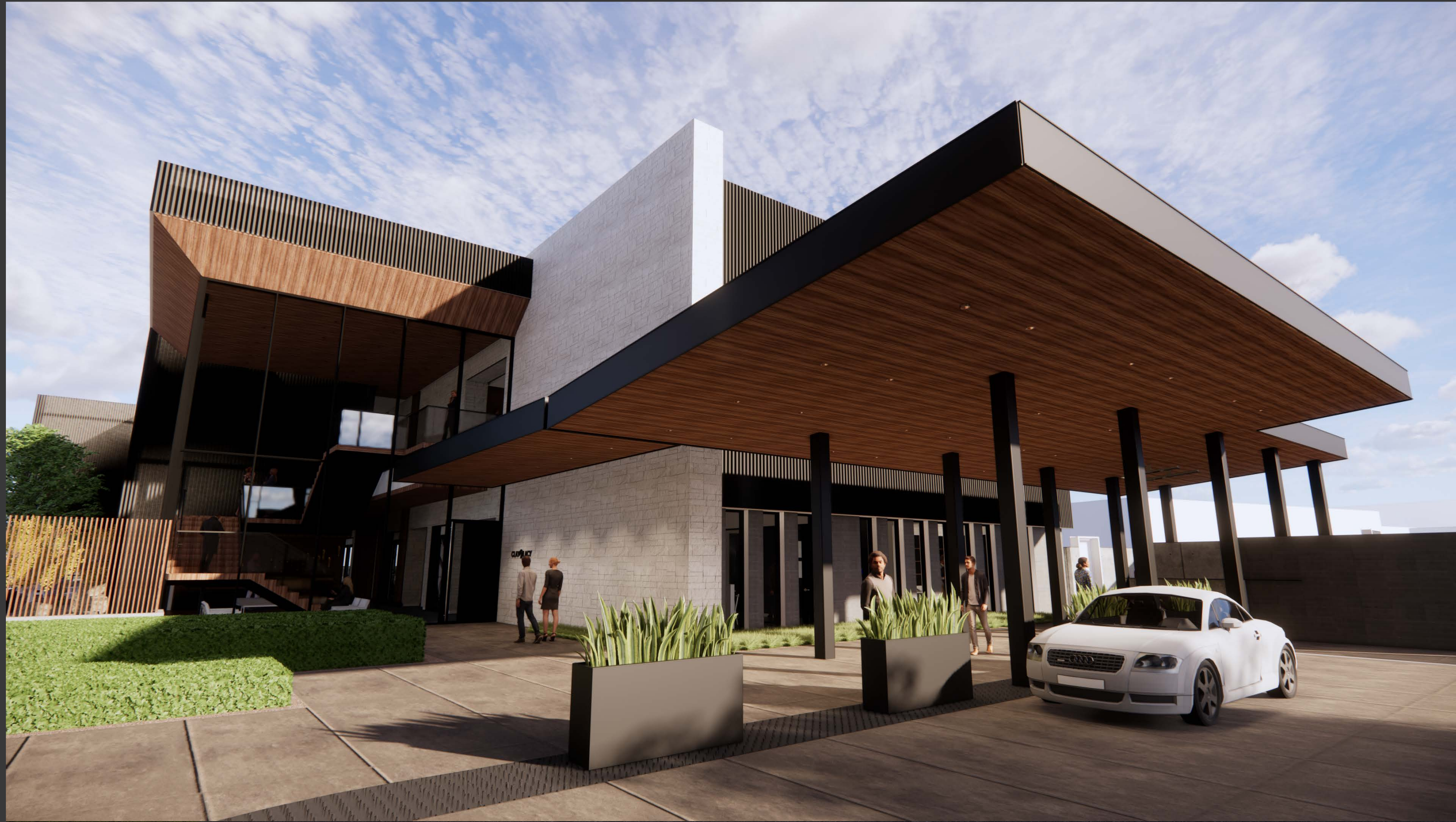


# INTERIOR VIEW – CONFERENCE ROOM

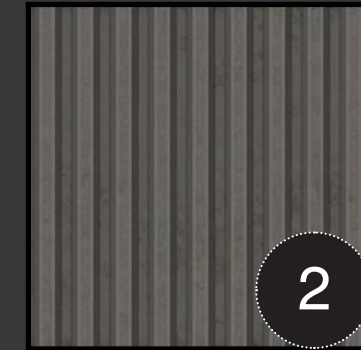




# INTERIOR/ EXTERIOR FINISHES



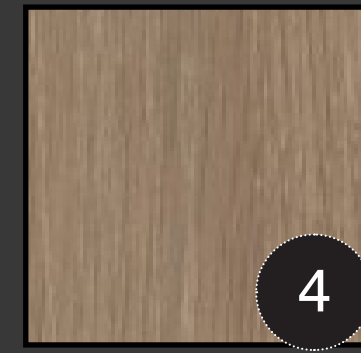
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Orco Burnished Block  
Natural Grey Burnished



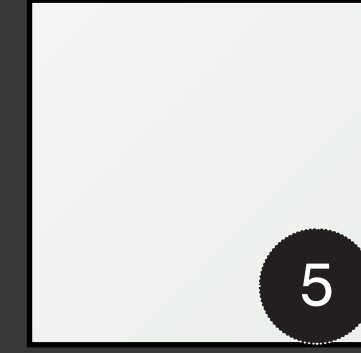
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AEP Span  
Flex Series 1.2x10-12 Grey



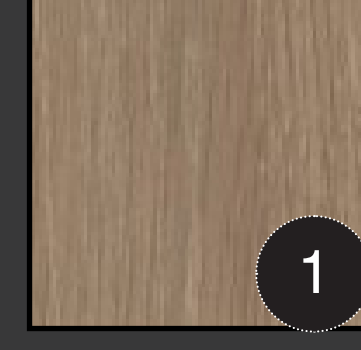
**FIELDSTONE**  
Cultured Stone  
Hewn Stone Foundation



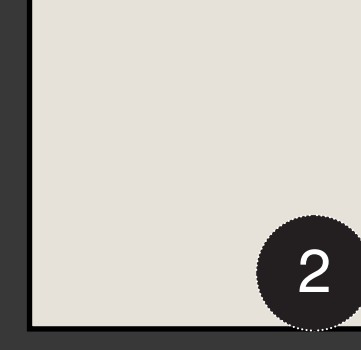
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Custom Color



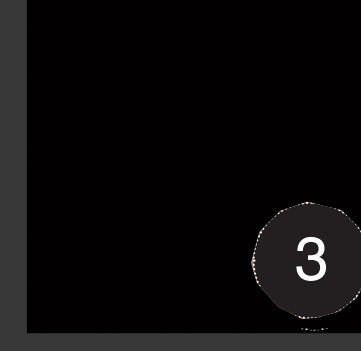
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Insulated Glazing 1"  
Laminated Insulating Low Iron Glass



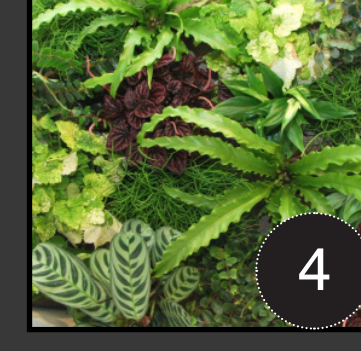
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Sarante Tan Sawn Oak - Custom Color



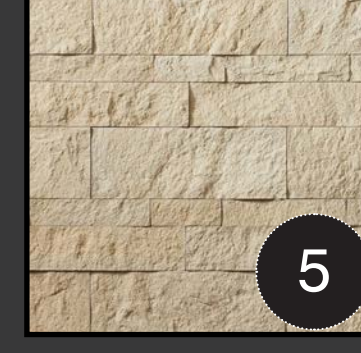
**PAINTED GYPSUM CEILING**  
Sherwin Williams Pearly White SW 7009



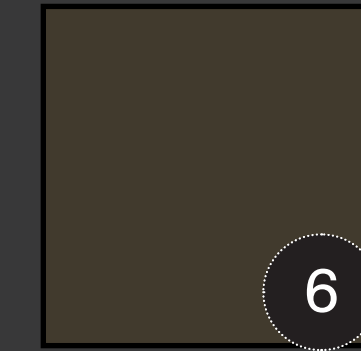
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Black



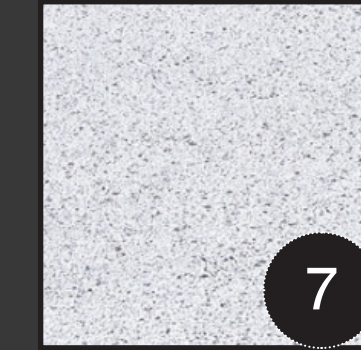
**LANDSCAPE**  
Native Drought Tolerant Species



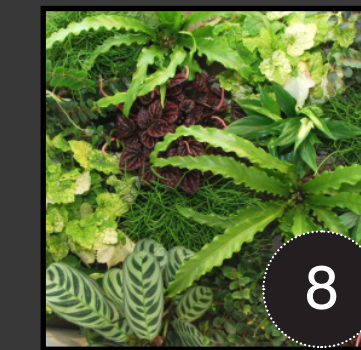
**FIELDSTONE**  
Cultured Stone  
Hewn Stone Foundation



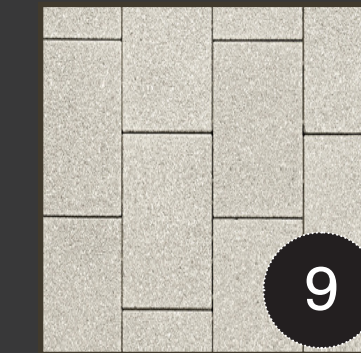
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Arcadia Custom Storefront  
Aluminium Custom 6" to 8" Vertical/Horizontal Mullion  
Bronze Black Anodized



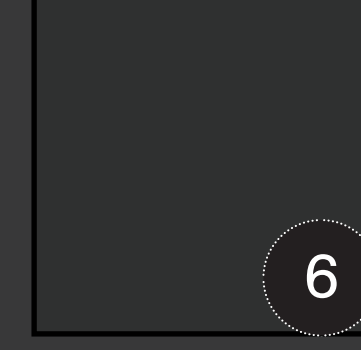
**WALKWAY**  
Poured concrete, acid finish



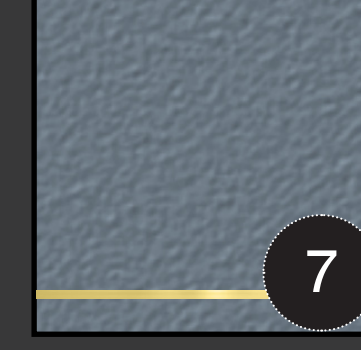
**Landscape**



**GARDEN PAVER**  
Linear Plank Series  
Grey



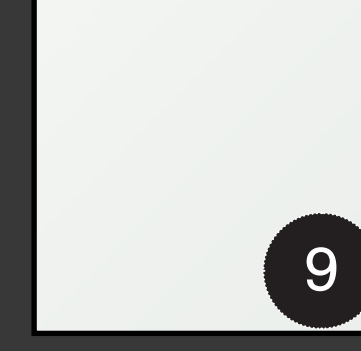
**PAINTED DOOR/ PORTAL FRAME**  
Sherwin Williams Caviar SW6990



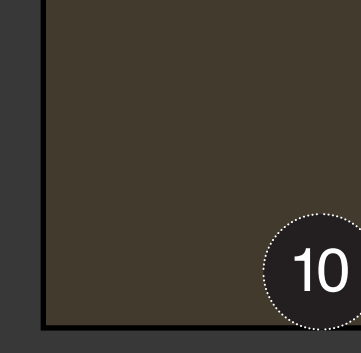
**CONCRETE FLOORING**  
Polished Concrete Grey  
W/ Brass Divider Strip



**WOOD FLOOR**  
Engineered Plank Flooring  
Custom Stain



**GLAZING**  
Insulated Glazing 1"  
Laminated Insulating Low Iron Glass



**GLASS MULLIONS**  
Arcadia Custom Storefront  
Aluminum 6" to 8" Vertical/Horizontal Mullion  
Bronze Black Anodized

## MEMORANDUM

### REVIEW OF CLAY LACY NORTHWEST FIXED BASE OPERATOR DEVELOPMENT AND FINAL ENVIRONMENTAL IMPACT REPORT NO. 627, JOHN WAYNE AIRPORT GENERAL AVIATION IMPROVEMENT PROGRAM

#### EXECUTIVE SUMMARY

- Buildout of the Northwest fixed base operator (FBO) leasehold at the John Wayne Airport under its General Aviation Improvement Program (GAIP) was conceptually approved by the Orange County Board of Supervisors on June 25, 2019 after evaluation and compliance with state environmental regulations. The related document, *Final Program Environmental Impact Report No. 627, John Wayne Airport General Aviation Improvement Program* (FEIR 627) explicitly stated, “These development parameters are intended as a concept of the type and size of the facilities that would be developed under the GAIP; however, they are not the only concepts that could be deemed to be consistent with the GAIP and this Program EIR.” (FEIR 627, page 3-7, para. 2).

The purpose of this Memorandum is to assist airport and County planning staff in analyzing revisions to the previously approved Clay Lacy Northwest FBO lease agreement (modified Clay Lacy FBO) against the overall objectives of the airport’s GAIP, as well as the buildout parameters contained in FEIR 627 in determining if further environmental review is needed.

- FEIR 627 identified five buildings on the Northwest FBO leasehold: three community hangars, an FBO office/terminal, and a hangar/office for the Orange County Sheriff’s Department (OCSD). However, the OCSD no longer requires as much office space as previously identified in FEIR 627 and the Orange County Board of Supervisor’s (Board) approved Clay Lacy FBO lease. Therefore, the OCSD hangar/office has been incorporated into a new community hangar. The modified Clay Lacy FBO site plan shows the five buildings in slightly different configurations and sizes than were shown in the FEIR 627 conceptual plan and the Board-approved plan to accommodate the change in OCSD needs (**Exhibit 1**).
- The total area for based aircraft in the modified Clay Lacy FBO site plan would increase by 6,452 square feet (sf) of combined hangar and apron space (2 percent) (**Table 3**). This additional space could accommodate one additional based aircraft (**Attachment A**, Table 5). For purposes of a conservative impact analysis, this Memorandum assumes it would be a business jet, such as a Gulfstream G450. The addition of one based jet would expand GAIP operations by approximately 0.3 percent.

- No new significant environmental impacts would occur due to the slight alterations to the proposed development. **Attachment B** provides a consistency analysis of the modified Clay Lacy FBO site plan and FEIR 627 for each impact evaluated within FEIR 627.
- No additional environmental documentation for the Clay Lacy FBO is required beyond the EIR consistency analysis within this Memorandum since:
  1. There are no substantial changes proposed for the Clay Lacy FBO, which will require major revisions of the previous EIR per Section 15162 et seq. of the State *California Environmental Quality Act* (CEQA) Guidelines.
  2. Substantial evidence per State CEQA Guidelines Section 15168(c)(2) has been provided in this Memorandum and its attachments to show that the Clay Lacy FBO would be within the scope of the project covered by FEIR 627.

## INTRODUCTION

The Clay Lacy team was selected by the County of Orange, airport sponsor of the John Wayne Airport, to develop a 14.2-acre leasehold located on the northwest side of the airport (Northwest FBO). Development of the Northwest FBO leasehold is part of Phases 1 and 2 of the airport's GAIP and is anticipated to be completed in 2.5 years. (FEIR 627, Appendix E, *Air Quality Technical Report*, Table 10).

Buildout of the Northwest FBO leasehold was conceptually approved by the local approving jurisdiction (County of Orange) after evaluation and compliance with CEQA. The applicable CEQA document, FEIR 627 (SCH #2017031072), assumed certain amounts of based and transient aircraft operations upon which to base its analysis and findings, as well as building square footage and conceptual site and phasing plans.

FEIR 627 explicitly stated, *"These development parameters are intended as a concept of the type and size of the facilities that would be developed under the GAIP; however, they are not the only concepts that could be deemed to be consistent with the GAIP and this Program EIR. At the time design plans are developed for each of the facilities at the Airport, consistency with the GAIP and this Program EIR would be evaluated to determine whether additional environmental review will be required."* (FEIR 627, page 3-7, para. 2). Section 15168(c) of the State CEQA Guidelines sets forth the conditions and manner under which a Program EIR should be used to evaluate later activities. (FEIR 627, page 2-2).

The purpose of this Memorandum is to assist airport and County planning staff in analyzing the modified Clay Lacy FBO site plan against the overall objectives of the airport's GAIP, as well as the buildout parameters contained in FEIR 627 in determining if further environmental review is needed. FEIR 627 looked at a range of buildout opportunities under the GAIP with two project alternatives evaluated in detail: Proposed Project and Alternative 1. As stated in FEIR 627, page 3-5, *"Given the programmatic nature of this EIR, the Proposed Project and Alternative 1 are concepts used to provide realistic development scenarios for what could be implemented and provide the parameters for evaluation in the Draft Program*

*EIR.*” The Proposed Project was ultimately selected by the Orange County Board of Supervisors on June 25, 2019 as the project to move forward. **Attachment B** provides a consistency analysis of the proposed Clay Lacy FBO and FEIR 627 for each impact evaluated within FEIR 627.

The goals of the GAIP, as set forth in FEIR 627 (page 1-2), include:

- Enhance safe and secure operations.
- Utilize limited land area efficiently and economically.
- Enhance compatibility between general and commercial aviation operations.
- Embrace flexibility to allow for technological advances and market trends.
- Maximize economic, self-sustaining, revenue-producing facilities.
- Assess the ability of existing infrastructure to support general aviation (GA) facilities.

#### **STATE GUIDELINES FOR ADDITIONAL ENVIRONMENTAL REVIEW**

Conditions listed in Section 15162(a) of the State CEQA Guidelines stipulate that the following items would require the preparation of a subsequent EIR:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR;
  - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- D. Mitigation measures or alternatives which are considerably different from those analyzed previously would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.

According to State CEQA Guidelines Section 15168(c)(2), if the lead agency finds that pursuant to Section 15162, no subsequent EIR would be required, *“the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record.”* Under Section 15164(a) of the State CEQA Guidelines, a lead agency may prepare an Addendum to a previously approved and adopted EIR if *“some changes or additions are necessary but none of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent EIR have occurred.”*

## MODIFIED CLAY LACY FBO SITE PLAN

The Clay Lacy FBO would be a “full-service” FBO facility to meet the demand of the current business jet market for hangars in the area. It would specifically meet the stated GAIP goals to utilize the airport’s limited land area efficiently and economically; to embrace flexibility to allow for technological advances and market trends; and to maximize economic, self-sustaining, revenue-producing facilities.

After approval of the Clay Lacy FBO lease by the County, OCSD indicated that they do not need the amount of space that was identified in FEIR 627 and the approved Clay Lacy lease. FEIR 627 identified five buildings on the Northwest FBO leasehold: three community hangars, an FBO office/terminal, and a combined hangar/office for OCSD. Since OCSD no longer requires as much space as previously identified in FEIR 627 and the approved lease, the OCSD hangar/office has been incorporated into a new community hangar. The modified Clay Lacy FBO site plan proposes five buildings in slightly different configurations and sizes than was shown in the approved Clay Lacy lease to accommodate the change in OCSD needs.

After reviewing the economic feasibility of various development options, the modified Clay Lacy FBO site plan contains the following components (**Exhibit 1**):

- Two (2) 37,780-sf community hangars and one (1) 35,440-sf community hangar.
- One (1) 27,145-sf combined community/OCSD hangar and attached OCSD office space. (The OCSD portion would include 9,600 sf of hangar space and 6,600 sf of office space.)
- One (1) two-story 24,000-sf FBO terminal/office building. (See FEIR 627, pages 3-8 and 3-9 for a list of anticipated FBO terminal/office uses).

- Single-story hangar office space (17,800 sf)<sup>1</sup> and hangar storage space (7,000 sf) attached to the community hangars.
- Based and transient aircraft ramp<sup>2</sup> (± 240,307 sf).
- Designated 31,000 sf of aircraft ramp for OCSD.
- Designated 21,300 sf of aircraft ramp for ground service equipment (GSE).
- Vehicular parking lots and landscaping per County of Orange Code requirements (± 263 vehicular spaces).

**Table 1** compares the modified Clay Lacy FBO site plan to the previously approved layout for the Northwest FBO due to the change in the OCSD needs.

<b>TABLE 1</b>		
<b>Comparison of Previously Approved Clay Lacy FBO vs. Modified Clay Lacy FBO</b>		
<b>Item</b>	<b>Previous Clay Lacy FBO</b>	<b>Modified Clay Lacy FBO</b>
Community Hangars	99,000 sf	128,545 sf
OCSD Hangar (with attached OCSD Office)	26,544 sf	16,200 sf
FBO Apron	270,270 sf	240,307 sf
OCSD Apron	30,000 sf	31,000 sf
GSE Dedicated Space	*	21,300 sf
FBO office space	19,994 sf	24,000 sf
Hangar Office Space	7,600 sf	17,800 sf
# Vehicle Parking Spaces	277	263
sf = square feet		
* GSE included in overall FBO apron total		

## CLAY LACY FBO MODIFIED SITE PLAN ENVIRONMENTAL ANALYSIS

To determine whether the modified Clay Lacy FBO site plan is consistent with the analysis contained in FEIR 627 or if previously unidentified significant environmental impacts or more severe environmental impacts could occur from the project changes, the following analysis (and attachments) evaluate the modified site plan against each impact identified in FEIR 627. **The modified Clay Lacy site plan does not change the limits of disturbance previously identified for the Northwest FBO leasehold (i.e., the 14.2-acre parcel). In other words, the Clay Lacy FBO would still be fully contained within the physical area previously evaluated within FEIR 627.**

<sup>1</sup> This office space serves the same function as office space within the FBO/terminal building but is conveniently located within the community hangars for pilots, maintenance crew, and other personnel to complete their paperwork and other tasks at the hangar.

<sup>2</sup> According to FEIR 627, it is assumed that 50 percent of the available aircraft ramp is for based aircraft and 50 percent of the available aircraft ramp is for transient aircraft.

**Table 2** compares the modified Clay Lacy FBO project components to the FEIR 627 assumptions for the Northwest FBO.

Item	FEIR 627	Modified Clay Lacy FBO
Community Hangar Space	99,000 sf	128,545 sf
OCSD Hangar Space	11,429 sf	9,600 sf
FBO Apron	282,757 sf	240,307 sf
OCSD Apron	31,039 sf	31,000 sf
Ground Service Equipment (GSE) Area	0 sf	21,300 sf <sup>1</sup>
FBO and OCSD office space	42,558 sf	48,400 sf
Hangar Storage Space	0 sf	7,000 sf
# Vehicle Parking Spaces	355	263

Sources: Addendum #16 to General Aviation Improvement Program, Request for Proposals for Two (2) Full-Service Fixed Operators and One (1) Limited-Service Fixed Based Operator (April 17, 2020); Clay Lacy Conceptual Development Plan (**Exhibit 1**).

sf = square feet

<sup>1</sup> The Clay Lacy FBO includes a designated GSE area separate from the general apron to provide electric hook-ups for GSE equipment.

**Table 3** provides a comparison of the Clay Lacy FBO areas provided for based aircraft to the planning forecasts and projections for based aircraft contained for the Northwest FBO leasehold in FEIR 627. The modified Clay Lacy FBO site plan increases FBO hangar space (30 percent) but reduces FBO based aircraft parking on the apron and OCSD hangar space (16 percent and 15 percent, respectively) when compared to the Proposed Project in FEIR 627.

Item	GAIP/FEIR 627 (sf)	Modified Clay Lacy FBO (sf)	Difference	
			(sf)	(Percent)
Northwest FBO Hangar Space	99,000	128,545	29,545	30%
OCSD Hangar Space	11,429	9,600	(1,829)	-16%
Apron Available for FBO Based Aircraft <sup>1</sup>	141,379	120,154	(21,225)	-15%
Apron Available for OCSD Helicopters	31,039	31,000	(39)	0%
<b>TOTAL AREA AVAILABLE FOR BASED AIRCRAFT ON NORTHWEST FBO</b>	<b>282,847</b>	<b>289,299</b>	<b>6,452</b>	<b>2%</b>

sf = square feet

<sup>1</sup> Apron available for based aircraft is 50 percent of the total available apron. The other 50 percent is for transient aircraft.

As shown in **Table 3**, the total area for based aircraft from the modified Clay Lacy FBO site plan would increase by 6,452 sf of combined hangar and apron space (2 percent). By adding based aircraft that could be accommodated by the increased hangar space and subtracting the reduction in based aircraft on the smaller apron, an estimate of the change in based aircraft from what was considered in FEIR 627 for the Northwest FBO leasehold has been made. See also **Attachment A**.

1. FEIR 627 assumed that 15 based aircraft could be housed in 99,000 sf of hangar space on the Northwest FBO leasehold resulting in an average of 6,660 sf per aircraft. The 29,545 sf of additional



hangar space from the modified Clay Lacy FBO site plan would allow an additional four based aircraft.<sup>3</sup>

2. FEIR 627 assumed 17 based aircraft would use half of the available apron within the Northwest FBO leasehold (141,379 sf) with the other half used by transient aircraft. This results in an average of 8,316 sf of apron area per based aircraft. A reduction of 21,225 sf of apron for based aircraft would result in a reduction of three based aircraft on the ramp.<sup>4</sup>
3. Although the OCSD hangar space has been reduced by 1,829 sf, OCSD has indicated that its designated hangar space is adequate to house its existing five based aircraft. Thus, no change in based aircraft on the Northwest FBO leasehold would occur due to the revision to OCSD's facilities.

**In summary, the modified Clay Lacy FBO site plan could increase the number of based aircraft assumed for the Northwest FBO in FEIR 627 by one.<sup>5</sup> FEIR 627 analyzed the impacts of two additional based aircraft over what could occur in the Proposed Project as part of its alternative analysis (i.e., Alternative 1) and concluded that no significant impacts would result from the addition of the two additional aircraft. Thus, the addition of one more based aircraft was covered within the range of analysis contained in FEIR 627.**

**Table 4** identifies the number of based aircraft (by type) and the average annual operations for each type of aircraft assumed in FEIR 627 for the GAIP (FEIR 627, Appendix D). By dividing the GAIP's operational ("constrained") forecasts<sup>6</sup> by the number of based aircraft, an average annual operations rate for each aircraft type has been ascertained. Average annual operations per based aircraft would vary from 282 to 561, depending upon the type of aircraft (i.e., helicopter, turboprop, piston, or jet). For purposes of a conservative impact analysis, this Memorandum assumes the additional based aircraft due to the modified Clay Lacy FBO site plan would be a business jet, such as a Gulfstream G450. Using this assumption, the addition of one based jet may lead to an increase in GAIP operations of an average of 561 annual operations, an increase of approximately 0.3 percent.<sup>7</sup>

<sup>3</sup> 99,000 sf of hangar space ÷ 15 based aircraft = 6,660 sf/based aircraft; 29,545 sf of additional hangar space ÷ 6,660 sf/based aircraft = 4 additional based aircraft

<sup>4</sup> 141,379 sf of apron for based aircraft ÷ 17 based aircraft = 8,316 sf/based aircraft; 21,225 sf less of apron for based aircraft ÷ 8,316 sf/aircraft = 3 fewer based aircraft

<sup>5</sup> 4 more based aircraft in the hangars - 3 fewer based aircraft on the apron = 1 additional based aircraft overall. This is explained in more detail in **Attachment A**.

<sup>6</sup> Operations generated by based aircraft are treated in FEIR 627 as constrained forecasts that reflect the design capacity of the GAIP. (FEIR 627, Section 3.5, page 3-5). Thus, it is appropriate for any change in design capacity of the Clay Lacy FBO leasehold to focus on the potential change in based aircraft and any related environmental impacts. (This is consistent with the analysis contained in the technical noise appendix of FEIR 627. (Appendix H, *Noise Study Report*, Modeling Assumptions, Section 7.1 - Operations Data Summaries). Since both the apron and hangars would provide capacity at the FBO, these have both been included in the analysis.

<sup>7</sup> 561 annual based jet operations ÷ 167,900 operations at GAIP buildout = 0.33%. Annual operations assumed by FEIR 627 for four additional based jets (Alternative 1) (FEIR 627, Appendix D, Tables 24 and 22) resulted in a slightly lower average annual operations per based jet (i.e., 544.7 average annual operations). However, using the calculations for four additional based aircraft (Alternative 1) also calculates to an approximately 0.3 percent increase (545 annual based jet operations ÷ 168,600 operations at GAIP buildout = 0.32%).

<b>TABLE 4 GAIP Constrained Forecast and Based Aircraft Assumptions (Full Buildout with the Proposed Project)</b>			
<b>Type of Aircraft</b>	<b>Overall GAIP</b>		
	<b>Based Aircraft Assumptions</b>	<b>Average Annual Operations</b>	<b>Average Annual Operations<sup>1</sup> (per based aircraft)</b>
Piston	235	111,000	472.3
TurboProp	30	11,700	390.0
Jet	72	40,400	561.1 <sup>2</sup>
Helicopter	17	4,800	282.4
<b>Total</b>	<b>354</b>	<b>167,900</b>	

Sources: FEIR 627, Appendix D, *Capacity Analysis and Constrained Forecasts*

<sup>1</sup>Calculated by dividing average annual operations by the based aircraft assumptions for the Proposed Project at full GAIP buildout (FEIR 627, Appendix D, Tables 21 and 19).

<sup>2</sup>Annual operations assumed by FEIR 627 for four additional based jets at full GAIP buildout (Alternative 1) (FEIR 627, Appendix D, Tables 24 and 22) resulted in a slightly lower average annual operations per based jet (i.e., 544.7 average annual operations). This forecast accounted for both based and transient operations. Since the unconstrained forecasts for the transient operations have been included in the total forecasted operations, an additional based jet would increase in the number of operations associated with based aircraft but would not increase the number transient operations.

Most impacts analyzed for the GAIP were site-specific based on the location of each proposed development area. These types of impacts would not change due to the modified Clay Lacy FBO site plan, which retains the same project area (14.2 acres) and type of land use (full-service FBO and OCSF facility) as evaluated in FEIR 627 and the Board-approved lease. Impacts related to aesthetics, cultural/scientific resources, hazards and hazardous materials, tribal cultural resources, utilities and public service systems, and water quality would be the same as described in FEIR 627. These topics are briefly discussed below. Additionally, see **Attachment B**.

- **Aesthetics - In FEIR 627, aesthetic impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** Visual impacts were determined in FEIR 627 by defining the visual quality of the area, the expected change as a result of the GAIP, and the sensitivity of the users to those changes. FEIR 627 notes that surrounding uses on the west side of the airport, including those in the vicinity of the Northwest FBO leasehold (i.e., near Paularino Avenue) are predominately low-rise office buildings and industrial buildings that are not considered view-sensitive uses because their length of exposure to the views is brief, and the nature of the businesses does not connect them to the visual character of the site. Also, the visual orientation of these uses is not focused on the airport.

Construction activities related to the modified Clay Lacy FBO site plan would not be different than those for the approved Clay Lacy lease or considered in FEIR 627. On page 4.1-9, FEIR 627 stated with regard to the Proposed Project, *“Construction activities would result in temporary visual changes at the Airport; however, given the urban context of the GAIP site, these changes would not result in a significant visual impact.”* Proposed construction of five buildings and pavement on the Clay Lacy FBO leasehold is the similar to that analyzed in FEIR 627 and would not create an aesthetic impact above what was already considered. (FEIR 627, Impact Threshold 4.1-1).

In the long term, the Clay Lacy FBO would visually improve the airport by replacing aging facilities with new facilities. Lighting changes on the subject site would include the replacement of the existing light sources with similar or upgraded light sources. (FEIR 627, Impact Threshold 4.1-2). The buildings would comply with existing regulations related to building height, lighting, and the use of reflective materials, including solar panels, and would be consistent with the visual character of the airport. The visual change between the approved Clay Lacy Project (i.e., three hangars, a combined hangar/office for the OCSO, and FBO terminal) and the modified Clay Lacy site plan (i.e., four hangars, one of which contains the combined hangar/office for the OCSO, and an FBO terminal) does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627 and will be an overall improvement in the aesthetics of the west side of the airport. (FEIR 627, Impact Threshold 4.1-1).

- **Cultural/Scientific Resources - In FEIR 627, cultural/scientific impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** The modified Clay Lacy FBO site plan would have the same amount of ground disturbance as what was analyzed in FEIR 627 for the Northwest FBO leasehold. Thus, no change to the conclusions of FEIR 627 with respect to cultural/scientific resources would occur due to the modified Clay Lacy site plan. FEIR 627 found that impacts were Less Than Significant for archaeological and paleontological resources and potential disturbance of human remains due to the low potential for the discovery of such resources. (FEIR 627, Impact Thresholds 4.3-1, 4.3-2, and 4.3-3). The modified site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627. See FEIR 627, SC CULT-1, SC CULT-2 and RR CULT-1 for applicable standard conditions of approval and regulatory requirements.

No new or more significant impacts would occur under the modified Clay Lacy FBO site plan to historical resources because no historic resources are located on or immediately adjacent to the project area. (FEIR 627, Impact Threshold 4.3-4).

- **Hazards and Hazardous Materials - In FEIR 627, hazards and hazardous materials impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** Operation and maintenance activities associated with the modified Clay Lacy FBO site plan would be consistent with the existing protocols at the airport for the use and handling of hazardous materials and would not change the types of fueling and maintenance of aircraft that currently occurs. All handling of hazardous materials would continue in full compliance with applicable codes and adopted safety programs currently in operation to reduce potential health risks related to handling of hazardous materials. (See FEIR 627, SC HAZ-1 through SC HAZ-4 and RR HAZ-1 through RR HAZ-5 for applicable standard conditions of approval and regulatory requirements.) Therefore, the modified Clay Lacy FBO site plan, as with the site plan analyzed in FEIR 627, would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (FEIR 627, Impact Thresholds 4.5-1 and 4.5-2).

No change to the airport's fueling services relative to schools in the area would occur due to the modified Clay Lacy FBO site plan. All FBO activity would remain on the previously analyzed site in a manner similar to what is occurring today and to what was envisioned when the GAIP and the Clay Lacy FBO lease were approved. (FEIR 627, Impact Threshold 4.5-3). Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

- **Tribal Cultural Resources - In FEIR 627, tribal cultural resources impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** The Clay Lacy FBO would have the same amount of ground disturbance as what was considered in FEIR 627 for the Northwest FBO leasehold. Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627. FEIR 627 found that impacts were Less Than Significant for tribal cultural resources because of the disturbed nature of the site and limited ground disturbance. (FEIR 627, Impact Threshold 4.9-1). See FEIR 627, MN TCR-1 for applicable minimization measures.
- **Utilities and Public Service Systems - In FEIR 627, utilities and public service system impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** FEIR 627 assumed compliance with existing regulations related to water use and wastewater generation (FEIR 627, Section 4.10.5, RR UTL-1 through RR UTL-3) and focused its analysis on the potential change in number of people served at the airport's general aviation facilities. FEIR 627's analysis for the Proposed Project (as well as Alternative 1, which included another FBO facility in addition to what was analyzed for the Proposed Project) found that wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board would not be exceeded (FEIR 627, Impact Threshold 4.10-1) nor would new or expanded water or wastewater treatment facilities be needed. (FEIR 627, Impact Threshold 4.10-2). FEIR 627 also found that incremental increases in water usage would occur under either the Proposed Project or Alternative 1 but would be offset by the installation of water-efficient plumbing fixtures and appliances. (FEIR 627, Impact Threshold 4.10-3).

The number of people served by the modified Clay Lacy FBO site plan would be similar to what was assumed for the Proposed Project under FEIR 627 and less than what would have occurred under Alternative 1. Thus, no new or more severe impacts related to utilities and public service systems beyond what was described in FEIR 627 would result from the Clay Lacy FBO. Similar to the Proposed Project of FEIR 627, new water-efficient appliances and fixtures would be installed as part of the Clay Lacy FBO and would offset the incremental increase in demand. The Clay Lacy FBO is on schedule to achieve ENVISION® Gold rating, which includes water efficiency measures.

- **Water Quality - In FEIR 627, water quality impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** The airport implements best management practices (BMPs) to address runoff leaving the airport to comply with all water quality standards. In addition, since the GAIP would reduce the number of based aircraft and the number of general aviation operations over the existing condition, an incremental decrease in the amounts of pollutants was anticipated in FEIR 627 (Table 1-2, page 1-36). See FEIR 627, SC WQ-1 through SC WQ-6 and RR WQ-1 for applicable standard conditions of approval and regulatory requirements.

Similar to the Proposed Project and Alternative 1 of FEIR 627, the modified Clay Lacy FBO site plan would reduce the number of based aircraft and the number of general aviation operations relative to the existing condition. Thus, an incremental decrease in pollutants over the existing condition is anticipated, and no violations of water quality standards or discharge requirements nor substantial degradation of water quality would occur. (FEIR 627, Impact Thresholds 4.11-1 and 4.11-3). No change in the amount of impervious surface compared to the conceptual plan for the Northwest FBO leasehold or the previously approved Clay Lacy plans would occur from the site plan revisions. The capacity of existing or planned storm water drainage systems would not be exceeded due to the modified Clay Lacy FBO site plan, and no new or more severe impacts related to water quality beyond what was described in FEIR 627 would result from the Clay Lacy FBO. (FEIR 627, Impact Threshold 4.11-2).

Other impacts of GAIP buildout in FEIR 627, such as air quality and greenhouse gas (GHG) emissions, land use and planning, noise, and vehicular traffic were partly related to aircraft operations. The modified Clay Lacy FBO site plan could increase based aircraft assumed in the FEIR 627 by one business jet, which would change the overall number of based aircraft at full buildout of the GAIP to 355. This is within the range of based aircraft and operations addressed in FEIR 627. FEIR 627 evaluated a range of based aircraft from the GAIP between 354 and 356 based aircraft as discussed below.

- **Air Quality - In FEIR 627, air quality impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** The number of GAIP-based aircraft from the modified Clay Lacy FBO site plan (355 based aircraft overall) and associated emissions was included in the FEIR 627 analysis. Both the Proposed Project (354 based aircraft) and Alternative 1 (356 based aircraft) of FEIR 627 were found to be consistent with the 2016 South Coast Air Quality Management Plan (AQMP), which was then incorporated into the State Implementation Plan in 2017. FEIR 627 states that airport staff participated in the Southern California Association of Governments' (SCAG) Aviation Technical Advisory Committee and coordinated with the South Coast Air Quality Management District (SCAQMD) to *"ensure that aircraft operation data specific to the airport and construction emissions were accounted for through the forecasted planning period."* The modified Clay Lacy FBO site plan, which would result in total based aircraft and overall construction activity within the range considered in FEIR 627, is consistent with the South Coast AQMP. (FEIR 627, Impact Threshold 4.2-1). Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

The construction analysis for Years 2019 - 2021 of the GAIP (which accounted for the Northwest FBO) shows that with mitigation, all criteria pollutants of concern would be well below any significance thresholds (FEIR 627, Table 4.2-7). Neither the Proposed Project nor Alternative 1 were found to violate any air quality standard or contribute substantially to an existing or projected air quality violation (FEIR 627, Impact Threshold 4.2-2) nor result in a cumulatively considerable net increase of any criteria pollutant for which the region has a non-attainment status under an applicable federal or state ambient air quality standard. (FEIR 627, Impact Threshold 4.2-3). This is also true of the development proposed for the modified Clay Lacy FBO

site plan, which would include slightly larger buildings, but less apron, than the Proposed Project and much less construction and fewer operations than Alternative 1. Similarly, since neither the Proposed Project nor Alternative 1 would result in a substantial concentration of toxic air contaminant (TAC) emissions, such as diesel particulate matter, the changes from the modified Clay Lacy FBO site plan would also not result in a substantial concentration of TACs (FEIR 627, Impact Threshold 4.2-4). The modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627 during construction.

- **Greenhouse Gas - In FEIR 627, GHG impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** GHGs from changes in the fleet mixes associated with the Proposed Project or Alternative 1 of the GAIP, as well as construction activities, were found by FEIR 627 to be substantially below the SCAQMD applicable thresholds for industrial uses (10,000 annual metric tons of carbon dioxide equivalents [MTCO<sub>2</sub>EQ]).<sup>8</sup> (FEIR 627, Impact Threshold 4.4-1). The modified Clay Lacy FBO site plan would also not exceed these GHG thresholds since the construction activity and based aircraft for the project are within the range considered in FEIR 627. Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

Similarly, the modified Clay Lacy FBO site plan would not conflict with any applicable plan, policy, or regulation established for reducing GHG emissions impacts (FEIR 627, Impact Threshold 4.4-2). The Clay Lacy FBO project is on schedule to achieve ENVISION® Gold rating, indicating a commitment to sustainability and reductions in its carbon footprint. Clay Lacy has already transitioned their diesel use at the John Wayne Airport to renewable diesel, a fuel recognized for reducing net GHG emissions by up to 80 percent over standard diesel. Clay Lacy Aviation has a robust corporate sustainability program focused on reducing the environmental effects of their operations and will make best efforts to utilize renewable diesel in all construction activity.

- **Land Use and Planning - In FEIR 627, impacts related to land use and planning on the airport were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** The approved GAIP reduced the number of general aviation based aircraft by 242 aircraft parking spaces, while Alternative 1 reduced the based aircraft parking by 240. The modified Clay Lacy site plan is covered within the range already evaluated in FEIR 627 (i.e., 240 - 242 fewer aircraft parking spaces). FEIR 627 found this impact to be Less than Significant, and no mitigation measures were required. (FEIR 627, Impact Threshold 4.6-1). Thus, the modified Clay Lacy FBO would also be Less than Significant for this potential land use impact. The modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

Like the Proposed Project and Alternative 1 analyzed in FEIR 627, there would be three residential units that would be included in the future (2026) cumulative 65 Community Noise Equivalent Level (CNEL) contour that do not have aviation easements and have not received (although they were

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<sup>8</sup> SCAQMD thresholds were used by FEIR 627 because no other quantitative threshold of general applicability was available within the geographic region.

offered) attenuation through the 1985 JWA Master Plan and Santa Ana Heights Acoustical Insulation Program to ensure interior noise levels do not exceed 45 CNEL. (FEIR 627, Impact Threshold 4.6-1).

**This off-airport land use concern was identified as a Potentially Unavoidable and Significant Impact in FEIR 627. However, like the Proposed Project in FEIR 627, the modified Clay Lacy FBO site plan would not substantially contribute to the cumulative land use impacts identified in FEIR 627.** The increase in the number of units in the 65 CNEL contour is substantially due to the increase in the number of commercial carrier operations approved for 2026 as part of the 2014 Settlement Agreement Amendment (FEIR 627, Table 1-2, page 1-29). Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

- **Noise - In FEIR 627, noise impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** Impacts of the modified Clay Lacy FBO site plan would be Less Than Significant. The modified Clay Lacy FBO site plan would not change the impact conclusions related to noise outlined in FEIR 627, which were that the Proposed Project would result in minor increases in aviation noise levels compared to the Baseline (2016) condition and an incremental increase in traffic noise levels on the west side of the airport. Although the modified Clay Lacy FBO site plan could increase based aircraft by one over what was considered by the Proposed Project in FEIR 627, Alternative 1 assumed two based aircraft above the Proposed Project. In the case of noise impacts, like the Proposed Project and Alternative 1 in FEIR 627, the Clay Lacy FBO would not exceed the threshold standards established for determining a significant impact. (FEIR 627, Impact Thresholds 4.7-1, 4.7-2, and 4.7-4). In addition, interior noise levels for the new Clay Lacy facilities would be consistent with County requirements (see FEIR 627, SC NOI-1). Thus, the modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.

During construction, temporary increases in the ambient noise would occur. However, due to the intervening distances and other commercial buildings between the construction areas and any sensitive noise receptors such as residents, FEIR 627 found that construction noise impacts would be Less than Significant. (FEIR 627, Impact Threshold 4.7-3). This conclusion is the same for the modified Clay Lacy FBO site plan, which would retain all construction activity within the previously approved project site. The modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627 during construction.

- **Transportation/Traffic (Performance of the Circulation System) - In FEIR 627, transportation/traffic impacts were Less than Significant. The modified Clay Lacy FBO site plan would not change this analysis.** FEIR 627, Appendix I, *General Aviation Improvement Program Traffic Impact Analysis*, Table 4-1 identifies the amount of westside traffic assumed for the Northwest FBO in the EIR analysis (i.e., 57 AM peak trips, 54 PM peak trips, and 738 average daily trips [ADT]). ADT generated by a jet (regardless of whether it was a based or transient aircraft) were assumed to be 19.43 trips per 100 annual operations. (FEIR 627, Appendix I, Table 3-1). Assuming 561 additional annual operations by one new based jet at the Clay Lacy FBO, 109

additional ADT could occur.<sup>9</sup> Using the same percentages of AM and PM peak trips as FEIR 627 (Appendix I, Table 4-1), eight peak hour trips could occur during either AM or PM peak periods (7.7 and 7.3 percent of 109 ADT, respectively). However, peak hour trips for an FBO are not the same as typical peak hours associated with “rush hour” traffic and are expected to be less than this on an average day. Also, based on the annual operations assumed for four based jets under Alternative 1 of FEIR 627 (i.e., 545 average operations per additional based jet), the ADT and peak hour volumes described above for the modified Clay Lacy FBO site plan may be over-estimated (see previous footnote 6 and Table 4, note 2).

Traffic impacts were determined in FEIR 627 to be Less Than Significant as the GAIP would generate fewer trips overall than the No Project alternative and all intersections would operate at LOS D or better. (FEIR 627, Impact Threshold 4.8-1).<sup>10</sup> The changes in buildout of the modified Clay Lacy FBO site plan compared to FEIR 627 or the approved Clay Lacy FBO lease would not result in new significant environmental effects (or a substantial increase in the severity of previously identified significant effects) for vehicular traffic on the west side of the airport.

In addition, none of the GAIP’s six study area intersections fell within the jurisdiction of the Orange County Transportation Authority’s (OCTA) 2017 Congestion Management Plan (CMP). Therefore, the Clay Lacy FBO development would not conflict with the OCTA CMP or contribute to a cumulative impact. (FEIR 627, Impact Threshold 4.8-2).

## CONCLUSION

**Attachment B** summarizes the impact analysis, mitigation program, and levels of impact significance after mitigation of the GAIP per FEIR 627. As can be seen in the attachment and is discussed in this Memorandum, there are no changes to the FEIR 627 significance conclusions due to the modified Clay Lacy FBO site plan.

<sup>9</sup> 19.43 ADT x 5.61 annual operations [000’s] = 109 ADT

<sup>10</sup> As of December 28, 2018, State CEQA Guidelines no longer consider changes in roadway levels of service to be a significant impact (see CEQA Guidelines Section 15064.3[b]). The County’s *Guidelines for Evaluating Vehicle Miles Traveled Under CEQA* provides that to the extent that circulation impacts have already been addressed at a programmatic level the analysis may tier from the previous document. The GAIP was approved with Program FEIR 627. Although prepared prior to CEQA adopting vehicle miles traveled (VMT) as the metric for assessing transportation impacts, FEIR 627 did include an assessment of the absolute change in VMT and the VMT per capita associated with the GAIP. FEIR 627 found there would not be an increase in VMT associated with the GAIP trips when compared to the 2016 baseline. Additionally, FEIR 627 found the transportation impacts for both project-specific and cumulative transportation impacts were less than significant.

The development proposed for the Clay Lacy proposal is consistent with the range of development evaluated in FEIR 627. The Clay Lacy proposal would not provide redundant infrastructure that would induce growth, or a change land uses that would require result in new or substantially greater transportation impacts; therefore, no modifications to the FEIR 627 is required. As noted in FEIR 627, the VMT associated with the GAIP development are included in Connect SoCal (the Regional Transportation Plan/Sustainable Communities Strategy) approved by the Southern California Association of Governments (SCAG) in September 2020; therefore, the trips have also been evaluated on the regional circulation network.



The market for “high end” FBOs has an expectation for space that accommodates items such as conference rooms and meeting areas, and plans to provide a facility that provides the amenities needed to meet the following GAIP goals:

- Utilize limited land area efficiently and economically. Clay Lacy has intentionally designed both the layout and functions of the FBO with different customers and aircraft makes and models in mind. From the needs of private jet passengers, pilots, cabin attendants, maintenance technicians, and student pilots, the amenities and facilities have been customized to meet specific needs providing maximum efficiency and safety. All areas of the FBO, except for the OCSD Air Support Facility, are designed to operate as community space, not dedicated or single-purpose space. This enables best use of the limited land area in a safe and economical manner.
- Embrace flexibility to allow for technological advances and market trends. The Clay Lacy FBO is designed to accommodate today’s largest business jets, as well as landing areas and a charging infrastructure to accommodate future advances in air mobility including all-electric aircraft, electric vertical take-off and land (eVTOL) and hybrid propulsion systems. The community space approach to the design and layout of the facility ensures that the entire facility can flex to accommodate market trends in new aircraft designs and sizes.
- Maximize economic, self-sustaining, revenue-producing facilities. Clay Lacy uses a wholistic approach to servicing the needs of the general aviation community. In addition to the facilities and amenities being purposely designed with the different user groups in mind, Clay Lacy also provides aircraft management, charter, maintenance, and avionics services. This broader range of services combined with a flexibly designed layout with key infrastructure elements to support each service, enables Clay Lacy Aviation to deliver higher and more consistent revenues and enlarges the fee and tax bases for John Wayne Airport and the County of Orange.

The Clay Lacy FBO at John Wayne Airport will provide the users of the FBO with a high-quality experience that compares or exceeds the same experience at another facility. It will also meet the needs of the OCSD, as required in the GAIP.

The analysis contained in this Memorandum shows that the Clay Lacy design plans are consistent with the GAIP and FEIR 627, and no new environmental document would be required, as summarized below:

1. There are no substantial changes proposed for the Northwest FBO, which will require major revisions of the previous FEIR per Section 15162 et seq. of the State CEQA Guidelines.
2. Substantial evidence per State CEQA Guidelines Section 15168(c)(2) has been provided to show that the Clay Lacy FBO would be within the scope of the project covered by FEIR 627.

From an environmental perspective, FEIR 627 determined No Impact, Less Than Significant, or Less than Significant (with mitigation) impacts for all but one of the environmental impact categories.<sup>11</sup> **Since the modified Clay Lacy FBO site plan would not change the size of the overall Northwest FBO development area or the type of development proposed for the Northwest FBO leasehold and is within the range of based aircraft and operations analyzed within FEIR 627, the impact analyses in FEIR 627 remain applicable. The modified Clay Lacy site plan does not increase the severity of previously identified impacts or create new substantial impacts not addressed by FEIR 627.**

### *Enclosures*

Exhibit 1, Proposed Clay Lacy FBO

Attachment A, AECOM Memorandum re: Analysis of the Revised Clay Lacy Northwest Fixed Base Operator Site Plan (R2) and Final Environmental Impact Report No. 627, John Wayne Airport General Aviation Improvement Program (dated October 25, 2021)

Attachment B, Comparison of Final EIR 627 Impacts and Modified Clay Lacy FBO Site Plan

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<sup>11</sup> The only significant impacts associated with the GAIP based on FEIR 627 were potentially significant land use compatibility impacts involving three residences without sound attenuation or avigation easements that would be within the 65 to 70 dB CNEL contour. Additionally, the GAIP would contribute to a potential cumulative land use compatibility impact at two schools. For both the residences and the schools, the Sound Insulation Program (SIP) adopted by the Board of Supervisors in 2014 in conjunction with the JWA Settlement Agreement Amendment would provide possible mitigation; however, given FAA criteria for the attenuation of noise sensitive uses, it is uncertain if the SIP would adequately reduce interior noise levels at all potentially impacted uses. Therefore, these impacts were determined to be significant and unavoidable (FEIR 627, pages 1-4 and 1-5).



**EXHIBIT 1: Proposed Clay Lacy FBO**

DATE: OCTOBER 27, 2021



## **ATTACHMENT A**

### **ANALYSIS OF THE REVISED CLAY LACY NORTHWEST FIXED BASE OPERATOR SITE PLAN (R2) AND FINAL ENVIRONMENTAL IMPACT REPORT NO. 627**



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## MEMORANDUM

### ANALYSIS OF THE REVISED CLAY LACY NORTHWEST FIXED BASE OPERATOR SITE PLAN (R2) AND FINAL ENVIRONMENTAL IMPACT REPORT NO. 627, JOHN WAYNE AIRPORT GENERAL AVIATION IMPROVEMENT PROGRAM

#### Summary and Findings

The Clay Lacy Memorandum, *Review of Clay Lacy Northwest Fixed Base Operator Development and Final Environmental Impact Report No. 627, John Wayne International Airport*, prepared by Coffman Associates (September 13, 2021) advocates that the proposed increase in aircraft hangar space would be offset by a corresponding decrease in aircraft parking apron space, resulting in a net increase of up to one based aircraft. The Clay Lacy Memo is based on a proposed FBO site plan, which has since been revised (see **Exhibit A** at the end of this memo). Based on the revised site plan (R2, October 15, 2021), AECOM's analysis supports the supposition presented in the Clay Lacy Memo.

For purposes of this discussion, AECOM's analysis accepts the premise that: (1) the stand-alone Orange County Sherriff's Department (OCS D) facilities described in the General Aviation Improvement Program (GAIP) and evaluated in the Final Environmental Impact Report (FEIR 627) would be reduced in size and integrated into the NW FBO facilities; (2) the three proposed community hangars can be increased in size; and (3) a fourth community hangar can be added to the plan.

When compared to the GAIP/FEIR, the revised Clay Lacy FBO site plan:

- *Increases* FBO community hangar space by 29,545 SF (30 percent)
- *Decreases* based aircraft parking apron space by 21,225 SF (-15 percent)
- *Decreases* OCS D combined hangar and apron space by 1,868 SF (-4 percent)

The total area available for based aircraft is 6,452 SF more than the area assumed in the GAIP/FEIR (6,452 ÷ 282,847 = 2.3%), but less than the average space allowance for one large business jet. Therefore, in terms of based aircraft parking and storage, the overall capacity of the revised Clay Lacy FBO site plan is approximately equivalent to the NW FBO facilities described in the GAIP and evaluated in FEIR 627. **Exhibit B** at the end of this memo presents a comparison analysis of both plans and is summarized below.

Version 3 (v3) of this memo corrects a typo in Table 4. The results of the analysis remain unchanged.

#### 1. FBO Community Hangars

As shown in **Table 1** below, when compared to the NW FBO facilities described in the GAIP and evaluated in FEIR 627, *the proposed Clay Lacy FBO increases community hangar storage space by 30 percent, which would increase aircraft storage capacity by ~4 aircraft.*



- The NW FBO facilities evaluated in FEIR 627 includes three community hangars at 33,000 SF each, totaling 99,000 SF. Assuming five business jets per hangar, there is capacity for ~15 aircraft or an average of 6,600 SF per aircraft.
- The revised Clay Lacy FBO site plan includes four hangars, totaling 128,545 SF. Assuming 6,600 SF per aircraft, there would be capacity for ~19 aircraft.

**Table 1: FBO Community Hangars**

Item	GAIP/ FEIR 627	Proposed Clay Lacy FBO	Difference	
			Units	Percent
Hangar 1	33,000	37,780	4,780	14%
Hangar 2	33,000	37,780	4,780	14%
Hangar 3	33,000	17,545	(15,455)	-47%
Hangar 4	-	35,440	35,440	--
FBO Hangar Space (SF)	99,000	128,545	29,545	30%
Est. Based Aircraft Storage Capacity	15	19	4	30%
Average SF per Aircraft	6,600	6,600	-	-

## 2. FBO Aircraft Parking Apron

As shown in **Table 2**, when compared to the NW FBO facilities described in the GAIP and evaluated in FEIR 627, *the proposed Clay Lacy FBO decreases aircraft parking apron space by 15 percent, which would decrease based aircraft storage capacity by ~3 aircraft.*

- The NW FBO facilities evaluated in FEIR 627 includes 282,757 SF of aircraft parking space. Assuming 17 based aircraft and 17 transient aircraft, there is capacity for ~34 aircraft, or an average of 8,316 SF per aircraft (includes space for aircraft parking and allowance for circulation).
- The proposed Clay Lacy FBO includes 240,307 SF of aircraft parking space. Assuming 8,316 SF per aircraft, there would be capacity for ~14 based aircraft and 14 transient aircraft (includes space for aircraft parking and allowance for circulation).

**Table 2: FBO Aircraft Parking Apron**

Item	GAIP/ FEIR 627	Proposed Clay Lacy FBO	Difference	
			Units	Percent
50% Based Aircraft	141,379	120,154	(21,225)	-15%
50% Transient Aircraft	141,379	120,154	(21,225)	-15%
Aircraft Parking Apron (SF)	282,757	240,307	(42,450)	-15%
Est. Based Aircraft Storage Capacity	17	14	(3)	-15%
Average SF per Aircraft	8,316	8,316	-	-



### 3. OCSD Facilities

**Table 3** presents the Orange County Sheriff Department (OCSD) facilities. When compared to the NW FBO facilities described in the GAIP and evaluated in FEIR 627, *the proposed Clay Lacy FBO decreases OCSD hangar storage space, while providing approximately the same amount aircraft parking apron space.*

- The NW FBO facilities evaluated in FEIR 627 includes 11,429 SF of hangar space and 31,039 SF of aircraft parking apron space.
- The proposed Clay Lacy FBO includes 9,600 SF of hangar space and 31,000 SF of aircraft parking apron space reserved for OCSD helicopters.

**Table 3: OCSD Facilities**

Item	GAIP/ FEIR 627	Proposed Clay Lacy FBO	Difference	
			Units	Percent
OCSD Hangar Space (SF)	11,429	9,600	(1,829)	-16%
OCSD Aircraft Parking Apron (SF)	31,039	31,000	(39)	-0%
Combined OCSD Facilities (SF)	42,468	40,600	(1,868)	-4%

Regarding OCSD based aircraft, when the GAIP was prepared, the OCSD requested a space allowance for 6 helicopters. Subsequently, as reported in the Clay Lacy Memo, the OCSD has agreed to a space allowance for 5 helicopters.

### 4. Comparison of FEIR 627 to Clay Lacy FBO

As shown in **Table 4**, when compared to the NW FBO facilities described in the GAIP and evaluated in FEIR 627, *the proposed Clay Lacy FBO increases the total area available for based aircraft by 2 percent.*

- The NW FBO facilities evaluated in FEIR 627 includes 282,847 SF of total space for based aircraft including OCSD helicopters.
- The proposed Clay Lacy FBO includes 289,299 SF of total space for based aircraft including OCSD helicopters.

**Table 4: Comparison of FEIR 627 Assumptions to Clay Lacy FBO**

Item	GAIP/ FEIR 627	Proposed Clay Lacy FBO	Difference	
			Units	Percent
FBO Hangar Space (SF)	99,000	128,545	29,545	30%
OCSD Hangar Space (SF)	11,429	9,600	(1,829)	-16%
Apron Available for FBO Based Aircraft	141,379	120,154	(21,225)	-15%
Apron Available for OCSD Helicopters	31,039	31,000	(39)	0%
Total Area Available for Based Aircraft	282,847	289,299	6,452	2%

Note: May not sum to total due to rounding.



## 5. NW FBO Based Aircraft

As shown in [Table 5](#), when compared to the NW FBO facilities described in the GAIP and evaluated in FEIR 627, the estimated change (increase) in based aircraft capacity resulting from the proposed Clay Lacy FBO is less than one aircraft. In sum:

- The increase in FBO community hangar space results in ~4 additional aircraft.
- The decrease in FBO apron space results in ~3 fewer aircraft.
- The decrease in OCSD space results in 1 less helicopter.

Because it is not possible to have an increase of less than one (0.9) aircraft, rather than rounding up, it would be reasonable to conclude that the potential increase in based aircraft capacity would be 0.

**Table 5: NW FBO Based Aircraft**

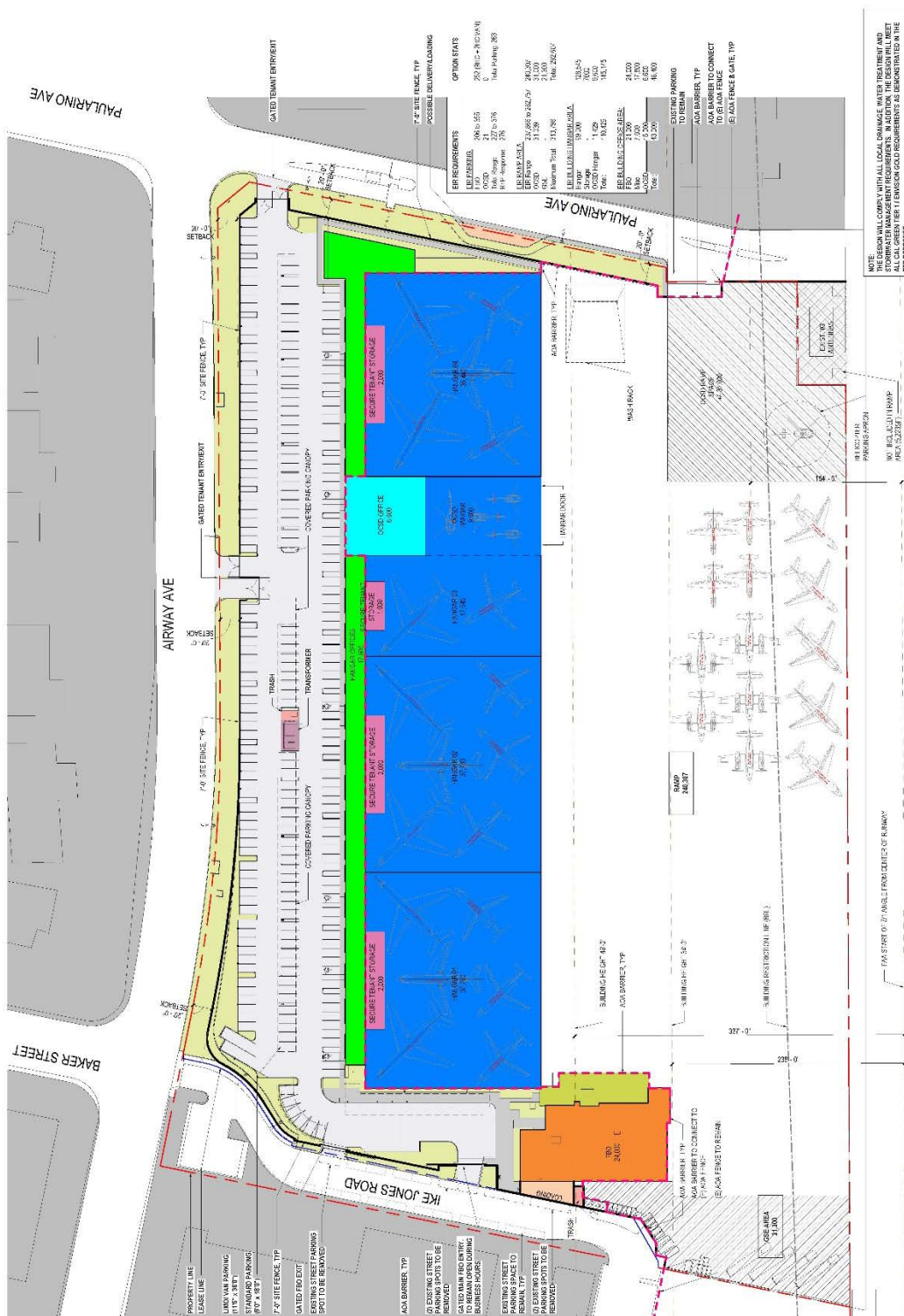
Item	GAIP/ FEIR 627	Proposed Clay Lacy FBO	Difference	
			Units	Percent
FBO Community Hangar Space (SF)	99,000	128,545	29,545	30%
Average SF per Aircraft	6,600	6,600	-	-
<b>Based Aircraft in Hangars</b>	<b>15</b>	<b>19</b>	<b>4</b>	<b>30%</b>
Apron Available for FBO Based Aircraft (SF)	141,379	120,154	(21,225)	-15%
Average SF per Aircraft	8,316	8,316	-	-
<b>Based Aircraft on the FBO Apron</b>	<b>17</b>	<b>14</b>	<b>(3)</b>	<b>-15%</b>
<b>OCSD Helicopters</b>	<b>6</b>	<b>5</b>	<b>(1)</b>	<b>-17%</b>
<b>Total Based Aircraft (Est.)</b>	<b>38</b>	<b>39</b>	<b>0.9</b>	<b>2%</b>

Notes: May not sum to total due to rounding. Actual number of based aircraft will vary based on the type and size of aircraft parked at the FBO at any given time.





Exhibit A: Revised Clay Lacy FBO Site Plan (R2, October 15, 2021)



NOTES:  
 1. THE DESIGN WILL COMPLY WITH ALL LOCAL DRAINAGE, WATER TREATMENT AND STORMWATER MANAGEMENT REQUIREMENTS. IN ADDITION, THE DESIGN WILL MEET ALL APPLICABLE FEDERAL, STATE AND LOCAL REGULATIONS AS DESCRIBED IN THE RFP RESPONSE.


**Exhibit B: NW FBO Space Allocation (AECOM)**

Analysis of the Revised Clay Lacy FBO Site Plan (R2)					
Item	GAIP/ FEIR 627	Revised Clay Lacy FBO	Difference Units	Percent	
<b>1. FBO Community Hangars</b>					
Hangar 1 (SF)	33,000	37,780	4,780	14%	
Hangar 2 (SF)	33,000	37,780	4,780	14%	
Hangar 3 (SF)	33,000	17,545	(15,455)	-47%	
Hangar 4 (SF)	-	35,440	35,440	-	
FBO Hangar Space (SF)	99,000	128,545	29,545	30%	
Est. Based Aircraft Storage Capacity	15	19	4	30%	
Average SF Per Aircraft	6,600	6,600	-	-	
<b>2. FBO Aircraft Parking Apron</b>					
50% Based Aircraft	141,379	120,154	(21,225)	-15%	
50% Transient Aircraft	141,379	120,154	(21,225)	-15%	
Aircraft Parking Apron (SF)	282,757	240,307	(42,450)	-15%	
Est. Based Aircraft	17.0	14.4	(3)	-15%	
Est. Transient Aircraft	17.0	14.4	(3)	-15%	
Est. Based & Transient Aircraft Parking Apron Capacity	34	29	(5)	-15%	
Average SF Per Aircraft	8,316	8,316	-	-	
NW FBO Based Aircraft (excluding OCSD facilities)	32	34	2	6%	
<b>3. OCSD Facilities (Exclusive Use)</b>					
OCSD Hangar Space (SF)	11,429	9,600	(1,829)	-16%	
OCSD Aircraft Parking Apron (SF)	31,039	31,000	(39)	0%	
Combined Hangar/Apron Space	42,468	40,600	(1,868)	-4%	
OCSD Helicopters	6	5	(1)	-17%	
<b>4. Comparison of FEIR 627 to Clay Lacy FBO</b>					
FBO Hangar Space (SF)	99,000	128,545	29,545	30%	
OCSD Hangar Space (SF)	11,429	9,600	(1,829)	-16%	
Apron Available for FBO Transient Aircraft	141,379	120,154	(21,225)	-15%	
Apron Available for FBO Based Aircraft	141,379	120,154	(21,225)	-15%	
Apron Available (Exclusive) for OCSD Helicopters	31,039	31,000	(39)	0%	
Combined Apron Area (SF)	313,796	271,307	(42,489)	-14%	
Hangar+Apron Available for FBO Based Aircraft (SF)	240,379	248,699	8,320	3.5%	
Hangar+Apron Area Available for OCSD (SF)	42,468	40,600	(1,868)	-4.4%	
<b>Total Area Available for Based Aircraft (SF)</b>	<b>282,847</b>	<b>289,299</b>	<b>6,452</b>	<b>2%</b>	
<b>5. NW FBO Based Aircraft (Est)</b>					
FBO Community Hangar Space	15	19	4	30%	
Apron Available for FBO Based Aircraft	17	14	(3)	-15%	
OCSD Helicopters	6	5	(1)	-17%	
<b>Total Based Aircraft</b>	<b>38</b>	<b>39</b>	<b>0.9</b>	<b>2%</b>	

Note: Numbers may not sum to total due to rounding.

## **ATTACHMENT B**

### **COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN**

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<b>AESTHETICS (AES) (Section 4.1)</b>				
<b>4.1-1:</b> Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	<p>Construction activities would result in temporary visual changes at the Airport; however, given the urban context of the GAIP site, these changes would not result in a significant visual impact. Long-term, the character of the improvements for the GAIP would be consistent with the visual character of the Airport. The GAIP would have to comply with existing regulations related to building height. The replacement of older facilities with new facilities would result in a visual improvement; therefore, the GAIP would not substantially degrade the existing visual character or quality of the site and its surroundings. Implementation of MN AES-1 would serve to reduce impacts associated with construction staging. (LTS)</p> <p>Cumulative impacts were also LTS.</p>	<p>No mitigation measures are required. Although impacts would be less than significant, the following Minimization Measure has been included:</p> <p><b>MN AES-1</b> Construction contract specifications for any phase of development where the Airport property on the southwest corner of Irvine Avenue and Bristol Street South (i.e., golf course area) will be used as a construction laydown area/staging area, shall include security fencing with opaque screening around the construction sites and staging areas to block the ground-level views of the site. No removal of trees shall be allowed at the staging area.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>Although the modified site plan would result in a slight intensification of the uses on the Northwest FBO site, the overall impact would be the same as those evaluated in FEIR 627. The modification would not substantially change the visual character and would be consistent with the urban setting. The Clay Lacy FBO would visually improve the airport by replacing aging facilities with new ones.</p> <p>Construction activities would not use the southwest corner of Irvine Avenue and Bristol Street South as a construction laydown/staging area.</p>
<b>4.1-2:</b> Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<p>The GAIP would result in the replacement of existing light sources on site. Compliance with RR AES-1 would regulate the type of building materials allowed and the intensity of lighting for all new facilities at the Airport. Use of solar panels would require a glint and glare evaluation pursuant to MN AES-2. Therefore, the GAIP would not result in substantially greater new sources of light or glare. (LTS)</p> <p>The GAIP and cumulative projects would be required to comply with Federal Aviation Administration (FAA) requirements pertaining to lighting and use of reflective materials, thereby minimizing the potential for cumulative light and glare impacts. (LTS)</p>	<p>No mitigation measures are required.</p> <p><b>RR AES-1</b> Prior to issuance of any building permit for individual general aviation projects at the Airport, the contractor shall file a Notice of Proposed Construction or Alteration (FAA Form 7460-1) with the FAA regional office that will show compliance with 14 CFR Part 77 (i.e., Federal Aviation Regulation [FAR] Part 77), as it relates to building or structure heights, markings, lighting, and other standards. The FAA's Determination of No Hazard shall be submitted to the County prior to the start of construction.</p> <p>Although impacts would be less than significant, the following Minimization Measure has been included:</p> <p><b>MN AES-2</b> Prior to issuance of a building permit for any project proposing the use of solar panels, the applicant shall prepare an evaluation of glare and glint on surrounding land uses and effects on navigation. The evaluation shall include description of the number,</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627. Proposed buildings would comply with existing regulations related to lighting and the use of reflective materials, including the use of solar panels. FAA Form 7460-1 is required.</p>

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<b>AIR QUALITY (AQ) (Section 4.2)</b>				
<b>4.2-1:</b> Would the project conflict with or obstruct implementation of the applicable air quality plan?	<p>The GAIP would be consistent with the Air Quality Management Plan (AQMP). Airport staff participated in Southern California Area of Government's (SCAG) Aviation Technical Advisory Committee and coordinated with South Coast Air Quality Management District (AQMD) to ensure that aircraft operation data specific to the Airport (such as the number of operations, fleet mix and taxi times) and construction emissions were accounted for throughout the forecasted planning period for both the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and AQMP. (LTS)</p> <p>The GAIP and identified cumulative projects are consistent with the AQMP. Therefore, the GAIP would not contribute to cumulative impacts associated with obstruction of the applicable air quality plan. (LTS)</p>	No mitigation measures are required.	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The SCAG Aviation Technical Advisory Committee was provided information on airport operations, including those associated with the GAIP, during development of the AQMP. The data provided to SCAG and evaluated in FEIR 627 included additional aircraft beyond what is considered by the modified Clay Lacy FBO site plan and was found to be consistent with the AQMP (FEIR 627 Tables 1-1 and 1-2).</p>
<b>4.2-2:</b> Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<p>below SCAQMD thresholds during the construction period. Operational emissions of criteria pollutants would be below thresholds established by the SCAQMD for the South Coast Air Basin (SoCAB). While no mitigation is required by CEQA for operational emissions, MN AQ-1 (use of low VOC architectural coatings) and MN AQ-2 (use of Zero Emission Vehicles for 90 percent or greater of the ground service equipment [GSE] operating hours) would further reduce potential emissions. (LTS)</p>		LTS	

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
4.2-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State Ambient Air Quality Standard (including releasing emission which exceed quantitative thresholds for ozone precursors)?	Based on the SCAQMD guidance, projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. The GAIP would not exceed the project-specific thresholds with mitigation; therefore, they would not result in cumulatively considerable net increase of any criteria pollutant for which the SoCAB region has a non-attainment status under an applicable federal or State Ambient Air Quality Standard. (LTS).	MN AQ-1 and MN AQ-2 and MM AQ-1 (listed above) would reduce the air emissions associated with the GAIP, which would reduce the cumulative emissions associated with the Airport.	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  The fleet mix and number of aircraft operations would be within the range evaluated in FEIR 627. Since the impacts of the GAIP scenarios were determined not to be considerably cumulatively significant, the emissions associated with the modified Clay Lacy site plan would not change this determination and impacts would remain under applicable SCAQMD significance thresholds.
4.2-4: Would the project expose sensitive receptors to substantial pollutant concentrations?		MM AQ-1 and MN AQ-1 would serve to reduce the concentration of pollutants. No further mitigation is required.	LTS	

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
	contribute emissions that expose sensitive receptors to adverse health effects and its cumulative contribution of criteria air pollutants and toxic air contaminants would be less than significant. (LTS).			
<b>CULTURAL/SCIENTIFIC RESOURCES (CULT) (Section 4.3)</b>				
<b>4.3-1:</b> Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	The GAIP has a low potential to cause a substantial adverse change in the significance of an archaeological resource. Should buried archaeological resources be discovered during grading, implementation of SC CULT-1 would reduce potential impacts to less than significant levels. Additionally, the cumulative projects identified are not expected to disturb unknown cultural resources because of the shallow depth of excavation. Further, each of the cumulative projects are subject to the same standard conditions. Therefore, cumulative impacts would be less than significant. (LTS)	No mitigation measures are required.  <b>SC CULT-1</b> Prior to the issuance of the first grading permit, the applicant shall provide written evidence to the Manager, Building and Safety, that applicant has retained a County-certified archaeologist, to observe grading activities and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  FEIR 627 assumed full disturbance of the Northwest FBO site. The modified Clay Lacy FBO site plan would have the same amount of ground disturbance as was considered in FEIR 627. The County's standard condition of approval would minimize impacts on any unknown archaeological resources.
<b>4.3-2:</b> Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	The GAIP has a low potential to directly or indirectly destroy a unique paleontological resource or site; however, the geologic formations underlying the site has moderate sensitivity. Implementation of SC CULT-2 would reduce potential impacts to less than significant should unknown buried resources be discovered as part of grading activities. Additionally, due to lack of unique geologic features on the site, no impacts to such features would occur and no mitigation is required. Each of the cumulative projects are located in the same geologic formation; therefore, the potential for cumulative impacts would also be less than significant. (LTS)	No mitigation measures are required.  <b>SC CULT-2</b> Prior to the issuance of the first grading permit, the project applicant shall provide written evidence to the Manager, Building and Safety, that applicant has retained a County-certified paleontologist to observe grading activities and salvage and catalogue fossils as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  FEIR 627 assumed full disturbance of the Northwest FBO site. The modified Clay Lacy site plan would have the same amount of ground disturbance as was considered in FEIR 627. The County's standard condition of approval would minimize impacts on any unknown paleontological resources.
<b>4.3-3:</b> Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?	The GAIP-specific and cumulative projects are not expected to disturb human remains. However, if human remains are encountered during grading activities, implementation of RR CULT-1 would reduce potential impacts to human remains to a less than significant level. (LTS)	No mitigation measures are required.  <b>RR CULT-1</b> If human remains are encountered during ground-disturbing activities, all activity shall cease immediately. Pursuant to Section 7050.5 of the California Health and Safety Code, no further disturbance shall occur until the County Coroner has	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  FEIR 627 assumed full disturbance of the Northwest FBO site. The modified Clay Lacy site plan would have the same amount of

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
		made the necessary findings as to origin and disposition pursuant to Section 5097.98 of the California Public Resources Code. The provisions of Section 15064.5 of the <i>California Environmental Quality Act</i> Guidelines shall also be followed.		ground disturbance as was considered in FEIR 627. The County's standard condition of approval would minimize impacts on any unknown human remains.
<b>4.3-4:</b> Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?		No mitigation measures are required.	NI	NI. No new or substantially greater impacts requiring modifications to FEIR 627. There are no historic resources located on or immediately adjacent to the project area.
GREENHOUSE GAS EMISSIONS (GHG) (Section 4.4)				
<b>4.4-1:</b> Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	GHG impacts are exclusively cumulative impacts. Construction activities and the changes in the fleet mix associated with the GAIP (2026) would generate greenhouse gas emissions beyond those identified for the Baseline (2016). However, the net emissions would be substantially below the SCAQMD threshold for industrial uses (i.e., 10,000, annual metric tons of carbon oxide equivalents [MTCO <sub>2EQ</sub> ]) both prior to and after the implementation of mitigation and minimizations measures (3,561 annual MTCO <sub>2EQ</sub> and 3,021 annual MTCO <sub>2EQ</sub> , respectively). Therefore, the GAIP would not generate greenhouse gas emissions that would have a significant impact on the environment. (LTS)	<p>No mitigation measures are required.</p> <p><b>RR GHG-1</b> GAIP facilities must be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CCR 6). These standards are updated, approximately every three years, to incorporate improved energy efficiency technologies and methods. The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p> <p><b>RR GHG-2</b> GAIP facilities must be designed in accordance with applicable requirements of the California Green Building Standards (CALGreen) Code (24 CCR 11). The Manager of Building &amp; Safety, or designee shall ensure compliance prior to the issuance of each building permit.</p> <p>Although no mitigation measures are required, MN AQ-1, and MN AQ-2 would serve to further reduce GHG emissions. Additionally, MN GHG-1 (listed below) would require GAIP-related facilities and uses to comply with the Airport's Climate Action Plan, which would also reduce GHG emissions.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The fleet mix and number of aircraft operations from the modified Clay Lacy site plan are within the range evaluated in FEIR 627.</p> <p>The Clay Lacy FBO is on schedule to achieve ENVISION® Gold rating and has already transitioned their diesel use at the airport to renewable diesel.</p>
<b>4.4-2:</b> Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	The GHG emissions for the GAIP would be less than the quantitative significance thresholds used to evaluate their significance and are further reduced by MN GHG-2 and the measures identified in Section 4.2 above. Additionally, the GAIP would implement applicable emissions-reducing strategies	<p>No mitigation measures are required.</p> <p>However, the GAIP incorporates additional measures not required to reduce significant impacts that would also reduce GHG emissions. This includes MN GHG-1 listed below, as well as MN AQ-1 and MN AQ-2, identified above under Section 4.2.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The fleet mix and number of aircraft operations from the modified Clay Lacy site plan are within the range evaluated in FEIR 627.</p>



ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<b>HAZARDS AND HAZARDOUS MATERIALS (Section 4.5)</b>				
<p><b>4.5-1:</b> Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p> <p><b>4.5-2:</b> Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<p>With implementation of existing federal, State, and local regulations the GAIP would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. These same regulations and standard conditions would apply to the cumulative projects; therefore, with the GAIP both project-specific and cumulative impacts would be less than significant. (LTS)</p>	<p>No mitigation measures are required.</p> <p><b>RR HAZ-1</b> Prior to the start of demolition or construction at the facilities, an asbestos abatement work plan shall be prepared in compliance with federal, State, and local regulations for any necessary removal and disposal of such materials.</p> <p><b>RR HAZ-2</b> Prior to the start of any construction/ demolition at the facilities, a lead-based paint/lead-containing paint abatement work plan shall be prepared in compliance with federal, State, and local regulations.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The Clay Lacy FBO would comply with the stated regulatory requirements. Operation and maintenance activities associated with the modified Clay Lacy FBO site plan would be consistent with the existing protocols at the airport for the use and handling of hazardous materials and would not change the types of fueling and maintenance of aircraft that currently occurs.</p>
<p><b>4.5-3</b> Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school?</p>			LTS	

**ATTACHMENT B  
COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN**

Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
	<p>adopted ongoing programs and procedures would continue to reduce the potential for risk of exposure to schools in proximity to the Airport. (LTS)</p>	<p><b>RR HAZ-5</b> A spill prevention, control, and countermeasure (SPCC) plan or an amendment to an existing SPCC may be required to address the additional fueling related activities. Prior to construction of the self-service fueling station, the Airport’s Environmental Engineer shall determine if an amendment to an existing SPCC Plan or a new plan is required. Prior to the self-serve fueling station becoming operational, said document, would be prepared in compliance with the requirements of the U.S. Environment Protection Agency as provided for in 40 CFR 112 to the satisfaction of the Airport’s Environmental Engineer.)</p> <p><b>SC HAZ-1</b> Prior to the issuance of a building permit for installation of an industrial oven, spray booth, powder coating operation, dust collection equipment, welding operation, refrigeration system, or other hazardous equipment, the applicant shall provide the Manager, Permit Services with a clearance from the Orange County Fire Authority (OCFA), or other Local Fire Agency (if applicable), indicating plan compliance with Fire Code and all guidelines specific to the operation.</p> <p><b>SC HAZ-2</b> Prior to the issuance of a grading permit or building permit, whichever comes first, for installation of an aboveground or an underground tank used for the storage of flammable, combustible, or hazardous liquids, the applicant shall provide the Manager, Permit Services with a clearance from OCFA indicating compliance with Guideline G-08.</p> <p><b>SC HAZ-3</b> A. Prior to the issuance of a building permit, the applicant shall provide the Manager, Permit Services with a clearance from OCFA, or other Local Fire Agency (if applicable), indicating compliance with Guideline G-06.</p> <p>B. Prior to the final inspection approval, the applicant shall provide the Manager, Permit Services with a clearance from OCFA, or other Local Fire Agency (if applicable), indicating a “Hazardous Materials Disclosure Chemical Inventory and Business Emergency Plan” packet has been submitted to the OCFA for review and approval.</p>		

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<b>LAND USE AND PLANNING (Section 4.6)</b>				
<p><b>4.6-1:</b> Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p>	<p>a. The GAIP would result in a reduction in the number of general aviation aircraft that could be based at the Airport. The reduction would be 242 fewer aircraft parking spaces compared to current capacity and 128 fewer aircraft parking spaces compared to the number of currently used aircraft parking spaces at the Airport. (LTS)</p> <p>b. The GAIP would result in 10 residential units being exposed to noise levels in excess of 65 CNEL (Community Noise Equivalent Level) compared to the Baseline (2016) condition. Aviation easements have been obtained for seven of these units. Therefore, for those units, land use compatibility impacts are less than significant. (LTS) For the remaining three units, the noise exposure would potentially result in interior and exterior noise levels in excess of policies adopted to avoid or mitigate an environmental effect and there would be a significant land use compatibility impacts. (S)</p>	<p>a. No mitigation measures are required.</p> <p>b. The residential units in the 65 CNEL contour would be eligible for consideration of attenuation measures through the Sound Insulation Program (2014) adopted as part of Final EIR 617 if they fall within the 65 CNEL contour. This measure would address both direct and cumulative impacts associated with incompatibility with interior noise standards established in the Orange County General Plan. However, Final EIR 617 identified a significant unavoidable impact because until interior noise measurements are taken after the increase in commercial carrier flights at the Airport, as projected in Final EIR 617, it cannot be determined if all the noise sensitive uses with interior noise levels in excess of 45 CNEL would qualify for sound attenuation based on FAA criteria.</p>	<p>a. LTS</p> <p>b. Potentially unavoidable significant impact for direct impacts.</p>	<p>No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>a. LTS. Similar to the range of alternatives evaluated in FEIR 627, the modified Clay Lacy FBO site plan would reduce the number of general aviation aircraft that could be based at the airport compared to the FEIR 627 baseline.</p> <p>b. S. Similar to the range of alternatives evaluated in FEIR 627, the modified Clay Lacy FBO site plan would result in three residential units with interior and exterior noise exposures that would be included in the future (2026) cumulative 65 CNEL contour that do not have aviation easements and have not received (although they were offered) attenuation through the 1985 JWA Master Plan and Santa Ana Heights Acoustical Insulation Program to ensure interior noise levels do not exceed 45 CNEL.</p>
		See discussion above.		

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
	<p>compared to the 2026 No Project Alternative. An aviation easement has been recorded for this unit. Therefore, although a significant unavoidable cumulative land use compatibility impact is identified, the GAIP is not substantially contributing to the cumulative impact.</p> <p>There would also be two units in the greater than 70 CNEL contour. Both of these residences received sound insulation through the AIP and aviation easements have been recorded. Therefore, these two residences would not be identified as incompatible uses. In the cumulative scenario, there would be a reduction in the number of places of worship in the 65 CNEL. (LTS)</p>			
<b>NOISE (NOI) (Section 4.7)</b>				
<p><b>4.7-1:</b> Would the project expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?</p> <p><b>4.7-2:</b> Would the project cause substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</p> <p><b>4.7-4</b> Would the project expose people residing or working in the project area?</p>	<p>The GAIP would result in minor increases in aviation noise levels compared to the Baseline (2016) condition. The increase in noise level would not exceed the performance standards established for determining a significant impact.</p> <p>Interior noise levels for the new facilities at the Airport would be consistent with County requirements through the implementation of SC NOI-1.</p> <p>Increased traffic on the west side of the Airport due to traffic redistribution would result in an incremental increase in traffic noise levels, although less than the performance standards established for determining a significant impact.</p> <p>Cumulative noise impacts would be less than significant because the change in noise level does not increase at a level greater than the significance threshold at any noise monitoring station even when comparing the 2026 cumulative noise levels (i.e., increase in commercial carrier operations and the GAIP operations) to the Baseline (2016) condition (LTS)</p>	<p><b>RR NOI-1</b> The Orange County Municipal Code Article 3 Section 2-1-30, General Aviation Noise Ordinance, prohibits nighttime general aviation operations for operations that exceed the specified single-event noise exposure level (SENEL) noise limit at each of the noise monitoring locations.</p> <p><b>SC NOI-1</b> Except when the interior noise level exceeds the exterior noise level, the applicant shall sound attenuate all nonresidential structures against the combined impact of all present and projected noise from exterior noise sources to meet the interior noise criteria as specified in the Noise Element and Land Use/Noise Compatibility Manual. Prior to the issuance of any building permits, the applicant shall submit to the Manager, Building and Safety, an acoustical analysis report prepared under the supervision of a County-certified acoustical consultant which describes in detail the exterior noise environment and the acoustical design features required to achieve the interior noise standard and which indicates that the sound attenuation measures specified have been incorporated into the design of the project. (County Standard Condition N02)</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>Similar to the range of alternatives evaluated in FEIR 627, the modified Clay Lacy FBO site plan would not exceed the thresholds established for determining a significant impact. In addition, interior noise levels for the new facilities would be consistent with County requirements per SC NOI-1.</p>

<b>ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN</b>				
<b>Threshold</b>	<b>General Aviation Improvement Program (GAIP) Impacts</b>	<b>GAIP Mitigation</b>	<b>GAIP Level of Significance after Mitigation</b>	<b>Clay Lacy FBO</b>
<b>4.7-3:</b> Would the project cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Construction activities for the GAIP would generate noise and nighttime construction activities may be required. The closest residences to the construction area are approximately 1,760 feet away. This distance and the intervening commercial buildings would provide enough attenuation that construction noise impacts would be less than significant. (LTS)	No mitigation measures are required.	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  FEIR 627 assumed full disturbance of the Northwest FBO site. The modified Clay Lacy FBO would have the same amount of ground disturbance as was considered in FEIR 627. There are no residences or other sensitive noise receptors in proximity to the project area.
<b>TRANSPORTATION/TRAFFIC (TRA) (Section 4.8)</b>				
<b>4.8-1:</b> Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	The GAIP would generate overall fewer trips than the No Project Alternative. It would not conflict with adopted plans, ordinances, or policies establishing measures of effectiveness for the circulation system, as it would not cause any change in level of service (LOS) at the study area intersections. All intersections would operate at an acceptable LOS D or better. No conflicts with alternative modes of transportation would result. Since the long range cumulative analysis (2026) reflects projected cumulative growth in the study area, the GAIP-specific and cumulative impacts would be less than significant. (LTS)	No mitigation measures are required.  <b>SC TRA-1:</b> Prior to the issuance of any grading permits, the applicant shall provide adequate sight distance per Standard Plan 1117 at all street intersections, in a manner meeting the approval of the Manager, Building and Safety OC Infrastructure/Traffic Engineering Permit Services. The applicant shall make all necessary revisions to the plan to meet the sight distance requirement such as removing slopes or other encroachments from the limited use area in a manner meeting the approval of the Manager, Building and Safety Permit Services. (County Standard Condition of Approval T10)	LTS	LTS. No new or substantially greater impacts requiring modifications to FEIR 627.  Under the modified Clay Lacy FBO site plan all study intersections would operate at LOS D or better. Also, peak hour trips for an FBO are not the same as typical peak hours associated with "rush hour."
<b>4.8-2:</b> Would the project conflict with an applicable congestion management program (CMP), including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	None of the six study area intersections fall within the jurisdiction of the Orange County Transportation Authority's (OCTA) CMP 2017. Therefore, the GAIP would not conflict with the OCTA CMP. Because the GAIP would not result in any impacts at a CMP location, it could not contribute to a cumulative impact. (NI)	No mitigation measures are required.	NI	NI. No new or substantially greater impacts requiring modifications to FEIR 627.  None of the GAIP's six study area intersections fell within the jurisdiction of the OCTA's 2017 CMP. Therefore, the modified Clay Lacy FBO site plan would not conflict with the OCTA CMP or contribute to a cumulative impact.

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<b>TRIBAL CULTURAL RESOURCES (TCR) (Section 4.9)</b>				
<p><b>4.9-1:</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> <li>i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</li> <li>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1,</li> </ul>	<p>The GAIP and cumulative projects have a low potential to cause a substantial adverse change in the significance of a tribal cultural resource as defined by Section 21074 of the Public Resources Code because of the disturbed nature of the site and limited ground disturbance. Implementation of MN TCR-1 would further minimize the potential for impacts should buried tribal cultural resources be discovered as part of grading activities. (LTS)</p>	<p>No mitigation measures are required.</p> <p>Although impacts would be less than significant, the following Minimization Measure has been included:</p> <p><b>MN TCR-1</b> Tribal Cultural Resources Observation and Salvage. Prior to the issuance of any grading permit in which native soil is disturbed, the applicant shall provide written evidence to the Manager, Permit Services, that a Native American monitor has been retained to observe grading activities in native sediment and to salvage and catalogue tribal cultural resources as necessary. The Native American monitor shall be present at the pre-grade conference, shall establish procedures for tribal cultural resource surveillance, and shall establish, in cooperation with the County, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the tribal cultural resource as appropriate. If the tribal cultural resources are found to be significant, the Native American observer shall determine appropriate actions, in cooperation with the County for exploration and/or salvage.</p>	<p>LTS</p>	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>FEIR 627 assumed full disturbance of the Northwest FBO site. The modified Clay Lacy FBO site plan would have the same amount of ground disturbance as was considered in FEIR 627. The County's standard condition of approval would minimize impacts on any unknown buried tribal cultural resources.</p>

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
the lead agency shall consider the significance of the resource to a California Native American tribe?				
<b>UTILITIES AND PUBLIC SERVICE SYSTEMS (UTL) (Section 4.10)</b>				
<p><b>4.10-1:</b> Would the project exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)?</p> <p><b>4.10-2:</b> Would the project require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental impacts?</p> <p><b>4.10-4:</b> Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</p>	<p>The GAIP would not exceed the wastewater treatment requirements of the Santa Ana RWQCB or result in discharges that would require the construction of new wastewater treatment facilities or the expansion of existing facilities. The GAIP is projected to increase the number of average daily users at the Airport by approximately 28 additional persons. The installation of new water-efficient appliances and fixtures that would be installed as part of newly constructed general aviation buildings would be expected to offset the incremental increase in demand. RR UTL-1 and RR UTL-2 would apply to new construction of GAIP facilities. (LTS)</p> <p>Cumulative impacts for wastewater would occur with the combined demand of the GAIP and the 2014 Settlement Agreement Amendment; however, based on the Service Agreement between the Airport and OCS D there is sufficient capacity to accommodate the cumulative demand. (LTS)</p>	<p>No mitigation measures are required.</p> <p><b>RR UTL-1</b> In conjunction with the development of the GAIP projects, building plans and site improvement plans shall show compliance with pertinent regulations of Orange County Sanitation District (OCS D) related to sewer system connections, installation of on-site facilities for industrial dischargers and food service establishments (e.g., pretreatment equipment, pollution control facilities, spill containment facilities, accidental slug control plans, and monitoring/metering facilities), as well as obtain the necessary discharge permits and comply with the discharge limits, prohibitions, monitoring and reporting, inspection and sampling, and other provisions of the permit. Compliance shall be in a manner meeting the approval of the Manager, Building and Safety compliance prior to issuance of any building permit.</p> <p><b>RR UTL-2</b> In conjunction with the development of the GAIP projects, building plans and site improvement plans shall demonstrate compliance with applicable non-residential mandatory measures in the CALGreen Code and the County's Landscape Water Use Standards in a manner meeting the approval of the Manager, Building and Safety compliance prior to issuance of any building permit.</p> <p><b>RR UTL-3</b> In conjunction with the development of the GAIP projects, new or modified water service to the site shall comply with Mesa Water District's rules and regulations, including design and construction of connections and water facilities, payments for service, conditions for service, and compliance with its permanent and emergency water conservation programs that outline water waste prohibitions, escalating water restrictions under water supply shortage conditions and other general provisions.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The modified Clay Lacy FBO site plan is within the range of development evaluated within FEIR 627.</p> <p>The Clay Lacy FBO is on schedule to achieve ENVISION® Gold rating, which includes water efficiency measures.</p>

ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
<p><b>4.10-2:</b> Would the project require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental impacts?</p> <p><b>4.10-3:</b> Would the project have sufficient water supplies available to serve the project from existing entitlements and resources or would new or expanded entitlements be needed?</p>	<p>The increase in the number of persons using the general aviation facilities associated with the GAIP would potentially result in an incremental increase in water usage; however, water-efficient plumbing fixtures and appliances that would be installed in new general aviation facilities would offset the minor increase in water demand under the GAIP (RR UTL-2 and RR UTL-3). Thus, the GAIP would not require additional water supplies or create the need for new or expanded water treatment facilities. Impacts would be less than significant pertaining to water usage. (LTS)</p> <p>Mesa Water determined there was sufficient capacity to accommodate the long-term demand at the Airport associated with the 2014 Settlement Agreement Amendment. The GAIP is within the service parameters identified in the evaluation of the Settlement Agreement Amendment, therefore, the cumulative impacts would result in less than significant impacts related to sufficient water supplies or the need for new or expanded water treatment facilities. (LTS)</p>	See Regulatory Requirements above.	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>The modified Clay Lacy FBO site plan is within the range of development evaluated within FEIR 627.</p> <p>The Clay Lacy FBO is on schedule to achieve ENVISION® Gold, which includes water efficiency measures.</p>
<b>WATER QUALITY (WQ) (Section 4.11)</b>				
<p><b>4.11-1:</b> Would the project violate any water quality standards or waste discharge requirements?</p> <p><b>4.11-2:</b> Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</p>	<p>General aviation activities at the Airport generate pollutants that may enter the storm water runoff. The Airport has an extensive list of best management practices (BMPs) to address runoff leaving the Airport to comply with all water quality standards. The GAIP would require additional BMPs under the priority redevelopment program improving storm water quality before discharging from the Airport. The GAIP would also reduce the number of based aircraft and the number of general aviation operations. Therefore, an incremental decrease in the amount of pollutants is anticipated.</p>	<p>No mitigation measures are required.</p> <p><b>RR WQ-1</b> If groundwater is encountered during ground disturbance activities at the Airport, the contractor shall provide evidence to the County that it has applied for coverage under Order No. R8- 2015-0004 for the disposal of acceptable construction dewatering discharges to the local storm drainage system.</p> <p><b>SC WQ-1</b> Prior to the issuance of any grading or building permits, the applicant shall submit for review and approval by the Manager, Building and Safety, a Water Quality Management Plan (WQMP) specifically identifying BMPs that will be used on site to control predictable pollutant runoff.</p>	LTS	<p>LTS. No new or substantially greater impacts requiring modifications to FEIR 627.</p> <p>Similar to the range of development considered in FEIR 627, the modified Clay Lacy FBO site plan would reduce the number of general aviation aircraft that could be based at the airport when compared to the FEIR 627 baseline. Thus, an incremental decrease in pollutants is anticipated. No change in the amount of impervious surface compared to the conceptual plan for the Northwest FBO leasehold or the previously approved Clay Lacy plans would occur from the modified Clay Lacy FBO site plan.</p>



ATTACHMENT B COMPARISON OF FINAL EIR 627 IMPACTS AND MODIFIED CLAY LACY FBO SITE PLAN				
Threshold	General Aviation Improvement Program (GAIP) Impacts	GAIP Mitigation	GAIP Level of Significance after Mitigation	Clay Lacy FBO
4.11-3: Would the project otherwise substantially degrade water quality?	The BMPs would apply to baseline operations, the GAIP, and cumulative projects. Therefore, the GAIP and cumulative projects would not violate water quality standards or waste discharge requirements, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality. (LTS)	<p><b>SC WQ-2</b> Prior to the issuance of a certificate of use and occupancy, the applicant shall demonstrate compliance with the County’s National Pollutant Discharge Elimination System (NPDES) Implementation Program.</p> <p><b>SC WQ-3</b> Prior to the issuance of any grading or building permits, the applicant shall demonstrate compliance with California’s General Permit for Stormwater Discharges Associated with Construction Activity. Projects subject to this requirement shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP).</p> <p><b>SC WQ-4</b> Prior to the issuance of any grading or building permit, the applicant shall submit an Erosion and Sediment Control Plan.</p> <p><b>SC WQ-5</b> Prior to the issuance of building permits for any tank or pipeline, the uses shall be identified, and the applicant shall submit a Chemical Management Plan in addition to a WQMP.</p> <p><b>SC WQ-6</b> For industrial facilities, the applicant shall demonstrate that compliance with the permit has been obtained and shall provide a copy of the notification of the issuance of a Waste Discharge Identification Number.</p>		
Sources: FEIR 627, Table 1-2 and analysis contained in this Memorandum				
CCR: California Code of Regulations CFR: Code of Federal Regulations LTS: Less than Significant Impact		MM: Mitigation Measure MN Minimization Measure NI: No Impact	RR: Regulatory Requirement S: Significant Impact SC: Standard Condition	