



CITY OF COSTA MESA

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CEQA REVIEW

November 21, 2018

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

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

Noise Technical Analysis:

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

Policy N-1.1: Enforce the maximum acceptable exterior noise levels for residential areas at 65 CNEL.

Policy N-1.7: Support alternative methods for the reduction of noise impacts at John Wayne Airport while continuing to maintain safety and existing limitations on aircraft daily departures.

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

Project Description:

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

- Page 3-18 refers to the operation of flight schools and the flight school apron capacity for 47 aircraft tie-downs, which is comparable to what is currently provided. The description is not clear on the operational characteristics of the flight schools (number of schools, hour of operation, etc.) or the potential number of daily flights. The City of Costa Mesa is concerned with the potential increase in the flight school capacity once these facilities are modernized. The Project Description needs to be specific about the operation of the schools and to consider any potential noise increases.
- Page 3-7 indicates that the facilities planning effort recognizes the trend that fewer small-engine and light twin-engine airplanes and more turboprops and business private jets are based at the airport and, given that larger aircraft require more space, the overall storage capacity of the airport in terms of the number of aircraft will be reduced. Given this, and the fact that the noise modeling shows an incremental increase in the noise levels, it can be concluded that the fewer number of planes will result in higher noise levels since the planes are noisier and or larger.

Air Quality:

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

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

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

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

Sincerely,



BARRY CURTIS, AICP
Director of Economic and
Development Services