



City of

RICHARD J. MAGGIO  
Community Development and  
Special Project Director

SENT VIA FACSIMILE TRANSMISSION AND  
CERTIFIED U.S. MAIL

September 28, 1998

Mr. Rodney L. Murphy, CAE  
Director of Airports  
555 Airport Way  
Camarillo, CA 93010

Subject: Comments on Draft Working Paper for the *F.A.R. Part 150 Noise Compatibility Study (Chapter Six)* and Amendment to Letter of October 15, 1997, Concerning Response to *Notice of Preparation* for Environmental Assessment/Environmental Impact Report

Dear Mr. Murphy:

After reviewing the draft of *Chapter Six (Noise Compatibility Plan)* and attending the Planning Advisory Committee meeting held in your office on September 3, comments are offered as follows:

1. The letter on Chapters One, Two, and Three dated December 22, 1997, is included for reference and to support comments made in this letter of September 28, on *Chapter Six*.
2. The letter on Chapters Four and Five dated May 22, 1998, is included for reference and to support comments made in this letter of September 28, on *Chapter Six*.
3. Comments on *Chapter Six* are focused primarily on the recommended **Measures** in the *Draft Noise Compatibility Plan*. As presented in *Chapter Six*, this draft *Compatibility Plan* includes a *Noise Abatement Element*, *Land Use Element*, and *Program Management Element*. Before offering comments in detail it must be emphasized again that the Oxnard Airport, including any plan for continuing or intensifying its use in the future, constitutes a project under the applicable provisions of the *California Environmental Quality Act* and the County of Ventura, as the owner and operator of the airport, must show how negative impacts associated with the operation of the airport can be mitigated. The responsibility for this mitigation cannot be transferred by the County to surrounding property owners or public agencies, such as the City of Oxnard.

With respect to the *Draft Noise Abatement Element*, it would be possible to concur with recommended **Measures** 1, 2, 3, 4, 5, 7, 8, and 10. With respect to **Measure** 6 (Direct southbound departures from Runway 25 to fly to coastline before turning left), it is felt that alternative departure routes should be evaluated further. On such route, that could be used by all aircraft departing the local area from Runway 25, would be for aircraft to turn northwesterly after takeoff and keep on the northerly side of the Edison Canal until the coastline is reached. Utilizing this departure route would avoid the existing and proposed noise sensitive uses located to the south of Fifth Street and to the west of the Edison Canal. Concerning **Measure** 9 (Request Part 36, Stage 2 aircraft to avoid takeoffs after 11:00 p.m. and before 6:00 a.m.), this recommended measure would negate the benefits obtained from recommended **Measures** 2 and 3 and, therefore, the hours for avoiding takeoffs by stage 2 aircraft should be from 10:00 p.m. to 7:00 a.m. to be consistent with the City's *Noise Ordinance*.

With respect to the *Draft Land Use Management Element*, it would not be appropriate to concur with recommended **Measures** 1, 2, 3, 4, and 5. The reasons for not concurring are included in the right-hand column of *Table 6E* which has been reproduced and included with this letter for reference. With respect to **Measure** 1 it would not be appropriate to concur because the methodology utilized for combining the 2003 and 2018 *Noise Contours* is arbitrary and nondefensible. Since the *Part 150 Study*, *Airport Master Plan*, and *Airport Land Use Compatibility Plan* will be reviewed again after 2003, the 2003 *Noise Contour* can be used for the interim period. Concerning **Measure** 2 it would not be appropriate to concur because there is no requirement to use the 60 CNEL Noise Contour and, therefore, the 65 CNEL should be used instead. This same conclusion can be applied to **Measure** 3 and the words "...and west to the coastline" can be deleted. With respect to **Measure** 4, it would not be appropriate to concur since there is no need to designate this area as *Airport Compatible* because it is outside the *Oxnard Sphere of Influence* boundary, there are no development proposals, and it is proposed to include the area within the SOAR ballot initiative which will be voted on November 3. Also, it would not be appropriate to concur with recommended **Measure** 5 for the same reasons stated for **Measures** 2 and 3, above. Recommended **Measure** 6 (purchase dwelling units on Little Fam Road) could be acceptable if the wording was expanded to state "Purchase dwelling units on Little fam Road through a voluntary program with property owners."

With respect to the *Draft Program Management Element*, it would be possible to concur with recommended **Measures** 1, 2, and 3. It would also be possible to concur (with reservations) concerning recommended **Measures** 4, 5, and 6, but it is felt that the proportions of funding are inappropriate. As an example, only \$5,000 is allocated for publishing a *Pilot Guide* to help inform pilots about the most effective noise abatement practices for use in the vicinity of Oxnard Airport, but over \$7.9 million is allocated to reviewing implementation of the *Noise Compatibility Plan*, updating *Noise Exposure Maps*, installing and operating noise and flight track monitoring equipment, and preparing an annual noise monitoring report. Spending funds to

Mr. Rodney L. Murphy, CAE

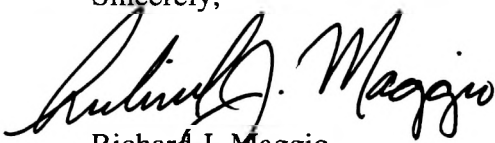
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record, report, and project noise into the future is not going to significantly prevent noise. As a reminder, people respond to single event noise and not averages. These funds could be much better spent on reducing and directing aircraft noise through pilot education, frequent updates and distribution of the *Pilot Guide*, and adding a qualified observer to the Department of Airports staff that could monitor flying practices in the more troublesome areas around the airport and issue written advisories or warnings, as appropriate.

With respect to the proposed *Implementation Materials* included in *Appendix C*, it should be recalled that the proposed Oxnard Airport Influence Area referred to in the *Model Agreement for Noise Disclosure* and companion *Model Fair Disclosure Statement* is several times larger than needed. Also, there are no statutory requirements for a *Fair Disclosure Statement* or utilizing a 60 CNEL Noise Contour for reference in said *Statement*. If you have any questions concerning the above comments, please feel welcome to contact me at your convenience.

Sincerely,



Richard J. Maggio

Community Development and Special Projects Director

cc: Edmund F. Sotelo, City Manager  
Joyce Parker-Bozylinski, Planning and Environmental Services Manager  
Gary Gillig, City Attorney  
Bill Little, City Manager, Camarillo  
Tony Boden, Director of Planning and Community Development, Camarillo  
Peter Cosentini, City Manager, Santa Paula  
Ginger Gherardi, Executive Director, Ventura County Transportation Commission  
Chris Stephens, VCTC Staff  
Tad Dougherty, Oxnard Airport Manager  
Charles Lieber, Federal Aviation Administration  
Mark Johnson, Study Technical Manager, Coffman Associates

Enclosures:

1. *Table 6E* with City of Oxnard Comments
2. Letter of December 22, 1997, Including Comments on Chapter One, Two, and Three
3. Letter of May 22, 1998, Including Comments on Chapter Four and Five

**TABLE 6E****Summary of Noise Compatibility Plan, 1998-2018****Oxnard Airport**

Measure	Cost to Airport or Government	Direct Cost to Users <sup>1</sup>	Timing	Lead Responsibility <sup>2</sup>	Potential Funding Sources	City Comment
<b>NOISE ABATEMENT ELEMENT</b>						
1. Continue prohibiting formation takeoffs and landings without prior permission of Director of Airports	None (existing measure)	None (existing measure)	Ongoing	County Department of Airports	N.A.	<b>CONCUR</b>
2. Continue prohibiting touch-and-go's and stop-and-go's between 8:00 p.m. and 7:00 a.m.	None (existing measure)	None (existing measure)	Ongoing	County Department of Airports	N.A.	<b>CONCUR</b>
3. Continue prohibiting high power engine run-ups for maintenance between 7:00 p.m. and 7:00 a.m.	None (existing measure)	None (existing measure)	Ongoing	County Department of Airports	N.A.	<b>CONCUR</b>
4. Continue prohibiting Runway 7 departures from midfield intersection (taxiway C).	None (existing measure)	None (existing measure)	Ongoing	County Department of Airports	N.A.	<b>CONCUR</b>
5. Designate Runway 25 as calm wind runway.	Administrative	None	1999	Airport Traffic Control Tower	Operating budget	<b>CONCUR</b>
6. Direct southbound departures from Runway 25 to fly to coastline before turning left.	Administrative	Very small increase in aircraft operating costs	1999	Airport Traffic Control Tower	Operating budget	<b>CONCUR in concept, but alternative departure routes should be evaluated further.</b>
7. Promote use of NBAA noise abatement departures by jets.	Administrative + \$10,000	Negligible	1998 and ongoing	County Department of Airports	Operating budget	<b>CONCUR</b>
8. Promote use of AOPA's "Noise Awareness Steps."	Administrative	Negligible	1998 and ongoing	County Department of Airports	Operating budget	<b>CONCUR</b>

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<b>Measure</b>	<b>Cost to Airport or Government</b>	<b>Direct Cost to Users<sup>1</sup></b>	<b>Timing</b>	<b>Lead Responsibility<sup>2</sup></b>	<b>Potential Funding Sources</b>	<b>City Comment</b>
9. Request Part 36, Stage 2 aircraft to avoid takeoffs after 11:00 p.m. and before 6:00 a.m.	Administrative	Cost of delaying departure or using alternative airport.	1998 and ongoing	County Department of Airports	Operating budget	<b>This recommended measure would negate the benefits obtained from Recommendations No. 2 and No. 3, above. Hours should be from 10:00 p.m. to 7:00 a.m. to be consistent with the City's Noise Ordinance.</b>
10. Request aircraft certificated as noisier than 84.7 dBA ( $L_{max}$ ) on takeoff to avoid use of Airport without prior permission of Director of Airports.	Administrative	Cost of using alternative airport.	1998 and ongoing	County Department of Airports	Operating budget	<b>CONCUR.</b>

**TABLE 6E**  
**Summary of Noise Compatibility Plan, 1998-2018**  
**Oxnard Airport**

Measure	Cost to Airport or Government	Direct Cost to Users <sup>1</sup>	Timing	Lead Responsibility <sup>2</sup>	Potential Funding Sources	City Comment
<b>LAND USE MANAGEMENT ELEMENT</b>						
1. Use combined 2003 and 2018 noise contours as basis for noise compatibility planning.	Administrative	None	1999-2000	City of Oxnard Ventura County	Operating budget	<b>DO NOT CONCUR.</b> Using the 2003 and 2018 Noise Contours is arbitrary and nondefensible since the <i>Part 150 Study, Airport Master Plan, and Airport Land Use Compatibility Plan</i> will be reviewed after 2003. For the interim period, the 2003 Noise Contour should be used.
2. Set 60 CNEL as threshold for promoting airport-compatible development.	Administrative	None	1999-2000	City of Oxnard Ventura County	Operating budget	<b>DO NOT CONCUR.</b> There is no requirement to use the 60 CNEL Noise Contour so the 65 CNEL can be used instead.
3. Preserve existing airport-compatible land use designations within 60 CNEL contour and west to coastline.	None	None	Ongoing	City of Oxnard Ventura County	Operating budget	<b>DO NOT CONCUR.</b> There is no requirement to use the 60 CNEL Noise Contour so the 65 CNEL can be used instead. Delete the words "and west to the coastline."

**TABLE 6E****Summary of Noise Compatibility Plan, 1998-2018****Oxnard Airport**

<b>Measure</b>	<b>Cost to Airport or Government</b>	<b>Direct Cost to Users<sup>1</sup></b>	<b>Timing</b>	<b>Lead Responsibility<sup>2</sup></b>	<b>Potential Funding Sources</b>	<b>City Comment</b>
4. Designate "planning reserve" area north of Teal Club Road between Victoria and Patterson for airport-compatible development.	Administrative	None	1999-2000	City of Oxnard	Operating budget	<b>DO NOT CONCUR.</b> There is no need to designate this area as Airport Compatible because it is outside the <i>Oxnard Sphere of Influence</i> boundary, there are no development proposals, and it is proposed to include the area within the SOAR ballot initiative which will be voted on November 3.
5. Establish noise compatibility guidelines for the review of development projects within 60 CNEL.	Administrative	None	1999-2000	City of Oxnard Ventura County	Operating budget	<b>DO NOT CONCUR.</b> There is no requirement to use the 60 CNEL Noise Contour so the 65 CNEL can be used instead.
6. Purchase dwelling units on Little Farms Road.	\$2,800,000	None	2000-2002 (based on available funding)	County Department of Airports	FAA (90%) Capital budget (10%)	<b>Concur with additional wording:</b> <b>"Purchase dwelling units on Little Farms Road through a <u>voluntary program with property owners.</u>"</b>



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Measure	Cost to Airport or Government	Direct Cost to Users <sup>1</sup>	Timing	Lead Responsibility <sup>2</sup>	Potential Funding Sources	City Comment
<b>PROGRAM MANAGEMENT ELEMENT</b>						
1. Maintain system for receiving, analyzing, and responding to noise complaints.	Administrative	None	Ongoing	County Department of Airports	Operating budget	<b>CONCUR</b>
2. Review Noise Compatibility Plan implementation	\$180,000 (assumes average of \$30,000 every three years)	None	Ongoing	County Department of Airports	Operating budget	<b>CONCUR</b>
3. Publish pilot guide.	\$5,000	None	1998	County Department of Airports	FAA (90%) Operating budget (10%) (already budgeted)	<b>CONCUR</b>
4. Update Noise Exposure Maps and Noise Compatibility Program	\$450,000 (assumes \$225,000 every 5 to 10 years)	None	Update every 5 to 10 years as needed	County Department of Airports	FAA (90%) Operating budget (10%)	<b>CONCUR with reservations—noise exposure maps just portray averages and people respond to single event noise, not averages. The money could be better spent on educating and training pilots to use lower noise impact procedures.</b>



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**Summary of Noise Compatibility Plan, 1998-2018**  
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Measure	Cost to Airport or Government	Direct Cost to Users <sup>1</sup>	Timing	Lead Responsibility <sup>2</sup>	Potential Funding Sources	City Comment
5. Install noise and flight track monitoring system.	Installation: \$625,000  O&M \$3,135,000 (assumes \$165,000/year)	None	2000 (based on available funding)	County Department of Airports	FAA (90%) Operating budget (10%)  O&M: Operating budget	<b>CONCUR with reservations—these types of systems simply record events after they happen. If the expenditures proposed for numbers 4, 5, and 6 were combined (\$450,000, \$625,000, \$3,135,000, and \$720,000 = \$4,930,000) these funds could be used for ongoing pilot education, retrofitting impacted buildings and purchasing significantly impacted properties.</b>
6. Prepare annual noise monitoring and modeling report.	\$720,000 (assumes \$40,000/year)	None	2001 and ongoing	County Department of Airports	Operating budget	<b>CONCUR with reservations for the same reasons stated for number 5, above.</b>
Total Costs and Funding		FAA		\$3,501,000.00	44%	
		Airport Operating Budget		\$4,080,500.00	52%	
		Airport Capital Budget		\$343,500.00	4%	
		Total		\$7,925,000.00	100%	

**NOTES:**

N.A. —Not applicable.

<sup>1</sup> Airport users will be indirectly responsible for at least part of County Department of Airports' share of funding through lease payments and user fees.

<sup>2</sup> Where Ventura County does not have direct responsibility for implementing a given measure, the County Department of Airports will encourage the listed jurisdictions to implement measures as described.