



John Flynn
Rod Murphy

City of

QIR - DEC 28
NOV

December 22, 1997

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

6B Review of land use
commission -
transportation

Transfer to
Airport authorities

phase 2

2 con
2 sup

1 public setting

beginning of a noise abatement program

727 Cam

Early last week -

Mid 96

Ralph

beginning of a noise abatement program

Rod
out of control

Draft

Dear Mr. Murphy:

After reviewing the drafts of Chapters One, Two, and Three and attending the Planning Advisory Committee meeting held in your office on December 3, 1997, comments are offered as follows:

COMMENTS ON CHAPTER ONE

When referring to the *Oxnard Airport Master Plan*, it is important to refer to it as the *Draft 1996 Oxnard Airport Master Plan* or *Draft Oxnard Airport Master Plan* until such time as suitable environmental documentation is prepared subject to the provisions of the California Environmental Quality Act and the required public hearings have been held. Taking this step will contribute significantly to reducing confusion about the status of adopted documents still in effect and proposed documents that are currently being prepared. Corrected copies of pages and exhibits from Chapter One are enclosed.

COMMENTS ON CHAPTER TWO

phase 1 + 2 of proposed

1. **P. 2-7, 2-8 Assignment of Aircraft to Flight Tracts.** A table should be prepared and included that portrays the information described in paragraphs one and two on page 2-8. This table should include the percentage of aircraft using each flight track and the number of specific aircraft from each group using each flight track.

**EXISTING AND PROJECTED
FLEET MIX DATA
PART 150 STUDY, TABLE 2B
OXNARD AIRPORT**

			Total % Increase Over 5 Years	% Increase Per Year Over 5 Years			Total % Increase Over 20 Years	% Increase Per Year Over 20 Years
	1998	2003			2018			
<i>Itinerant Operations</i>								
Commuter								
Beech 1900	7,300	7,950	9%	1.8%	4,470	-39%	-1.9%	
SF 340	0	1,325	100%	20%	2,980	110%	7.4%	
Dash 8	0	1,325	100%	20%	2,980	110%	7.4%	
ATR-72	0	0	0	0	1,490	100%	6.6%	
Canadair Regional Jet	0	0	0	0	2,980	100%	6.6%	
Air Taxi								
Beech Super King Air	1,100	1,900	73%	14%	4,225	284%	14.2%	
Twin Engine Turboprop	1,660	3,180	92%	18%	5,915	256%	12.8%	
Twin Engine	6,085	5,080	-16%	-3.3%	3,380	-44%	-2.2%	
Bell 206 Helicopter	1,100	1,270	15.4%	3.1%	1,690	29.5%	1.8%	
Bell 222 Helicopter	1,100	1,270	15.4%	3.1%	1,690	29.5%	1.8%	
General Aviation								
LEAR-25 (JET)	126	210	67%	13%	0	0	0	
Gulfstream III (JET)	30	60	100%	20%	0	0	0	
LEAR-35 (JET)	108	180	66%	13%	720	566%	28%	
Citation 500 Series (JET)	68	110	62%	12.3%	515	657%	33%	
Falcon 50 (JET)	50	80	60%	12%	305	510%	25%	
Westwind (JET)	68	110	62%	12.3%	515	657%	33%	
Beech Super King Air	25	100	400%	80%	500	2,000%	100%	
Convair	25	100	400%	80%	500	2,000%	100%	
Twin Engine Turboprop	1,842	2,390	29%	5.9%	3,915	112%	5.6%	
Twin Engine	5,530	6,775	22%	4.5%	9,790	77%	3.8%	
Light Single-Variable Pitch Propeller	14,000	14,745	5.3%	1.1%	17,130	22%	1.1%	
Light Single-Fixed Pitch Propeller	15,200	15,940	4.8%	0.9%	18,110	1.9%	0.9%	
Bell 206 Helicopter	12,000	14,400	20%	4%	21,000	75%	3.7%	
Bell 222 Helicopter	1,600	1,920	20%	4%	2,800	75%	3.7%	
Robinson 22	2,400	2,880	20%	4%	4,200	75%	3.7%	
Military								
Beech King Air	965	950	-1.5%	.3%	950	1.5%	.07%	
UH-1	950	950	0	0	950	0	0	
Subtotal Itinerant	73,332	85,200	16%	3.2%	113,700	55%	2.7%	
<i>Local Operations</i>								
General Aviation								
Twin Turboprop	2,290	3,600	57%	11.1%	6,400	179%	8.9%	
Light Twin	6,860	10,200	49%	9.7%	16,000	133%	6.6%	
Light Single-Variable Pitch Propeller	17,400	22,200	27%	5.5%	28,000	61%	3%	
Light Single-Fixed Pitch Propeller	19,224	24,000	25%	5%	29,600	54%	2.7%	
Military								
Beech King Air	150	150	0	0	150	0	0	
UH-1	150	150	0	0	150	0	0	
Subtotal Local	46,074	60,300	31%	6.2%	80,300	74%	3.7%	
TOTAL	119,406	145,500	22%	4.4%	194,000	62%	3.1%	

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 Farms Road) could be acceptable if the wording was expanded to state "Purchase dwelling units on Little Farms 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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2. P. 2-9, 2-10 1998, 2003, and 2018 Noise Exposure Contours. Comments are as follows:

- a. The area impacted by noise contours in each exhibit should be shown at a scale three to four times larger so that the exhibits will be easier to interpret by staff and decision-makers.
- b. The total amount of area within each noise contour should be expressed in acres as follows:

Total amount of area

Amount of area within airport property boundary

Amount of area outside airport property boundary

Amount of area outside the airport property boundary that includes noise-sensitive uses such as those identified in Table 1D.

- c. Noise exposure contours should also be projected for the Intermediate Term Forecast included for reference in Table 1A. This is only logical since the Short-Term Forecast is used as the basis for the year 2003 noise projection (Exhibit 2H) and the Long-Range Forecast is used as the basis for the year 2018 noise projection (Exhibit 2J).

3. Exhibits 2D, E, F, G, H, and J. Changes to surface designations made to Exhibits in Chapter 1, that are applicable to Exhibits in Chapter 2, should be made in order to present a consistent background frame of reference.

COMMENTS ON CHAPTER THREE

- 1. P. 3-7, 3-8, 3-9, 3-10 FUTURE NOISE IMPACTS.** Land use and population impacts should also be prepared and included for the Intermediate Term Forecast stated for reference in Table 1A. This is only logical since the Short-Term Forecast is used as the basis for the 2003 Land Use and Population Impacts (Exhibit 3C and Tables 3C and 3D) and the Long-Range Forecast is used as the basis for 2018 Land Use and Population Impacts (Exhibit 3D and Tables 3C and 3D).
- 2. P. 3-6, 3-9.** A new table should be prepared (or Table 3D should be revised) and included that portrays Population Impacted by Noise for 1998, 2003, **Intermediate Term Forecast Year Equivalent Date**, and 2018. The table should also include the percent increase of the future impacted population in relation to the 1998 reference year. An example of the table is provided below.

TABLE 3D
Population Impacted by Projected Future Noise
Oxnard Airport

CNEL Contour Range	Population			
	1998	2003	Intermediate Term Forecast Year Equivalent Date	2018
60-65	75	147 (96%) ²	?(?) ²	311 (315%)
65-70	54	43 (NI) ³	?(?)	43 (NI) ³
70-75	25	47 (88%)	?(?)	47 (88%)
75+	0	0 (NI)	?(?)	0 (NI)
Total	154	236 (53%)	?(?)	401 (160%)
LWP ¹	52	76 (46%)	?(?)	110 (111%)
Total Above 65 CNEL	79	90 (14%)	?(?)	90 (14%)
LWP ¹ Above 65 CNEL	36	46 (28%)	?(?)	46 (28%)

¹ Level-weighted population is an estimate of the number of people actually annoyed by aircraft noise. It is derived by multiplying the population in each CNEL contour range by the appropriate LWP response factor: 60-65 CNEL = .205; 65-70 CNEL = .376; 70-75 CNEL = .644; 75+ CNEL = 1.000. See the Technical Information Paper, "Measuring the Impact of Noise on People."

² Number in () expresses percent increase over 1998.

³ NI is the abbreviation for No Increase.

As a comment, after calculating the percentage increases included above, it can be concluded that the proposed intensification of Oxnard Airport will have significant impacts on the area surrounding the airport and the City of Oxnard.

Mr. Rodney L. Murphy, CAE

December 22, 1997

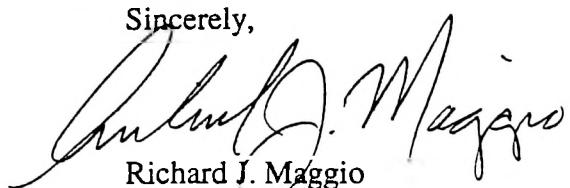
Page 4

3. **Exhibits 3B, C, and D.** Changes to surface designations made to Exhibits in Chapter 1, that are applicable to Exhibits in Chapter 3, should be made in order to present a consistent background frame of reference.

During the Advisory Committee meeting held in your office on December 3, I understood the consultants to say that the *Part 150 Noise Compatibility Study* would serve as one of the base components for both the *Airport Comprehensive Land Use Plan* update and the *Draft Oxnard Airport Master Plan EIR*. In keeping with this intent, I would like to take the opportunity to state that under CEQA a **plan** (i.e., Oxnard Airport Master Plan) is considered just the same as a physical project. Thus, all on-site and off-site impacts of implementing the *Draft Master Plan*, if it is adopted, have to be identified and mitigated. Reasonable and feasible alternatives also have to be proposed.

Related to this and in addition to the comments made on this subject in our letter of October 15, it is requested that you direct your consultants to make one complete run of the noise model with all jet traffic eliminated for the Short-Term, Intermediate Term, and Long-Range Forecast Aircraft Operations (Table 1A). Again, if any significant impacts are identified from any of these forecast service levels (145,500; 163,600; or 194,000 operations per year) then, the first step to take is to redesign the project (i.e., lowering the *Draft Airport Master Plan* services levels) so that the noise impacts will not be created in the first place. Taking this redesign step is required under CEQA and, in the case of Oxnard Airport, may necessitate curtailing hours of jet operation, eliminating jets altogether, curtailing the hours of all aircraft operation, increasing the minimum approach height for both visual and instrument approaches to Runway 25, limiting the gross weight of aircraft, and limiting the total annual number of operations. If significant impacts still remain after the project (plan) is redesigned, then, it will be the County's responsibility to mitigate these impacts to a level of insignificance for all affected property owners, users, and the City.

Sincerely,



Richard J. Maggio

Community Development and Special Projects Director

cc: Prisilla Hernandez, Acting City Manager

Joyce Parker-Bozylinski, Planning and Environmental Services Manager

Ginger Gherardi, Executive Director, Ventura County Transportation Commission

Charles Lieber, Federal Aviation Administration

Enclosures: Corrected copies of pages 1-10, 1-11, 1-25, 1-27, 1-28, 1-34, 1-49, 2-1, and 2-3

Corrected copies of Exhibits 1D, 1F, 1G and 1H

21718.2



City of

RICHARD J. MAGGIO
Community Development and
Special Project Director

SENT VIA FACSIMILE TRANSMISSION AND
CERTIFIED U.S. MAIL

May 22, 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 (Chapters Four and Five)* and Amendment to Letter of October 15, 1997, Concerning Response to *Notice of Preparation* for Environmental Assessment/Environmental Impact Report

Rod
Dear Mr. Murphy:

After reviewing the drafts of Chapters Four and Five and attending the Planning Advisory Committee meetings held in your office on April 6 and 7, comments are offered as follows:

COMMENTS ON CHAPTER FOUR

In the introductory portion of the chapter, responsibilities for noise reduction are described for the federal government, aircraft manufacturers, airport proprietors, local government, general aviation operations, air travelers, and residents. Before going on with detailed comments, as stated in previous letters, since it is proposed to revise the adopted *Oxnard Airport Master Plan*, all of the impacts associated with the plan will have to be mitigated pursuant to the requirements of the *California Environmental Quality Act* and the County is responsible for mitigation through the forthcoming provisions of the *Part 150 Study* or the Revised *Airport Land Use Compatibility Plan* which will be based in large part on the *Part 150 Study*.

To help facilitate a more productive working relationship, it is strongly recommended your consultants revise the draft of the *Part 150 Study* as follows:

1. **P. 4-3.** Include only noise projections for 1998 and 2003. It is our understanding from your consultant's presentation on May 6, the Federal Aviation Administration only requires noise projections for the current year (1998) and a time five years hence (2003). Taking this approach will help everyone step away from the unwarranted speculation that is inherent in the projected aircraft service levels that serve as a key input for the *2018 Noise Projection* included in the *Part*

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150 Noise Study and the proposed revisions to the currently adopted *Oxnard Airport Master Plan* and the *Airport Comprehensive Land Use Plan* underway at this time. The City strongly protested the projected aircraft service levels when they were first proposed for use in revising the currently adopted *Oxnard Airport Master Plan*.

2. **P. 4-3.** Delete all references in the text and on the exhibits to the 60 CNEL noise contour because it was stated by your consultant on May 6 and is also stated in the draft text of the *Part 150 Noise Study* the FAA uses the 65 CNEL level and higher "to determine the acceptability of any proposed noise abatement measures."
3. **P. 4-4.** Emphasize the *Part 150 Study* and other studies preceding (i.e., Proposed Revised *Airport Master Plan*) or based upon it (i.e., *Airport Comprehensive Land Use Plan* and Environmental Impact Report/Environmental Assessment) will include a planning horizon of only five years and, when this date (2003) is reached, they must be revised based upon data available at the time.
4. **Pp. 4-9 through 4-13 (Airport Regulations) and pp. 4-13 through 4-17 (Aircraft Operating Procedures).** Focus on actions that can be taken by the Oxnard Airport personnel over the forthcoming weeks and months to help inform and remind pilots through published advisories, signage, and explicit direction given over the radio by tower personnel to maintain applicable minimum altitudes over all parts of the City. To add emphasis, we very seldom receive complaints about noise that is associated with the mere proximity of the airport (i.e., engine runup, taxiing, take-off, etc.), but more and more people have commented over the last several years about the incidences of very low flying and sloppy flying they have observed. If necessary, you might even consider a pilot intending to use Oxnard Airport for anything other than an en route stop will have to pass both a written and flight proficiency test before they are permitted to use the airport on a regular basis.
5. **P. 4-22, Table 4-6.** Comments pertaining to the four alternatives presented in *Table 4-6* are as follows:

ALTERNATIVE	COMMENT
a. Runway 25 Straight-out Departures for Southbound Traffic	Possibly worth further consideration.
b. Runway 7 Straight—GPS Approach	Possibly worth further consideration.
c. Runway 7-25 Runway Relocation 3,000 Feet West	Should be considered in the EIR/EA along with the No Project Alternative and the alternative of closing the airport by 2003.

ALTERNATIVE **COMMENT**

d. Increase Glide Slope to 3.5 Degrees and Reduce Threshold Displacement to 772 Feet

Retaining the Displaced Threshold in its present position was recently reaffirmed by the Ventura County Board of Supervisors. It is doubtful that the City would concur in reducing the displacement.

In addition to the above alternatives, it is felt that pilot education, training, and frequent advisories both before and during flights can help achieve a significant decrease in the single-event types of aircraft noise that bother residents on the ground the most.

COMMENTS ON CHAPTER FIVE

In the introductory portion of the chapter, it is stated that the chapter "...covers land use management alternatives intended to prevent or reduce noise impacts." It is further stated related to *Issue 1: Noise exposure above 65 CNEL in [the] residential areas north of the east end of Runway 7-25* "[that] This is the only noise-sensitive area around the airport exposed to noise above 65 CNEL. Based upon 2003 noise [projections], 12 dwellings are between the 65 and 70 CNEL contours, 12 are in the 70 to 75 CNEL range, and one is inside the 75 CNEL [noise contour]." As a comment, it will be the County Department of Airport's responsibility to mitigate impacts on these dwelling units and related persons if this and adjacent areas are shown to be within the projected 65 CNEL noise contour included for reference in the *Draft Revised Airport Master Plan* and forthcoming *Environmental Assessment/Environmental Impact Report*.

In the following issue (*Issue 2*) it is stated "*Existing and planned residential development north, east, and south of the airport underscores the importance of preserving the west side as a noise compatible area.*" Our comment at this point is that we don't see an issue because the City's adopted *2020 General Plan* very clearly designates the area for both the west and northwest sides of the airport for open space and agricultural use. The space south of the airport is open space (park) or other nonresidential. The area north of the airport is designated nonresidential as well. Also, some of these areas lie outside the City's Sphere of Influence Line, which is adopted by the Local Agency Formation Commission (a State of California Commission), and cannot be unilaterally changed by any one agency such as the City of Oxnard. In addition, as was mentioned during the meeting with your consultants on May 6, both versions of the S.O.A.R. initiative, which will be on the November ballot, would preclude most all urban development in the area; however, if you feel that the combined intent of all adopted land use policy does not provide adequate protection for the Oxnard Airport, you may wish to pursue purchasing the property, development rights, or an adequate easement.

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The last issue (*Issue 3*) concerns “*Existing residential development within the 60 CNEL contour east and south of airport.*” For reference, it is stated in the subsequent text “Noise levels in these areas are less than 65 CNEL [and] because these areas are exposed to noise below 65 CNEL, a program calling for Federal funding assistance to mitigate the effects would not be approved by the ... FAA. Thus, the noise concerns must be addressed solely through potential noise abatement alternatives. Alternatives for abating noise in these areas are discussed in Chapter Four.” Our comment is we agree and wish to emphasize that the airport owner and operator have to do everything possible to mitigate the impacts directly or indirectly associated with their facility.

Pertaining to some of the conclusions, suggestions, and recommendations included in the remainder of *Chapter 5*, our comments are as follows:

1. **Pp. 5-3 and 5-4. Policy Techniques, General Planning.** The suggestions and recommendations stated under the heading *Conclusions* are also included in *Table 5C* as *Preferred Land Use Alternatives a, b and c*. Our objections to recommendations a, b, and c are included within *Table 5C* which is enclosed with and made a part of this letter.
2. **Pp. 5-4 through 5-6 Project Review Guidelines.** The suggestions and recommendations stated under the heading *Conclusions* are also included in *Table 5C* as *Preferred Land Use Alternative d*. Our objections to recommendation d is included within *Table 5C* which is enclosed with and made a part of this letter.
3. **P. 5-6 Regulatory Techniques.** Our comment concerning the technique of *Compatible Use Zoning* is we agree with the overall conclusion that “Since the undeveloped part of the noise-impacted area around the airport is already planned and zoned for compatible uses, there is no need for further compatible use rezonings in the area.”
4. **Pp. 5-6 and 5-7, Zoning Changes—Residential Density.** Our comment concerning *Residential Density Zoning* is we agree with the conclusions stated that “the general plans and zoning maps of Ventura County and the City of Oxnard already provide for future compatible uses in undeveloped parts of the noise-impacted area. Thus, there is no need to consider low-density zoning or planned unit development as second best alternatives to compatible use designations.”
5. **P. 5-7 and 5-8, Noise Overlay Zoning.** Our comment concerning *Noise Overlay Zoning* is we agree with the conclusion “...that there is no particular need for airport compatibility zoning in the area. The purposes that would be achieved by overlay zoning are already being achieved by conventional zoning of the performance standards set in the general plans.”
6. **Pp. 5-8 and 5-9 Subdivision Regulations.** Our comment concerning *Subdivision Regulations* is we agree with the conclusion “Since the undeveloped area within the 60 CNEL is designated

in the Oxnard and Ventura County general plans for compatible uses, there is no particular need for amendments to subdivision regulations to promote noise compatibility.”

7. **Pp. 5-9 and 5-10, Building Codes.** Our comment concerning *Building Codes* is we agree with the conclusion that “For a variety of reasons, local building code amendments to establish sound insulation standards are not needed [et. seq].”
8. **Pp. 5-10 and 5-11, Transfer of Development Rights.** Our comment concerning the concept of transferring *Development Rights* is we agree with the conclusion that they are not “...needed for airport compatibility purposes [and] as already noted, undeveloped areas within the noise contours are already designated by the general plans and zoning ordinances for compatible uses.”
9. **P. 5-11, Environmental Zoning.** Our comment is we agree with the conclusion stating that “Various forms of environmental zoning regulations are already being used in the area. They do not directly lend themselves to also promoting airport noise compatibility. This technique does not deserve further consideration.
10. **Pp. 5-11 through 5-13, Fair Disclosure Regulations.** The suggestions and recommendations stated under the heading *Conclusions* are also included in *Table 5C* as *Preferred Land Use Alternative e*. Our objection to using the 60 CNEL contour for reference is that it is unnecessary because as stated by your consultant on May 6 and also stated in the draft text of the *Part 150 Noise Study* that the FAA uses the 65 CNEL level and higher “to determine the acceptability of any proposed noise abatement measures.” As stated under **City of Oxnard Comments** in *Table 5C*, we “Might consider requiring a Noise Disclosure Agreement, for properties located within the 65 CNEL noise contour, but with the City to have the final say on the wording of the Agreement and said Agreement would be limited solely to disclosing the proximity of the airport and the potential for low-flying aircraft and aircraft noise—other topics such as waiving liability for any and all acts related to the airport would not be included.”
11. **Pp. 5-13 through 5-16, Expenditure Techniques—Property Acquisition.** A summary of the suggestions and recommendations stated under the heading *Conclusion* are also included in *Table 5C* as *Preferred Land Use Alternative f*. Our comment is that “The City has not taken any official position on the proposed acquisition, but feels that the County should discuss the possibility of retrofitting or acquiring impacted properties with their owners.”
12. **Pp. 5-16 through 5-18, Sound Insulation.** Our comment is we disagree with much of what is stated in the *Conclusion* and feel the conclusion is not consistent with the scope of the preceding text. First, it should be recognized the mixed use (residential and commercial area) along Little Farms and Teal Club Roads has existed for decades and will probably continue to exist for many years to come with very little change—it is very doubtful this area will convert to commercial

or office use, as claimed in the *Conclusion*, because demand for these types of uses around the Oxnard Airport is low and is not economically feasible since it includes improved land.

- 13. Pp. 5-18 and 5-19, Acquisition of Noise and Avigation Easements.** Our comment is we disagree with the stated *Conclusion* and feel the broadest possible set of options should be presented to the property owners and residents in the area along Little Farms and Teal Club Roads. These options should include property acquisition, sound insulation, acquisition of noise and avigation easements, purchase assurance, sales assistance, and development rights acquisition.
- 14. Pp. 5-19 and 5-20, Purchase Assurance.** Our comment is we disagree with what is stated in the *Conclusion*, particularly that the Teal Club/Little Farms is a mixed use area with limited long-term viability as a residential neighborhood and wish to mention again, as stated above (Number 12, Sound Insulation), that the area "...has existed for decades and will probably continue to exist for many years to come with very little change...."
- 15. Pp. 5-20 and 5-21, Sales Assistance.** Our comment is we disagree with what is stated in the *Conclusion* for the reasons stated above (Numbers 12, 13, and 14).
- 16. Pp. 5-21 and 5-22, Development Rights Acquisition.** Our comment is we disagree for the same reasons as stated in Number 13 (above).

For reference, there is an interesting statement provided in the introductory portion of Chapter Four (p. 4-3) and it is included here in its entirety, as follows:

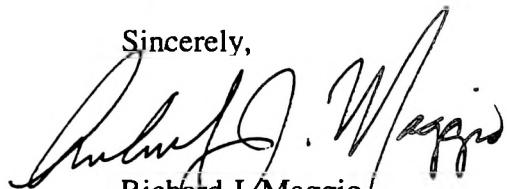
"While the current noise exposure around Oxnard Airport indicates a need for concern and proper planning, it does not constitute a dramatic problem by most standards. The fact that there are 90 persons exposed to noise levels above 65 CNEL in five years should be considered when formulating expectations regarding the potential benefits of noise abatement techniques. Simply put, the smaller the problem, the smaller the potential benefit that a particular procedure will yield. Furthermore, the cost of the solution must be commensurate with the magnitude of the problem."

After reviewing the *Potential Noise Abatement Measures* included in Chapter 4, it could also be concluded that there is not much opportunity for lessening the impacts of aircraft noise to people on the ground. If aircraft-related noise problems cannot be solved by focusing on all of the procedures related to the movement of aircraft on the ground and in the air, solving the remaining problems cannot be achieved by the methods suggested in Chapter Five (Land Use Alternatives) of the *Part 150 Study* or the forthcoming *Draft Airport Comprehensive Land Use Plan* (ACLUP) that is being

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prepared by the same consultant. In retrospect, when many of the recommendations of Chapter Five and the ACLUP are viewed in context of the relatively low estimated numbers of dwellings impacted (25 in the year 2003), it can be said that many of the proposed recommendations for controlling land use are all out of proportion to either existing or projected noise impacts.

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: *Table 5C* with City of Oxnard Comments
Letter of April 21, 1998

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TABLE 5C
PRELIMINARY PREFERRED LIST OF LAND USE MANAGEMENT ALTERNATIVES
OXNARD AIRPORT

SUGGESTIONS AND RECOMMENDATIONS Description	Cost	Implementing Agency	City of Oxnard Comments
a. <i>General Plan Amendment:</i> Consider adopting a policy that the noise contours to be used for airport compatibility planning in the Oxnard Airport area shall be a composite of the 2003 and 2018 noise contours.	Administrative	City of Oxnard Ventura County	Do not agree with adopting the suggested policy because 1) the FAA only requires noise projections for the current year (1998) and a time five years hence (2003) and 2) the concept of using a maximum area "composite" is purely arbitrary.
b. <i>General Plan Amendment:</i> Consider noting that the goal of the City and County is to retain compatible land use designations for undeveloped land within the 60 CNEL contour.	Administrative	City of Oxnard Ventura County	Do not agree—all references in the text and on exhibits to the 60 CNEL noise contour should be deleted because the FAA uses the 65 CNEL level and higher "to determine the acceptability of any proposed noise abatement measures."
c. <i>General Plan Amendment:</i> Consider enacting a policy that the "planning reserve" area south of Doris Avenue within 60 CNEL contour will be reserved for airport-compatible uses.	Administrative	City of Oxnard	Do not agree with adopting the suggested policy because 1) the area under the right-hand traffic pattern for Runway 25 (Doris Avenue side) is minimally impacted compared with the area under the left-hand traffic pattern, 2) all references to the 60 CNEL noise contour should be deleted (as described above), and 3) both versions of the S.O.A.R. November ballot initiative would prevent urban development in the area.
d. <i>General Plan Amendment:</i> consider enacting guidelines specifying noise compatibility criteria for the review of development projects within the 60 CNEL contour.	Administrative	City of Oxnard Ventura County	Do not agree with adopting guidelines because 1) the FAA uses the 65 CNEL level and higher "to determine the acceptability of any proposed noise abatement measures," 2) new construction standards produce a significant reduction in interior noise, and 3) the pace of change would be so slow within the designated area that there would not be a significant benefit.

SUGGESTIONS AND RECOMMENDATIONS Description	Cost	Implementing Agency	City of Oxnard Comments
e. <i>General Plan Amendment:</i> Consider requiring the recording of fair disclosure agreements and covenants for any new noise-sensitive development approved within the 60 CNEL contour.	Administrative	City of Oxnard Ventura County	Might consider requiring a Noise Disclosure Agreement, for properties located within the 65 CNEL noise contour, but with the City to have the final say on the wording of the Agreement and said Agreement would be limited solely to disclosing the proximity of the airport and the potential for low-flying aircraft and aircraft noise—other topics such as waiving liability for any and all acts related to the airport would not be included.
f. <i>Property Acquisition:</i> Consider buying some or all of the homes and multi-family buildings in the Teal Club/Little Farms Road area.	\$2,800,000 to \$6,000,000	Ventura County Department of Airports	The City has not taken any official position on the proposed acquisition, but feels that the County should discuss the possibility of retrofitting or acquiring impacted properties with their owners.



City of

RICHARD J. MAGGIO
Community Development and
Special Project Director

April 21, 1998

Ms. Ginger Gherardi
Ventura County Transportation Commission
950 County Square Drive, Suite 207
Ventura, CA 93003

Subject: Response to Communication of April 7, Concerning Forthcoming *Draft Airport Comprehensive Land Use Plan*

Dear Ms. Gheradi:

In the communication from your office dated April 7, it is mentioned that the consultants will review their preliminary recommendations for the *Draft Comprehensive Airport Land Use Plan (CLUP)* on May 7 and this meeting will "give the Advisory Committee an opportunity to provide specific input and direction to the consultant prior to the preparation of the formal *Draft CLUP*." As we have mentioned before, it is not possible for City staff to provide response to preliminary recommendations or proposals on complex topics in a meeting unless we have had a meaningful opportunity to review them beforehand.

To help move forward with the process of preparing the draft report, we thought that it might be helpful at this point to provide you with information on what we want to see coming out of the planning process, as follows:

1. Recognition that the currently adopted *Airport Comprehensive Land Use Plan* has been working well and that we are not aware of any substantive concerns.
2. Recognition that there is going to have to be a compelling showing of need in a practical sense before any proposed change to the currently adopted *Airports Comprehensive Land Use Plan*, would be considered favorably.
3. Recognition that two sets of assumptions underlying the proposed *Oxnard Airport Comprehensive Land Use Plan* are significantly flawed (i.e., exaggerated aviation demand forecasts and incomplete noise projections) and that these should be corrected as recommended in our letter of March 24, 1998, before work proceeds on the *Draft Comprehensive Airport Plan* for Oxnard Airport.

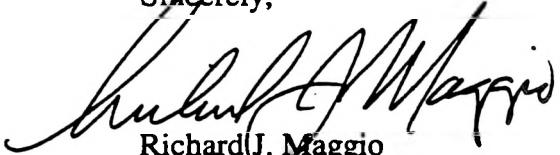
4. Recognition that the existing and proposed land use around Oxnard Airport has not changed significantly for a long time. As examples, the existing land uses to the east of the airport, most of which actually preceded development of the airport, will remain in their present status for many decades to come. The same can be said for the much newer land uses located to the south of the airport. The land to the west and north of the airport is in agricultural use and will probably stay this way for an extended period of time.
5. Recognition that aircraft operations have declined and that many factors have and will continue to contribute to this decline. Some of these factors include an aging population that is not going to be as inclined to get involved in flight training and the use of personal aircraft, the increasing cost of general aviation, lack of growth in disposable income over the last 20 years in the segment of the population that has traditionally supported general aviation, and the preference of Ventura County residents to use surface transportation instead of commuter flights when traveling to and from Burbank, LAX, and Santa Barbara Airports.
6. Recognition that it is the responsibility of the airport operator and owner (i.e., Ventura County Department of Airports and Ventura County) to manage and operate the airport in a manner that will minimize and mitigate the impacts of airport operation on the City of Oxnard as it currently exists and is proposed in its adopted *2020 General Land Use Plan*. Based upon hundreds of observations made by our staff over the last several years, the incidents of both sloppy and unsafe flying, particularly related to aircraft flying over the center of the city on approach to Runway 25, have increased. Thus, the real problems that the City faces from use of the airport are related to poor piloting skills and lack of enforcement of safe minimum altitudes for aircraft flying over populated areas of the city—placing more provisions in a new *Draft Comprehensive Airport Plan* that would tighten up review on proposed land use is not going to solve these problems. The solution to these problems lies with the ability of control tower personnel to inform all pilots, through frequent published and radio advisories, that flying below published minimum altitudes over populated areas of the city will not be tolerated and that violators will be cited.

To conclude, we want to emphasize again that the County of Ventura, as Airport owner and operator, is going to have to mitigate the impacts of operating Oxnard Airport on the City of Oxnard both now and in the future. Also, all proposed plans related to the Oxnard Airport (i.e., *Airport Master Plan and CLUP*) are going to have to have an Environmental Impact Report prepared that meets the intent of the *California Environmental Quality Act*.

Ms. Ginger Gherardi
April 21, 1998
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Once again, we want to emphasize that the effort to revise the *Oxnard Airport Comprehensive Land Use Plan*, which is currently underway, will not help provide a solution to some of the day-to-day problems that we experience.

Sincerely,



Richard J. Maggio
Community Development and Special Projects Director

cc: Edmund F. Sotelo, City Manager, Oxnard
Joyce Parker-Bozylinski, Planning and Environmental Services Manager
Gary Gillig, City Attorney
Rodney Murphy, Ventura County Director of Airports
Bill Little, City Manager, Camarillo
Peter Cosentini, City Manager, Santa Paula
Charles Lieber, Federal Aviation Administration
Chris Stephens, VCTC Staff

Enclosure: Letter of March 24, 1998

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City of

RICHARD J. MAGGIO
Community Development and
Special Project Director

March 24, 1998

Ms. Ginger Gherardi, Executive Director
Ventura County Transportation Commission
950 County Square Drive, Suite 207
Ventura, CA 93003

Subject: Response to Letter of March 3, Concerning *Phase I Airport Comprehensive Land Use Plan (ACLUP) Addendum*

Dear Ms. Gherardi:

In the letter to us from Mr. Stephens of your staff, we were invited to review the *Phase I Addendum* and submit additional comments. Also, it is evident from reviewing Mr. Stephen's letter that members of your staff and other jurisdictions have significant comments on the *Phase I* work prepared by the consultant to date.

Previously, I submitted to you comprehensive letters of comment on the *Phase I ACLUP* and the underlying *Part 150 Noise Compatibility Study* (Letters of December 22, 1997; January 29, 1998; and February 4, 1998). To date, we have not received a response to the dozens of issues identified in these letters. Also, I want to take this opportunity to emphasize that until issues are resolved with the *Part 150 Noise Compatibility Study*, it is premature to proceed with the *Airport Comprehensive Land Use Plan*—the reason for this is simply that the *Noise Compatibility Study* provides a critical input for the *Comprehensive Land Use Plan*. At this time, I am requesting that you ask the consultant to respond explicitly to the issues and questions identified in the City's letters cited above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard J. Maggio'.

Richard J. Maggio
Community Development and Special Projects Director

cc: Edmund F. Sotelo, City Manager, Oxnard
Joyce Parker-Bozylinski, Planning and Environmental Services Manager
Rodney Murphy, Ventura County Director of Airports
Bill Little, City Manager, Camarillo
Peter Cosentini, City Manager, Santa Paula
Charles Lieber, Federal Aviation Administration

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