

RESPONSES TO AGENCY COMMENTS

OXNARD SCHOOL DISTRICT

Letter dated December 9, 1998

Comment #1: Believe the proposed improvements will serve to directly or indirectly encourage more use of the airport and, therefore, potentially encourage more growth to incur in both business and residential environments surrounding the airport. This may, in turn require more classroom space, teachers, supplies, and materials. This cumulative and growth-inducing effects of the project are not seriously considered in the document.

Response: The standard industry practice in forecasting future demand for or use of an airport is to utilize socioeconomic and aviation-related data prepared by others. Historical and projected population and economic forecasts are compared with historical airport use (e.g., operations, enplanements, based aircraft) to project future estimates of airport use. Other sources that are considered in the forecasting effort are studies prepared by other aviation-related agencies, including the FAA and the State of California. The basis of Oxnard Airport's aviation forecasts are fully described in Chapter 2 of the *Draft Airport Master Plan Update*.

Faulty forecasting
This method of forecasting does not account for a factor of "if you build it, they will come." Its basis is in the approach that the demand will occur *before* the improvements and regardless of whether the improvements occur. In other words, operations will occur before the additional exit taxiways need to be constructed, the taxiways will simply improve the efficiency of the airfield; aircraft will be parking on the ramp before additional hangars will need to be constructed; passengers will be utilizing Oxnard's terminal building to capacity before the building needs to be expanded. In reality, it is a much more complex relationship between the demand and the facilities.

Within the cumulative impact and growth-inducing impact discussions of Chapter 6, we have attempted to address this complicated issue. The bottom line is that there may be a percentage of future aviation activity at Oxnard Airport that is directly related to the improvements, but what that percentage is it is impossible to determine with any degree of certainty. Aircraft owners and pilots have the freedom to choose where they base their aircraft and what airports they fly in and out of. They may very well choose a low-cost hangar over a high-cost hangar at a more convenient airport; conversely, they may choose a tiedown space at the local airport over any hangar at another airport. Airline passengers have the freedom to choose convenience over cost, or vice-versa. There is just room for individual responses.

Finally, it is important to remember that the aviation forecasts are developed and used in the Master Plan as a planning tool and should not be interpreted as hard and fast. Aviation activity is heavily affected by upswings and downswings in the economy, as clearly stated in Chapter 2 of the *Draft Airport Master Plan Update*. Forecasts are only reliable over the short-term, and even then some fluctuation above and below the trend-line would not be unusual. For the long-term, forecasts are

used to identify growth potential so that facilities needed in the short-term can be located/designed appropriately in order to limit the need for their relocation/redesign in the future.

Comment #2: Believe that doubling the air traffic in and out of Oxnard Airport will increase noise and safety impacts within the surrounding community, particularly as a result of overflights by general aviation aircraft which do not utilize the carefully defined flight tracks of commercial aircraft.

Response: The noise and safety impacts of the projected future aviation activity at Oxnard Airport is addressed in Chapter 4 of this document. The 65 CNEL contour is projected to increase by 0.06 square miles in the long-term, compared with the existing condition. Using the federal, state, regional, and locally accepted threshold, this results in impacts to only three additional homes in the Little Farms Road area.

In addition, as stated in Chapter 4, the project will also result in beneficial safety conditions at the airport through the acquisition of the Runway Protection Zones, Object Free Area, and portions of the transitional surface not already under airport control. The great majority of aircraft accidents are really incidents (runway excursions or short-landings) which occur on the runway, followed by in the Runway Safety Area (which is smaller than the Object Free Area), and in the Runway Protection Zone.

Pilots flying in the vicinity of the airport, including general aviation pilots, are required to fly according to FAA rules and guidelines for safe flight. Except when in the process of landing or take-off, pilots are supposed to maintain a minimum altitude of 1,000 feet over urban areas.

Comment #3: Concerned the proposed improvements are a precursor to extending the length or width of the runway area to accommodate larger aircraft. Such an improvement would effect the placement of new schools and maintenance of existing schools.

Response: Comment noted. No indication was provided in the *Draft Airport Master Plan Update* that there were any plans to lengthen or widen the runway at Oxnard Airport. The Airport Layout Plan clearly states that the ultimate runway length and width are expected to be the same as the existing length and width.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Letter dated December 23, 1998

Comment #1: The Final EA/EIR should address the relationships to SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan.

Response: See following responses to Comments #2 through #10.

Comment #2: The Draft EA/EIR lacks a clear discussion of the relationship of the project to SCAG's recently adopted population, housing, and employment forecasts (adopted April 16, 1998). The data used in the report is dated. No discussion is made of regional housing or employment forecasts. The Final EA/EIR should reference SCAG adopted forecasts and compare them with the population, housing, and employment projections for this project. This comment refers to SCAG, Core Growth Management Policy #3.01.

Response: The socioeconomic statistics used in the EA/EIR are the same as those used in the *Draft Airport Master Plan Update* in order to be consistent. The master planning process began in 1996 and SCAG's forecasts of the time were used in that endeavor. SCAG's newly adopted forecasts are more conservative than those used in the Master Plan. What this means is that aviation projections for the long-term, which was originally construed as approximately 20 years, may not occur for 25 or 30-years. As this is a Program EIR and as the improvements would only occur as demand warrants them, the change in the forecasts will have no effect on the physical plan for the airport, only on the timing of the improvements.

This project makes no projections of population, housing, or employment. These socioeconomic factors are beyond the control of the airport. As discussed in the Response to Comment #1 of the Oxnard School District, it is standard industry practice to utilize local/regional socioeconomic factors to estimate aviation activity at a given airport, but no reciprocal factor is applied as to how the aviation forecasts affect the socioeconomic ones.

Comment #3: On page 5-8, the Draft EA/EIR states the project is consistent with the population projections in the 1994 AQMP for the Oxnard Growth Area, but no comparative data is presented to support this statement. This comment refers to SCAG, Core Growth Management Policy #3.01.

Response: The referenced page/section does provide both the County's population projections and the AQMP's population projections. As noted in Ventura County Air Pollution Control District's comments (see following response), the statistics used reference the Camarillo Growth Area instead of the Oxnard Growth Area, this has been corrected.

See also Response to Comment #2. The project, the implementation of the *Draft Airport Master Plan Update*, utilizes available socioeconomic estimates prepared by others to forecast future

aviation activity. It is general industry practice in preparing aviation forecasts that aviation activity is dependent on local/regional socioeconomic activity, but not vice-versa.

Comment #4: No definition is provided on what the time frame is of "short-term" and "long-term." Final EA/EIR's for similar projects should address the manner in which the proposed project will be developed so that provision of service to new housing units or jobs producing commercial, industrial or other uses will be staged or phased to help achieve greater jobs/housing balance. The objective of a phasing or development staging plan would be to encourage the implementation of types of development that would address the jobs/housing balance issue and work toward the reduction of Vehicle Miles Traveled early in the development period. This comment refers to SCAG, Core Growth Management Policy #3.03.

Response: See page 1-1 of Chapter 1, where it states that short-term improvements/actions are expected to be implemented over the next five years and long-term projects would be implemented, "should the use of the airport warrant them," over the next twenty years.

tries to get around CEQA requirement
See also Response to Comment #2. The project, the implementation of the Draft Airport Master Plan Update, utilizes available socioeconomic estimates prepared by others to forecast future aviation activity. It is general industry practice in preparing aviation forecasts that aviation activity is dependent on local/regional socioeconomic activity, but not vice-versa. The project, therefore, is not expected to play a significant role in the jobs/housing balance.

Comment #5: The Draft EA/EIR does not provide specific information regarding the relationship of existing and proposed transit to the airport. No information is provided regarding bicycle access to the facility. This comment refers to SCAG, Ancillary Growth Management Policy #3.12.

Response: The Draft EA/EIR evaluates the potential environmental impacts of implementing the Draft Oxnard Airport Master Plan Update. It is not the intent or responsibility of the Master Plan to propose and evaluate transit and bicycle access. As indicated in Appendix G, page G-6, currently there are no bicycle lanes to the airport from Fifth Street, the only points of ingress/egress to the airport. In addition, as indicated in the same Appendix, the City of Oxnard's planned improvements to Fifth Street include development of a bicycle lane. The Department of Airports will contribute its "fair share" contribution toward improvement to Fifth Street on a cumulative impact basis, as required by the City/County Reciprocal agreement and as stated in Chapter Four of this document, under Traffic and Circulation Mitigation Measures.

Comment #6: the Draft EA/EIR lacks a discussion of the relationship of the project to existing and proposed public transit. The Final EA/EIR should include a discussion of transit services and specific actions to make the project transit friendly. This comment refers to SCAG, Ancillary Growth Management Policy #3.13.

Response: Policy 3.13 states "encourage local jurisdictions plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment." The comment notes that the Draft EA/EIR lacks a discussion of the relationship of the Project to existing and proposed public transit. The Draft Oxnard Airport Master Plan Update is intended to address project demand for the use of the airport and make it safer by improving the existing facilities. The airport itself is a transit facility and this project is aimed at facilitating use of the existing airport both as an infill and redevelopment project; therefore, the project in and of itself is encouraging the use of an existing urbanized transit facility. Existing services include the City bus service that provides a stop approximately three blocks from the airport. Further, the Oxnard Transportation Center is located approximately five miles from the airport and provides local and regional bus and train service in the area. This facility is easily accessible from Oxnard Airport. Although this project does not provide for improving other transit availability, it does involve improving the existing airport and, therefore, the Draft Airport Master Plan Update is consistent with this policy. !!!

create demand on other transit

Comment #7: The Draft EA/EIR makes no reference to support of SCAG's Regional Performance Indicators and associated objectives pertaining to: mobility, accessibility, environment, reliability, safety, livable communities, equity, and cost-effectiveness. Mitigation measures in Transportation and Circulation and Air Quality sections will improve mobility and accessibility, increase roadway efficiency and safety, and help create a highly livable, pedestrian friendly environment which encourage alternatives to the automobile. This comment refers to SCAG, 1998 Regional Transportation Plan Policy #4.01.

Response: The comment acknowledges that the Draft EA/EIR is partially consistent with this core RCPG policy. It is not clear as to what portion of the policy is not consistent with the Draft Airport Master Plan Update; therefore, no meaningful response is possible.

Head in sand approach

Comment #8: The Draft EA/EIR does not address the extent to which the project considers the implementation of Transportation Control Measures set forth in the Ventura County Air Quality Management Plan, including: high occupancy vehicle projects, park and ride lots and intermodal facilities; transit improvements, urban freeway system management improvements, smart corridors TSM programs, railroad consolidation programs, CMP-based demand management strategies, vanpool programs, telecommunication facilities, demonstration programs, and bicycle and pedestrian facilities; and marketing information services for employers and activity centers to encourage shared rides and transit use, and transit pass centers. This comment refers to SCAG, 1998 Regional Transportation Plan Policy #4.04.

Response: Because the Proposed Action is consistent with the AQMP and because the cumulative impacts of the continuing use of Oxnard Airport is considered to be de minimus, the project is not required to implement Transportation Control Measures, as outlined in the Ventura County Air Quality Management Plan. A discussion was added to the Air Quality section of Chapter Four,

under Consistency with Plans and Policies, however, which indicates that while the County Department of Airport is not required to implement the Transportation Control Measures as mitigation measures, they will encourage the implementation of a number of the measures, as appropriate and applicable. *ignore CEQA*

Comment #9: The Draft EA/EIR does not provide any specifics as to the relationship of the project elements to the current Regional Transportation Improvement Program. This comment refers to SCAG, 1998 Regional Transportation Plan Policy #4.07.

Response: Policy #4.07 refers to "...a reasonable phasing of construction between segments...". Because the *Draft Airport Master Plan Update* is intended to be a demand-based plan, meaning that identified improvements will only occur as demand warrants, the phasing of the various elements of the project will be appropriate to meet the demands of users of Oxnard Airport. This approach is described in Chapter One (page 1-4) of this EA/EIR. In addition, the Master Plan proposes minimal new construction development including expansion of the terminal building, and development of new hangars along with the other non-development components such as, acquiring easements and improving security fencing, parking lots, taxiways, and lighting. The Proposed Action is, therefore, consistent with this policy.

Comment #10: In developing the Final EA/EIR, please reference the attached text and figures from the Aviation Section of the 98 Regional Transportation Plan. This comment refers to SCAG, Core Regional Transportation Plan Actions.

Response: The information attached to SCAG's letter (see Appendix K) included two tables specifically identified as "not part of the Plan, but...included as information for further analysis" which provided a total of five alternatives for passenger forecasts in the year 2020. For Oxnard Airport, the projections were as follows: Alternative #1 (98 Draft Regional Transportation Plan, High), 165,000; Alternative #2 (Scenario #1, LAX Constrained, El Toro Unconstrained), 101,000; Alternative #3 (Scenario #2, LAX Unconstrained, No El Toro), 112,000; Alternative #4 (Scenario #3, LAX Constrained, No El Toro), 118,000; Alternative #5 (TCC Aviation Subcommittee Scenario), 137,000. These estimates all assume the joint military-civilian use of Pt. Mugu. These estimates are lower than those projected for Oxnard Airport within the *Draft Airport Master Plan Update* which identified 130,000 enplanements over the long-term, or 260,000 passengers.

The forecasts identified in the *Draft Airport Master Plan Update* and summarized in Chapter 1 of this EA/EIR, assume that Pt. Mugu remains a military facility. Page 2-11 of the *Draft Airport Master Plan Update* specifically states that "If Point Mugu were to establish air service as a joint use facility, air passenger growth at Oxnard Airport would be limited."

Because this is a Program EIR and because the terminal improvements would only occur as, or if, demand warranted them, the *Draft Airport Master Plan Update* and corresponding environmental

documentation remains appropriate. The purpose of the *Draft Airport Master Plan Update* is to allow facilities needed in the short-term to be located and designed in consideration of potential future facility requirements.

The attachments to the SCAG letter also include the "98 RTP Constrained Projects List for the 98 Regional Transportation Plan." No specific projects were identified for Oxnard Airport.

Finally, the SCAG letter includes a memorandum and attached table reflecting "additional air passenger allocations." The table provides specific information regarding international passengers which is not applicable to Oxnard Airport.

Comment #11: All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements.

Response: A mitigation monitoring plan will be prepared prior to certification of the Final EA/EIR, as required by AB 3180.

CITY OF OXNARD

Letter dated December 28, 1998

Comment #1: The approach to determining the significance of impact, as provided in the Draft EA/EIR, does not meet the intent of CEQA. The Final EA/EIR needs to compare the effects of the Proposed Action with the Existing Condition, and provide reasonable and feasible mitigation, where appropriate.

Response: The document has been revised to more clearly reflect the approach necessary for NEPA compliance (comparison of the Proposed Action to the No Action) and CEQA compliance (comparison of the Proposed Action to the Existing Condition). This is expressed in the Summary section, Chapter 1 (under Approach), and throughout Chapter 4. This information was in the Draft EA/EIR, but has been reorganized in this document to make the analysis clearer. Each section of Chapter 4 now contains a clear discussion of the appropriate thresholds and the conclusions, as to the significance of the impact, under both NEPA and CEQA criteria. This has been done by adding subheadings separating the two discussions.

Comment #2: In determining the effects of the Proposed Action it is necessary to examine the project in total, including the plan, all of its related activities, actions, and capacity.

Response: See Response to Comment #1. The current approach, as it applies to CEQA, examines the impact of the physical improvements to the airport and the forecasted increase in aircraft operations, passenger activity, and based aircraft. This results in a corresponding effect on noise, compatible land use, and average daily traffic (see Chapter 4), where the previous approach (now referred to as NEPA) indicated no significant impact.

While this added approach does address the forecasted future use of Oxnard Airport, it does not specifically address the "capacity" of the airport. An airport's capacity is based on multiple factors including the cost of delay in terms of dollars and time, and whether the user determines the cost exceeds the benefit of the airport's location or service, or vice-versa. It is, therefore, not feasible or reasonable to estimate the maximum capacity of an airport. There is no known equation or approach for identifying the capacity of an airport as "x" number of operations where "x+1" operations would not or could not be accommodated.

FAA does provide a means to estimate an Annual Service Volume (ASV) based on the airfield design and the number and approach speed of aircraft operations at a given facility. This estimate represents the maximum volume of aircraft operations with a corresponding, FAA-defined, "acceptable" length of delay per operation. ASV is intended as a planning tool for determining the need and timing of airside facility improvements, such as the construction of parallel runways, but does not constitute a maximum capacity for an airport.

The *Draft Airport Master Plan Update* provides a detailed discussion of “capacity” as the term is used/considered by the FAA (see Chapter 3). As indicated in Table 3D of that document, the ASV for Oxnard Airport in the long-term is projected to be 186,000 operations, while the forecasted demand for the airport is 194,000 operations. Operations at Oxnard Airport are, therefore, projected to exceed the ASV, indicating that delay (both time and cost) will reach levels which may be a factor in the decision of some pilots/passengers to utilize the airport. At this time, there is no way of estimating what percentage, if any, of forecasted demand would not occur because of the projected delay. The environmental analysis was completed assuming the forecasted operations for the facility, the higher of the two numbers and, therefore, addresses the nearest concept to the “capacity” of Oxnard Airport accepted or considered by the FAA and in the industry.

Comment #3: Noise impacts more than double from the short-term to the long-term, as evidenced that short-term noise conditions impact 66 residences and two churches, and long-term noise conditions impact 112 residences, two churches, one community center, and one school. Yet, the Draft EA/EIR indicates that no mitigation is required.

Response: Commentor is citing impacts within the 60 CNEL contour; however, federal, state, county, and local plans and regulations identify the 65 CNEL contour as the threshold of significance. In the long-term, the 65 CNEL contour of the Proposed Action will incorporate 25 residential units and no churches, community centers, or schools; the existing 65 CNEL contour incorporates 22 residential units and no churches, community centers, or schools. That is a difference of 3 residential units. Currently, there are no thresholds as to how many units constitute a significant impact; however, for the purposes of this analysis, all 3 units were determined to be significantly impacted under CEQA. Mitigation is now specified for these 3 units, as well as, the existing 22 units within the 65 CNEL, resulting in an overall beneficial impact.

The Draft EA/EIR includes information on the 60-65 CNEL contour range to be consistent with the FAR Part 150 Study and as a means to acknowledge that noise-sensitivity does not stop at the 65 CNEL contour. It is for informational and land use planning purposes only, but is below the identified and accepted threshold of significance.

Comment #4: The Draft EA/EIR does not acknowledge or address the impact of adding approximately 1,282 trips per day to Fifth Street. The EA/EIR needs to include the alignment for Fifth Street, showing the right-of-way required to provide two traffic lanes, sidewalk, curb, gutter, bike lanes, and a raised median. The mitigation measure should also include the construction schedule for Fifth Street Improvements to provide these improvements and to correct the known drainage problems along this roadway.

Response: The Draft EA/EIR indicates that the project will add 1,292 ADT to the local street system at full Master Plan build out. The resulting level of service on local area intersection is summarized in Chapter Four. The Draft EA/EIR analysis assesses the impact of the project at full build out of

the City of Oxnard's 2020 General Plan. At full build out of the 2020 General Plan, widening of Fifth Street, in accordance with the City's Circulation Element, would be necessary to accommodate the anticipated growth within the City. Individual projects that involve frontage along Fifth Street would be required to dedicate the necessary right-of-way to allow future widening as outlined in the Circulation Element. In addition, individual projects will be reviewed to determine the appropriate traffic mitigation fee needed to offset cumulative traffic impacts. Together these measures will effectively mitigate the effects of project generated cumulative traffic. The Fifth Street widening is not proposed as part of the *Draft Oxnard Airport Master Plan Update* and the timing of the improvement is not contingent on activities proposed within the Master Plan. Project traffic represents only a small portion of the City of Oxnard projected 2020 traffic volumes and, therefore, the timing of the planned Fifth Street improvements would be dictated by growth rates within the City and priorities established through the City's Capital Improvement Program. The timing of such improvements is not known, however, it is anticipated that the widening project itself would be subject to future environmental review under CEQA.

Comment #4: The Draft EA/EIR is inconsistent with the Draft FAR Part 150 Noise and Land Use Compatibility Study which identifies a number of dwelling units and population significantly affected by noise in 2003 and 2018. The FAR Part 150 Study identifies 12 noise abatement measures, six land use management measures, and six monitoring measures. The Draft EA/EIR indicates that no mitigation is required for noise impacts.

Response: The FAR Part 150 Study for Oxnard Airport and this EA/EIR are two separate and distinct documents, prepared under different guidelines and criteria. While technical information developed in the FAR Part 150 Study can be used (and was used) in the noise and compatible land use discussions of the EA/EIR, the conclusions of the studies are not expected to be identical.

The FAR Part 150 Study is intended to identify the change in the noise contours and impacts in the future compared to both the existing condition and the preferred condition (no impacts), and to provide abatement or mitigation measures which reduce or completely eliminate the impacts. In other words, the goal of the FAR Part 150 Study is to reduce impacts to noise-sensitive land uses to zero, or to mitigate those impacts, if at all possible or reasonable. At Oxnard Airport, the FAR Part 150 Study's goal was to reduce impacts to noise-sensitive land uses from 25 residential units in the 65 CNEL contour to zero. Noise effects within the 60-65 CNEL contour range were also considered, primarily from a land use management perspective.

The EA/EIR only needs to abate or mitigate the impacts down to the existing condition; in the case of Oxnard Airport this equates to mitigation for a total of 3 residential units. There is no requirement to address noise effects within the 60-65 CNEL contour range as this is below the stated and accepted threshold of significance. In implementing the mitigation measure identified in Chapter Four of this document, the Ventura County Department of Airports will be creating a beneficial impact to the 22 residential units that are currently within the 65 CNEL contour. Additional mitigation measures identified in the FAR Part 150 Study are not applicable the EA/EIR analysis.

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Letter dated December 30, 1998

Comment #1: Page 4-26, paragraph 5, line 7: Revise this section to reflect that SCAG is involved in air quality planning for the SCAG region, of which Ventura County is a part, and indicate that APCD prepares the AQMP which provides the framework for air quality and pollution management in Ventura County.

Response: Comment noted. Text revised as requested.

Comment #2: Page 4-28, Table 4J, Ambient Air Quality Standards: Replace the table in the Draft EA/EIR with the table attached to the comments.

Response: Comment noted. Table revised as requested.

Comment #3: Page 5-8, Ventura County Air Quality Management Plan: Revise this section to include the following information. Since 1991, several AQMPs have been approved. The 1994 AQMP was prepared to satisfy the planning requirements of the 1990 federal Clean Air Act Amendments and to outline a strategy for meeting the federal ozone clean air standard. The Plan indicates that Ventura County will attain the federal ozone standard by 2005. The 1995 AQMP Revision was prepared to update information that has changed since the 1994 AQMP was approved. It contains new modeling results and improved emission forecasts. The 1997 AQMP Revision revised the adoption and implementation dates for several control measures. Also, the text regarding AQMP consistency should be revised as the population numbers in the Draft EA/EIR reflect the Camarillo Growth Area and not the Oxnard Growth Area. The correct numbers, as of September 1998, should be 159,162 for the Oxnard Growth Area, which is lower than the population forecasts in Table 3-1 of the guidelines and 1995 AQMP Revision, Appendix E-95 (page E-35). The project is consistent with the AQMP.

Response: Comment noted. Text revised as requested.

CALIFORNIA DEPARTMENT OF TRANSPORTATION
Letter dated December 3, 1998

Comment #1: The proposed project will have a significant impact on State facilities. A detailed traffic study is needed to address the following: (1) projected traffic volumes (year 2020), trip generation, and traffic circulations; (2) cumulative effect of this project in conjunction with the other developments in the area; (3) existing and future level of services; (4) traffic impact on State facilities; (5) mitigation measures to alleviate the anticipated traffic impacts. Any cost for mitigation should be extended to cover mainline State highways.

Response: A detailed traffic analysis was prepared and it was determined that project generated traffic represents only a very small portion of the anticipated year 2020 traffic volumes. Individual projects implemented under the *Draft Airport Master Plan Update* will be required to participate in locally adopted traffic mitigation fee programs. These programs are in place to address traffic congestion and infrastructure improvements including multi-jurisdictional issues related to the regional road network. The countywide Congestion Management Plan (CMP) provides a mechanism by which the need for regional transportation improvements is identified, solutions are designed, and funding sources are established. By contributing a pro-rata share of traffic mitigation fees, individual projects implemented under the *Draft Oxnard Airport Master Plan Update* would effectively mitigate cumulative impacts to local and regional road facilities.

RESPONSE TO PUBLIC HEARING COMMENTS

The following comments represent a summary of the comments received at the January 6, 1999 Public Hearing on the Draft EA/EIR. Speakers at the hearing, whose comments are summarized and grouped according to subject below, were: members of the Ventura County Environmental Report Review Committee (Bruce Smith, Chair, Arnold Dowdy, Janna Minsk, Pete Kaiser, Jim Fullmer, and Melinda Talent), Howard Maroz, Jane Tomach, Richard Maggio, Ted Christianson, and Steve Elsey. The transcript of the public hearing is included in its entirety in **Appendix K** of this document.

GRAPHICS

Comment #1: The exhibits illustrating the existing and generalized future land uses are in error. Streets that are in place, are not shown. A park is actually located in an area designated as residential.

Response: Comment noted. Exhibits have been revised following coordination with the preparers of the FAR Part 150 Study. The corrected exhibits correlate with the “final” land use exhibits prepared for the Oxnard Airport FAR Part 150 Study, Noise Compatibility Program element.

Comment #2: Exhibits 3D, Generalized Existing Land Use, and 3E, Future Land Use Per General Plans, are inconsistent with each other. More explanation is needed as to the basis of each exhibit.

Response: Comment noted. Effort was made to make the two base maps more consistent with each other. The locations of schools, churches, and other noise-sensitive land uses were added or relocated, as appropriate. Land use colors or classifications were not changed, however, except to correct known errors. Exhibit 3D refers to existing land uses in the area and lumps together several land uses (e.g., commercial, industrial, transportation, and utilities are all illustrated with pink; parks and open space are illustrated as one shade of green). It also defines residential in terms of the number of units in a structure (single-family or multi-family). Exhibit 3E, on the other hand, reflects future land uses per the adopted General Plans in the area. These planning documents provide for more specificity in uses; therefore, Exhibit 3E utilizes different, additional, land use categories. Also Exhibit 3E defines residential in terms of the overall density of the area. As these differences are appropriate to the sources and are not critical to the analysis, no change was made.

Regarding the need for more explanation as to the basis of each exhibit: text was added to Chapter 3 to describe the sources of the two exhibits. No change was made to the exhibits themselves because they are clearly titled and the sources are identified below each exhibit’s legend.

Comment #3: Confirm the site west of the Edison Canal is in the Greenbelt agreement area..

Response: Comment noted. Area in question is not is the Greenbelt agreement area and has been so noted on Exhibits 3E, 4E, 4F, 4G, and 4H.

INITIAL STUDY CHECKLIST

Comment #4: On page A-2 of the Initial Study Checklist, item number 18B should be checked as less-than-significant.

Response: Comment noted. Checklist has been revised, as requested.

PUBLIC HEARING/COMMENT

Comment #5: The hearing has not been properly noticed under the Brown Act. The hearing notice distributed by the Environmental Report Review Committee does not reference that the proposed action constitutes a replacement of the existing Airport Master Plan with a new draft Airport Master Plan Update. The hearing is properly noticed under CEQA.

Response: Comment noted. No further response is necessary as the hearing was properly noticed under both NEPA and CEQA.

Comment #6: The hearing was not posted at Oxnard Airport. None of the airport users were aware of the hearing date/time.

Response: Comment noted. The hearing was properly posted; however, consideration should have been given to posting the meeting at the subject site. Efforts will be made to do so in the future.

Comment #7: The public has not had adequate opportunity to make written comment.

Response: Comment noted. NEPA, through *FAA Order 5050.4A*, requires 30 days for public review and comment. The CEQA Guidelines also require a minimum of 30 days, 45 days when the document is sent to the State Clearinghouse for review, as was this document. The availability of the Draft EIR was first noticed in the *Ventura County Star* on November 11, 1998 (see Certificate of Publication on page K-1 of Appendix K), 57 days prior to the hearing. Notice of Availability was also posted on November 11, 1998 at the Department of Airport Administration office in Camarillo and with the Clerk of the Board of Supervisors. Copies of the Draft were available at Camarillo

Airport offices, Oxnard Public Library and Ventura County Government Center. Public notice regarding availability of the Draft EA/EIR and the public hearing was, therefore, adequate under both NEPA and CEQA.

Comment #8: Attended six meetings in November and December for the airport authorities of Oxnard and Camarillo Airports, but no mention was made about the public hearing for the Oxnard Airport EA/EIR.

Response: Comment noted. The hearing was properly posted; however, consideration should have been given to making announcements at other airport-related meetings prior to this hearing. Efforts will be made to do so in the future.

Comment #9: Comments made at a public hearing on the FAR Part 150 Study have not been addressed in this Draft EA/EIR. Commentor requested that these previous comments be added to the record on this document.

Response: Comment noted. The portion of the transcript for the December 9, 1998 Public Hearing on the FAR Part 150 Study for Oxnard Airport is included in Appendix K of this document. As the FAR Part 150 Study hearing occurred after the Draft EA/EIR was made available for review, it was not possible to address the Commentor's concerns prior to now.

The comments referred to in the FAR Part 150 Study hearing transcript are as follows: (1) the agreement between the County and the City of Oxnard prevent the airport from intensifying its activities; (2) there is greater concern with single event noise, than with average cumulative noise, as depicted by CNEL; (3) aircraft do not follow the flight tracks drawn on the exhibits; (4) the *Draft Airport Master Plan Update* and FAR Part 150 Study appear to be a "deliberate attempt...to take control of the land use planning away from elected city council members"; and (5) maps are inaccurate as to mobile homes and multi-family dwellings.

Regarding statement (1), refer to the following Response to Comment #12.

Regarding statement (2), refer to the following Response to Comment #21.

Regarding statement (3), this comment refers to Exhibits 4A, 4B, and 4C of the EA/EIR, which are identical to exhibits in the FAR Part 150 Study. As noted in the legend to these exhibits, the illustrated lines represent consolidated flight track spines and sub-tracks. They are not intended to represent the only place aircraft either can or do fly. It is necessary to identify consolidated flight tracks in order to run the Integrated Noise Model. These consolidated flight tracks were determined based on a combination of field observations and discussions with the air traffic controllers at Oxnard Airport.

Regarding statement (4), the *Draft Airport Master Plan Update* has no direct effect on the role of elected city council members in land use planning. The purpose of the Master Plan is to provide Ventura County with guidance as to what facilities are expected to be needed in the future and where to locate those same facilities in the safest and most efficient manner. Indirectly, the city council members should refer to the Airport Master Plan Update and related documents in evaluating proposed land use changes in the city. The final decision regarding those land uses, however, remains at the city level.

Regarding statement (5), see response to Comment #1 of this section of Appendix L. Commentator did not specify where these errors occur in the map; therefore, we cannot confirm that these changes have been made. Every reasonable attempt has been made to ensure the maps are accurate.

Comment #10: In order to comply with CEQA, after the Draft EIR is revised, it should be recirculated for at least 45 days for public review and comment.

Response: Comment noted. At the January 6, 1999 public hearing it was determined that it would not be necessary to recirculate the Draft EIR prior to the March 10 continuance of the public hearing. The revisions that have been made to this AFEA/EIR primarily include adding sub-headings to Chapter Four and clarification, where indicated in these responses. No substantial changes or new information requiring recirculation have been added.

PROJECT DEFINITION

Comment #11: The EIR should evaluate the maximum airport capacity, all the actions planned, and the impacts of the total plan.

Response: Comment noted. See Response to Comment #2 made by the City of Oxnard.

Comment #12: Expanded use of the airport is considered an "expansion" of the airport, which is contrary to an agreement between the County Board of Supervisors and the City of Oxnard.

Response: The agreement between the County and the City of Oxnard is described on page 3-11 of Chapter 3 in the EA/EIR. The agreement provides for mutual cooperation and coordination regarding improvements, but does not prohibit them. Nor does the agreement prohibit additional use of the airport. *not actually true —*

Comment #13: The Proposed Project should be defined as everything that is identified in the Draft Airport Master Plan Update, including all activities, both on the ground and in the air, and all activities associated with the plan itself.

Response: Comment noted. See Response to Comment #2 made by the City of Oxnard.

ALTERNATIVES

Comment #14: If we are proceeding with the Pt. Mugu plan, why do we need to expand Oxnard Airport?

Response: At this time, there is no indication of whether or when Pt. Mugu will be developed into a joint military-civilian use facility. This is discussed in Chapter 2 of the EA/EIR, under Alternative E - Transferring Service to Another Airport(s).

IMPACTS - GENERAL COMMENTS

Comment #15: The EIR needs to look at the difference between the existing physical environment and that which is projected in the future.

Response: Comment noted. See Response to Comment #1 by the City of Oxnard.

Comment #16: The Draft EIR is inadequate because impacts related to noise, traffic and drainage that are known to be significant are not identified as significant.

Response: The sections regarding Noise and Compatible Land Use have been clarified and the mitigation measure more clearly specified. This mitigation measure was included in the umbrella of the Draft EA/EIR's Noise and Compatible Land Use mitigation measure, but here has been spelled out in more detail. The Traffic and Circulation section of Chapter Four acknowledges potentially significant cumulative noise impacts but, in accordance with the revised *State CEQA Guidelines*, these impacts are mitigated to a level of less-than-significant because the County of Ventura Department of Airports agrees to participate in the Reciprocal Agreement between the County of Ventura and the City of Oxnard regarding traffic impact fees.

Drainage impacts are expected to be beneficial because the Proposed Action includes implementation of the 1996 *Storm Drain Master Plan Study* completed as part of the *Oxnard Airport Master Plan Update* process. This is discussed in Chapter Four, under Water Supply and Water Quality.

Comment #17: The Draft EIR should be revised to identify significant impacts and include mitigation to reduce the impacts on the City's residents and infrastructure to a level of insignificance.

This has not been done and the modifications indicated [at the public hearing] are still not specific enough as to the mitigation measures that are required.

Response: Comment noted. The mitigation measures identified in this document have been clarified and revised to address this concern.

Comment #18: Concerned that the planes seem to fly in an erratic manner. There seems to be no pattern or height control. Aircraft in the pattern fly a very short circle at very low level before simulating another landing take-off; this is a hazardous situation.

Response: Comment noted. The Proposed Action will have no effect on how or where aircraft operate. Pilots are required to comply with FAA rules and regulations regarding ensuring a safe flight. Pilots that do not fly in an acceptable manner are reported to the FAA. The determination of "safe flight" and whether a pilot is flying in an acceptable manner is not within the jurisdiction of the County of Ventura Department of Airports, but is within the jurisdiction of the FAA. No further response is necessary.

Comment #19: If there is no significant impact, no mitigation measures should be identified. This comment specifically applies to water quantity and light emissions.

Response: Comment noted. These mitigation measures have been removed.

Comment #20: The discussion of visual impacts to the eligible county scenic highway needs to be expanded.

Response: Comment noted. Additional text has been added to Chapter 4. The conclusion remains the same: no significant impact to the eligible county scenic highway is expected to result from the project.

IMPACTS - NOISE

Comment #21: CNEL does not adequately reflect the noise impact; it does not describe the "pain and annoyance of the noise." The concern is "single excessive noise."

Response: The FAA and the State of California require that aircraft noise in environmental assessments and environmental impact reports describe noise in terms of the CNEL metric. This is the only noise metric for which airport land use compatibility standards have been established in the State of California. A grid-point analysis, which evaluates single noise events, was prepared as part

of the FAR Part 150 Study for Oxnard Airport; however, it is not included here because there are no thresholds of significance related to this metric.

Comment #22: Noise impacts are significant because that is the finding of the FAR Part 150 Study, which serves as the base for this EIR. The Draft EA/EIR has concluded that no mitigation measures are required, but in the Part 150 Study, 18 separate mitigation measures and six monitoring measures are recommended. Given the findings of the FAR Part 150 Study compared with those of the Draft EA/EIR, it doesn't make sense to have two documents produced at the same time by the same consultant but have two different conclusions. One or the other is wrong.

Response: See response to the City of Oxnard's Comment #4. While the method of preparing noise contours for each study are the same, the analysis is different. The purpose of the FAR Part 150 Study is to identify noise abatement or mitigation methods which would reduce or, preferably, eliminate significant impacts on noise-sensitive land uses. The purpose of the EA/EIR, on the other hand, is to identify the impacts of the proposed project compared with the existing condition and reduce those impacts to a level of less-than-significant. This is not necessarily comparable to no impact. Both studies can, therefore, be correct in their own context and yet have different conclusions.

Comment #23: When they address noise in the Draft EA/EIR, it sounds like they address it based on the planes sitting on the runway, not that they're flying over anybody.

Response: Chapter 4 describes the information input into the Integrated Noise Model, which was used to generate the noise contours. This includes not only the numbers and types of aircraft and operations, but also their flight tracks, time of day, and runway in use. Time of day is important because people are generally more sensitive to noise in the evening or nighttime hours. Runway use is important because the noise aircraft make at departure, when engines are at full-throttle, is generally louder than that made in arrival, when the engines are cut back. The Chapter includes three exhibits of consolidated flight tracks which were considered in the computer analysis (Exhibits 4A, 4B, and 4C). Aircraft not arriving or departing Oxnard Airport, but transiting the area were not included in the study.

Comment #24: The noise/compatible land use mitigation measure, providing implementation of the FAR Part 150 Study, is not appropriate because (1) the County Board of Supervisors would have the final say, not the Department of Airports and (2) the study has not been completed.

Response: Comment noted. The mitigation measure has been modified.

Comment #25: Consideration should be given to including a discussion of the grid-point analysis completed for the FAR Part 150 Study. It could be included either within Chapter 4 or as an appendix. This analysis addresses incremental increases in noise, which is a land use compatibility issue, even if it does not directly apply to the accepted noise impact threshold

Response: Comment noted. As there are no NEPA or CEQA-thresholds related to the findings of the grid point analysis, it was not included in this version of the document. Concern is that this additional information would lead to confusion by the reader and would not change the final analysis on which the determination of impact or the need for mitigation, under either noise or land use compatibility, were made.

IMPACTS - TRAFFIC

Comment #26: The existing mitigation language identified in the Draft EA/EIR is too general. It needs to be more specific to ensure its long-term effectiveness.

Response: According to the *State CEQA Guidelines*, participation in a trip fee mitigation program is considered an acceptable means of mitigating the cumulative effects of a project. The required fee for each individual project is not known at this time, but would be based on the nature of the use (i.e., number of trips generated) and the traffic impact fees in place at the time the project is implemented.

Comment #27: The EIR needs to identify that the widening of 5th Street will be needed and that the Airport Sponsor will contribute their fair share of the cost of that improvement.

Response: See Responses to Comment #26 above and City of Oxnard's Comment #4.

Comment #28: The EIR needs to specifically reference the reciprocal agreement between the County of Ventura and the City of Oxnard with regard to transportation improvement projects under their respected jurisdictions and what fees they would pay on cumulative trips.

Response: The proposed mitigation measure indicates that the project will be required to participate in the City's and County's Traffic Impact Fee Mitigation Programs. This includes the Reciprocal Agreement in place between the City of Oxnard and the County of Ventura. According to the *State CEQA Guidelines*, participation in a trip fee mitigation program is considered an acceptable means of mitigating the cumulative effects of a project. The required fee for each individual project is not known at this time, but would be based on the nature of the use (i.e., number of trips generated) and the traffic impact fees in place at the time of the project is implemented.

Comment #29: As this is a programmatic EIR, under the terms of the agreement, the fees for traffic impact mitigation are paid at the time of construction or at the time of the discretionary entitlement is issued for that specific improvement.

Response: Comment noted. No further response is necessary.

Comment #30: Both discretionary and nondiscretionary projects are required to comply with the reciprocal agreement. This should be identified in the EIR.

Response: Comment noted. As identified in the Draft EA/EIR, traffic mitigation fees for individual projects will be assessed and implemented in accordance with applicable programs. As the Commentor has noted, this includes both discretionary and nondiscretionary projects that may be implemented under the *Draft Oxnard Airport Master Plan Update*.

Comment #31: Cannot use the City of Oxnard's plans for improvement as the existing condition, for purposes of the traffic and circulation analysis. The fact is that if the road were to remain in its existing condition, it would fall below the City's standards for level of service; therefore, creating a cumulative future significant adverse impact toward which the airport project is incrementally contributing. The mitigation for this is, as stated in the Draft EA/EIR, the payment of fees.

Response: Comment noted. The text has been reorganized with subheadings in order to clarify this issue. See the Traffic and Circulation section of Chapter Four.

Comment #32: Airport can do math now to estimate the total traffic fee using 1999 dollars, but that this would not be paid/generated until the individual projects are built.

Response: The traffic mitigation fees that are required by the City/County Reciprocal Agreement could be calculated now for the projected long-term traffic impacts. As stated in the Draft EA/EIR, however, it is not known if this increase in use will be realized. It is, therefore, unreasonable to lock in on a figure that is a mere projection. In fact, CEQA discourages speculation. Calculating anticipated fees based on the existing traffic mitigation programs could be misleading since the existing programs may be revised and new programs added prior to such time that the project is actually implemented.

Comment #33: The mitigation measure is appropriate; however, there needs to be clarification regarding the last statement, that the fee will be negotiated if the individual project is determined to have an impact. The term "negotiate" is a concern. The reciprocal agreement provides that the County will pay the City's fee, not that the fee will be negotiated. If the intent was to discuss the technical parameters on which the fee is based, that should be more clearly stated.

Response: Comment noted. The text of the mitigation measure has been revised to replace the word “negotiate” with “determine.”

CUMULATIVE/GROWTH-INDUCING IMPACTS

Comment #34: The cumulative and growth-inducing impacts of replacing the currently adopted 1987 Airport Master Plan with the Draft Airport Master Plan Update have not been identified.

Response: The 1987 Airport Master Plan provided a total of eight projects, as follows: (1) construct a north parallel taxiway; (2) remove the 756-foot displaced threshold to Runway 7; (3) improve the access road from Victoria Avenue; (4) provide aircraft storage on the west ramp; (5) acquire land and construct an aircraft tiedown apron on Fifth Street; (6) acquire an avigation easement over both Runway Protection Zones and within the building restriction line on the north side of the airport; (7) acquire an extended runway safety area to Runway 25 (on the east side of Ventura Road); and (8) install southside taxiway lights. These improvements were expected to allow the airport to accommodate the projected long-range operations and based aircraft. At the time of the study, long-range was defined as the year 1998 when 165,000 operations were forecasted.

Many of these improvement were not implemented, including items (1), (2), (4), (5) in part, (6), and (7). This is in part because the airport did not meet the projected operations or based aircraft numbers, hence they did not have the need for the improvements. Aircraft operations in 1994 totaled only 95,424, compared with the 1987 Airport Master Plan projection of 160,000 in 1993.

The *Draft Airport Master Plan Update* identifies long-range as approximately twenty years (2017), forecasts 194,000 annual operations, and includes items (4), a version of (5): now hangars instead of tiedowns, a version of (6): now acquisition in fee simple as well as avigation easements, and (7), listed above. These projects, therefore, would have no cumulative or growth-inducing impacts when compared with the previous Master Plan. The remaining 1987 projects are not included in the proposed plan (north parallel taxiway and removal of the displaced threshold).

The proposed Master Plan also includes projects related to passenger service, including expanding the terminal building, and terminal and rental car parking; and other improvements, as described in Chapter 1 and illustrated on Exhibit 1A. These projects were not addressed in the 1987 Airport Master Plan, thus the existing analysis in Chapters 4 and Chapter 6 of this document, regarding cumulative and growth-inducing impacts adequately addresses these projects.

Comment #35: The document repeatedly denies that cumulative or growth-inducing impacts will occur, or that there is a need to mitigate those impacts. This position is based on the faulty argument that the airport is only responding to demand and not causing the demand in the first place. This is

a denial of responsibility on the part of the airport owner/operator and is contradictory to the intent of CEQA.

Response: Comment noted. See response to Comment #1 of the Oxnard School District.

Comment #36: But for the proposed improvement, the forecasted air and automobile traffic would not occur. The improvements induce the additional growth by accommodating the additional growth and are, therefore, growth-inducing.

Response: Comment noted. See response to Comment #1 of the Oxnard School District.

Comment #37: Implementation of the Draft Airport Master Plan Update will contribute to the need to widen Fifth Street and there is the need to examine what that contribution is and how it should be mitigated. This project alone does not have to do all the widening needed to the street, but there needs to be some specific tie or measure to the improvements so that when the added increase does occur, those improvements are in place. This would be a cumulative impact.

Response: Comment noted. The Traffic and Circulation discussion and mitigation measure adequately address the mitigation of the cumulative impact. Also see responses to Comments #26, 28, and 32 above.

Comment #38: Traffic is a cumulative effect. Everybody knows the road is going to have to be improved irrespective of whether or not the airport is closed. The question is, should there be any contribution to a cumulative impact by any improvements made of the airport.

Response: See responses to Comments #26, 28, 32, and 37.

Comment #39: "Demand" is different than "they're already here [on-airport]." It implies that users will be relocating to Oxnard Airport once the facilities are in place. Some incremental portion of the additional operations, enplanements, traffic is attributable to the proposed improvements. The issue is "how much."

Response: Comment noted. See response to Comment #1 by the Oxnard School District. At this time, there is no methodology available to estimate the percentage of operations, enplanements, based aircraft, or related automobile traffic would be directly attributable to the proposed improvements. There is also no means to estimate the percentage of operations, enplanements, based aircraft (and thus related automobile traffic) which would not occur because of greater operational delays at Oxnard Airport as a result of the airport exceeding its defined Annual Service Volume (see response to Comment #2 by the City of Oxnard).

Comment #40: The EIR needs to clarify the relationship between what causes what [e.g., do improved facilities cause increased demand or does increased demand cause improved facilities] and realize that there are some unknowns and that it is speculative to try to ascertain an exact number of the contribution to cumulative impacts.

Response: Comment noted. Language has been added to the Approach section of the Summary chapter and Chapter 1, and to Chapter 6 regarding cumulative impacts and this unknown factor. See also response to Comment #39.

Comment #41: It is important to distinguish between mitigation measures for cumulative effects as opposed to project effects.

Response: Comment noted. The text of Chapter 4 and Chapter 6 have been revised accordingly.

GENERAL COMMENTS

Comment #42: The corporate jet users of Oxnard Airport are local businesses and industries, residents, administrators, and city council people. They are people who contribute money to the area. To say "no more corporate jets" hurts the quality of life in Oxnard.

Response: Comment noted. No further response is necessary.

Comment #43: The Board of Supervisors does not have the authority to call for the closure of Oxnard Airport within the planning period due to Federal law and agreements between the FAA and the County of Ventura regarding the transfer of property and improvements to the airport. Under those same agreements, the County cannot take actions that would directly impede the operation of the airport, other than what it was originally agreed to at the time of transfer.

Response: Comment noted. No further response is necessary.

Recommended action would increase the use of the airport beyond what was agreed to at time of transfer.

Comment #44: The discussion of the relationship between local short-term uses of the environment and long-term productivity needs to be eliminated.

Response: Comment noted. Text eliminated.