

County of San Diego

DEPARTMENT OF PUBLIC WORKS

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June 17, 2004

City of El Cajon James Griffin, Director of Community Development 200 E. Main Street El Cajon, CA 92020-3996

Dear Mr. Griffin:

GILLESPIE FIELD - AIRPORT LAYOUT PLAN DRAFT FINAL NARRATIVE REPORT

This letter is written in response to your May 10, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"It is disappointing that the role of the City of El Cajon, within whose jurisdiction virtually all of Gillespie Field resides, is not described. In fact, the City of El Cajon does have land use and building permit issuance authority over all of Gillespie Field that is in the El Cajon city limits. The ALP should be modified to reflect the City's role in the further development of Gillespie Field."

The text on Page 3-1 will be revised to read that the City of El Cajon has building permit issuance authority for private development of facilities, for those portions of Gillespie Field within the city limits. Private developers will continue to obtain permits from City of El Cajon.

"In addition, it is interesting that the City Council of the City of El Cajon is not afforded the opportunity to take public action on the ALP. Again, Gillespie Field is in the El Cajon city limits."

Please note that the City of El Cajon (City) has been a member of the Planning Advisory Committee (PAC) since its inception on November 19, 2001, with Dick Ramos representing the City. There were three meetings of the PAC held on November 19, 2001, April 23, 2002, and September 25, 2002. Meeting notices and materials were

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distributed well in advance of the meetings. Furthermore, there were two meetings of the Gillespie Field Development Council held on November 19, 2002 and April 15, 2004.

"It is also hard to understand how the ALP was able to reach this point <u>without</u> any reference to the California Environmental Quality Act (CEQA) or the preparation of an environmental analysis."

"Since the proposed ALP actually shows future buildings and their sizes, the ALP is more than just a set of policies. It is a document used to specify the usage of a property. As such, it should have been considered a "project" under CEQA, in my opinion. The ALP does not mention CEQA or why it's exempt."

During the initial phase of the project (FAA grant application and award) the County was advised by the FAA that an environmental analysis was not required for an ALP Update. It is the County's understanding that a CEQA document is also not warranted for an ALP Update. The ALP Update and Narrative Report is a planning document that will lead to a master plan including the preparation of an appropriate environmental document in accordance with CEQA. The master plan and environmental analysis will be pursued as a second phase of the planning program.

"In a related matter, as just mentioned, portions of the ALP are very specific. For example, the map of the ALP (Figure 2-1) shows specific hangar locations and tiedown spaces on the 70-acre Cajon Plaza (Brucker) site. Table 2-3 further describes the action to be accomplished in each of the three development phases of the ALP over the next 20 years including the sizes of building to be constructed and when. The ALP does not indicate what happens if there is a need to modify the size or location of a building or its timing. Must the ALP be formally amended or can this be done administratively?"

→ Please note the discussion that begins at the bottom of Page 6-21. It states that the configuration of future buildings is conceptual and that the ultimate building footprints and orientation may vary. The important point is that the ultimate configuration of buildings should be capable of accommodating the forecast of based aircraft. The configuration of the preferred concept and ALP depicts a strategy that accommodates forecast demand.

"The ALP forecasts future needs based upon a "high growth" forecast even though the number of annual aircraft operations has <u>decreased</u> from 271,000 in 1980 to 187,750 in 2000 (this time period avoids any effects of the post- Sept 11, 2001 flying restrictions). This is a reduction of over 30%. (See Table 3-5) The total

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number of aircraft based at Gillespie Field has only slightly increased from 702 to 774 or 10 % during this same time period. (Table 3-4)"

The forecast acknowledges that demand was not tied to projected socioeconomic growth since there is little relationship between annual changes in based aircraft and changes in population and employment. Rather the forecast was based on the regional trends in based aircraft projected by the FAA Terminal Area Forecast and a scenario where the airport "captures" its historical high market share of the competitive market area.

"Even though the review of the available fixed-based facilities (hangars and tiedowns) indicates a limited number of currently available spaces, the justification for accepting the "high growth" scenario is largely unsubstantiated in my opinion. On page 4-2 there is a statement that "due to a variety of factors mentioned in increase in the CMA" (Gillespie Field Competitive Market Area) but that doesn't justify the "high growth" scenario."

"Since the East County area served by Gillespie Field is essentially built out (the SANDAG 2030 projections show El Cajon, La Mesa, Santee and the surrounding unincorporated areas growing by less than one percent per year over the next 25 years), where are these future pilots and planes going to come from? If there was only a 10 % increase in the number of based aircraft at Gillespie Field from 1980-2000 while the population of the surrounding area increased by 1.1% per year (avg. growth over 20 years from 1980-2000) why would there be a greater increase in aircraft to 2025, with a slower rate of growth in the surrounding areas?"

"The reason for this discussion is that this ALP will result in a major reduction in anticipated jobs, especially with the loss of the Cajon Plaza / Brucker site to only airport-related uses. Using information in Appendix B, the "aviation leaseholds" at Gillespie Field generate 4.2 jobs / acre while the "non-aviation leaseholds" generate 12.9 jobs / acre or a three-fold increase. For the Cajon Plaza 70 acres, this is a difference between 294 potential jobs and 903 potential jobs! (Note: It is understood that the FAA is very unlikely to release these 70 acres to non-aviation uses but the consequences are significant.)"

The 70-acre parcel is the last remaining area capable of accommodating future aviation uses and as such, was identified for these uses on the ALP. You are correct that the FAA will not approve the release of this parcel for non-aviation uses.

"The format of the ALP is confusing. As previously described, actual hangar sizes and locations as well as tie-down spaces are shown on the 70-acre Cajon Plaza site but no land use at all is shown of the 41-acre site at the northwest

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corner of Weld Blvd. and Cuyamaca St. It would be much easier for the City to incorporate the ALP into the City's General Plan if the ALP used colors or words to indicate proposed land use categories rather than the shapes, sizes and locations of specific buildings. For example, the City's General Plan could say "airport-related uses" for the Cajon Plaza site but would not show actual buildings if that's how the ALP is approved."

The ALP is formatted in compliance with FAA requirements for the preparation of the document. Also please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and maps. We can provide the City with an AutoCAD file containing the proposed improvements. This can then be incorporated with City GIS.

"The Airport Airspace Plan (Figure 7-5) is very difficult to understand and the scale is too large to be able to accurately locate a property on the drawing and determine if it would be subject to special height limits. The same is true of the Airport-Protection Zones (Figure 7-6), which do not provide streets or other landmarks for easy reference. The City does not use runway numbers to demarcate restrictions of this nature. This information would be much more useful if placed on a base map of Gillespie Field at a scale clear enough to be understood."

Notes on the ALP as well as Figures 7-5 and 7-6 indicate that the graphics are reduced versions of large sheet airport plans prepared in accordance with FAA requirements. We can provide you with full size drawings should you wish. Please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and noise contours. We can provide the City with an AutoCAD file containing the proposed runway improvements and runway protection zones. This can then be incorporated with City GIS to analyze parcels.

"The noise contour information shown on Figure 15 in Appendix C (Noise Study) is also at a scale that is too large to easily apply to a specific property for the same reasons."

Figures 7-8 and 7-9 were prepared to enhance the format of noise contour graphics in the technical report (Appendix C). The format of Figures 7-8 and 7-9 are typical presentations for a report such as the ALP Narrative. Please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and noise contours. We can provide the City with an AutoCAD file containing the proposed improvements. This can then be incorporated with City GIS to analyze parcels

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"If a property owner or resident needs a determination on noise, crash hazards or building heights, we must be able to locate their property easily. These drawings will only allow a "best guess" in most cases, which is not very reliable or accurate."

The graphics are not intended to provide assessments of particular parcels and as explained above the AutoCAD files to be provided to the County at the conclusion of the project will provide the detail you request. We will provide you with the electronic files for the noise contours so that the City can conduct analysis on a parcel-level of detail.

"Finally, there is no discussion in the ALP of access or traffic issues. While this would obviously be a part of any environmental analysis of the ALP, the current "breakdown" service level of the on- and off-ramps and bridge at Bradley and Route 67 warrant discussion and mitigation."

→ This type of study is not part of an ALP Update or Narrative Report. It will be included in Phase II of this project, the Gillespie Field Master Plan Update.

Thank you for your review and input. If you have any questions, please call Sunny Barrett (619) 956-4834.

Sincerely,

PETER DRINKWATER, Director

County Alrports

PD:SM:jk

cc: John Milligan, FAA; file