



April 25, 2017

Ms. Leah Choum  
JWA Project Manager  
3160 Airway Avenue  
Costa Mesa, CA 92626  
NOP627@ocair.com

Re: John Wayne Airport General Aviation Improvement Program:  
Notice of Preparation of Program Environmental Impact Report 627  
(IP # 16-432)

Dear Ms. Choum:

The City of Newport Beach (City) appreciates the opportunity to review and comment upon the Notice of Preparation (NOP) and Initial Study (IS) for the John Wayne Airport (JWA) General Aviation Improvement Program (GAIP). The City commends the County of Orange (County) and the Airport Director for operating JWA in a manner that seeks to balance air transportation needs with residents' quality of life. In continuing to do so, the GAIP should aim to satisfy the county's air transportation needs (including general aviation) without expanding the operational footprint of JWA. With that in mind, the City has the following comments on the NOP and IS.

#### *Project Description*

As described in the NOP, the GAIP would provide a framework for general aviation improvements at JWA with the goal of maximizing the efficiency and safety of JWA facilities in order to prioritize future improvements. The GAIP could provide a basis for the review of potential future improvements proposed by fixed-base operators as part of leases at the airport.

The NOP states that any improvements under the GAIP would be "confined to the existing Airport footprint (i.e., no expansion of the general aviation uses beyond the current Airport limits)." (NOP, p. 7.) The City strongly supports this aspect of the project description. The City would oppose the adoption of any alternative that allows for impacts outside the existing airport footprint. Indeed, the City and County have a previous agreement from October 2006 (the "Cooperative Agreement" and known as the "Spheres Agreement") that suggests that any acquisition of land (generally associated with addition of a second commercial carrier runway or expansion to the south of the existing runway)

would require the approval of Newport Beach. In this manner, Newport Beach has expressed its strong interest in approving or vetoing any expansion of the JWA operational footprint.

Further, the City is a partner with multiple other cities within the JWA arrival and departure corridors (the "Corridor Cities"). As a member of the Corridor Cities, we have pledged to (among other things):

- Oppose any expansion of JWA beyond its current (2007) footprint;
- Oppose a second air carrier runway or extension of the existing runway; and
- Oppose any significant reduction in general aviation operations/facilities.

Of primary concern to the City with respect to JWA is noise. Goal N 3 of the City of Newport Beach General Plan Noise Element is to protect "Newport Beach residents from adverse noise impacts of commercial air carrier operations at John Wayne Airport as provided in the City Council Airport Policy." Further, Policy N 3.6 (Existing Level of General Aviation Operations) of the Noise Element is to "[s]upport any plan or proposal that maintains, and oppose any plan or project that proposes any significant changes to the existing level of general aviation operations and general aviation support facilities."

The NOP states that a "key design" element of the GAIP is to incorporate, to the maximum extent feasible, "a comparable number and type of general aviation-based aircraft facilities, as compared to existing occupied facilities." The City supports the strong and long-term presence of General Aviation at JWA and this objective. (NOP, p. 9.)

#### *Air Quality*

The IS states the Draft Program Environmental Impact Report ("Draft PEIR") will evaluate potential emissions from construction and operational activities of the project, as well as the project's compliance with federal, state, and regional air quality standards. (IS, p. 33.) Goal NR 9 of the City's General Plan Natural Resources Element calls for the reduced air pollution emissions from aircraft and ground operations at JWA. To that end, the General Plan contains the following policies:

- **NR 9.1 Efficient Airport Operations:** Work with John Wayne Airport to minimize air pollution generated by stationary and nonstationary sources.



- **NR 9.2 Aircraft and Equipment Emission Reduction:** Work with John Wayne Airport to encourage development and use of reduced emission ground service equipment and transit vehicles.

Mitigation measures for any significant air quality impacts should address both mobile and stationary sources, and should include the use of reduced-emission or alternatively fueled (e.g., CNG/LNG) equipment and vehicles.

#### *Land Use and Planning*

The IS concludes the GAIP could cause a potentially significant land use impact. (IS, p. 43.) The Land Use Element of the City of Newport Beach General Plan provides for development of residential uses in the Airport Area outside of the JWA 65 A-weighted decibels (dBA) community noise equivalent level (CNEL) noise contour. Residential uses in the Airport Area would later be developed as clusters of residential villages centering on neighborhood parks and interconnected by pedestrian walkways. These would contain a mix of housing types and buildings that integrate housing with ground-level convenience retail uses, and would be developed at a sufficient scale to achieve a “complete” neighborhood. Any evaluation of the potential effects of the GAIP should be considered in light of the General Plan’s overall policy vision for the Airport Area.

In addition, any potential inconsistencies with the General Plan’s Noise Element (discussed below) should be thoroughly evaluated and, if necessary, mitigated to less-than-significant levels.

As indicated in the IS, the Draft Program EIR should also evaluate the consistency of the planned improvements with the requirements of the Airport Environs Land Use Plan (AELUP). In addition, the City recommends that the Draft PEIR analyze the GAIP’s consistency with the JWA Settlement Agreement, as amended. The analysis should consider whether any of the planned improvements would interfere with the requirements of the mitigation monitoring and reporting program (MMRP) adopted by the County in connection with the JWA Settlement Agreement Amendment and Final EIR 617.

The Draft PEIR should also evaluate the GAIP’s consistency with the City of Newport Beach City Council Airport Policy.<sup>1</sup> If potential inconsistencies are identified, mitigation measures must be imposed to ensure the GAIP is consistent with the AELUP, the Settlement Agreement, the City Council Airport Policy, and the City’s General Plan.

#### *Noise*

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<sup>1</sup> Available at: <http://www.newportbeachca.gov/home/showdocument?id=20996>

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Noise impacts of the GAIP should be thoroughly evaluated, and if necessary, mitigated. The City has established 65 and 45 CNEL as the outdoor and indoor noise compatibility criteria for residential land uses. Further, the Noise Element of Chapter 12 of the City's General Plan include noise land use compatibility guidelines and noise standards for a variety of land use types. Policy N 1.8 (Significant Noise Impacts) requires "the employment of noise mitigation measures for existing sensitive users when a significant noise impact is identified. A significant noise impact occurs when there is an increase in ambient CNEL produced by new development impacting existing sensitive uses." The CNEL increase is shown in the table below:

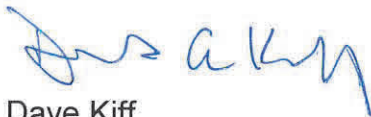
<b>CNEL (dBA)</b>	<b>dBA increase</b>
55	3
60	2
65	1
70	1
Over 75	Any increase is considered significant

The Draft PEIR should incorporate these criteria into the thresholds used to evaluate noise impacts associated with the GAIP. If noise levels would exceed these thresholds, mitigation measures must be incorporated into the project to reduce noise levels to below the City's criteria. All efforts should be made to ensure that residents are not adversely affected by noise generated by the project.

We thank you again for the opportunity to comment on the NOP and for our continued strong relationship with the County at JWA. Please continue to keep the City informed of this project and the status of the environmental review process by providing me with a copy of any notices issued under CEQA and for any public hearings on the Project.

If you have any questions, please contact me at [DKiff@newportbeachca.gov](mailto:DKiff@newportbeachca.gov), or by telephone at 949-644-3001. Thank you again for your consideration of our comments.

Sincerely,



Dave Kiff  
City Manager